PUBLIC REVIEW DRAFT

INITIAL STUDY/NEGATIVE DECLARATION

KENT PROPERTY
GENERAL PLAN AMENDMENT AND REZONING
6207 SIERRA COURT, DUBLIN, CALIFORNIA

LSA
January 2021
PUBLIC REVIEW DRAFT

INITIAL STUDY/NEGATIVE DECLARATION

KENT PROPERTY
GENERAL PLAN AMENDMENT AND REZONING
6207 SIERRA COURT, DUBLIN, CALIFORNIA

Submitted to:

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City of Dublin
100 Civic Plaza
Dublin, California 94568

Prepared by:

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LSA Project No. DUB1601.01
City Application No. PLPA-2019-00002

January 2021
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<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAQS</td>
<td>Ambient Air Quality Standards</td>
</tr>
<tr>
<td>AB</td>
<td>Assembly Bill</td>
</tr>
<tr>
<td>ABAG</td>
<td>Association of Bay Area Governments</td>
</tr>
<tr>
<td>ACDEH</td>
<td>Alameda County Department of Environmental Health</td>
</tr>
<tr>
<td>ACFD</td>
<td>Alameda County Fire Department</td>
</tr>
<tr>
<td>APN</td>
<td>Assessor’s Parcel Number</td>
</tr>
<tr>
<td>BAAQMD</td>
<td>Bay Area Air Quality Management District</td>
</tr>
<tr>
<td>Basin Plan</td>
<td>Water Quality Control Plan</td>
</tr>
<tr>
<td>CalFire</td>
<td>California Department of Fire and Forestry Protection</td>
</tr>
<tr>
<td>CALGreen</td>
<td>California Green Building Standards Code</td>
</tr>
<tr>
<td>C-2</td>
<td>General Commercial</td>
</tr>
<tr>
<td>CAP 2030</td>
<td>City of Dublin Climate Action Plan 2030 and Beyond</td>
</tr>
<tr>
<td>CBC</td>
<td>California Building Code</td>
</tr>
<tr>
<td>CDMG</td>
<td>California Department of Mines and Geology</td>
</tr>
<tr>
<td>CEC</td>
<td>California Energy Commission</td>
</tr>
<tr>
<td>CEQA</td>
<td>California Environmental Quality Act</td>
</tr>
<tr>
<td>CH₄</td>
<td>Methane</td>
</tr>
<tr>
<td>City</td>
<td>City of Dublin</td>
</tr>
<tr>
<td>Clean Air Plan</td>
<td>Bay Area Air Quality Management District 2017 Clean Air Plan</td>
</tr>
<tr>
<td>CNEL</td>
<td>Community Noise Equivalent Level</td>
</tr>
<tr>
<td>CO</td>
<td>carbon monoxide</td>
</tr>
<tr>
<td>CO₂</td>
<td>Carbon dioxide</td>
</tr>
<tr>
<td>CO₂e</td>
<td>CO₂ equivalents</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Full Form</td>
</tr>
<tr>
<td>--------------</td>
<td>-----------</td>
</tr>
<tr>
<td>CPUC</td>
<td>California Public Utilities Commission</td>
</tr>
<tr>
<td>CUPA</td>
<td>Certified Unified Program Agency</td>
</tr>
<tr>
<td>dB</td>
<td>decibel</td>
</tr>
<tr>
<td>dBA</td>
<td>A-weighted (sound level) decibels</td>
</tr>
<tr>
<td>DMC</td>
<td>Dublin Municipal Code</td>
</tr>
<tr>
<td>ECOS</td>
<td>Environmental Conservation Online System</td>
</tr>
<tr>
<td>EFZs</td>
<td>Earthquake Fault Zones</td>
</tr>
<tr>
<td>FAR</td>
<td>Floor Area Ratio</td>
</tr>
<tr>
<td>FEMA</td>
<td>Federal Emergency Management Agency</td>
</tr>
<tr>
<td>GHG</td>
<td>Greenhouse gas</td>
</tr>
<tr>
<td>GPA</td>
<td>General Plan Amendment</td>
</tr>
<tr>
<td>GWP</td>
<td>Global Warming Potential</td>
</tr>
<tr>
<td>HFCs</td>
<td>Hydrofluorocarbons</td>
</tr>
<tr>
<td>I-680</td>
<td>Interstate 680</td>
</tr>
<tr>
<td>I-580</td>
<td>Interstate 580</td>
</tr>
<tr>
<td>IS/ND</td>
<td>Initial Study/Negative Declaration</td>
</tr>
<tr>
<td>LID</td>
<td>Low Impact Development</td>
</tr>
<tr>
<td>LUST</td>
<td>Leaking Underground Storage Tank</td>
</tr>
<tr>
<td>M-1</td>
<td>Light Industrial</td>
</tr>
<tr>
<td>MMI</td>
<td>Modified Mercalli Index</td>
</tr>
<tr>
<td>MRP</td>
<td>San Francisco Bay Regional Water Quality Control Board Municipal Regional Permit</td>
</tr>
<tr>
<td>N₂O</td>
<td>Nitrous oxide</td>
</tr>
<tr>
<td>NAHC</td>
<td>California Native American Heritage Commission</td>
</tr>
<tr>
<td>NO₂</td>
<td>nitrogen dioxide</td>
</tr>
<tr>
<td>Acronym</td>
<td>Definition</td>
</tr>
<tr>
<td>---------</td>
<td>------------</td>
</tr>
<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>Nitrogen oxide</td>
</tr>
<tr>
<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
</tr>
<tr>
<td>O&lt;sub&gt;3&lt;/sub&gt;</td>
<td>ozone</td>
</tr>
<tr>
<td>OPR</td>
<td>Office of Planning and Research</td>
</tr>
<tr>
<td>Pb</td>
<td>lead</td>
</tr>
<tr>
<td>PFCs</td>
<td>Perfluorocarbons</td>
</tr>
<tr>
<td>PM</td>
<td>particulate matter</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>respirable particulate matter</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>fine particulate matter</td>
</tr>
<tr>
<td>POTWs</td>
<td>publicly owned treatment works</td>
</tr>
<tr>
<td>PPV</td>
<td>peak particle velocity</td>
</tr>
<tr>
<td>ROG</td>
<td>Reactive organic gases</td>
</tr>
<tr>
<td>SCP</td>
<td>Stormwater Control Plan</td>
</tr>
<tr>
<td>SF&lt;sub&gt;6&lt;/sub&gt;</td>
<td>Sulfur Hexafluoride</td>
</tr>
<tr>
<td>SLIC</td>
<td>spills, leaks, investigations, and cleanups</td>
</tr>
<tr>
<td>SO&lt;sub&gt;2&lt;/sub&gt;</td>
<td>sulfur dioxide</td>
</tr>
<tr>
<td>SRA</td>
<td>State responsibility area</td>
</tr>
<tr>
<td>SWRCB</td>
<td>State Water Resources Control Board</td>
</tr>
<tr>
<td>SWPPP</td>
<td>Storm Water Pollution Prevention Plan</td>
</tr>
<tr>
<td>TACs</td>
<td>toxic air contaminants</td>
</tr>
<tr>
<td>TCE</td>
<td>trichloroethylene</td>
</tr>
<tr>
<td>USFWS</td>
<td>United States Fish and Wildlife Service</td>
</tr>
<tr>
<td>VMT</td>
<td>vehicle miles traveled</td>
</tr>
<tr>
<td>Water Board</td>
<td>San Francisco Bay Regional Water Quality Control Board</td>
</tr>
</tbody>
</table>
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1.0 PROJECT INFORMATION

1. Project Title:
Kent Property General Plan Amendment and Rezoning (City Application No. PLPA-2019-00002)

2. Lead Agency Name and Address:
City of Dublin Community Development Department
100 Civic Plaza
Dublin, CA 94568

3. Contact Person and Phone Number:
Robert Smith, Associate Planner
(925) 833-6610
Robert.Smith@dublin.ca.gov

4. Project Location:
The project site is located at 6207 Sierra Court at the northeast corner of Dublin Boulevard and Sierra Court in Dublin, Alameda County, California (Assessor’s Parcel Number [APN] 941-0205-13-4). Regional access to the project site is provided by Interstates 580 (I-580) and 680 (I-680), which are located approximately 0.5-mile south and west of the project site, respectively. Local access to the project site is provided by Sierra Court. Figure 1, on Page 1-2, depicts the regional and local context of the project site. Figure 2, on Page 1-3, is an aerial view of the project site and its vicinity.

5. Project Sponsor’s Name and Address:
City of Dublin Community Development Department
100 Civic Plaza
Dublin, CA 94568

6. Existing General Plan Designation:
Business Park/Industrial

7. Existing Zoning:
M-1 (Light Industrial)

8. Description of Project:
Existing Use. The project site consists of an approximately 1.5-acre (66,122-square-foot) property located at 6207 Sierra Court in the City of Dublin. The site is currently developed with an existing 16,117-square-foot one-story building that includes an existing commercial use. The site is currently designated Business Park/Industrial in the City’s General Plan and is within the M-1 (Light Industrial) zoning district. The existing General Plan land use designations for the project site and surrounding properties are shown on Figure 3, on Page 1-4.
FIGURE 1

Kent Property General Plan Amendment
Dublin, Alameda County, California
Regional Location

SOURCE: ESRI World Street Map (03/20).
E:\DUB1601\GIS\Maps\Figure 1_Regional Location.mxd (9/4/2020)
FIGURE 2
Kent Property General Plan Amendment
Aerial View of the Project Site and Surrounding Land Uses

SOURCES: Google Earth, 6/20/19; LSA, 2020
P:\DUB1601.01 Kent Property GPA\PRODUCTS\Graphics\Figure 2.ai (9/1/2020)
This map is based on City of Dublin GIS Information and reflects the most current information at the time of this printing. The map is intended for reference purposes only and the City and its staff is not responsible for errors.
According to the City’s General Plan, the Business Park/Industrial land use designation allows for non-retail businesses (e.g., research, limited manufacturing and distribution activities, and administrative offices) that do not involve heavy trucking, or generate nuisances due to emissions, noise or open uses. Permitted floor area ratio (FAR) ranges from 0.30 to 0.40 and the allowable employee density is 360 to 490 square feet per employee.

The M-1 zoning district is intended to provide for the continued use, expansion and new development of light industrial use types in proximity to major transportation corridors and to ensure compatibility with adjacent residential and commercial uses. Permitted uses in the M-1 zoning district include ambulance service, laboratory, office, parking lot/garage, light industrial, printing and publishing, research and development, trucking terminal, warehousing and distribution, and similar related uses.

Proposed Land Use. The City is initiating a General Plan Amendment (GPA) to change the land use designation for the site from Business Park/Industrial to Retail/Office and Automotive representing a natural evolution of land uses and land use changes over time, creating continuity along Dublin Boulevard between the project site, and neighboring properties to the east. The site would also be rezoned from M-1 (Light Industrial) to C-2 (General Commercial) consistent with the amended General Plan land use designation. As described above, the project site is already developed and no new development (i.e., demolition, construction, or change in site access) is currently proposed.

The Retail/Office and Automotive designation allows general commercial, retail and service uses and typically includes shopping centers, stores, restaurants, business and professional offices, motels, service stations, and the sale of auto parts, as well as, automobile/vehicle sales and service, auto body shops, and similar auto-focused uses. Permitted FAR ranges from 0.25 to 0.50 and the allowable employee density is 220 to 490 square feet per employee.

The C-2 zoning district is intended to provide for the continued use, expansion, and new development of general commercial use types along major transportation corridors and intersections, and to ensure compatibility with adjacent residential and commercial uses.

With implementation of the GPA and Rezoning, permitted uses for the project site that are not currently allowed under the existing zoning, would include: adult business establishment (with Conditional Use Permit [CUP]), banks and financial institutions, building material sales, car wash/detailing (with CUP), copying and blueprinting, health services/clinics, hotel/motel (with CUP), hospital/medical center (with CUP), massage establishment, personal services, plant nursery (with CUP), repair shop, retail- general, retail – neighborhood, retail – outdoor storage (with CUP), retail - service, shopping center, tobacco retailer (with Zoning Clearance) and similar related uses.

Maximum Development. Table A shows the development regulations that apply to the existing (M-1) and proposed (C-2) zoning districts, as defined in Dublin Municipal Code (DMC) Chapter 8.36.030 Commercial and Industrial Development Regulations.
Under the current General Plan and Zoning regulations, the maximum development footprint on the site could include a 26,448-square foot, one-story building, which would generate a maximum of 73 employees at the maximum employment density (approximately 10,000 square feet greater than the current use of the site). A taller building would have a smaller development footprint in accordance with FAR requirements; however, the number of employees would be the same. Consistent with existing employee density requirements, the existing building supports approximately 44 employees.

### Table A: Development Regulations

<table>
<thead>
<tr>
<th>Standard</th>
<th>Existing Zoning District (M-1)</th>
<th>Proposed Zoning District (C-2)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Lot Area</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interior Lot</td>
<td>20,000 square feet</td>
<td>6,000 square feet</td>
</tr>
<tr>
<td>Corner Lot</td>
<td>20,000 square feet</td>
<td>7,000 square feet</td>
</tr>
<tr>
<td><strong>Lot Width and Frontage</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interior Lot</td>
<td>100 feet</td>
<td>50 feet</td>
</tr>
<tr>
<td>Corner Lot</td>
<td>100 feet</td>
<td>60 feet</td>
</tr>
<tr>
<td>Lot Depth</td>
<td>100 feet</td>
<td>100 feet</td>
</tr>
<tr>
<td><strong>Setbacks</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Front</td>
<td>10 feet</td>
<td>0 feet</td>
</tr>
<tr>
<td>Side</td>
<td>10 feet</td>
<td>0 feet</td>
</tr>
<tr>
<td>Street Side</td>
<td>20 feet</td>
<td>0 feet</td>
</tr>
<tr>
<td>Rear</td>
<td>20 feet</td>
<td>0 feet</td>
</tr>
<tr>
<td>Height Limits</td>
<td>45 feet</td>
<td>45 feet</td>
</tr>
</tbody>
</table>


With implementation of the GPA and Rezoning, the maximum allowable development on the site could include a 33,061-square foot, one-story building, which would generate approximately 150 employees at the maximum employment density (approximately 16,944 square feet greater than what currently exists and 6,613 square feet greater than what is currently allowed on the site). A taller building would have a smaller development footprint in accordance with FAR requirements; however, the number of employees would be the same. Based on the types of allowable uses under the proposed land use designation, the most intensive uses of the site may include a shopping center or restaurant. At the maximum employee density, the proposed project could increase employment at the site by approximately 106 employees.

The analysis in Section 3.0, Environmental Checklist of this Initial Study considers the maximum development potential that would be allowed under the proposed GPA and rezoning, compared to existing conditions.

---

1. 66,122 square feet x 0.4 = 26,448 square feet; 26,448/360 = 73 employees
2. 16,117/360 = 44 employees
3. 66,122 square feet x 0.5 = 33,061 square feet; 33,061/220 = 150 employees
**Discretionary Approvals.** As described above, the City has initiated a GPA to change the land use designation for the site from Business Park/Industrial to Retail/Office and Automotive, and a Rezoning of the site from an M-1 to C-2 zoning district.

9. **Surrounding Land Uses and Setting:**

As described above, the project site is currently developed with an existing 16,117-square-foot building that includes an existing commercial use. The remainder of the site consists of paved parking. Landscaping, including shrubs, turf, and several mature trees, are located along Sierra Court.

The site is generally surrounded by industrial uses to the north, public/semi-public uses to the south, and retail, office, automotive uses to the east and west. Surrounding land uses are shown in Table B below.

<table>
<thead>
<tr>
<th>Existing Use</th>
<th>Land Use Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charmet Tile (flooring store)</td>
<td>Business Park/Industrial</td>
</tr>
<tr>
<td>McGoldrick Milling Company Inc. (building materials supplier)</td>
<td></td>
</tr>
<tr>
<td>South</td>
<td>Dublin Sports Grounds, Dublin Civic Center</td>
</tr>
<tr>
<td>East</td>
<td>Dublin City Shopping Center (Sahara Market, Sahara Kabob Grill, Funks Autoworks, Russian School of Mathematics, and Harvey’s Cleaners)</td>
</tr>
<tr>
<td>West</td>
<td>NAPA Auto Parts (auto parts store)</td>
</tr>
<tr>
<td></td>
<td>California Custom Carpets, Inc. (carpet store)</td>
</tr>
</tbody>
</table>

Source: City of Dublin (2020).

10. **Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**

N/A

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

On April 20, 2020, the City provided formal notification to those California Native American tribes that are traditionally and culturally affiliated with the geographic area within which the proposed project is located pursuant to the consultation requirements of SB 18 and AB 52. To date, no tribes have requested consultation pursuant to Public Resources Code section 21080.3.1.
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2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist in Section 3.0.

☐ Aesthetics
☐ Agricultural and Forestry Resources
☐ Air Quality
☐ Biological Resources
☐ Cultural Resources
☐ Energy
☐ Geology/Soils
☐ Greenhouse Gas Emissions
☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality
☐ Land Use/Planning
☐ Mineral Resources
☐ Noise
☐ Population/Housing
☐ Public Services
☐ Recreation
☐ Transportation
☐ Tribal Cultural Resources
☐ Utilities/Service Systems
☐ Wildfire
☐ Mandatory Findings of Significance

2.1 DETERMINATION

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a “Potentially Significant Impact” or “Potentially Significant Unless Mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature
12/29/2020
Date
3.0 CEQA ENVIRONMENTAL CHECKLIST

3.1 AESTHETICS

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Except as provided in Public Resources Code Section 21099, would the project:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. Have a substantial adverse effect on a scenic vista?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

a. Would the project have a substantial effect on a scenic vista? (No Impact)

Scenic vistas in Dublin consist of the ridgelines located in the open space area in the Western Extended Planning Area of the City. This area is generally accessed by Interstate 580 (I-580) and Interstate 680 (I-680), which are designated Alameda County scenic routes. In addition, San Ramon Road, Dougherty Road, and Tassajara Road are designated scenic routes. Per the City of Dublin General Plan policies, design review would be required for all project visible from a designated scenic route in order to enhance a positive image of Dublin as seen by through travelers.

The project site is located in a generally level area, approximately two miles east of the open space areas/ridgelines associated with the Western Extended Planning Area. The project site is not visible from any of these County- or City-designated scenic routes. The site is not located in an area considered to be within a scenic vista. The project site is currently developed with a single-story 16,117-square-foot building, associated surface parking lot, and landscaped areas. The proposed GPA and Rezoning would allow general commercial, retail and service uses, as well as auto-focused uses in an already developed area and would not result in any physical changes to the project site. Although potential future development on the project site may be visible from scenic viewpoints, applicable height restrictions would apply, and new construction would be governed by existing regulations that apply to development within this area. The proposed GPA and Rezoning would not result in a substantial adverse effect on a scenic vista and no impact would occur.
b. **Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcappings, and historic buildings within a state scenic highway? (No Impact)**

The closest officially designated State scenic highways to the project area and project site are I-680 and I-580, which are located approximately 0.4 mile west and 0.2 mile south of the project site, respectively. Due to intervening development, the project area and project site are not visible from these scenic roadways.

As described above, San Ramon Road, Dougherty Road, and Tassajara Road are designated scenic routes. The project site is not located along any of these County- or City-designated scenic routes. As discussed above in Section 3.1.a, the proposed project would not result in any physical improvements to the site and future development projects on the project site would be governed by City regulations for the amended land use designation and zoning district. Therefore, the proposed project would not result in substantial changes to scenic resources within view of a State scenic highway or scenic corridor and no impact would occur.

c. **In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (No Impact)**

Implementation of the proposed project would allow general commercial, retail, and service uses, as well as auto-focused uses in an already developed area and no physical improvements to the project site would occur. Any potential future development project proposed at the project site would be reviewed based on, among other things, the effect on the visual character of the site and surroundings as a part of the City’s permit process. New structures would be evaluated for compliance with the City’s Zoning Ordinance, including height and setback requirements and other design controls. Compliance with the City’s applicable regulations would ensure that any future development of the project site would not result in a substantial adverse effect on the visual character or quality of the project site and no impact would occur.

d. **Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (No Impact)**

The proposed project is located in an industrial area with existing lighting consisting of security and streetlights. The proposed GPA and Rezoning would allow general commercial, retail and service uses, as well as auto-focused uses in an already developed area and no physical site improvements to the project site would occur. Potential future development of the project site would be reviewed based on, among other things, exterior lighting that could affect surrounding views, as part of the City’s permit process. Any lighting associated with potential future development at the project site would be consistent with City standard lighting requirements in the project area and no impact would occur.
3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</td>
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<tr>
<td>c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</td>
<td>☐</td>
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<tr>
<td>d. Result in the loss of forest land or conversion of forest land to non-forest use?</td>
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</tr>
<tr>
<td>e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</td>
<td>☐</td>
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</tbody>
</table>

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (No Impact)

The project site is not used for agricultural production and is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The surrounding area is characterized by industrial, public/semi-public, retail, office, and automotive uses. Furthermore, the Farmland Mapping and Monitoring Program categorizes the project site as Urban and Built-Up Land by, which is defined as land that is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Examples of

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Urban and Built-Up Land include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to non-agricultural uses. No impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? (No Impact)

The project site is currently classified as M-1 on the City’s Zoning Map. With implementation of the proposed project, the site zoning would change to C-2. Neither of these zoning districts allow for agricultural uses. The project site is not currently used for agricultural purposes, not zoned for agricultural uses, and is not protected by, or eligible for, a Williamson Act contract. Therefore, the proposed project would not conflict with existing zoning or Williamson Act contracts. No impacts would occur.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? (No Impact)

As described above, the project site is zoned M-1 and would be Rezoned to C-2 with implementation of the proposed project. The project site is currently developed with an existing 16,117-square-foot building that includes an existing commercial use. Neither the project site nor the surrounding area is zoned as forest land, timberland, or timberland production. No impacts would occur.

d. Would the project result in the loss of forest land or conversion of forestland to non-forest use? (No Impact)

The project site is located in an area of the City that is characterized by an urban setting. No forest or timberland exists on the project site or in the surrounding area. Therefore, the proposed project would not result in the loss of forest land or the conversion of forest land to non-forest use. No impacts would occur.

e. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of farmland to non-forest use? (No Impact)

The project site is currently developed with an existing 16,117-square-foot building that includes an existing commercial use. The proposed project would result in a change to the General Plan land use designation and zoning classification of the site, to allow for uses such as retail, office and automotive, similar to the neighboring properties to the east. The proposed project would not result in the conversion of farmland on or off the project site to non-agricultural uses because there are no agricultural uses on or in the immediate vicinity of the project site. Likewise, the proposed project

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5 Ibid.
would not result in impacts related to changes in the existing environment that could result in the conversion of agricultural land to non-agricultural uses. No impacts would occur.
3.3 AIR QUALITY

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

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Conflict with or obstruct implementation of the applicable air quality plan?</td>
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<tr>
<td>b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</td>
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<tr>
<td>c. Expose sensitive receptors to substantial pollutant concentrations?</td>
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<tr>
<td>d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</td>
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</tbody>
</table>

a. Would the project conflict with or obstruct implementation of the applicable air quality plan? (Less-Than-Significant Impact)

The project site is located in the City of Dublin, which is located in the San Francisco Bay Area Air Basin, a large shallow air basin ringed by hills that taper into a number of sheltered valleys around the perimeter. The City of Dublin is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which regulates air quality in the San Francisco Bay Area. Air quality conditions in the San Francisco Bay Area have improved significantly since the BAAQMD was created in 1955. Ambient concentrations of air pollutants and the number of days during which the region exceeds air quality standards have fallen substantially. In Dublin, and the rest of the air basin, exceedances of air quality standards occur primarily during meteorological conditions conducive to high pollution levels, such as cold, windless winter nights or hot, sunny summer afternoons.

Within the San Francisco Bay Area Air Basin, ambient air quality standards for ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (PM₁₀, PM₂.₅), and lead (Pb) have been set by both the State of California and the federal government. The State has also set standards for sulfate and visibility. The Air Basin is under State non-attainment status for ozone and particulate matter standards. The Air Basin is classified as non-attainment for the federal ozone 8-hour standard and non-attainment for the federal PM₂.₅ 24-hour standard.

The applicable air quality plan is the BAAQMD 2017 Clean Air Plan (Clean Air Plan),⁶ which was adopted on April 19, 2017. The Clean Air Plan is a comprehensive plan to improve Bay Area air quality and protect public health. The Clean Air Plan defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest heath risk, with an emphasis on protecting the communities most

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heavily affected by air pollution; and reduce greenhouse gas (GHG) emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project: 1) supports the goals of the Clean Air Plan; 2) includes applicable control measures from the Clean Air Plan; and 3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan.

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

BAAQMD has established significance thresholds for project construction and operational impacts at a level at which the cumulative impact of exceeding these thresholds would have an adverse impact on the region’s attainment of air quality standards. The health and hazards thresholds were established to help protect public health. As discussed below the proposed project would result in less than significant construction- and operation-period emissions. Therefore, the project would not conflict with the Clean Air Plan goals.

**Clean Air Plan Control Measures.** The control strategies of the Clean Air Plan include measures in the following categories: Stationary Source Measures, Transportation Measures, Energy Measures, Building Measures, Agriculture Measures, Natural and Working Lands Measures, Waste Management Measures, Water Measures, and Super-GHG Pollutants Measures. The following sections describe the Clean Air Plan control strategy measures:

**Stationary Source Control Measures.** The stationary source measures, which are designed to reduce emissions from stationary sources such as metal melting facilities, cement kilns, refineries, and glass furnaces, are incorporated into rules adopted by the BAAQMD and then enforced by the BAAQMD’s Permit and Inspection programs. Since the project would not include any stationary sources, the Stationary Source Control Measures of the Clean Air Plan are not applicable to the project.

**Transportation Control Measures.** BAAQMD identifies transportation measures as part of the Clean Air Plan to decrease emissions of criteria pollutants, toxic air contaminants (TACs), and GHGs by reducing demand for motor vehicle travel, promoting efficient vehicles and transit service, decarbonizing transportation fuels, and electrifying motor vehicles and equipment. The proposed project includes a GPA to change the land use designation for the site from Business Park/Industrial to Retail/Office and Automotive and Rezoning from M-1 to C-2 to be consistent with the land use designation. No new development is proposed at this time. As discussed in Section 3.17, Transportation, any future proposals to redevelop the site would require discretionary review by the City and the land use proposed at that time would be subject to review. If a specific proposed land use is found to have the potential to affect vehicle level of service or vehicle miles traveled, project features such as travel demand management measures could be implemented to preserve vehicle level of service. In addition, retail/commercial or restaurant uses that would be allowed with the proposed GPA and Rezoning may attract many of their trips from traffic already on the adjacent roadway. As such, the proposed project would not hinder BAAQMD’s initiatives to reduce vehicle trips and vehicle miles traveled.
**Energy Control Measures.** The Clean Air Plan also includes Energy Control Measures, which are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Since these measures apply to electrical utility providers and local government agencies (and not individual projects), the energy control measures of the Clean Air Plan are not applicable to the project.

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

**Agriculture Control Measures.** The agriculture measures are designed primarily to reduce emissions of methane. Since the project does not include any agricultural activities, the Agriculture Control Measures of the Clean Air Plan are not applicable to the project.

**Natural and Working Lands Control Measures.** The natural and working lands measures focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to enact ordinances that promote urban-tree plantings. Since the project does not include the disturbance of any rangelands or wetlands, the Natural and Working Lands Control Measures of the Clean Air Plan are not applicable to the project.

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

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

**Super GHG Control Measures.** The Super-GHG measures are designed to facilitate the adoption of best GHG control practices and policies through BAAQMD and local government agencies. Since these measures do not apply to individual projects, the Super-GHG Control Measures are not applicable to the project.
Clean Air Plan Implementation. As discussed above, implementation of the proposed project would not conflict with any of the measures outlined in the Clean Air Plan. Therefore, the project would not disrupt or hinder implementation of a control measure from the Clean Air Plan.

In addition, as discussed below, implementation of the project would not result in the generation of criteria air pollutants that would exceed BAAQMD thresholds of significance. Therefore, the project would not conflict with or obstruct implementation of applicable air quality plans. This impact would be less than significant.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (Less-Than-Significant Impact)

Both State and federal governments have established health-based Ambient Air Quality Standards for six criteria air pollutants: CO, ozone (O₃), NO₂, SO₂, Pb, and suspended particulate matter (PM). These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. As identified above, the Air Basin is under State non-attainment status for ozone, PM₁₀, and PM₂.₅ standards. The Air Basin is also classified as non-attainment for both the federal ozone 8-hour standard and the federal PM₂.₅ 24-hour standard.

Air quality standards for the proposed project are regulated by the BAAQMD CEQA Air Quality Guidelines. According to the BAAQMD CEQA Air Quality Guidelines, to meet air quality standards for operational-related criteria air pollutant and air precursor impacts, the project must not:

- Contribute to CO concentrations exceeding the State ambient air quality standards;
- Generate average daily construction emissions of reactive organic gases (ROG), nitrogen oxides (NOₓ) or PM₂.₅ greater than 54 pounds per day or PM₁₀ exhaust emissions greater than 82 pounds per day; or
- Generate average operational emissions of ROG, NOₓ or PM₂.₅ of greater than 10 tons per year or 54 pounds per day or PM₁₀ emissions greater than 15 tons per year or 82 pounds per day.

The following sections describe the proposed project’s construction- and operation-related air quality impacts and CO impacts.

Construction Emissions. The proposed project includes a GPA to change the land use designation for the site from Business Park/Industrial to Retail/Office and Automotive and a Rezoning of the site from M-1 to C-2. The project site is currently developed with a 16,117-square-foot building that includes an existing commercial use. No new building is currently proposed to replace the existing building.

Under current General Plan and Zoning regulations, the project site could be developed with a maximum of a 26,448-square-foot building and up to 73 employees. The proposed GPA and Rezoning would permit a maximum of 33,061 square feet of building area with up to 150
employees. This is an increase of approximately 6,600 square feet and 77 employees compared to the maximum that is currently allowed on the site.

For regional shopping center and high turnover restaurant land uses (the most intensive use that could be developed under the proposed GPA and Rezoning), BAAQMD’s screening size for construction criteria pollutants is 277,000 square feet. Since the proposed project would allow for a maximum of 33,061 square feet, based on BAAQMD’s screening criteria, the potential increase in intensity of use on the site is not anticipated to exceed established thresholds. Therefore, any future construction activities at the project site would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standards (AAQS).

**Operational Emissions.** Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity and natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment) related to the proposed project.

PM$_{10}$ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM$_{10}$ occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Energy source emissions result from activities in buildings for which electricity and natural gas are used. The quantity of emissions is the product of usage intensity (i.e., the amount of electricity or natural gas) and the emission factor of the fuel source. Major sources of energy demand include building mechanical systems, such as heating and air conditioning, lighting, and plug-in electronics, such as refrigerators or computers. Greater building or appliance efficiency reduces the amount of energy for a given activity and thus lowers the resultant emissions. The emission factor is determined by the fuel source, with cleaner energy sources, like renewable energy, producing fewer emissions than conventional sources.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and the use of consumer products.

As discussed above, the proposed project includes a GPA to change the land use designation for the site from Business Park/Industrial to Retail/Office and Automotive and a Rezoning of the site from M-1 to C-2. The project site is currently developed with a 16,117-square-foot building that includes an existing commercial use. No new building is currently proposed to replace the existing building. Although no development is proposed at this time, under the current General Plan and Zoning regulations, the project site could be developed with a maximum 26,448-square-foot building and up to 73 employees. The proposed GPA and Rezoning would permit a maximum of 33,061 square feet with up to 150 employees. This is an increase of approximately 6,600 square feet and 77
employees compared to what is currently allowed on the site and approximately 16,900 square feet greater than what currently exists on the site.

For regional shopping center land uses, BAAQMD’s screening size for operational criteria pollutants is 99,000 square feet. Since the proposed project would allow for a maximum of 33,061 square feet, based on BAAQMD’s screening criteria, the potential increase in intensity of use on the site is not anticipated to exceed established thresholds. Furthermore, the proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). Therefore, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS.

Localized CO Impacts. Emissions and ambient concentrations of CO have decreased dramatically in the Bay Area with the introduction of the catalytic converter in 1975. No exceedances of the State or federal CO standards have been recorded at Bay Area monitoring stations since 1991. A screening level analysis using guidance from the BAAQMD CEQA Guidelines was performed to determine the impacts of the project. The screening methodology provides a conservative indication of whether the implementation of a proposed project would result in significant CO emissions. According to the BAAQMD’s CEQA Guidelines, a proposed project would result in a less-than-significant impact to localized CO concentrations if the following screening criteria were met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, and the regional transportation plan and local congestion management agency plans.
- Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, or below-grade roadway).

Implementation of the proposed project would not conflict with the Alameda County Transportation Commission requirement for designated roads or highways, a regional transportation plan, or other agency plans. The project site is not located in an area where vertical or horizontal mixing of air is substantially limited. As discussed further in Section 3.17, Transportation, changing the land use designation for the project site could result in approximately 54 more trips during the PM peak commute hour within the current building. The maximum development potential of the project site would be increased by approximately 115 vehicle trips during the PM peak commute hour. Therefore, the project would not increase traffic volumes at intersections to more than 44,000 vehicles per hour. Therefore, the proposed project would not result in localized CO concentrations that exceed State or federal standards and this impact would be less than significant.
c. **Would the project expose sensitive receptors to substantial pollutant concentrations? (Less-Than-Significant Impact)**

Sensitive receptors are defined as individuals that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, day care centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptors include the multi-family residences located approximately 550 feet east of the project site.

The proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). Any future construction on the project site may expose nearby sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement BAAQMD’s Basic Construction Mitigation Measures and any future project construction emissions are expected to be below BAAQMD’s significance thresholds. In addition, based on the types of allowable uses under the proposed land use designation, the proposed land use would not be a source of substantial emissions. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant concentrations, and potential impacts would be considered less than significant.

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

The proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). However, future construction on the project site may create localized odors associated with construction equipment in use on-site. These odors would be temporary and are not likely to be noticeable for extended periods beyond the project site. The potential for diesel odor impacts is therefore considered less than significant. In addition, the proposed land use would not be a source of odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and potential impacts would be considered less than significant.
### 3.4 BIOLOGICAL RESOURCES

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<thead>
<tr>
<th>Would the project:</th>
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<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
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<tr>
<td>b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
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<tr>
<td>c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</td>
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<tr>
<td>d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</td>
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<td>e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
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<td>f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</td>
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**a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (No Impact)**

The project site is located in a built-out urban area and does not contain habitat that would support sensitive species; there are no known candidate, sensitive, or special-status animal species on the site. Additionally, the United States Fish and Wildlife Service (USFWS) Threatened & Endangered Species Active Critical Habitat Report (Environmental Conservation Online System [ECOS])\(^7\) does not identify any locations of critical habitat within approximately two miles of the project site. The closest known critical habitat (California red-legged frog [*Rana draytonii*]) is located approximately 2.5 miles to the west of the project site.

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The proposed GPA and Rezoning would allow retail, office, and automotive uses and this change in the allowed uses within the project site would not result in adverse effects to special-status wildlife species. Therefore, no impacts to sensitive or special-status species would result from project implementation.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (No Impact)

The project site is currently developed and is located in an urban area. As noted in Response 3.4.a., the USFWS Threatened & Endangered Species Active Critical Habitat Report (ECOS) does not identify any locations of critical habitat within approximately two miles of the project site. The closest known critical habitat is approximately 2.5 miles away to the west of the project site. Therefore, implementation of the proposed GPA and Rezoning would not result in adverse effects on a riparian habitat or other sensitive natural communities.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (No Impact)

The project site is currently developed and is located in an urban area. Based on a review of site photographs and current and historical aerial images, the site does not contain any natural hydrologic features or State and/or federally protected wetlands. Therefore, implementation of the proposed GPA and Rezoning would have no impact on wetlands.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (No Impact)

The project site is located in an urban area and is currently developed with a 16,117-square-foot building that includes an existing commercial use. No portion of the project site or immediately surrounding areas contains an open body of water that serves as natural habitat in which fish could exist. Alamo Creek runs in a north-south direction just west of Dougherty Road, approximately 800 feet west of the project site. The portion of the creek in proximity to the project site has been channelized, consisting of a concrete-lined drainage.

Likewise, there is no established native resident or migratory wildlife corridor existing within or adjacent to the project site. Species that are found on the site either fly onto the site or are able to navigate through long stretches of urban development. Therefore, the project site does not contain any native resident or migratory fish, wildlife species, or wildlife corridors.

Existing landscaping, including several mature trees, may provide suitable habitat for nesting birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503. The proposed GPA and Rezoning would allow retail, office, and automotive uses and this change in the allowed uses within the project site would not interfere with the movement of any native resident or migratory fish or wildlife species, including nesting birds and there would be no impact.
Future development that could occur, as a result of the change in General Plan land use designation and zoning, would be subject to further environmental review and/or discretionary actions, depending on the nature of the proposed project. Such projects would be subject to the City’s standard conditions of approval for all development projects and could be subject to additional conditions and/or mitigation measures (in the event that further environmental review is required). Therefore, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites and no impact would occur.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (No Impact)

Heritage trees and approved street trees are protected under the Dublin Municipal Code, specifically Sections 7.56, Street Trees, and 5.60, Heritage Trees.

As defined in the Dublin Municipal Code, approved street trees include:

1. Any tree planted within any street right-of-way or adjacent easement, which conforms to the approved streetscape master plan;

2. Any existing tree within the right-of-way or adjacent easement, which conforms to the established species and location in any given area, and which was planted as a required street tree under the provisions of any improvement agreement, or as otherwise approved by the City; or

3. Any tree of the approved species and in an acceptable location, which was or may be planted as a replacement.

Heritage trees include any of the following:

1. Any oak, bay, cypress, maple, redwood, buckeye and sycamore tree having a trunk or main stem of twenty-four (24) inches or more in diameter measured at four (4) feet six (6) inches above natural grade.

2. A tree required to be preserved as part of an approved development plan, zoning permit, use permit, site development review, or subdivision map;

3. A tree required to be planted as a replacement for an unlawfully removed tree.

A permit is required from the City for the removal of any heritage tree and the removal/pruning of any approved street tree. In addition, for any property containing one or more heritage trees, a plan to protect heritage trees must be prepared and submitted to the City prior to the issuance of a demolition, grading, or building permit.
The proposed GPA and Rezoning would allow retail, office, and automotive uses and this change in the allowed uses within the project site would not conflict with any policies to protect biological resources. Therefore, impacts to approved street trees or heritage trees would not occur.

Future development that could occur as a result of the change in land use designation and zoning would be required to comply with the Dublin Municipal Code, which requires that a tree permit be obtained, and tree replacement be implemented, consistent with the City’s standard conditions of approval.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (No Impact)

The project area is not subject to any adopted habitat conservation plan or natural community conservation plan. Therefore, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Plan, or other approved local, regional, or State habitat conservation plan and no impact would occur.
3.5 CULTURAL RESOURCES

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c. Disturb any human remains, including those interred outside of formal cemeteries?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (No Impact)

For a cultural resource to be considered a historical resource (i.e., eligible for listing in the California Register of Historical Resources), it generally must be 50 years or older. Under CEQA, historical resources can include precontact (i.e., Native American) archaeological deposits, historic-period archaeological deposits, historic buildings, and historic districts. CEQA requires agencies considering projects that are subject to discretionary action to consider the potential impacts on cultural resources that may occur from project implementation (see CEQA Guidelines Section 15064.5).

The project site is currently developed with an existing 16,117-square-foot building that includes an existing commercial use. The building is not listed on the Tri-Valley Directory of Historical Resources and Places of Interest, or in the City’s General Plan, nor is it considered a historical resource as defined by Section 15064.5 of the CEQA Guidelines.

The proposed project, which would allow retail, office, and automotive uses on the project site, would not include any new construction, earthmoving, or changes to the exterior of the building or site. As described above the existing building on the site is not considered a historical resource as defined by §15064.5 of the CEQA Guidelines. Therefore, the proposed project would not cause a substantial change in the significance of a historic resource and no impact would occur.

The project site has been previously disturbed and significantly altered as a result of past construction activities. Although no archaeological deposits that qualify as historical resources are known to occur on the project site, the potential for such resources cannot be discounted. Future development projects that would result in ground disturbance such as grading and excavation, which could unearth archaeological resources, would be evaluated on an individual basis as part of the City’s permit process. Projects determined to potentially affect archaeologically sensitive areas

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9 Ibid.
may either be denied or subject to further environmental review and evaluation, including mitigation.

b.  **Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (No Impact)**

Pursuant to CEQA Guidelines Section 15064.5(c)(1), “When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource.” Those archaeological sites that do not qualify as historical resources shall be assessed to determine if they qualify as “unique archaeological resources” pursuant to California Public Resource Code Section 21083.2.

The proposed GPA and Rezoning would allow retail, office, and automotive uses on the project site and would not include any earthmoving activities. Therefore, the proposed project would not result in adverse changes to the significance of archaeological resources at the project site and no impact would occur.

As described in Response 3.5.a., future development projects at the site would be evaluated on an individual basis as part of the City’s permit process. Such projects would be subject to the City’s standard conditions of approval for all development projects and could be subject to additional conditions and/or mitigation measures (in the event that further environmental review is required) to ensure that no impacts to archaeological resources would result from construction or operation of the proposed use.

c.  **Would the project disturb any humans remains, including those interred outside of formal cemeteries? (No Impact)**

There are no known human remains at the project site. The proposed GPA and Rezoning would allow retail, office, and automotive uses on the project site. This change in land use and zoning would not result in the disturbance of human remains that may be interred outside of a formal cemetery and no impact would occur.

Future development projects that would result in ground disturbance such as grading, and excavation would be evaluated on an individual basis as part of the City’s permit process and would be required to comply with Section 7050.5 of the California Health and Safety Code and Public Resources Code Section 5097.98 regarding the treatment of human remains.
3.6 ENERGY

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

**a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? (Less-Than-Significant Impact)**

Operation of future land uses on the site could result in a long-term energy demand associated with the lighting and space heating/cooling, and vehicle travel. Typical construction activities also require the use of energy (e.g., electricity and fuel) for various purposes such as the operation of construction equipment and tools, as well as excavation, grading, demolition, and construction vehicle travel.

**Construction.** The proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access); therefore, no construction-period energy impacts would occur. Any future construction projects on the site would be reviewed on an individual basis as part of the City’s permit process and would be subject to the City’s standard conditions of approval and existing government regulations, including BAAQMD’s Basic Construction Mitigation Measures, to reduce air emissions and improve energy efficiency.

**Operation.** Energy use is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips.

The proposed project includes a GPA to change the land use designation for the site from Business Park/Industrial to Retail/Office and Automotive and a Rezoning of the site from M-1 to C-2. The project site is currently developed with a 16,117-square-foot building that includes an existing commercial use. No new development is currently proposed to replace the existing building. Under current General Plan and Zoning regulations, the project site could be developed with a maximum of a 26,448-square-foot building and up to 73 employees. The proposed General Plan and Zoning regulations would permit a maximum of 33,061 square feet with up to 150 employees. This is an increase of approximately 6,600 square feet and approximately 77 employees compared to what is currently allowed on the site and approximately 16,900 square feet greater than what currently exists on the site.

The proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). In addition, any future development would be constructed using energy efficient modern building materials and construction practices, in accordance with
California Green Building Standards Code (CALGreen), California Public Utilities Commission’s (CPUC) Long Term Energy Efficiency Strategic Plan, and City standards. New buildings also would use new modern appliances and equipment. Under these requirements, future development would use environmentally sustainable building materials, building designs that reduce the amount of energy used in building heating and cooling systems as compared to conventionally built structures, and landscaping that incorporates water efficient irrigation systems, all of which would conserve energy. As such, the potential increase in intensity of use on the site compared to existing conditions is not expected to substantially increase long-term operational energy usage at the project site compared to existing conditions.

Therefore, implementation of the project would not result in a long-term substantial demand for electricity, natural gas, or gasoline nor would the project require new service connections or construction of new off-site service lines or substations to serve the project. The nature of the proposed project would not require substantial amounts of energy for amended uses and new physical development would be assessed based upon the merits of that project. Furthermore, the proposed project would not result in the wasteful, inefficient or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building operation, equipment use, and transportation. Impacts would be less than significant.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Less-Than-Significant Impact)

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

The most recently CEC adopted energy report is the 2019 Integrated Energy Policy Report.10 The 2019 Integrated Energy Policy Report provides the results of the CEC’s assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2019 Integrated Energy Policy Report covers a broad range of topics, including implementation of Senate Bill 350, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency, transportation electrification, barriers faced by disadvantaged communities, demand response, transmission and landscape-scale planning, the California Energy Demand Preliminary Forecast, the preliminary transportation energy demand forecast, renewable gas (in response to

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Senate Bill 1383), updates on California electricity reliability, natural gas outlook, and climate adaptation and resiliency.

As indicated above, the project site is located in an urbanized area and is currently developed. In addition, the proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). As such, the proposed project is not expected to substantially increase construction-period or operational energy usage at the project site compared to existing conditions. Furthermore, the proposed project would not conflict with California’s energy conservation plans as described in the CEC’s 2019 Integrated Energy Policy Report. As such, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and this impact would be less than significant.
### 3.7 GEOLOGY AND SOILS

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

a. **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
   
i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (No Impact)**

Surface rupture occurs when the ground surface is broken due to fault movement during an earthquake. The location of surface rupture generally can be assumed to be along an active or potentially active major fault trace.

The State of California enacted the Alquist-Priolo Fault Zoning Act in 1972, requiring the State Geologist to delineate Earthquake Fault Zones (EFZs) along known active faults that have high potential for fault rupture. The project site is not located within a designated EFZ and the proposed
project does not include any physical changes to the project site. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault.

**ii. Strong seismic ground shaking? (No Impact)**

The project site and the entire San Francisco Bay Area is in a seismically active region subject to strong seismic ground shaking. Ground shaking is a general term referring to all aspects of motion of the earth’s surface resulting from an earthquake and is normally the major cause of damage in seismic events. The extent of ground-shaking is controlled by the magnitude and intensity of the earthquake, distance from the epicenter, and local geologic conditions. The magnitude of a seismic event is a measure of the energy released by an earthquake; it is assessed by seismographs that measure the amplitude of seismic waves. The intensity of an earthquake is a subjective measure of the perceptible effects of a seismic event at a given point. The Modified Mercalli Intensity (MMI) scale is the most commonly used scale to measure the subjective effects of earthquake intensity. It uses values ranging from I to XII. The closest faults to the project site are the Calaveras Fault, located approximately one mile to the west, and the Pleasanton Fault, located approximately 0.8 mile to the east.

Mapping has been performed by the Association of Bay Area Governments (ABAG) for the likely shaking intensities in the Bay Area that would have a 10 percent chance of occurring in any 50-year period. A large earthquake (magnitude 6.7 or greater) on one of the major active faults in the region would generate violent (MMI 9) ground shaking at the project site.

Title 7 of the Dublin Municipal Code includes the 2019 California Building Code (CBC), Part 2, Title 24 of the California Code of Regulations, a portion of the California Building Standards Code, as defined in the California State Health and Safety Code Section 18901, and the International Building Code. Chapter 7.28, Building Regulation Administration, authorizes the Building Official to administer those codes. Chapter 7.32 mandates the requirements for building safety and reducing earthquake-related hazards by requiring a geotechnical report for all new buildings or additions, unless waived by the Building Official. Chapter 7.16, Grading Regulations, states the requirements for managing erosion, grading, and excavation. Per the Dublin Municipal Code, a geotechnical investigation must be prepared and submitted when the proposed grading exceeds five feet in depth, when highly expansive soils are present, in areas of known or suspected geological hazards (e.g., landslide, ground failure), and when the Director of Public Works deems that a soil or geotechnical investigation is necessary.

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The proposed GPA and Rezoning would allow retail, office, and automotive uses and this change in the allowed uses within the project site would not result in the exposure of people or new structures to the adverse effects associated with ground shaking; therefore, no impact would occur.

Construction projects that would result in the development of new structures on the project site would be evaluated on an individual basis as part of the City’s permit process and would be required to comply with the recommendations of the soil or geotechnical investigation, the most current CBC, and the City of Dublin Building Code, which stipulates appropriate seismic design provisions that shall be implemented with project design and construction.

iii. Seismic-related ground failure, including liquefaction? (No Impact)

Liquefaction is the transformation of saturated, loose, fine-grained sediment to a fluid-like state because of earthquake shaking or other rapid loading. Soils most susceptible to liquefaction are loose to medium dense, saturated sands, silty sands, sandy silts, non-plastic silts and gravels with poor drainage, or those capped by or containing seams of impermeable sediment.

The California Geological Survey (CGS) has mapped Seismic Hazard Zones that delineate areas susceptible to liquefaction and/or landslides that require proposed new developments in these areas to conduct additional investigation to determine the extent and magnitude of potential ground failure. According to mapping by CGS, the project site is located within a Seismic Hazard Zone for liquefaction. Mapping performed by ABAG indicates that the project site is in an area of moderate liquefaction susceptibility.

As described in Response 3.7.a.ii, the proposed GPA and Rezoning would allow retail, office, and automotive uses and this change in the allowed uses within the project site would not result in the exposure of people or new structures to the adverse effects associated with liquefaction; therefore, no impact would occur.

Any future development of the project site would be required to comply with the recommendations of the soil or geotechnical investigation, the most current CBC, and the City of Dublin Building Code, which stipulates appropriate seismic design provisions that shall be implemented with project design and construction.

iv. Landslides? (No Impact)

According to CGS, the project site is not located within a Seismic Hazard Zone for landslide. The project site and surrounding vicinity is generally level. The project site is located within a developed

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urban area and is not located within a rainfall-induced landslide zone, according to ABAG.\textsuperscript{17} Therefore, future development that would be permitted under the proposed project is not likely to adversely impact persons or structures due to landslides and no impact would occur.

\textbf{b. Would the project result in substantial soil erosion or the loss of topsoil? (No Impact)}

The proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site. The majority of the project site is covered by existing structures and surface pavements. Due to the absence of topsoil onsite, there would not be substantial soil erosion or loss of topsoil as a result of future development of the project site and no impact would occur.

\textbf{c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (No Impact)}

As discussed in Section 3.7.a, site soils would not be subject to lateral spreading or landslide but could be subject to liquefaction. Compliance with the recommendations contained in the geotechnical investigation and requirements of the CBC and City of Dublin Building Code would ensure that potential risks to people and structures as a result of liquefaction would be reduced to a less-than-significant level with implementation of future development projects. Therefore, the proposed project would not result in impacts associated with unstable geologic conditions.

\textbf{d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? (No Impact)}

Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly. Changes in soil volume could result in significant expansion pressure on any structures proposed as part of future development of the project site. Expansive soils are common throughout California and can cause damage to foundations and slabs unless properly treated during construction.

Soil types found on the project site include Sunnyvale clay loam over clay, according to the Natural Resources Conservation Service web soil survey.\textsuperscript{18} The shrink-swell potential for this type of clay soil is high. As described in Response 3.7.a.ii, no physical improvements to the site would occur with implementation of the proposed project; therefore, no impact would occur.

Any future development of the project site would be required to comply with the recommendations of a soil or geotechnical investigation, the most current CBC, and the City of Dublin Building Code. Adherence to these requirements would ensure that geotechnical design of any future development

\textsuperscript{17} Association of Bay Area Governments (ABAG). 2020c. Interactive Landslide Hazards Map. Available online at: mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8 (accessed September 1, 2020).

The project site would reduce potential impacts related to expansive soils to a less-than-significant level.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water? (No Impact)

The project site is located in an urban area served by wastewater collection infrastructure. Implementation of the proposed GPA and Rezoning and future development of the project site would not result in the need for new septic systems within areas known to have unstable soils and no impact would occur.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (No Impact)

The majority of the project site is paved and disturbed land that is not known to contain paleontological resources. The proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site and would not include any ground disturbance; therefore, no impact would occur.

Future development projects that could result in ground disturbance such as grading and excavation within paleontologically sensitive areas would be evaluated on an individual basis as part of the City’s permit process. Projects determined to potentially affect paleontologically sensitive areas may either be denied or subject to the further environmental review and evaluation, including mitigation and/or implementation of the City’s standard conditions of approval to reduce environmental impacts.
3.8 GREENHOUSE GAS EMISSIONS

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
<td>☐</td>
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</tbody>
</table>

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less-Than-Significant Impact)

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO2);
- Methane (CH4);
- Nitrous oxide (N2O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur Hexafluoride (SF6).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO2, methane, and N2O, some gases, like HFCs, PFCs, and SF6 are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of
each gas is measured relative to CO₂, the most abundant GHG. The definition of GWP for a particular GHG is the ratio of heat trapped by one-unit mass of the GHG to the ratio of heat trapped by one unit mass of CO₂ over a specified time period. GHG emissions are typically measured in terms of pounds or tons of “CO₂ equivalents” (CO₂e).

This section describes the proposed project’s construction- and operational-related GHG emissions and contribution to global climate change.

Construction Greenhouse Gas Emissions. The proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access); therefore, no impact would occur.

Any future construction projects on the site would be reviewed on an individual basis as part of the City’s permit process and would be subject to the City’s standard conditions of approval and existing government regulations, including BAAQMD’s Basic Construction Mitigation Measures. Implementation of these measures would reduce GHG emissions by reducing the amount of construction vehicle idling and by requiring the use of properly maintained equipment.

Operational Greenhouse Gas Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., cars, trucks and buses), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle trips to and from the project site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the project. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

The proposed project includes a GPA to change the land use designation for the site from Business Park/Industrial to Retail/Office and Automotive and a Rezoning of the site from M-1 to C-2. The project site is currently developed with a 16,117-square-foot building that includes an existing commercial use. No new construction is proposed to replace the existing building. Under current General Plan and Zoning regulations, the project site could be developed with a maximum of a 26,448-square-foot building and up to 73 employees. The proposed General Plan and Zoning regulations would permit a maximum of 33,061 square feet with up to 150 employees. This is an increase of approximately 6,600 square feet and approximately 77 employees compared to what is currently allowed on the site and approximately 16,900 square feet greater than what currently exists on the site.
As discussed above, BAAQMD has developed screening criteria to provide lead agencies with a conservative indication of whether the proposed project would result in potentially significant air quality impacts. If all of the screening criteria were met by a proposed project, then the lead agency would not need to perform a detailed air quality assessment of the proposed project’s emissions. These screening levels are generally representative of new development without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

For regional shopping center land uses, BAAQMD’s screening size for GHG emissions is 19,000 square feet and for high turnover restaurant land uses (the most intensive use that could be developed under the proposed GPA and Rezoning), BAAQMD’s screening size is 7,000 square feet. Since the proposed project would allow for a maximum of 33,061 square feet, based on BAAQMD’s screening criteria, the potential increase in intensity of use on the site could exceed the screening criteria. Future projects that would be above this threshold would be evaluated on an individual basis as part of the permit process for new construction and may require subsequent analysis to ensure compliance with regulatory requirements intended to reduce greenhouse gas emissions.

In addition, the City of Dublin Climate Action Plan 2030 and Beyond (CAP 2030) establishes a vision for the City to reach carbon neutrality by 2045 and includes quantified actions the City will take to reduce GHG emissions by 65,090 metric tons CO₂e by 2030. The CAP 2030 identifies additional actions that will need to be implemented to reach carbon neutrality. Dublin adopted its first Climate Action Plan (CAP 2020) in 2010 and is on track to meet the 2020 GHG emissions target. The purpose of the CAP 2030 is to meet the State’s 2030 GHG emissions reduction target of at least 40 percent below 1990 levels by 2030. The CAP 2030 identifies GHG reduction strategies and measures that relate to renewable and carbon-free energy, building efficiency and electrification, sustainable mobility and land use, materials and waste management, and municipal leadership.

Future development would be required to show consistency with the City’s CAP and would be constructed using energy efficient modern building materials and construction practices, in accordance with CALGreen, California Public Utility Commission Long Term Energy Efficiency Strategic Plan, and City standards. New buildings also would use new modern appliances and equipment. Under these requirements, future development would use environmentally sustainable building materials, building designs that reduce the amount of energy used in building heating and cooling systems as compared to conventionally built structures, and landscaping that incorporates water efficient irrigation systems, all of which would conserve energy. The project would be subject to all applicable permit and planning requirements in place or adopted by the City of Dublin. Therefore, the proposed project would not be a significant source of operational GHG emissions. Operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment and impacts would be less than significant.
b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Less-Than-Significant Impact)

As discussed above, the proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). In addition, future development would be constructed using energy efficient modern building materials and construction practices, in accordance with CALGreen, CPUC Long Term Energy Efficiency Strategic Plan, and City standards. New buildings also would use new modern appliances and equipment. Under these requirements, future development would use environmentally sustainable building materials, building designs that reduce the amount of energy used in building heating and cooling systems as compared to conventionally built structures, and landscaping that incorporates water efficient irrigation systems, all of which would conserve energy. The project would be subject to all applicable permit and planning requirements in place or adopted by the City of Dublin. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant.
3.9 HAZARDS AND HAZARDOUS MATERIALS

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td>□</td>
<td></td>
<td>□</td>
<td>□</td>
</tr>
<tr>
<td>b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</td>
<td>□</td>
<td></td>
<td>□</td>
<td>□</td>
</tr>
<tr>
<td>c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</td>
<td>□</td>
<td></td>
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</tr>
<tr>
<td>d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</td>
<td>□</td>
<td></td>
<td>□</td>
<td>□</td>
</tr>
<tr>
<td>e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?</td>
<td>□</td>
<td></td>
<td>□</td>
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<tr>
<td>f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</td>
<td>□</td>
<td></td>
<td>□</td>
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<tr>
<td>g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?</td>
<td>□</td>
<td></td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? *(Less-Than-Significant Impact)*

The proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site. These types of land uses would not involve transport, use, or disposal of significant quantities of hazardous materials. Small quantities of hazardous materials, such as paints, oil, and cleaning chemicals, may be used. Any future owner/operator of such facilities at the project site would be required to comply with existing government regulations in the use and disposal of any hazardous materials. Therefore, the proposed project would have a less than significant impact related to the routine transport, use, or disposal of hazardous materials.

Construction activities associated with potential future development of the project site could include removal of the existing building and pavements, and construction of a new building(s). During construction, hazardous materials such as vehicle fuels and lubricants and building materials such as asphalt, paints, and adhesives would be used. While these are commonly used materials, if handled improperly, they could endanger workers or the public. Locally, the use, storage, and management of hazardous materials are regulated by the Hazardous Materials Division, which is part of the Alameda
County Department of Environmental Health (ACDEH). ACDEH is the Certified Unified Program Agency (CUPA) for all areas of Alameda County. The Hazardous Materials Division provides comprehensive environmental regulatory compliance inspection services to protect human health and the environment. Additionally, program personnel perform plan reviews and inspections associated with the construction, upgrading, and closure of hazardous materials storage facilities and equipment. Compliance with federal, State, and Alameda County hazardous materials laws and regulations would minimize any potential risks to the public from construction-related hazardous materials.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Less-Than-Significant Impact)

There are two main ways that the public and/or the environment could be affected by the release of hazardous materials from the project site, including: (1) exposing workers and/or the public to potentially contaminated soil and groundwater during construction and/or operation of the project; or (2) exposing workers and/or the public to hazardous building materials (e.g., lead paint, asbestos) during demolition of existing structures. However, implementation of the project would not result demolition activities or any other physical improvements to the project site.

The proposed GPA and Rezoning would allow for the potential future development of the project site with general commercial, retail, and service uses, as well as automobile/vehicle sales and service, automobile/vehicle repairs and service, eating and drinking establishments, shopping centers, professional/administrative offices, hotels and motels, and services stations. As described above, small quantities of common hazardous materials would be used at the project site during construction and operation of potential future uses at the project site. Improper use, storage, or handling could result in a release of hazardous materials into the environment, which could pose a risk to construction workers and the public. However, any future project applicant would be required to comply with existing government regulations in its use and disposal of these materials, and such materials would not be used in sufficient strength or quantity to create a substantial risk to human or environmental health. Therefore, the proposed project would have a less-than-significant impact related to the release of hazardous materials into the environment during both the construction and operational periods.

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

No public schools are located within 0.25 mile of the project site. The nearest schools to the project site are Valley High School, located approximately 0.4-mile northwest, and Wells Middle School, located approximately 0.5-mile north of the project site. As noted in Section 3.9.a, development of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As noted in Section 3.9.b, construction activities would not create a hazard to the public and environment through reasonably foreseeable upset and accident conditions, and this impact would be less than significant.
d. **Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Less-Than-Significant Impact)**

Government Code Section 65962.5 states that the California Department of Toxic Substances shall compile and maintain annually a list of hazardous waste facilities subject to corrective action as part of the Health and Safety Code. This list is commonly referred to as the Cortese List. The project site is not located on the Regional Water Quality Control Board’s Leaking Underground Tank Cleanup Site (LUST) or any other Cleanup Program Sites (formerly known as spills, leaks, investigations, and cleanups or SLIC). These two components comprise the State Cortese List of known hazardous materials sites compiled pursuant to Government Code Section 65962.5.

According to the California State Water Resources Control Board (SWRCB) Geotracker website, 19 two State-listed hazardous materials clean-up sites are located within 1,000 feet of the project site. One site, the City of Dublin Civic Center, located south of the project site at 100 Civic Plaza, is listed as a LUST site. This site is designated “closed.” A closed site indicates that regulatory requirements for response actions, such as site assessment and remediation, have either been completed or were not necessary and, therefore, potential migration of residual contaminants in groundwater beneath the project corridor (if any) does not likely pose a risk to human health and the environment.

One other site, the former Chevron Records Facility, is located northwest of the project site at 6400 Sierra Court. This site is listed as “Open – Remediation as of 12/05/14” due to the presence of trichloroethylene (TCE). However, due to the direction of groundwater flow (northwest) away from the project site, 20 potential migration of residual contaminants in groundwater beneath the project site would not likely pose a risk to human health and the environment. Therefore, no significant hazard to the public or environment would be associated with this listed site, and this impact would be less than significant.

e. **Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (No Impact)**

The project site is located approximately five miles west of the Livermore Municipal Airport. The project area is not located within the Airport Safety Zones or Airport Influence Area of the Livermore Municipal Airport. 21 The proposed GPA and Rezoning would not result in new construction within the vicinity of an airport. Therefore, the proposed project would not result in a safety hazard for

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people residing or working in the area, or for people assembling at the project site due to the proximity of an airport. No impact would occur.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Less-Than-Significant Impact)

The Tri-Valley Local Hazard Mitigation Plan\(^\text{22}\) was developed in compliance with State requirements and also meets the requirements of the Federal Emergency Management Agency (FEMA) as the City’s local hazard mitigation plan. The Tri-Valley Local Hazard Mitigation Plan provides a uniform hazard mitigation strategy for the Tri-Valley area, addressing a range of hazards including, but not limited to, earthquakes, floods and wildland fire. The City of Dublin also has an adopted Comprehensive Emergency Management Plan and a Local Hazard Mitigation Plan to assess hazards and mitigate risks prior to a disaster event.

The proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site. Because the proposed project would not alter or block adjacent roadways, implementation of the proposed project would not be expected to impair the function of nearby emergency evacuation routes. Therefore, the proposed project would have a less-than-significant impact on implementation of an adopted emergency response plan or emergency evacuation plan.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less-Than-Significant Impact)

The project site is located within a developed urban area and according to the California Department of Fire and Forestry Protection (CalFire), the project site is not located in a Very High Fire Hazard Severity Zone.\(^\text{23}\) Therefore, the proposed project would not expose people or structures to a significant loss, injury or death involving wildland fires and this impact would be less than significant.


3.10 HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?  
   
<table>
<thead>
<tr>
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</table>

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

<table>
<thead>
<tr>
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<th>Less Than Significant Impact</th>
<th>No Impact</th>
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</table>

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. Result in substantial erosion or siltation on- or off-site;
   ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
   iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
   iv. Impede or redirect flood flows?

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<thead>
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<th>Less Than Significant Impact</th>
<th>No Impact</th>
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</table>

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

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<thead>
<tr>
<th>Potentially Significant Impact</th>
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e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

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</thead>
</table>

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (Less-Than-Significant Impact)

The proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site. No physical improvements to the project site would result with implementation of the proposed project; therefore, impacts related to water quality standards, waste discharge requirements, and surface water quality would not occur.

Future construction projects that would result in the development of new structures or alteration of existing drainage conditions would be evaluated on an individual basis as part of the City’s permit process and would be required to comply with the most current regulatory requirements, as described further below.

The State Water Resources Control Board and nine Regional Water Quality Control Boards regulate water quality of surface water and groundwater bodies throughout California. In the Bay Area, including the project site, the San Francisco Bay Regional Water Quality Control Board (Water Board) is responsible for implementation the Water Quality Control Plan (Basin Plan). The Basin Plan establishes beneficial water uses for waterways and water bodies within the region.
Runoff water quality is regulated by the National Pollutant Discharge Elimination System (NPDES) Program (established through the federal Clean Water Act). The NPDES program objective is to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the Water Board. According to the water quality control plans of the Water Board, any construction activities, including grading, that would result in the disturbance of one acre or more would require compliance with the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activity (Construction General Permit). The project site is approximately 1.5 acres and, as such, any future development project at the site would be required to comply with the Construction General Permit.

Physical improvements to the project site would be subject to the Water Board’s Municipal Regional Permit (MRP), implemented in November 2015 by Order R2-2015-0049. Provision C.3 of the MRP requires new development and development projects that would replace more than 10,000 square feet of existing impervious surfaces 24 to include post-construction stormwater control in project designs. In addition, projects that disturb more than one acre of land may also be subject to the hydromodification 25 management requirements of the MRP. Under the C.3 requirements, the preparation and submittal of a Stormwater Control Plan (SCP) would be required for the project site. The purpose of an SCP is to detail the design elements and implementation measures necessary to meet the post-construction stormwater control requirements of the MRP. In particular, SCPs must include Low Impact Development (LID) design measures, which reduce water quality impacts by preserving and recreating natural landscape features, minimizing imperviousness, and using stormwater as a resource, rather than a waste product. Proposed projects would also be required to prepare a Stormwater Facility Operation and Maintenance Plan to ensure that stormwater control measures are inspected, maintained, and funded for the life of the project.

Compliance with these regulatory requirements would ensure that potential construction- and operation-period impacts to water quality associated with any future development project at the site would be less than significant.

**b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (No Impact)**

The proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site. This change in the allowed uses at the project site would not result in the depletion of groundwater supplies or interfere with groundwater recharge. The majority of the project site consists of impervious surfaces comprised of an existing building and a surface parking lot. Any

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24 Under Provision C.3 of the MRP, gas station, restaurant, automotive facilities, or parking lots that create or replace 5,000 square feet of impervious surfaces must implement post-construction stormwater controls.

25 Hydromodification is defined as the modification of a stream’s hydrograph, caused in general by increases in flows and durations that result when land is developed (e.g., made more impervious). The effects of hydromodification include, but are not limited to, increased bed and bank erosion, loss of habitat, increased sediment transport and deposition, and increased flooding.
future development at the project site would likely not have the potential to interfere with groundwater recharge, as minimal pervious surfaces currently exist at the site. Future construction projects that would result in the development of new structures or potentially interfere with groundwater recharge would be evaluated on an individual basis as part of the City’s permit process and would be required to comply with the most current regulatory requirements. Furthermore, the project site is located in an urban area where the majority of stormwater runoff drains to storm drainpipes rather than infiltrating into the groundwater aquifer. Consequently, the project site is not located in an area that substantially contributes to the recharge of the underlying groundwater aquifer. Therefore, the proposed project would not interfere with groundwater recharge and potential impacts related to the depletion of groundwater supplies would not occur.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
iv. Impede or redirect flood flows? (No Impact)

The proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site. This change in the allowed uses at the project site would not alter the course of a stream or river. The project site is located in a developed area and implementation of the proposed project would not substantially alter the existing drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site, result in on- or off-site flooding, or redirect or impede floods flows and no impact would occur.

Future construction projects that would result in the development of new structures or alteration of existing drainage conditions would be evaluated on an individual basis as part of the City’s permit process and would be required to comply with the most current regulatory requirements.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? (No Impact)

The project site is not located within a 100-year flood hazard zone as mapped by FEMA and is not located within a mapped dam failure inundation area. There are no levees protecting the site from flooding and as a result, no risk of failure. The project site and surrounding areas are generally level and would not be subject to mudflows.

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The project site is not located within a mapped tsunami area\textsuperscript{27} and no seismically induced seiche waves have been documented in the San Francisco Bay throughout history.\textsuperscript{28} Therefore, no impact would occur.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)

As discussed above, the proposed GPA and Rezoning would allow retail, office, and automotive uses within the project site. This change in land uses would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Construction and operation of any future development project at the site would be subject to State and regional requirements related to stormwater runoff. Required compliance with State and local regulations regarding stormwater during construction and operation would ensure that the proposed project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As a result, no impact would occur.


\textsuperscript{28} Association of Bay Area Governments and Metropolitan Transportation Commission. 2013. Plan Bay Area. July 18.
3.11 LAND USE AND PLANNING

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
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<tbody>
<tr>
<td>a. Physically divide an established community?</td>
<td>☐</td>
<td>☐</td>
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<td>☑</td>
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<tr>
<td>b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</td>
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<td>☐</td>
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a. **Would the project physically divide an established community? (Less-Than-Significant Impact)**

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and an outlying area. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside of the community.

The project site consists of an existing building within a developed area surrounded by industrial and commercial uses. The proposed project would result in a change in the permitted uses allowed at the site, including retail, office, and automotive uses and the potential development of the project site, which could include automobile/vehicle sales and service, automobile/vehicle repairs and service, as well as eating and drinking establishments, shopping centers, professional/administrative offices, hotels and motels, and services stations. The proposed project would not result in the construction of any new infrastructure that would divide an established community and would not remove any means of access. The proposed project would not result in a physical division of an established community or adversely affect the continuity of land uses in the vicinity and no impact would occur.

b. **Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Less-Than-Significant Impact)**

It should be noted that according to CEQA, policy conflicts do not, in and of themselves, constitute a significant environmental impact. Policy conflicts are considered to be environmental impacts only when they would result in direct physical impacts or where those conflicts relate to avoiding or mitigating environmental impacts. As such, associated physical environmental impacts are discussed in this Initial Study under specific topical sections (e.g., cultural resources, hazardous materials, noise, etc.). The proposed project would not result in any direct physical changes and impacts would be less than significant.

The project site is currently designated as Business Park/Industrial on the City’s General Plan Land Use Map and is within the M-1 zoning district on the City’s Zoning Map. The project proposes to re-designate and rezone the project site to Retail/Office and Automotive and C-2, respectively.
General Plan. As described in Chapter 2.0, Project Description, the project site is designated Business Park/Industrial in the City’s General Plan. According to the City’s General Plan, the Business Park/Industrial designation allows for non-retail businesses (e.g., research, limited manufacturing and distribution activities, and administrative offices) that do not involve heavy trucking or generate nuisances due to emissions, noise or open uses. Permitted FAR ranges from 0.30 to 0.40 and the allowable employee density is 360 to 490 square feet per employee.

The proposed project would allow re-designation of the project site to Retail/Office and Automotive, which supports general commercial, retail and service uses, as well as automobile/vehicle sales and service, and similar auto focused uses. Uses also include eating and drinking establishments, shopping centers, business and professional offices, hotels and motels, and services stations. The Retail/Office and Automotive designation permits development at intensities of up to 0.5 FAR and employee density up to 220 to 490 square feet per employee.

As outlined in the project description, implementation of the proposed project would amend the City’s General Plan and the General Plan Map to reflect the change in land use changes over time in the vicinity of the project site and create consistency between the project site and neighboring properties to the east.

Zoning Ordinance. The project site is located within the M-1 zoning district, which is intended to provide for the continued use, expansion and new development of light industrial use types in proximity to major transportation corridors and to ensure compatibility with adjacent residential and commercial uses. Permitted uses in the M-1 zoning district include ambulance service, commercial kitchen, laboratory, light industrial, mini-storage, office – contractor’s, office – professional/administrative, outdoor seating, parking lot/garage, printing and publishing, recording studio, research and development, storage of petroleum products for on-site use, trucking terminal, and warehousing and distribution. As part of the proposed project, the site would also be rezoned from M-1 to C-2 consistent with the amended General Plan land use designation.

As outlined in the project description, the proposed Rezoning would reflect the change in land uses over time in the vicinity of the project site and create consistency between the project site and neighboring properties to the east. The proposed Rezoning would allow retail, office, and automotive uses within the project site. Such uses would be harmonious and compatible with existing and potential development in surrounding areas, which consist of industrial uses to the north; public/semi-public uses to the south, including the Dublin Civic Center and Dublin Sports Ground; and retail, office, automotive uses to the east and west.

The project site is currently developed with an existing 16,117-square-foot one-story building that includes an existing commercial use. No new building is currently proposed to replace the existing building. Under current General Plan and Zoning regulations, the project site could be developed with a maximum of a 26,448-square-foot building and up to 73 employees. The proposed GPA and

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29 The term floor area ratio refers to the gross floor area permitted on a site divided by the total net area of the site. The gross floor area includes the total floor area of each floor and of all buildings on a site, including internal circulation (halls, lobbies, stairways, elevator shafts, enclosed porches, and balconies, etc.), storage and equipment space, as measured from the outside faces of the exterior walls.
Rezoning would permit a maximum of 33,061 square feet of building area with up to 150 employees. This is an increase of approximately 6,600 square feet and approximately 77 employees compared to what is currently allowed on the site. The project site consists of an approximately 1.5-acre (66,122-square-foot) property, surrounding by similar urban development. The project site is physically suitable for the increase in intensity associated with the change in zoning from M-1 to C-2.

As described throughout this Initial Study, proposed GPA and Rezoning would allow general commercial, retail, and service uses, as well as auto-focused uses in an already developed area. No new construction is currently proposed at the project site. Future development at the project site would be evaluated as part of the City’s review process and would be subject to further environmental review and/or discretionary actions, depending on the nature of the proposed project. Future projects would be subject to the City’s standard conditions of approval for all development projects and could be subject to additional conditions and/or mitigation measures (in the event that further environmental review is required) to ensure that any future development would not adversely affect the health or safety of persons residing or working in the vicinity, or be detrimental to the public health, safety and welfare. Therefore, proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be less than significant.
3.12 MINERAL RESOURCES

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

a. **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (No Impact)**

Neither the State Geologist nor the California Department of Mines and Geology (CDMG) have classified any areas in the City as containing mineral deposits that are either of Statewide significance or the significance of which requires further evaluation.\(^{30}\) The project site has been classified by the CDMG as being located in MRZ-1, indicating that the project site is located in an area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.\(^{31}\) In addition, the project site is not designated or zoned for the extraction of mineral deposits. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value of the region and the residents of the state and no impact would occur.

b. **Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (No Impact)**

As stated in Response 3.12.a., the project site is classified as MRZ-1, indicating the site is located where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. The project site is currently developed with an existing 16,117-square-foot building that includes an existing commercial use. No mineral extraction activities occur on the project site, and it is not located within an area known to contain locally important mineral resources. Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan and no impact would occur.

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\(^{31}\) Ibid.
3.13 NOISE

<table>
<thead>
<tr>
<th>Would the project result in:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a.  Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</td>
</tr>
<tr>
<td>b.  Generation of excessive groundborne vibration or groundborne noise levels?</td>
</tr>
<tr>
<td>c.  For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</td>
</tr>
</tbody>
</table>

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Less-Than-Significant Impact)

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements that better represent human sensitivity to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise sensitive receptor of concern.

A project would have a significant noise effect if it would substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of applicable regulatory agencies, including, as appropriate, the City of Dublin.

Short-Term (Construction) Noise Impacts. Implementation of the proposed GPA and Rezoning would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). Future projects that would result in the development of new structures
would be evaluated on an individual basis as part of the City’s development review process and would be required to comply with the Dublin Municipal Code ordinances establishing permissible hours of noise-producing construction activity, which would ensure that short-term construction noise impacts would be less than significant.

**Operational Noise Impacts.** According to the City’s General Plan, traffic is the major source of noise in Dublin. Much of the project site, along with the area adjacent to the project site, is exposed to noise levels between 65 and 70 dB CNEL as shown in Figure 9-1 of the City’s General Plan.

A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level. The project site itself is located in an urban area adjacent to roadways that are heavily traveled. Noise from the proposed project would be similar to existing conditions and would generally include noise from vehicles, air conditioner units, and other similar equipment. Due to its location at a heavily used arterial and its existing noise contours, it is not expected that more intensive uses that could occupy the existing building would result in a perceptible increase in noise to surrounding land uses. In addition, as discussed above, the proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access). Any future construction of a new building would require discretionary review by the City and the land use proposed at that time would be subject to review. Therefore, the project would have a less-than-significant impact related to generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies.

**b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels? (Less-Than-Significant Impact)**

Vibration refers to groundborne noise and perceptible motion. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock layers, to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by the occupants as the motion of building surfaces, rattling of items on shelves or hanging on walls, or as a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

As the proposed project would not result in any physical changes to the existing site (e.g., demolition, construction, modification of site access), potential structural damage from heavy construction activities would not occur.

The streets surrounding the project area are paved, smooth, and unlikely to cause significant groundborne vibration. In addition, the rubber tires and suspension systems of buses and other on-road vehicles make it unusual for on-road vehicles to cause groundborne noise or vibration problems. Therefore, no such vehicular vibration impacts would occur and no vibration impact analysis of on-road vehicles is necessary. The potential change in use or increase in the intensity of
use at the project site, which could result from the proposed project, would not generate groundborne vibration. This impact would be less than significant.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (Less-Than-Significant Impact)

The proposed project is not located within two miles of a private airstrip, public airport, or a public use airport and is not within an airport land use plan. The nearest airport, Livermore Municipal Airport, is located approximately five miles east of the project site. Although aircraft-related noise is occasionally audible at the project site, the site does not lie within the 55 dBA CNEL noise contours of any public airports or private airfields. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels due to the proximity of a public airport. This impact would be less than significant.
3.14 POPULATION AND HOUSING

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</td>
<td>□</td>
<td>□</td>
<td>✗</td>
<td>□</td>
</tr>
<tr>
<td>b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

a. **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (Less-Than-Significant Impact)**

With implementation of the proposed GPA and Rezoning, the maximum allowable development on the site could include a 33,061-square foot, one-story building, which would generate approximately 150 employees at the maximum employment density (approximately 16,944 square feet greater than what currently exists and 6,613 square feet greater than what is currently allowed on the site). At the maximum employee density, the proposed project could increase employment at the site by approximately 104 employees over the existing condition and by approximately 77 employees compared to what is currently allowed on the site under the existing zoning designation. The proposed project does not include housing and the site is located in a developed urban area.

Although the proposed project could increase the intensity of use at the site and generate additional employees, the number of additional employees would not be substantial. According to the City’s General Plan, the Primary Planning Area, within which the project site is located, had an estimated 12,163 jobs in 2012. Based on the employee density regulations outlined in the City’s General Plan, the City anticipated potential development of 2,735 to 4,972 jobs in areas designated as Business Park/Industrial and 898 to 4,045 jobs designated as Retail/Office and Automotive, with total jobs Citywide between 6,478 and 21,017. The potential employment growth associated with future development of the project site would be consistent with and within the scope of the planned employment growth assumed in the City’s General Plan. Because it was anticipated that uses within the Retail/Office and Automotive land use designation would provide employment, the proposed project would not induce substantial unplanned population growth in the area, and this impact would be less than significant.

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b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

As described above, the project site is currently developed with an existing 16,117-square-foot building that includes various an existing commercial use No residential units currently exist at the project site. Therefore, the proposed project would not result in the displacement of people or housing necessitating replacement housing elsewhere in the City, and no impact would occur.
3.15 PUBLIC SERVICES

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>i. Fire protection?</td>
<td></td>
<td></td>
<td>❌</td>
<td>❌</td>
</tr>
<tr>
<td>ii. Police protection?</td>
<td></td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
</tr>
<tr>
<td>iii. Schools?</td>
<td></td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
</tr>
<tr>
<td>iv. Parks?</td>
<td></td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
</tr>
<tr>
<td>v. Other public facilities?</td>
<td></td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
</tr>
</tbody>
</table>

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

   i. Fire protection?
   ii. Police protection?
   iii. Schools?
   iv. Parks?
   v. Other public facilities? (Less-Than-Significant Impact)

Fire suppression, emergency medical and rescue services, and other life safety services are provided to the project area and site by the Alameda County Fire Department (ACFD). There are three fire stations in Dublin, with the closest to the project site being Fire Station No. 16 at 7494 Donohue Drive, approximately one-mile northwest.

The Alameda County Sheriff’s Office provides contracted police protection to the project area and project site. The Dublin Police Services headquarters are located at 6361 Clark Avenue, southwest of the project site.

The proposed GPA and Rezoning would allow retail, office, and automotive uses and this change in the allowed uses within the project site would not increase the demand for fire or police services. Existing service providers would continue to serve the project site within the City with the existing staffing and facilities. The proposed project would not increase the demand for fire or police services, such that new or physically altered facilities would be required.
In addition, the proposed GPA and Rezoning would not induce population growth (see Section 3.14.a) and would not generate new students, park users, or users of other government facilities, such as libraries, community centers or public health care facilities. The proposed project would allow retail, office, and automotive uses at the project site. These uses would not individually increase the demand for school, park, or other facilities such that new or physically altered facilities would be required to serve the new demand and this impact would be less than significant.
3.16 RECREATION

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

a. **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (No Impact)**

As discussed in Section 3.14, Population and Housing, and Section 3.15, Public Services, the proposed GPA and Rezoning would not induce population growth or otherwise increase the use of existing recreational facilities. Therefore, the proposed project would not result in impacts related to the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impact would occur.

b. **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (No Impact)**

The project does not include nor require the construction or expansion of new or existing public recreational facilities. Therefore, the proposed project would not result additional environmental effects associated with recreation beyond those described in this document.
3.17 TRANSPORTATION

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☒</td>
</tr>
<tr>
<td>d. Result in inadequate emergency access?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

a. **Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Less-Than-Significant Impact)**

The proposed GPA and Rezoning would change the land use designation of the project site from Business Park/Industrial to Retail/Office and Automotive in the General Plan and from M-1 to C-2 zoning district. The project site is currently developed with a 16,117-square-foot building that includes an existing commercial use. No new building is currently proposed to replace the existing building. Under current General Plan and Zoning regulations, the project site could be developed with a maximum of a 26,448-square foot building and up to 73 employees. The proposed General Plan and Zoning regulations would permit a maximum of 33,061 square feet with up to 150 employees. This is an increase of 6,613 square feet and 77 employees.

The City of Dublin General Plan Circulation and Scenic Highways Element establishes vehicle level of service targets for intersections and roadway segments within the City. Vehicle level of service can be affected by the vehicle trips generated by land developments. Because no building is currently proposed to replace the existing building, no immediate change in the trip generation potential would result from the proposed GPA and Rezoning. However, the future trip generation potential of the project site could be affected. Table C calculates the potential effect on trip generation resulting from the proposed GPA and Rezoning. Trip rates are based on the Institute of Transportation Engineers (ITE) Business Park category for the existing land use and the Shopping Center category for future land uses that could be allowed within the existing building or with future redevelopment of the site.

As Table C shows, changing the General Plan land use designation and zoning for the project site could result in approximately 54 more trips during the PM peak commute hour if a more intense land use occupies the current building. The maximum development potential of the project site would be increased by approximately 115 vehicle trips during the PM peak commute hour. However, retail/commercial or restaurant uses (the most intensive use that could be developed under the proposed GPA and Rezoning) attract many of their trips from traffic already on the
adjacent roadway. The percentage of these pass-by trips is predictable based on the type of use and application of the appropriate pass-by rate could reduce the net new trip generation below 100 peak hour trips.

The Alameda County Transportation Commission Congestion Management Program (September 2019) establishes a 100 PM peak hour trip threshold of review of land use actions. A screening threshold of 100 peak hour trips is commonly used to determine whether a land use project has the potential to affect vehicle level of service and a detailed traffic analysis may be required. Because the proposed change in land use designation would result in fewer than 100 additional peak hour trips within the existing building, the change in land use designation is less likely to affect vehicle level of service. However, demolition of the existing building and construction of a new building could result in more than 100 net new peak hour trips depending on the type of use proposed. Construction of a new building would require discretionary review by the City and the land use proposed at that time would be subject to review and measurement against the 100 net new peak hour trip threshold. If, as part of the subsequent discretionary review, a specific proposed land use is found to have the potential to affect vehicle level of service based on the City’s review standards, specific measures such as implementation of a travel demand management plan could be implemented to preserve vehicle level of service.

Table C: Potential Change in Trip Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Size</th>
<th>Unit</th>
<th>ADT</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>In</td>
<td>Out</td>
</tr>
<tr>
<td>Trip Rates(^1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Park (770)</td>
<td></td>
<td></td>
<td></td>
<td>12</td>
<td>0.24</td>
</tr>
<tr>
<td>Shopping Center (820)</td>
<td></td>
<td></td>
<td></td>
<td>37</td>
<td>0.58</td>
</tr>
<tr>
<td>Existing Building Trip Generation Potential</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing Business Park (770)</td>
<td>16.117</td>
<td>TSF</td>
<td>200</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>Proposed Shopping Center (820)</td>
<td>16.117</td>
<td>TSF</td>
<td>608</td>
<td>9</td>
<td>6</td>
</tr>
<tr>
<td>New Trip Generation Potential</td>
<td>408</td>
<td></td>
<td></td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>Maximum Development Trip Generation Potential</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing Business Park (770)</td>
<td>26.448</td>
<td>TSF</td>
<td>329</td>
<td>6</td>
<td>5</td>
</tr>
<tr>
<td>Proposed Shopping Center (820)</td>
<td>33.061</td>
<td>TSF</td>
<td>1,248</td>
<td>19</td>
<td>12</td>
</tr>
<tr>
<td>New Trip Generation Potential</td>
<td>919</td>
<td></td>
<td></td>
<td>13</td>
<td>8</td>
</tr>
</tbody>
</table>

\(^1\) Trip rates referenced from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition (2017).

ADT = average daily traffic
TSF = thousand square feet

The proposed project would not modify the public right-of-way including pedestrian, bicycle, or transit facilities. The project would not affect pedestrian, bicycle, or transit facilities, the project is not likely to affect vehicle level of service standards established for roadways in the vicinity of the
existing building, and any future new development project would be evaluated and modified to prevent affecting vehicle level of service standards established by the City. Therefore, the proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system. This impact would be less than significant.

b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)? (Less-Than-Significant Impact)

Effective December 28, 2018, the CEQA Guidelines were updated and require the evaluation of vehicle miles transportation (VMT) as the criteria for analyzing transportation impacts for land use projects. As noted in CEQA Guidelines Section 15064.3(c), the provisions of CEQA Guidelines Section 15064.3 shall apply prospectively as described in CEQA Guidelines Section 15007. A lead agency could have elected to be governed by the provisions of CEQA Guidelines Section 15064.3 immediately; however, beginning on July 1, 2020, the provisions of this section was stated to apply Statewide. The City of Dublin, as lead agency, has not yet adopted specific thresholds related to VMT metrics. However, simultaneous with clearance of the revised State CEQA Guidelines, the Governor’s Office of Planning and Research (OPR) released the Technical Advisory for Evaluating Transportation Impacts under CEQA (OPR, December 2018). This State document provides sufficient guidance to permit the evaluation of project transportation impacts for the purposes of compliance with CEQA.

The Technical Advisory for Evaluating Transportation Impacts under CEQA suggests that adding local serving retail development tends to shorten trips and reduce VMT. It continues to suggest that retail development less than 50,000 square feet be considered to have a less than significant impact on VMT. The new land uses possible for the project site with the change in land use designation would be local serving and would be less than 50,000 square feet. Therefore, the proposed project would neither conflict with nor be inconsistent with CEQA Guidelines Section 15064.3, and the impact would be less than significant.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (No Impact)

As shown in Section 1.0, similar land uses to the proposed land use designation currently exist adjacent to the project site. Vehicles accessing the project site would not be substantially different from or incompatible with vehicles accessing adjacent parcels. The project would not alter access or geometric design features. Therefore, the project would result in no impact.

d. Would the project result in inadequate emergency access? (Less-Than-Significant Impact)

The proposed project would not result in the alteration of any access points. Any future development would be subject to City review and approval of site plans including emergency access. As shown in Table C, new vehicle traffic generated by the change in land use designation would be less than 100 trips in either peak commute hour, which is not likely to affect vehicle level of service. Therefore, the potential impact to emergency access would be less than significant.
3.18 TRIBAL CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or

   ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

   - [x] Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

     i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or

     ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (No Impact)

Assembly Bill 52 (AB 52), which became law on January 1, 2015, provides for consultation with California Native American tribes during the CEQA environmental review process, and equates significant impacts to “tribal cultural resources” with significant environmental impacts.

The consultation provisions of the law require that a public agency consult with local Native American tribes that have requested placement on that agency’s notification list for CEQA projects. Within 14 days of determining that a project application is complete, or a decision by a public agency to undertake a project, the lead agency must notify tribes of the opportunity to consult on the project, should a tribe have previously requested to be on the agency’s notification list.
California Native American tribes must be recognized by the NAHC as traditionally and culturally affiliated with the project site and must have previously requested that the lead agency notify them of projects. Tribes have 30 days following notification of a project to request consultation with the lead agency.

The purpose of consultation is to inform the lead agency in its identification and determination of the significance of tribal cultural resources. If a project is determined to result in a significant impact on an identified tribal cultural resource, the consultation process must occur and conclude prior to adoption of a Negative Declaration or Mitigated Negative Declaration, or certification of an Environmental Impact Report (PRC Sections 21080.3.1, 21080.3.2, 21082.3).

No California Native American tribe formally requested consultation notifications with the City during the required 30-day notification period, consistent with the requirements of PRC 21080.3.1. As such, tribal consultation for the proposed project was not required for this project.

As discussed in Section 3.5, Cultural Resources, the proposed project would not result in any physical improvements to the project site; therefore, no impact would occur.
### 3.19 UTILITIES AND SERVICE SYSTEMS

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

**a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less-Than-Significant Impact)**

The project site is located in an area currently served by existing utilities. The proposed GPA and Rezoning would allow retail, office, and automotive uses at the project site. This change in the allowed uses would not require or result in the relocation or construction of new or expanded facilities because such uses are not likely to generate substantial increases in demand as compared to the existing, currently allowable uses. Construction projects that would result in the development of new structures on the project site would be evaluated on an individual basis as part of the City’s development review process and would be required to comply with the most current requirements for the installation of new utility infrastructure. Proposed uses would also be required to comply with existing building occupancy limits and so would not be expected to substantially increase the use of or demand for existing services and infrastructure. Therefore, the relocation or reconstruction of new or expanded water, recycled water, wastewater, stormwater drainage, electric power, gas, or telecommunications facilities would not be required, and this impact would be less than significant.
b. **Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Less-Than-Significant Impact)**

Refer to Response 3.19.a. The project site is located in an area currently served by existing utilities. The proposed GPA and Rezoning would allow retail, office, and automotive uses at the project site. These uses are not likely to generate substantial increase in demand for water as compared to the existing, currently allowable uses. As described above, future projects that would result in the development of new structures on the project site would be evaluated on an individual basis as part of the City’s development review process. Therefore, the proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. This impact would be less than significant.

c. **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? (Less-Than-Significant Impact)**

Please refer to Response 3.19.a. for a discussion on the project’s impacts to wastewater treatment. The proposed GPA and Rezoning would not result in a substantial increase in demand for wastewater treatment that would exceed the capacity of the wastewater treatment plant. This impact would be less than significant.

d. **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (No Impact)**

The proposed GPA and Rezoning would allow retail, office, and automotive uses at the project site. This change in the allowed uses would not result in landfill use or capacity because such uses are not likely to generate substantial increases in solid waste as compared to the existing Business Park/Industrial use. Therefore, there would be no impact associated with landfill capacity and waste disposal needs.

e. **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (No Impact)**

As noted in Response 3.19.d, the proposed GPA and Rezoning would not include a new source of solid waste and would not exceed the capacity of any landfills that would serve the proposed project. Therefore, the project would not conflict with applicable solid waste regulations and no impact would occur.
### 3.20 WILDFIRE

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Substantially impair an adopted emergency response plan or emergency evacuation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

#### a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? *(No Impact)*

The project site is not located within any State responsibility areas (SRA) for fire service, and is not within a very high fire hazard severity zone. In addition, as noted in Section 3.9.f, the proposed project would not impair the implementation of, or physically interfere with, and adopted emergency response plan. Therefore, no impact would occur.

#### b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? *(No Impact)*

Refer to Section 3.20.a. Additionally, as noted in Section 1.0, Project Information, the project site is bound by existing development on all sides. Therefore, the proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and no impact would occur.

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c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (No Impact)

Refer to Response 3.20.a. The proposed project is not located within an SRA for fire service and is not within a very high fire hazard severity zone. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure, and no impact would occur.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (No Impact)

Refer to Section 3.20.a and 3.20.b. The proposed project would not expose people or structures to significant risks due to post-fire slope instability or drainage and runoff changes. Therefore, no impact would occur.
3.21 MANDATORY FINDINGS OF SIGNIFICANCE

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (No Impact)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. Does the project have impacts that are individually limited, but cumulatively considerable? (&quot;Cumulatively considerable&quot; means that the incremental effects of a 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.)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

a. **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (No Impact)**

Changing the land use and zoning designation at the project site would not adversely affect protected wildlife species as there are no listed sensitive species or habitats in the vicinity, and no new construction is included as part of the proposed project. The project site is currently developed with 16,117-square-foot building and associated paved parking. No historic or cultural resources are located on the project site. Therefore, the proposed project would not: 1) degrade the quality of the environment; 2) substantially reduce the habitat of a fish or wildlife species; 3) cause a fish or wildlife species population to drop below self-sustaining levels; 4) threaten to eliminate a plant or animal community; 5) reduce the number or restrict the range of a rare or endangered plant or animal; or 6) eliminate important examples of the major periods of California history.

b. **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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)? (Less-Than-Significant Impact)**

The proposed GPA and Rezoning would allow retail, office, and automotive uses at the project site. Although this change in the allowed uses within the project site could increase the intensity of use at the site (e.g., increase in employees, vehicle trips), such an increase in intensity would not result
in significant impacts. All potential impacts that could result from of the proposed project are considered to be less than significant. Therefore, the proposed project’s potential impacts would be individually limited and not cumulatively considerable. No impact would occur.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (No Impact)

As described above, the proposed GPA and Rezoning would allow retail, office, and automotive uses at the project site. Although this change in the allowed uses within the project site could increase the intensity of use at the site, such an increase in intensity would not result in any environmental effects that would cause substantial direct or indirect adverse effects to human beings. No impact would occur.
4.0 LIST OF PREPARERS

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5.0 REFERENCES


