



Valley Christian Center
Supplemental Mitigated Negative Declaration / Initial Study

June 8, 2018

Planning Application Number: PLPA-2014-00052

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- 1 Biological Resources Assessment Report & Update (WRA, 2015 & 2018)
- 2 Noise Assessment (Illingworth & Rodkin, Inc., 2018)
- 3 Traffic & Parking Analysis (Omni-Means, Ltd., 2015)

List of Exhibits

- Exhibit 1: Regional Location
- Exhibit 2: Site Context
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Introduction

This Initial Study has been prepared in accordance with the provisions of the California Environmental Quality Act ("CEQA", Pub. Res. Code §§ 21000 et seq.) and the CEQA Guidelines (Cal. Code Regs. title 14, §§ 15000-15387). This Initial Study analyzes whether any further environmental review is required for the proposed expansion of Valley Christian Center ("VCC") under the standards of Public Resources Code section 21166 and CEQA Guidelines sections 15162 and 15163. Development of the project site has been previously analyzed in an Environmental Impact Report titled "Valley Christian Center Expansion Program (State Clearinghouse No. 200212070)." This EIR was certified by the City of Dublin on May 20, 2003 by City Council Resolution No. 92-03.

This Initial Study analyzes whether proposed changes to the development program for the VCC would result in any new or substantially more severe significant environmental impacts than those analyzed in the prior CEQA document or whether any of the other standards requiring further environmental review under CEQA are met.

This Initial Study assesses program changes and development level activities to implement that program through a Stage 1 and Stage 2 Development Plan Amendment, Site Development Review (SDR) and other related entitlements for the property.

Prior Environmental Impact Report

In 2003, the City of Dublin certified an Environmental Impact Report for the VCC property. The VCC includes a church and related activities as well as a pre-school through grade 12 private school. The EIR analyzed the following improvements on the site, which would be phased over a number of years.

- Expansion of the previously approved building area on the site to include up to a 90,000 square foot sanctuary building (with a seating capacity of 2,000), a pre-school, a fellowship hall and administration building (which could extend to 3 stories) a 1,000 square foot expansion to an existing pre-school, construction of a 45,000 square foot junior and senior high school administration building (3 stories), construction of a 15,000 square foot sports building, construction of a 30,000 square foot senior activity center

- (2 stories) and construction of a 6,000 square foot chapel building (2 stories).
- Construction of up to 22 multi-family dwellings on the northwest corner of Dublin Boulevard and Inspiration Drive. This component was withdrawn from the project by the Applicant and was not approved by the City.
 - Construction of paved parking areas along the west side of Inspiration Drive near existing parking areas.
 - Installation of an LED-readout changeable message board sign on the south side of the administration building and mounted on the building. The sign was approved at a dimension of 12 feet wide and 30 inches tall.

The 2003 EIR addressed the following environmental topics:

- Aesthetics and Light and Glare
- Air Quality
- Biological resources
- Cultural Resources
- Geology and Soils
- Hydrology and Water Quality
- Land Use
- Noise
- Population, Housing and Employment
- Transportation and Circulation
- Utilities and Public Services
- Parks and Recreation

The 2003 EIR analyzed the potential effects of developing the site with residential uses and an alternative configuration of the VCC facility. The EIR found that the proposed residential development alternative would not meet the objectives of the project and was rejected as infeasible. The alternative that would relocate certain uses to the central and northern portions of the site was found to be the Environmentally Superior Alternative compared to the proposed project.

The EIR identified a number of potentially significant impacts, but also recommended mitigation measures to reduce all impacts to a less-than-significant level. These are identified in the following Initial Study. No significant and unavoidable impacts were found.

Applicant/Contact Person

Valley Christian Center
Attn: James Goring, Goring & Straja, project architect
7500 Inspiration Drive

Dublin, CA 94568
Phone: (510) 848-0895

Project Description

Project location and context. The project site consists of approximately 51 acres of land located in the western portion of Dublin. **Exhibit 1** shows the regional location of Dublin in the Bay area and **Exhibit 2** shows the project site location in the context of the local roadways, freeways and other features.

The site is generally rectangularly shaped and is located on the north side of Dublin Boulevard. Inspiration Drive provides access into the project site and extends through the site in a north-south direction. The site address is 7500 Inspiration Drive.

Dublin Boulevard is the southern boundary of the site with the I-580 freeway located south of Dublin Boulevard. A combination of residential uses (located on Glengarry Lane, McPeak Lane and Brigadoon Lane) and open space exists west of the site. Single-family homes on Inspiration Circle and open spaces are located north of the site and single-family homes are located east of the site along Las Palmas Way and Bay Laurel Street.

Project background and prior planning approvals. The Valley Christian Center was approved under a Conditional Use Permit issued by Alameda County in 1978, prior to the incorporation of Dublin in 1982. Following incorporation, the City granted approval for an elementary school in 1994, and expansion of a playfield in 1995. In 1998, the City approved a Site Design Review (SDR) application for placement of two temporary classrooms. As described above, the City approved a Master Plan for the site in 2003.

Existing On-Site Development. Following approval of the Master Plan by the City in 2003, a number of buildings and other improvements have been constructed on the site. Table 1, below, summarizes exiting land uses on the site as well as proposed uses.

VCC currently operates church facilities on the site on Sundays and some weekday evenings. Peak attendance for Sunday services is approximately 520 visitors with 40 employees also on the site.

The private school on the site provides for pre-school through grade 12 educational services with an estimated enrollment of 790 students and a faculty and staff of 129.

Project Characteristics

Overview. The application includes a request to the City of Dublin for amendments to the Valley Christian Center Master Plan that would include a lighted athletic field for football, soccer, track and other sports; construction of new buildings on the campus; expansion of existing buildings; and changes to on-site parking and landscaping. These are described below.

Proposed Master Plan Changes. The Applicant is requesting the following changes to the Master Plan that would allow additional development on the VCC site. Table 1 summarizes existing land uses shown in square footage, the amount of development allowed under the approved Master Plan and the amount of development that would be allowed if the amended Master Plan is approved. As shown in the table, a number of approved uses would be rearranged on the site to allow the facility to meet current and future needs. There would be up to a 1,300 square foot addition in the total amount of development square footage from what is currently permitted.

The ultimate size of the church sanctuary would be reduced by 42,600 square feet. School, fellowship, and administrative floor space would increase by up to 23,600 square feet. Space devoted to daycare use would expand by 11,300 square feet, and middle school and high school space would increase by 9,000 square feet. No increase in the student population is anticipated.

Table 1. Existing and Proposed Land Uses

Building (see Ex. 4)	Land Use	Existing Sq. Ft.	Proposed Additional Sq. Ft.	Proposed Total Sq. Ft.	Approved Sq. Ft. (2003)	Difference (Sq. Ft.)
A	Sanctuary	15,700	31,700	47,400	90,000	-42,600
A1	Pre-School/Day Care/Fellowship/ Admin.	14,400	16,200	30,600	14,400	+16,200
A2	Fellowship/Sanctuary/ Admin.	0	7,400	7,400	0	+7,400
D, 2	Pre-School/Daycare	10,000	12,300	22,300	11,000	+11,300
3	Jr. /Sr. High School	10,725	0	10,725	8,800	+1,925
4	Jr./Sr. High School	32,600	0	32,600	32,600	0
5	Elementary School	52,500	0	52,500	52,500	0
B	Jr. & Sr. High School/Admin./Sports	0	52,075	52,075	45,000	+7,075
C	Sports/School	0	15,000	15,000	15,000	0
E	Senior Center/Counseling/ Club/Activity Center	0	30,000	30,000	30,000	0
F	Church/School Assembly	0	6,000	6,000	6,000	0
Total		135,925	170,675	306,600	305,300	+1,300

Source: Project Applicant, 2018

The Applicant is also proposing to add one caretaker dwelling unit on the site in the future. A Site Development Review Permit will be required prior to the caretaker unit being constructed.

The site has been divided into four parcels as depicted on **Exhibit 3**. Parcel 1 (APN 941-0022-0040) is the largest parcel consisting of 33.3 acres of land located in the approximate center of the site. This parcel contains all school improvements, including buildings, athletic fields and parking. Parcel 1-A (APN 941-0022-003) is located on the northwest corner of the site and contains 3.7 acres of land that would be devoted to open space but would be converted to a baseball field as part of Phase 3.

Parcel 2 (APN 941-0022-005) is located on the northwest corner of Inspiration Drive and Dublin Boulevard and contains 1.4 acres of land. Parcel 3 (APN 941-0022-006) contains 12.7 acres of land located east of Inspiration Drive. This parcel includes 8.02 acres of land that has been dedicated as a conservation easement that precludes development. Parcels 2 and 3 are undeveloped and no development is proposed as a part of the project.

Features of the proposed changes to the Master Plan include:

- *Football/Athletic Field.* A major portion of the project would include converting an existing softball field and parking lot on the northeast portion of the campus to a football athletic field. The field would be constructed in an oval configuration as shown on **Exhibit 4**. The field would accommodate soccer, track and field and other similar outdoor activities. Improvements would include grading the site to construct a flat playing field with raised edges to accommodate seating. Metal bleacher seating for up to 1,100 people would be located on the southwest side of the field, nearest to the main campus. The main field would be synthetic material with a gravel running track on the outside of the playing field.

It is anticipated that the field would be used during the academic year for a variety of sports activities, with the main use being football. The football season runs from approximately mid-August until mid-November. Up to six home games would be played; however, if the school qualifies for playoffs, an additional three games could for a total of nine games. Football practice would occur on Monday through Thursday from 3:00 pm to 5:30 pm with games scheduled for Friday evenings from 4:00 pm to 9:00 pm. Some Saturday evening games could be played between those hours as well. Attendance at football games is expected to average 400 visitors for most games. The attendance could increase to 600 visitors for homecoming and playoff games. The VCC junior varsity team would play at 4:00 pm.

Other sports including men's varsity soccer and middle school soccer would be played throughout the year. These sporting events would most likely not result in major attendance. Men's and women's soccer practice would occur three days per week from 3:00 pm to 5:00 pm. Additionally, there would be one to two home games per week from 3:30 pm to 5:30 pm with occasional Saturday afternoon games. The varsity soccer team would play five home games per season with the possibility of additional playoff games. There would also be middle school soccer matches. Maximum attendance at these non-football events is anticipated to include up to 40 visitors and 40 players and coaches. Junior varsity men's soccer games would occur between 3:30 and 5:30 pm.

Invitation track meets would occur on Saturdays. These events could involve visitation by multiple schools. Track practice would occur Monday through Friday from 3:00 pm to 5:00 pm. One track meet per month is anticipated, which would occur on a weekday from 2:00 pm to 6:00 pm. Attendance is expected to include 40-60 athletes and 40-60 visitors. There would also be a maximum of two all-day track events per year that would include up to 100-200 athletes and 200 visitors. These invitational track meets would occur on Saturdays.

VCC proposes using sound amplification during football games, track meets and other sporting events held on the proposed field. This would include the use of exterior speakers that would generally be directed onto the field. Use of amplified sound would cease no later than 10:00 pm. Exterior lights would be installed as part of the proposed athletic field to allow for nighttime activities. It is anticipated that lights would be used during football games, soccer matches and track and field events, generally on Friday and Saturday evenings. A condition of approval will be applied to the project requiring that the lights be turned off by 10:00 pm.

- *Softball/Athletic Field.* The existing athletic field in the northwest portion of the site would be expanded to accommodate the existing softball field that would be relocated from the football field site. A small outdoor play area would be constructed just north of the softball field. This facility would only accommodate future VCC events. No permanent bleacher seats are proposed.
- *Central plaza.* A plaza would be created in the approximate center of the campus, to be located north of Building 3 and east of Building 4. The intent of this feature is to serve as a central campus focal point and will include a mixture of hardscape and landscape features. A tall cross would be installed in the approximate center of the plaza.

- *On-site school enrollment.* School enrollment is not anticipated to increase above current enrollment levels. The estimated high school enrollment would be up to 750 students. Enrollment at the elementary and middle school is expected to be up to 400 students and the day care component would be capped at 156 students.
- *Parking.* An existing parking lot would be removed in the northeast portion of the site to accommodate the proposed multi-sports field. Other portions of the site would be converted to permanent parking. There are currently 510 parking spaces on the site. With implementation of the Master Plan, there would be 600 spaces on the site (540 permanent spaces on the site and 60 overflow spaces located east of Building B).

The supply of parking spaces would vary with each phase of development. An existing parking lot will be eliminated to allow construction of the stadium facility; however, the Applicant will be providing additional parking at a new parking area. A total of 511 parking spaces are provided for Phases 1 & 2, 530 parking spaces for Phase 3 and 600 parking spaces for Phase 4.

- *Landscaping.* The updated campus would include planting of trees, shrubs and groundcover around the periphery of the campus as well as adjacent to buildings and within parking lots. **Exhibit 5** depicts the preliminary landscape plan for the campus. A number of existing trees would be removed to accommodate proposed improvements, but replacement tree plantings would occur.
- *On-site dwelling.* One caretaker dwelling would be constructed on the site as part of later phases of development. The Stage 2 Development Plan is being amended as part of the current project to approve the use; however, a Site Development Review Permit will be required prior to construction of the unit.

Buildings. Buildings on the site are subject to Site Development Review (SDR) by the Dublin Planning Commission. SDR approval is required prior to issuance of a building permit. SDR approval is also required for landscaping, walls and fences, signs and similar improvements. The Applicant has requested SDR approval for the football/athletic field facility, central plaza, and site modifications including landscaping. **Exhibit 6** depicts building sections.

Access and Circulation. Access to and from the site would continue to be provided by Inspiration Drive. Inspiration Drive provides two vehicular access

points to and from the site via Dublin Boulevard to the south and Bay Laurel Drive to the north.

Water and Sewer Services: Utility services to support the proposed land use changes would continue to be supplied by the Dublin San Ramon Services District. This topic is described in the following Initial Study.

Water Quality Protection. Proposed improvements on the project site will continue to be subject to Best Management Practices to support water quality standards as enforced by the City of Dublin.

Project Grading. Portions of the project site, especially the proposed football field, would be graded to provide for a generally flat athletic field. Other portions of the site would also be graded to accommodate proposed improvements. Given the moderate to steep topography of the site, one or more retaining walls may be constructed. Preliminarily, it is anticipated that walls could extend to a height of 11 feet.

Phasing. Proposed improvements would be constructed over a number of years that would extend until the year 2030. **Exhibit 7** shows the proposed build-out of site improvements under the amended Master Plan.

Requested land use entitlements. The following land use entitlements have been requested to allow implementation of the proposed project:

- Planned Development Rezoning and Stage 1 & Stage 2 Development Plan amendment;
- Conditional Use Permit to establish the parking requirement for the football/athletic field;
- Minor Use Permit for Shared Parking; and
- Site Development Review approval (football/athletic field, central plaza, parking lot modifications and landscaping).

- 1. Project description:** The Applicant requests approval of an amendment to the approved Valley Christian Center Master Plan to allow for a lighted multi-purpose athletic field on the northeast portion of the existing campus, construction of a central plaza/quad area, construction of other new buildings on the campus and changes to on-site parking and landscaping.
- 2. Lead agency:** City of Dublin
100 Civic Plaza
Dublin, CA 94583
- 3. Contact person:** Martha Battaglia, Dublin Planning Department
(925) 833-6610
- 4. Project location:** North of Dublin Boulevard at Inspiration Drive
at 7500 Inspiration Drive
- 5. Project contact person:** James Goring, Goring & Straja Architects
(510) 848-0895
- 6. General Plan Land Use Designation:** Public/Semi Public
- 8. Zoning** PD-Planned Development
- 9. Other public agency necessary, potential and/or desired approvals:**
- Stage 1 and 2 Development Plan Amendment, Conditional Use Permit, Minor Use Permit and Site Development Review Permit (City of Dublin)
 - Grading Plans, Improvement Plans, and Building Permits (City of Dublin)
 - Sewer and water connections (DSRSD)
 - Encroachment permits (City of Dublin)
 - Notice of Intent (State Water Resources Control Board)

Environmental Factors Potentially Affected

The environmental factors checked below may be potentially affected by this project, involving at least one impact that is a "potentially significant impact" as indicated by the checklist on the following pages requiring preparation of a Supplemental Mitigated Negative Declaration.

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

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 the proposed project **could not** have a significant effect on the environment and a **Addendum** 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 the mitigation measures described on an attached sheet have been added to the project. A **Mitigated Negative Declaration** will be prepared.

X I find that although the proposed project **may** have a potentially significant effect, or a potentially significant effect unless mitigated, on the environment, but at least one or more effects: 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 the attached sheets. A **focused Supplemental Mitigated Negative Declaration** is required, but it must only analyze the effects that meet the CEQA standards for supplemental review as identified in attached checklist.

Signature: _____

Date: _____

Printed Name: Martha Battaglia, Associate Planner
For: City of Dublin Community Development Department

Evaluation of Environmental Impacts

- 1) A brief explanation is required for all answers. Certain "no impact" answers are supported by the information sources the lead agency cites in the parenthesis following each question. A "no impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone), or, in this case, there is no impact of the proposed project beyond that which was considered previously in the certified 2003 EIR (see explanation under Earlier Analysis section below). A "no impact" answer should be explained where it is based on project-specific factors as well as general factors (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "potentially significant impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" implies elsewhere the incorporation of mitigation measures has reduced an effect from "potentially significant effect" to a "less-than-significant impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level.
5. Earlier Analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a discussion should identify the following on attached sheets:
 - a. Earlier analysis used. Identify earlier analyses and state where they are available for review.
 - b. Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation measures. For effects that are "Less-than-Significant with Mitigation Incorporated," describe the mitigation measures, which

were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

- d. A “No New Impact” finding means that there would be no new or substantially more severe significant impacts to the impact area beyond what has been analyzed in 2003 EIR, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for the impact area.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question.
 - b. The mitigation measure identified, if any, to reduce the impact to less-than-significant.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Environmental Impacts (Note: Source of determination listed in parenthesis. See listing of sources used to determine each potential impact at the end of the checklist)

Note: A full discussion of each item is found following the checklist.

1. Aesthetics. *Would the project:*

- a) Have a substantial adverse effect on a scenic vista? (Source: 2, 6)
- b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? (Source: 2, 6)
- c) Substantially degrade the existing visual character or quality of the site and its surroundings? (Source: 6)
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Source: 2, 6)

2. Agricultural Resources. *Would the project:*

- a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use? (Source: 2)
- b) Conflict with existing zoning for agriculture use, or a Williamson Act contract? (Source: 2)
- c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to a non-agricultural use? (Source: 2)

3. Air Quality (Where available, the significance criteria established by the applicable air quality management district may be relied on to make the following determinations). *Would the project:*

- a) Conflict with or obstruct implementation of the applicable air quality plan? (Source: 1,4)
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Source: 2, 8)

Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
			X
			X
			X
	X		
			X
			X
			X
	X		

	Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors? (2, 8)				X
d) Expose sensitive receptors to substantial pollutant concentrations? (Source: 2, 8)				X
e) Create objectionable odors affecting a substantial number of people? (Source: 2, 6)				X
4. Biological Resources. <i>Would the project</i>				
a) Have a substantial adverse effect, either directly 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 the U.S. Fish and Wildlife Service?(Source: 2,3)		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service? (Source: 2,3)		X		
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means? (Source: Source: 2,3)		X		
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? (Source: 2, 3)				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as tree protection ordinances? (Source: 2, 3)				X
f) Conflict with the provision of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan? (Source: 2, 8)				X
5. Cultural Resources. <i>Would the project</i>				
a) Cause a substantial adverse impact in the significance of a historical resource as defined in Sec. 15064.5 or listed or eligible for listing on the CA Register of Historic Places? (2)				X
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to Sec. 15064.5 (Source: 2)				X
c) Directly or indirectly destroy a unique paleontological resource, site or unique geologic feature? (Source: 2)				X
6. Geology and Soils. <i>Would the project</i>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				X
i) Rupture of a known earthquake fault, as delineated on the most recent Earthquake Fault Zoning Map issued by the State Geologist or based on other substantial evidence of a known fault (Source: 2)				X
ii) Strong seismic ground shaking (2)				X
iii) Seismic-related ground failure, including liquefaction? (2)				X
iv) Landslides? (2)				X
b) Result in substantial soil erosion or the loss of topsoil? (Source: 2)				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
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 similar hazards (2)				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? (2)(Source: 2)				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (Source: 1, 2)				X
7. Greenhouse Gas Emissions. <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (9)				X
b) Conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.				X
8. Hazards and Hazardous Materials. <i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials (Source: 2)				X
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? (Source: 2)			X	
c) Emit hazardous emissions or handle hazardous materials or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Source: 2)			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Sec. 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Source: 2, 8)				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted within two miles of a public airport of public use airport, would the project result in a safety hazard for people residing or working in the project area? (Source: 1, 2)				X
f) For a project within the vicinity of private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with the adopted emergency response plan or emergency evacuation plan? (1.2)				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (Source: 2, 7)				X
9. Hydrology and Water Quality. <i>Would the project.</i>				
a) Violate any water quality standards or waste discharge requirements? (Source: 2)				X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted? (2)				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? (Source: , 72)				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
d) Substantially alter the existing drainage pattern of the site or areas, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Source: 2, 7)				X
e) 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? (Source: 2)				X
f) Otherwise substantially degrade water quality? (Source: 2)				X
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood delineation map? (Source: 2, 7)				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (Source: 2, 7)				X
i) Expose people or structures to a significant risk of loss, injury, and death involving flooding, including flooding as a result of the failure of a levee or dam? (2, 7)				X
j) Inundation by seiche, tsunami or mudflow? (2)				X
10. Land Use and Planning. Would the project:				
a) Physically divide an established community? (Source: 1, 2,)				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Source: 1, 2)				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan? (1, 2)				X

11. Mineral Resources. *Would the project*

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? (Source: 1, 2)

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? (Source:1, 2)

12. Noise. *Would the proposal result in:*

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (1, 2,4)

b) Exposure of persons or to generation of excessive groundborne vibration or groundborne noise levels? (Source:2, 3)

c) A substantial permanent increase in ambient noise levels in the project vicinity above existing levels without the project? (2,4)

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (2, 4)

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (2, 4)

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (Source: 2, 4)

13. Population and Housing. *Would the project*

Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
			X
			X
	X		
			X
	X		
			X
			X

Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
a) Induce substantial population growth in an area, either directly or indirectly (for example, through extension of roads or other infrastructure)? (Source: 1, 2)			X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (1, 2)			X
c) Displace substantial numbers of people, necessitating the construction of replacement of housing elsewhere? (Source: 6)			X
14. Public Services. <i>Would the proposal:</i>			
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 government 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? (Sources: 2,7)			
Fire protection			X
Police protection			X
Schools			X
Parks			X
Other public facilities			X
Solid Waste			X
15. Recreation:			
a) Would the project increase the use of existing neighborhood and regional parks or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (Source: 1, 2)			X
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? (Source: 1, 2)			X
16. Transportation and Traffic. <i>Would the project:</i>			

	Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e. result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads or congestion at intersections)? (2,5)				X
b) Exceed, either individually or cumulatively, a level of service standard established by the County Congestion Management Agency for designated roads or highways? (2,5)				X
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (2, 5)				X
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses, such as farm equipment? (5)		X		
e) Result in inadequate emergency access? (5)				X
f) Result in inadequate parking capacity? (5)		X		
g) Conflict with adopted policies, plans or programs supporting alternative transportation (such as bus turnouts and bicycle facilities) (1,2)				X
17. Tribal Cultural Resources. <i>Would the project:</i>				
a) Be listed or eligible for listing on the California Register of Historic Resources or be listed in a local register of historic resources, as defined in Pub. Resources Code sec. 5020.1 (k)? (2, 7)				X
b) Be a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria in subdivision (c) of Pub. Resources Code sec. 5024.1, including potential significance to any resources associated with a California Native American Tribe? (2, 7)				X
18. Utilities and Service Systems. <i>Would the project:</i>				

	Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (2, 7)				
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (2, 7)				X
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (4, 7)				X
d) Have sufficient water supplies available to serve the project from existing water entitlements and resources, or are new or expanded entitlements needed? (2, 7)				X
e) 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 providers existing commitments? (2, 7)				X
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (2)				X
g) Comply with federal, state and local statutes and regulations related to solid waste? (2)				X
18. Mandatory Findings of Significance				
a) Does the project have the potential to 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 of 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?				X

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).

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact	Less Than Significant With Mitigation	Less than Significant Impact	No New Impact
			X
			X

Sources used to determine potential environmental impacts

1. Dublin General Plan Amendment
2. VCC Final EIR, City of Dublin 2003
3. Biological Reconnaissance, WRA, July 2015, Updated March, 2018
4. Acoustic Analysis, Illingworth & Rodkin, June 2018
5. Parking & Traffic Analysis, Omni-Means, November 2015
6. Site Visit
7. Information from Service Provider
8. Other Source

XVII. Earlier Analyses and Incorporation By Reference

a) **Earlier analyses used.** Identify earlier analyses and state where they are available for review.

The following Environmental Impact Report has been used in the preparation of the Initial Study. All are available for review at the City of Dublin Community Development Department, 100 Civic Plaza, Dublin CA, during normal business hours. Each of the following documents are incorporated by reference into this Initial Study.

Valley Christian Center Expansion Program EIR (State Clearinghouse No. 200212070). March 2003.

This Initial Study analyzes whether any further environmental review than that performed in this prior certified EIR are required for the proposed project under the standards of Public Resources Code section 21166 and CEQA Guidelines section 15162 and 15163. This Initial Study analyzes whether the proposed changes to the VCC Master Plan Project will result in any new or substantially more severe significant environmental impacts than those analyzed in the prior EIR or whether any other of the standards requiring further environmental review under CEQA are met.

If the Initial Study determines that there are no new or substantially more severe environmental impacts than those analyzed in the prior EIR and no CEQA standard for subsequent or supplemental review is met, then the impact is identified as “No New Impact.”

Discussion of Checklist

1. Aesthetics

Environmental Setting

The project is located on a prominent knoll north of the Interstate 580 (I-580) freeway and Dublin Boulevard in the western portion of Dublin. The site has steeply sloping hillsides rising to an elevation of approximately 830 feet above sea level at the highest elevation on the site.

Major features of the site include a number of buildings at the top of the knoll devoted to existing VCC operations. Buildings are largely screened by mature vegetation which has been planted on the campus. Inspiration Drive, the major access road to the site from Dublin Boulevard, is also noticeable from passers-by on the I-580 freeway and Dublin Boulevard. Views of the roadway are softened by mature trees planted adjacent to the road alignment. Lower portions of the site more visible from adjacent roadways are vacant and include native grasslands and low vegetation. Eastern facing side slopes are also vegetated with grasses.

The project site is not located adjacent to an officially designed state highway, although I-580 is considered by Caltrans to be eligible for listing as a state scenic highway (source: http://www.dot.ca.gov/hq/LandArch/scenic_highways).

Existing light sources include streetlights along Inspiration Drive, parking lot lighting, building exterior lights and pathway lights.

2003 EIR

The 2003 EIR identified the following potentially significant aesthetic impacts and mitigation measures:

- Impact 4.1-1 identified a significant impact with respect to views of the project site from the I-580 freeway and from Dublin Boulevard since building proposed in the complex would be out of scale with other existing development in the western portion of Dublin. Mitigation Measure 4.1-1 required that the proposed senior center and chapel buildings on the site be restricted to one story constructed and set back from the top of the slope on the site. Consideration should also be given to reducing the apparent height by use of low rooflines use of earth tone colors and non-reflective surfaces. This mitigation also required that the residential component of the project be setback from Dublin Boulevard, restricted to single story construction on the south side of the site and

using extensive landscaping near the entrance and using earth tone colors and non-reflective surfaces. These measures reduced this impact to a less-than-significant level.

- Impact 4.1-3 found that construction of the proposed project would increase the amount of light and potential glare due to parking and building lights. Lighting of the playfields would be an additional source of light and glare that could impact nearby residential areas. Mitigation Measure 4.1-2 required that exterior light fixtures be equipped with cut-off lenses, directed downward and limited in height to minimize excess light and glare. Future lighting of playfields is subject to a publicly noticed Planning Commission hearing. Adherence to these measures reduced this impact to a less-than-significant level.

The proposed project will be required to adhere to all applicable mitigation measures identified above and other land use regulations dealing with aesthetics, visual conditions and light and glare.

Project Impacts

- a) *Have a substantial adverse impact on a scenic vista?* No New Impact. Approval and implementation of the proposed project would increase the amount of future buildings on the site above existing land use approvals by an estimated 1,300 square feet. Existing open sports fields would also be expanded to accommodate a wider variety of sports and outdoor activities. Since the higher elevations of the site have previously been developed for Valley Christian Center, the addition of approximately 1,300 square feet would not represent a significant impact. The Applicant is also proposing to preserve approximately 8 acres of the eastern-facing slope as a permanent non-buildable open space conservation area. With adherence to previous applicable mitigation measures and applicable regulations, there would be no new or substantially more severe significant impacts to scenic vistas beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.
- b) *Substantially damage scenic resources, including visual resources within state scenic highway?* No New Impact. Future development under the amended Master Plan would largely occur within or adjacent to the existing development portion of the site at the top of the knoll. New development would not be significantly noticeable from the I-580 freeway or Dublin Boulevard due to the lower elevation of roadways as compared to the top of the knoll.

As noted in the Biological Resources section of this Initial Study, a small wetland area with associated riparian vegetation is located on the southwest corner of the site. Based on the proposed development plan, this existing scenic resource would not be developed or otherwise impacted by the proposed development.

With adherence to previous applicable mitigation measures and applicable regulations, there would be no new or substantially more severe significant impacts to scenic resources beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- c) *Substantially degrade existing visual character or the quality of the site?* No New Impact. The proposed project would include limited new building construction (approximately 1,300 square feet), athletic fields, a central plaza and related improvements in close proximity to the existing VCC campus and at the top of the knoll. The Applicant is proposing to preserve approximately 8 acres of the eastern-facing slope as a permanent non-buildable open space conservation area.

With the open space conservation easement to preclude additional development of buildings or improvements, there would be no new or more severe significant impact with respect to degradation of the visual character or quality of the site that was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- d) *Create light or glare?* Less-than-Significant with Mitigation. The issue of light and glare was analyzed in the 2003 EIR. The EIR contained Mitigation Measure 4.1-2 that requires that exterior light fixtures be equipped with cut-off lenses, directed downward and limited in height to minimize excess light and glare. Future lighting of playfields is subject to a publically noticed Planning Commission and City Council hearings.

The current project includes lighted playfields on the northeast portion of the main campus that would be used at night several times per year, which was not included in the 2003 approved Master Plan. There are residences just east of the project site that could be impacted by lighting at the currently proposed playfield. Therefore, the following mitigation measure would augment the existing Mitigation Measure 4.1-2 by requiring documentation that there will be no spillover of light and glare from the site onto adjacent residences:

Mitigation Measure AES-1. In addition to the requirements contained in 2003 EIR Mitigation Measure 4.1-2 to equip all exterior lighting with cut-off lenses, directed downward, limited in height and that lighting of playfields, the following shall also apply:

- a) Submittal of final playfield lighting plans to the City of Dublin Community Development Department prior to issuance of a building permit for the sports stadium to include detailed photometric drawings documenting that no spill over of light or glare would occur off the VCC project site. The photometric drawings shall be approved prior to the issuance of the building permit.

The previous requirement for Planning Commission approval of lighting plans is no longer applicable.

2. Agricultural & Forestry Resources

Environmental Setting

The project site has been largely developed with the Valley Christian Center for more than thirty years. The site is zoned “Planned Development” which is not an agricultural zoning district and no Williamson Act Land Conservation Agreement has been signed on the property. No crop production occurs on the site.

Other than introduced, ornamental trees, no significant trees or forestry resources exist on the site.

Previous EIR

The topic of agricultural and forestry resources was identified as a less-than-significant impact in the 2003 EIR.

Project Impacts

- a-c) *Convert prime farmland to a non-agricultural use or involve other changes which could result in conversion of farmland to a non-agricultural use?* No New Impact. As noted in the Environmental Setting Section, the site is not used for agricultural production, is not zoned for agriculture and is not subject to a agricultural conservation easement. There would be no new or substantially more severe significant impacts to agricultural resources beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- d,e) *Involve other changes in the existing environment that, due to their location or nature, could result in conversion of farmland to a non-agricultural use or conversion of forestland to a non-forest use?* No New Impact. No significant forest resources exist on the site. There would be no new or substantially more severe significant impacts with respect to forestry resources beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

3. Air Quality

Background. The project is located in the San Francisco Bay Area Air Basin. Ambient air quality standards have been established at both the state and federal level. The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM10) and fine particulate matter (PM2.5).

High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. Highest ozone levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone levels aggravate respiratory and cardiovascular diseases, reduce lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant in the Bay Area. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM10) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM2.5). Elevated concentrations of PM10 and PM2.5 are the result of both region-wide (or cumulative) emissions and localized emissions. High particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

The ambient air quality in a given area depends on the quantities of pollutants emitted within the area, transport of pollutants to and from surrounding areas, local and regional meteorological conditions, and the surrounding topography of the air basin. Air quality is described by the concentration of various pollutants in the atmosphere. Units of concentration are generally expressed in parts per million (ppm) or micrograms per cubic meter (µg/m³). The project is located within the Livermore Valley. The Livermore Valley forms a small sub regional

air basin distinct from the larger San Francisco Bay Area air basin. The Livermore Valley air basin is surrounded on all sides by high hills or mountains. Significant breaks in the hills surrounding the air basin are Niles Canyon and the San Ramon Valley, which extends northward into Contra Costa County.

The terrain of the Livermore-Amador Valley influences both the climate and air pollution potential of the sub-regional air basin. As an inland, protected valley, the area has generally lighter winds and a higher frequency of calm conditions compared to the greater Bay Area.

The occurrence of episodes of high atmospheric stability, known as inversion conditions, severely limits the ability of the atmosphere to disperse pollutants vertically. Inversions can be found during all seasons in the Bay Area, but are particularly prevalent in the summer months when they are present about 90% of the time in both morning and afternoon.

According to the Bay Area Air Quality Management District (BAAQMD), air pollution potential is high in the Livermore Valley, especially for ozone in the summer and fall. High temperatures increase the potential for ozone, and the valley not only traps locally generated pollutants but can be the receptor of ozone and ozone precursors from upwind portions of the greater Bay Area. Transport of pollutants also occurs between the Livermore Valley and the San Joaquin Valley to the east.

During the winter, the sheltering effect of terrain and its inland location results in frequent surface-based inversions. Under these conditions pollutants such as carbon monoxide from automobiles and particulate matter generated by fireplaces and agricultural burning can become concentrated.

National and state ambient air quality standards. As required by the Federal Clean Air Act, National Ambient Air Quality Standards (NAAQS) have been established for six major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter, including respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}), sulfur oxides, and lead. Pursuant to the California Clean Air Act, the State of California has established the California Ambient Air Quality Standards (CAAQS). Relevant current state and federal standards are summarized in Table 2. CAAQS are generally the same or more stringent than NAAQS.

Air Quality Monitoring Data. The significance of a pollutant concentration is determined by comparing the concentration to an appropriate ambient air quality standard. The standards represent the allowable pollutant concentrations designed to ensure that the public health and welfare are protected, while including a reasonable margin of safety to protect the more sensitive individuals

in the population. BAAQMD monitors air quality conditions at more than 20 locations throughout the Bay Area. The closest monitoring station to the project site is in Livermore at the 793 Rincon Avenue monitoring station. Summarized air pollutant data for this station is provided in Table 3. This table shows the highest air pollutant concentrations measured at the station over the three-year period from 2012 through 2014. Note that BAAQMD discontinued monitoring of carbon monoxide in 2009 at this station. The data shows that ozone levels exceeded state or federal standards from 2012 through 2014. The PM_{2.5} 24-hour standard was exceeded in 2013 and 2014.

Ambient Air Quality Status. Areas with air pollutant levels that exceed adopted air quality standards are designated as “nonattainment” areas for the relevant air pollutants. Nonattainment areas are sometimes further classified by degree (marginal, moderate, serious, severe, and extreme for ozone, and moderate and serious for carbon monoxide and PM₁₀) or status (“nonattainment-transitional”). Areas that comply with air quality standards are designated as “attainment” areas for the relevant air pollutants. “Unclassified” areas are those with insufficient air quality monitoring data to support a designation of attainment or nonattainment, but are generally presumed to meet the ambient air quality standard. State Implementation Plans must be prepared by states for areas designated as federal nonattainment areas to demonstrate how the area will come into attainment of the exceeded federal ambient air quality standard. The Bay Area is considered a marginal nonattainment area for ozone under the NAAQS and nonattainment for ozone under the CAAQS (both 1-hour and 8-hour standards). The Bay Area is also designated as nonattainment for the 24-hour PM_{2.5} NAAQS. The Bay Area is also considered nonattainment for the State annual PM_{2.5} standard and the 24-hour PM₁₀ standard. The region is designated attainment or unclassified for all other ambient air quality standards.

Sensitive Receptors. There are groups of people more affected by air pollution than others. The California Air Resources Board (CARB) has identified the following persons who are most likely to be affected by air pollution: children under 14, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. The Valley Christian Center site itself is the closest sensitive receptor since it currently contains a day care facility, elementary school and outdoor playgrounds.

Table 2. Relevant California and National Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards
Ozone	8-hour	0.070 ppm (137 µg/m ³)	0.075 ppm (147 µg/m ³)
	1-hour	0.09 ppm (180 µg/m ³)	–
Carbon monoxide	1-hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)
	8-hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)
Nitrogen dioxide	1-hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)
	Annual	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)
Sulfur Dioxide	1-hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)
	24-hour	0.04 ppm (105 µg/m ³)	0.14 ppm (365 µg/m ³)
	Annual	–	0.03 ppm (56 µg/m ³)
Particulate Matter (PM10)	Annual	20 µg/m ³	–
	24-hour	50 µg/m ³	150 µg/m ³
Particulate Matter (PM2.5)	Annual	12 µg/m ³	12 µg/m ³
	24-hour	–	35 µg/m ³

Source: BAAQMD and EPA, 2015.

Notes: ppm = parts per million mg/m³ = milligrams per cubic meter µg/m³ = micrograms per cubic meter

Toxic Air Contaminants. Toxic air contaminants (TAC) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer). TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Table 3. Highest Measured Air Pollutant Concentrations at Livermore Station

Pollutant	Average Time	Measured Air Pollutant Levels		
		2012	2013	2014
Ozone (O3)	1-Hour	0.102 ppm	0.096	0.093 ppm
	8-Hour	0.090 ppm	0.077	0.080 ppm
Carbon Monoxide (CO)	8-Hour	ND	ND	ND
Nitrogen Dioxide (NO2)	1-Hour	0.053 ppm	0.051	0.049 ppm
	Annual	0.010 ppm	0.011	0.010 ppm
Respirable Particulate Matter (PM10)	24-Hour	ND	ND	ND
	Annual	ND	ND	ND
Fine Particulate Matter (PM2.5)	24-Hour	31.1 ug/m3	40.1	42.9 ug/m3
	Annual	6.6 ug/m3	8.4	7.6 ug/m3

Source: CARB, 2015.

Notes: ppm = parts per million and ug/m3 = micrograms per cubic meter.
 Values reported in bold exceed ambient air quality standard.
 ND = No data.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average). According to CARB, diesel exhaust is a complex mixture of gases, vapors and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by CARB, and are listed as carcinogens either under the state's Proposition 65 or under the Federal Hazardous Air Pollutants programs.

CARB has adopted and implemented a number of regulations for stationary and mobile sources to reduce emissions of diesel particulate matter. Several of these regulatory programs affect medium and heavy duty diesel trucks that represent the bulk of diesel particulate matter emissions from California highways. These regulations include the solid waste collection vehicle rule, in-use public and utility fleets, and the heavy-duty diesel truck and bus regulations. In 2008, CARB approved a new regulation to reduce emissions of diesel particulate matter and nitrogen oxides from existing on-road heavy-duty diesel fueled vehicles. The regulation requires affected vehicles to meet specific performance requirements between 2012 and 2023, with all affected diesel vehicles required to have 2010 model-year engines or equivalent by 2023. These requirements are phased in over the compliance period and depend on the model year of the vehicle.

BAAQMD. The BAAQMD is the regional agency tasked with managing air quality in the region. At the state level, CARB (a part of the California Environmental Protection Agency) oversees regional air district activities and regulates air quality at the state level. The BAAQMD published CEQA Air Quality Guidelines are used in this assessment to evaluate air quality impacts of projects.

Previous EIR

The 2003 EIR identified the following potentially significant air quality impact and mitigation measure:

- Impact 4.2-1 identified a significant short-term construction impact that included increased dustfall and locally elevated emissions of PM10 for downwind properties. Adherence to Mitigation Measure 4.2-1 reduced this impact to a less-than-significant level by requiring watering of active construction sites, watering of covering of stockpiled material, covering of haul trucks, paving or stabilizing unpaved access roads, sweeping all paved access roads, sweeping nearby streets on a daily basis, hydroseeding inactive construction areas, limiting on-site truck speeds to 15 miles per hour, installing sandbags to limit silt runoff onto adjacent streets, and replanting vegetation on disturbed areas as soon as possible. These measures reduced this impact to a less-than-significant level.

The proposed project will be required to comply with the above mitigation measure as modified below in Mitigation Measure AIR-1.

Project Impacts

- a) *Would the project conflict with or obstruct implementation of an air quality plan?*
No New Impact. The proposed project would allow for a redistribution of uses on the site, many of which have been approved by the City for more than ten years. Limited expansion of school facilities would be allowed should the project be approved. The project also includes a new football and track stadium which was not been previously approved by the City.

The Association of Bay Area Governments (ABAG) Clean Air Plan is predicated on population projections for local agencies within the region based on ABAG's regional population projections. The population projections are based on a compilation of local agency general plan documents. Development allowed under the proposed project would be generally consistent with the type and amount of development allowed under the Dublin General Plan and the approved VCC Master Plan.

The Applicant is proposing the construction of one on-site dwelling unit. The proposed dwelling would be occupied by VCC staff (caretakers), which would have the effect of slightly reducing vehicle trips to and from the site.

With adherence to mitigation measures and other local and regional requirements, there would be no new or more severe significant impact with respect to a potential conflict with or obstruction of the regional Clean Air Plan than was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- b) *Would the project violate any air quality standards?* Less-than-Significant with Mitigation. The 2003 EIR found that construction of the VCC project could violate air quality standards, which could be a potentially significant impact. Adherence to Mitigation Measure 4.2-1 reduced this impact to a less-than-significant level by requiring project grading contractors to comply with then current BAAQMD's standards to minimize emission of dust and construction vehicle emission during grading operations. The BAAQMD has since adopted newer and more restrictive standards to reduce construction dust and construction vehicle emission and, as an additional mitigation measure; the Applicant shall adhere to the following to reduce this construction impact to a less-than-significant level.

Mitigation Measure AIR-1. The Applicant's grading contractor(s) shall adhere to the most current Bay Area Air Quality Management District's (BAAQMD) construction mitigation measures (Tables 8-1 and 8-2 or as may be updated at the time a grading permit is requested) as set forth in the May 2017 BAAQMD CEQA Guidelines, or as may be amended in the future and in effect at time of issuance of grading permit.

Operational and mobile air quality impacts were analyzed in the 2003 EIR. The 2003 EIR found that construction of the project would fall below the BAAQMD daily emission threshold of 80 pounds per day and that this was a less-than-significant impact (Impact 4.2-2). The current project would include an additional 1,300 square feet of floor space above the amount of development analyzed in the 2003 EIR and approved by the City. This amount of development falls below the screening thresholds for pollutant screening size adopted by the BAAQMD (see Table 3-1 of the 2017 BAAQMD CEQA Guidelines). Table 3.1 notes that high schools (the closest land use type shown on this table) with less than 311,000 square feet falls below the level of significance as adopted by the BAAQMD.

In addition to the above, and as documented in the Transportation and Traffic section of this Initial Study, implementation of the proposed project would generate 15 fewer vehicle trips in the am peak hour and 19 fewer trips in the pm peak hour period that was set forth in the 2003 EIR.

With adherence to other local and regional requirements, there would be no new or more severe significant impacts with respect to violation of any air quality standard from operations than was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for the impact from operations on this area.

- c) *Would the project result in cumulatively considerable air pollutants? Less-than-Significant with Mitigation for construction and No New Impact for operations. See item "b."*
- d,e) *Expose sensitive receptors to significant pollutant concentrations or create objectionable odors? No New Impact.* Existing users on the site include young children that are sensitive receptors, surrounded by single-family residential uses that would likely also contain sensitive air quality receptors. Proposed changes to the Master Plan as requested by the Applicant are generally minor in nature and would not generate significantly greater pollution concentrations that previously analyzed in the 2003 EIR. As documented in subsection "b" above, implementation of the proposed project would generate slightly fewer am and pm peak hour vehicle trips that was documented in the 2003 EIR.

None of the existing or proposed uses would generate objectionable odors. Proposed uses would consist of new educational facilities, athletic fields and parking lots. With adherence to previous applicable mitigation measures and applicable regulations, there would be no new or substantially more severe significant impacts to scenic resources due to odors beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

4. Biological Resources

Environmental Setting

A Biological Reconnaissance Analysis of the project site was completed in July 2015 by WRA. The WRA report is incorporated by reference into this Initial Study and is included as Attachment 1. The findings and conclusions of WRA's 2015 report were reviewed and reconfirmed by WRA in March, 2018.

Biological communities. Six biological communities have been identified on the site, as follows:

Developed Land. Developed land on the project site consists of all portions of the site not mapped as a natural community type, comprising approximately 35.68 acres. Developed land on the site includes school, church, and administrative buildings, sports facilities, parking areas, Inspiration Drive, and associated landscaping. Much of these developed areas contain planted exotic vegetation, including common landscape tree and shrub species such as Bradford pear (*Pyrus calleryana* 'Bradford'), Raywood ash (*Fraxinus angustifolia* 'Raywood'), Monterey pine (*Pinus radiata*), and oleander (*Nerium oleander*).

Non-Native Annual Grassland/Ruderal Vegetation. Non-native annual grassland comprises the majority of the site (32.33 acres of the site) and is composed of a mix of non-native annual grasses and other predominantly non-native herbaceous species. This community is similar to the non-native grassland community described by Holland (1986). Non-native annual grassland site is dominated by slender oats (*Avena barbata*), Italian rye grass (*Festuca perennis* [*Lolium multiflorum*]), mouse barley (*Hordeum murinum* ssp. *leporinum*), and longbeak stork's bill (*Erodium botrys*).

Non-native grassland mapped on the site also includes dense stands of ruderal herbaceous species, including black mustard (*Brassica nigra*), short podded mustard (*Hirschfeldia incana*), Italian thistle (*Carduus pycnocephalus*) and poison hemlock (*Conium maculatum*), all of which are listed as having "moderate" potential to cause negative ecological impacts by the Cal-IPC (2015). Native plant cover is less than 5% within the non-native annual grassland. Wildlife species observed in this community on the site were turkey vulture (*Cathartes aura*), common raven (*Corvus corax*), song sparrow (*Melospiza melodia*), and black-tailed deer (*Odocoileus hemionus*).

Coyote Brush Scrub. Coyote brush scrub is scattered in small, fragmented portions throughout the site, on both natural slopes and disturbed, previously graded areas. This community contains approximately 1.4 acres. The dominant plant in this community is coyote brush (*Baccharis pilularis* ssp. *consanguinea*) and the understory is dominated by the non-native grasses and forbs also observed non-native annual grassland/ruderal vegetation community. This community is similar to the Northern coyote brush scrub community described by Holland (1986) and the coyote brush scrub series described by Sawyer et al. (2009).

Riparian Woodland. The riparian woodland occupies a small area (approximately 0.57 acres of the site) near the southwest corner of the site. This community is considered a sensitive community in that it may contain protected species, similar to the central coast live oak riparian forest community described by Holland (1986). The riparian woodland consists of coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), arroyo willow (*Salix lasiolepis*), and red willow (*Salix laevigata*). The understory consists of a mixture of native and non-native herbaceous species including California bulrush (*Schoenoplectus californicus*), tall flatsedge (*Cyperus eragrostis*), and fiddle dock (*Rumex pulcher*). Riparian woodland is considered sensitive under the CEQA and is protected by the California Fish and Game Code (Section 1600 et seq.).

Coast Live Oak Woodland. Coast live oak woodland occupies a small (approximately 1.29 acre), fragmented area in the northeast corner of the site. This community is similar to the coast live oak woodland community described by Holland (1986) and is considered a sensitive biological community. Coast live oak woodland is dominated by coast live oak, but also consists of California bay (*Umbellularia californica*), valley oak, and California buckeye (*Aesculus californica*). The understory is dominated by non-native grasses and forbs also observed non-native annual grassland/ruderal vegetation community. A portion of the area mapped as coast live oak woodland in the west part of the site consists of planted oaks.

Ephemeral Stream. An ephemeral stream exists within the southwestern corner of the site. The ephemeral stream is located in a concave, north to south drainage to the south and downhill from the baseball field and is approximately 462 lineal feet. The ephemeral stream appears to be the result of a culvert system that drains the hillside to the north, and could also potentially be fed by a seep. Water was present in the ephemeral stream during the site visit; however, the presence of a seep could not be confirmed, as the water appeared to originate from under a dense patch of poison oak (*Toxicodendron diversilobum*), and Himalayan blackberry (*Rubus armeniacus*). The ephemeral stream was intermittent during the time of the site visit, flowing down the south-facing hill and into a rock-lined trapezoidal ditch, at which point the water appeared to become subsurface flow. The trapezoidal ditch parallels the property boundary and feeds into a culvert where it flows into Dublin Creek. This community is also considered to be significant.

Special-status species. The project site does not contain woodland or scrub habitats or rocky outcroppings to support this species, nor is it adjacent to these necessary physical and biological conditions. Additionally, the site does not serve as a

corridor to existing suitable habitat because it is surrounded on three sides by suburban development, an effective barrier to dispersal that isolates the site from access by this species.

In summary, no special-status wildlife species were observed during the May 20, 2015 site visit by WRA field biologists, and six special-status wildlife species have a moderate potential to occur on the project site.

Previous CEQA documents

The 2003 EIR identified the following significant biological impacts and contains the following mitigation measures.

- Impact 4.3-1 found that development of the proposed residential component of the project on the southwest corner of the site would impact an existing wetland area. Other wetlands may also be found on the site. Adherence to Mitigation Measure 4.3-1 reduced this impact to a less-than-significant level by requiring a protocol level wetland delineation on the site. Based on the delineation, the development plan may be modified to avoid wetlands. If avoidance is not possible, alternative replacement wetlands shall be identified and secured at a 2:1 ratio with issuance of necessary permits from regulatory agencies.

The current project does not include development on the southwest corner of the site. However, due to the potential of wetlands on-site, a new mitigation measure Mitigation Measure BIO-5 is included below.

Project Impacts

- a) *Have a substantial adverse impact on a candidate, sensitive, or special-status species?* Less-than-Significant with Mitigation. Most of the project site is comprised of developed land and non-native annual grassland/ruderal vegetation. Although non-native annual grassland and developed land are not sensitive biological communities under CEQA, they may provide habitat for special status plant and wildlife species. Such species will require mitigation if found on the site. The site contains 1.29 acres of coast live oak woodland, which is potentially sensitive under the Oak Woodland Conservation Act and 0.57 acre of riparian woodland, which is potentially within the jurisdiction of the California Department of Fish & Wildlife (CDFW) under Sections 1600-1616 of California Fish and Game Code. Construction of proposed project improvements could result in both direct and indirect impacts to sensitive on-site biological resources.

Construction of the proposed project could directly or indirectly impact on-site sensitive biological resources on the site, as follows:

Development of non-native grasslands. Future development of non-native grasslands could impact habitat for special-status birds and other mammals that forage or nest in this type of community. The following mitigation will reduce this impact to a less-than-significant level.

Mitigation Measure BIO-1. No more than 14 days prior to ground disturbance and vegetation removal during the nesting season (February 1-August 31), the project Applicant shall retain a qualified biologist to perform pre-construction breeding bird surveys. If nests are found, they shall be flagged and protected with a suitable buffer. Buffer distance would vary based on species and conditions at the project site, but would usually be at least 50 feet and up to 250 feet for raptors. This measure shall not apply to ground disturbance of vegetation removal outside of the nesting season (September 1 to January 31).

Removal of Coast Live Oak Woodland. Impacts to coast live oak woodlands as a result of construction could be significant and such impacts will be reduced to a less-than-significant impact by adherence to the following.

Mitigation Measure BIO-2. Any on-site coast live oak lost or impacted as a result of project construction shall be replaced on site or in the immediate vicinity at a 2:1 (replacement: impacted) ratio. A Replacement Plan shall be prepared by a qualified biologist identifying the location of replacement habitat, replanting plans and long-term monitoring to ensure the success of the replacement habitat area. Necessary permits shall be obtained from local, state and federal biological resource agencies prior to commencement of replantings.

Impacts to Special-Status plants. Of the 42 special-status plant species known to occur in the vicinity of the project site, one species, Congdon's tarplant, has a moderate potential to occur on the site. Most of the species found in the review of background literature occur in high quality vernal pool habitat, in different plant communities, often at higher elevations, or in high quality grassland habitat. Due to the history of disturbance, and predominance of non-native ruderal species, the grassland and woodlands on the site are likely of too low quality to support the majority of these other special-status plant species.

Congdon's tarplant is considered to have a moderate potential to occur on the project site. Two tarplant individuals (*Centromadia* sp.) were observed in the northeast portion on the site in a disturbed ruderal field used for

heavy equipment storage. This area is an “island” of non-native annual grassland/ruderal vegetation surrounded by developed land. The tarplant individuals observed in this area during the site visit were unidentifiable to species level due to the timing of the site visit and the absence of mature inflorescences.

Given the presence of *Centromadia* species in the region, it is unlikely, all though not impossible, that these individuals are not Congdon’s tarplant and instead common tarweed, (*Centromadia pungens* ssp. *pungens*), a non-listed species.

Due to the very low number of individuals present, and the presence of larger populations in the region, these two individuals do not represent a significant population and loss of these plants would not be considered significant. To ensure absence of a greater population on site, rare plant surveys for this species is recommended during the blooming season. The following measure is recommended to reduce this impact to a less-than-significant level.

Mitigation Measure BIO-3. The project Applicant shall retain a qualified botanist to conduct rare plant surveys within construction zones on the site for Congdon’s Tarplant or for other species within the project site during the appropriate time of year in accordance with agency protocols. Impacts to special-status plants shall be avoided to the fullest extent feasible and habitat that supports special-status plant species shall be preserved. Rare plant surveys shall be conducted at the proper time of year when rare or endangered species are both evident and identifiable. Field surveys shall be scheduled to coincide with known blooming periods and/or during periods of physiological development that are necessary to identify the plant species of concern. If no special-status plant species are found, the proposed project would not have a significant impact to species and no additional mitigation is needed.

If any of the species are found on-site and cannot be avoided, the following measures shall be required:

- a) Where surveys determine that special-status plant species are present within or adjacent to the proposed project site, direct and indirect impacts of the project on the species (e.g., Congdon’s tarplant and/or San Joaquin spearscale) shall be avoided where feasible through the establishment of activity exclusion zones, where no ground-disturbing activities shall

take place, including construction of new facilities, construction staging, or other temporary work areas. Activity exclusion zones for special-status plant species shall be established prior to construction activities around each occupied habitat site, the boundaries of which shall be clearly marked with standard orange plastic construction exclusion fencing or its equivalent. The establishment of activity exclusion zones shall not be required if no construction related disturbances would occur within 250 feet of the occupied habitat site. The size of activity exclusion zones may be reduced through consultation with a qualified biologist and with concurrence from California Department of Fish & Wildlife (CDFW) based on site-specific conditions.

- b) If exclusion zones and avoidance of impacts on a special-status plant species are not feasible, then the loss of individuals or occupied habitat of a special-status plant species shall be compensated for through the acquisition, protection, and subsequent management of other existing occurrences. Before the implementation of compensation measures, the project's Applicant shall provide detailed information to the CDFW and lead agency on the quality of preserved habitat, location of the preserved occurrences, provisions for protecting and managing the areas, the responsible parties involved, and the other pertinent information that demonstrates the feasibility of the compensation. A mitigation plan identifying appropriate mitigation ratios shall be developed in consultation with, and approved by, the CDFW and the City prior to the commencement of any activities that would impact any special status plants.

Impacts to California red-legged frog. There is no aquatic breeding for the California red-legged frog (CRLF) on the project site. However, CRLF may inhabit the wetland/riparian areas and uplands within the Study Area 200 feet of these wet areas. Construction of project improvements near or on riparian areas may be a significant impact on this protected species. The following measure shall be implemented for development near potential wetland areas of the site.

Mitigation Measure BIO-4. For any development near on-site riparian areas, the project Applicant shall conduct pre-construction surveys for CRLF species. The survey shall be completed no more than 30 days prior to work within 200 feet of potential

wetland/wet areas on the site. If no species are found, no mitigation shall be required.

If CRFL are found on the project site then the project Applicant shall provide information to support Section 7 consultation with the U.S. Fish & Wildlife Service (USFWS) and the project Applicant shall ensure no net loss of habitat that shall be achieved through avoidance, preservation, creation and/or purchase of credits. The final selected measures may be part of the Section 7 permitting process.

The project Applicant shall obtain a biological opinion from the USFWS and comply with the conditions and mitigation requirements under the opinion to ensure that no net loss of habitat occurs. Mitigation may include, but would not be limited to on-site and off-site preservation and creation of CRLF habitat, purchase of credits at mitigation banks, payment of in-lieu fees approved by the agencies, or other agency approved and required mitigation measures.

Avoidance measures may include the following or equivalent protective measures:

- a) To minimize disturbance of breeding and dispersing CRLF construction activity within CRLF upland habitat shall be conducted during the dry season between April 15 and October 15 or before the onset of the rainy season, whichever occurs first. If construction activities are necessary in CRLF upland habitat between October 15 and April 15, the project Applicant would contact the USFWS for approval to extend the work period.
- b) To minimize disturbance and mortality of adult and juvenile CRLF in aquatic habitat and underground burrows, the project Applicants should minimize the extent of ground-disturbing activities within these habitats by requiring the contractor to limit the work area to the minimum necessary for construction. In addition, the project Applicant should ensure that the contractor installs temporary exclusion fence between the construction work area and potential aquatic habitat for all construction within grasslands near aquatic habitat. A minimum buffer zone of 150 feet shall be maintained around CRLF aquatic habitat during construction. No staging, parking, material storage or ground disturbance shall be allowed in the buffer zone. The

buffer zone will be clearly defined with construction fencing prior to the initiation of construction activities and shall be maintained until completion of construction.

- c) The project Applicant should ensure that a qualified wildlife biologist monitors all construction activities within CRLF upland habitat to ensure no take of individual CRLF occurs during project construction. If a CRLF is found, then the monitor would immediately stop construction in that area and contact USFWS for development of a plan for how to proceed with construction.

b, c) *Have a substantial adverse impact on riparian habitat or federally protected wetlands?* Less-than-Significant with Mitigation. The project contains an ephemeral stream that could be within the jurisdiction of the Regional Water Quality Control Board (RWQCB) under the Porter Cologne Act and Section 401 of the Clean Water Act. The conversion of ephemeral streams to developed land is a potentially significant impact under CEQA that could require mitigation efforts. Therefore, before continuing development on portions of the project area, a formal jurisdictional wetlands delineation is recommended to determine whether the potential seasonal wetlands are jurisdictional wetlands. The creek may also be subject to jurisdiction by CDFW under Sections 1600-1616 of California Fish and Game Code

Mitigation Measure BIO-5. Prior to commencement of ground disturbing activities on Parcel 1 of the project site, the Applicant shall retain a qualified biologist to determine the potential presence of wetlands or other waters. If wetlands are found, the Applicant shall prepare a wetland mitigation plan acceptable to the Community Development Department that demonstrates compliance with the following:

- a) The project Applicant shall obtain all required resource agency permits and shall prepare and obtain approval of a wetland mitigation plan that ensures no net loss of wetland and water habitat.
- b) The wetland mitigation plan shall include measures for avoidance, minimization and compensation for wetland impacts. Avoidance and minimization measures may include the designation of buffers around wetland features to be avoided or project design measures. Compensation measures shall include the preservation and/or creation of wetlands or other waters. The final mitigation ratio (the amount of wetlands and other water created or preserved compared to the amount

impacted) shall be determined by the applicable resource agency(s). The wetland mitigation and monitoring plan shall include the following:

- Description of wetland types and their expected functions and values;
- Performance standards and monitoring protocol to ensure the success of the mitigation wetlands over a period of time to be determined by the resource agencies;
- Engineering plans showing the location, size and configuration of wetlands to be created or preserved;
- An implementation schedule showing the construction or preservation of mitigation areas shall commence prior to or concurrently with the initiation of construction; and
- A description of legal protection of the preserved wetlands (such as dedication of fee title, conservation easement and/or an endowment held by an approved conservation organization, government agency or mitigation bank).

- d) *Interfere with movement of native fish or wildlife species?* No New Impact. The project site is located in an urban area of western Dublin that consists of a patchwork of developed residential areas interspersed with undeveloped, open areas. The site is bordered to the north by residential development and open space, to the east by residential development, to the south by I-580 and to the west by residential development and open space. Since surrounding properties are largely developed, there is a very low probability that the site is used for wildlife or fish migration. No migratory corridors were observed on the site as part of the biological reconnaissance performed by WRA.

With adherence to other local and regional requirements, there would be no new or more severe significant impacts with respect to interference with fish or wildlife corridors than was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- e, f) *Conflict with local policies or ordinances protecting biological resources or any adopted Habitat Conservation Plans or Natural Community Conservation Plans?* No New Impact. The project site lies within the Eastern Alameda County Conservation Strategy (EACCS) planning area. The City of Dublin utilizes the Conservation Strategy as guidance for environmental permitting for public projects, and private development projects are encouraged to use the EACCS as a resource. The Conservation Strategy embodies a regional approach to permitting and mitigation for wildlife habitat impacts

associated with land development, infrastructure, and other activities. The Conservation Strategy is neither a Habitat Conservation Plan nor a Natural Community Conservation Plan, but is a document intended to provide guidance during the project planning and permitting process to ensure that impacts are offset in a biologically effective manner.

A number of trees are present on the site, some likely protected under the provisions of the Dublin Heritage Tree Ordinance. Future individual development projects will be reviewed as part of Site Development Review (SDR) applications to ensure compliance with the Heritage Tree Ordinance. There may be a requirement for planting of replacement trees to satisfy the requirements of the ordinance. Compliance with the regulatory requirements of the Dublin Heritage Tree Ordinance will ensure impacts are less than significant.

With adherence to other local and regional requirements, there would be no new or more severe significant impacts with respect to conflicts with local ordinances and policies as well as local Habitat Conservation Plans or Natural Community Conservation Plans than was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

5. Cultural Resources

Environmental Setting

The 2003 EIR did not identify significant impacts on historic, cultural, Native American or other cultural resources. This conclusion was based on a cultural records search conducted at the Northwest Information Center (NWIC) at Sonoma State University in 2002. The NWIC is affiliated with the California Office of Historic Preservation and is a repository for cultural reports in the Bay Area and coastal Northern California.

The project site has been largely disturbed for the construction of buildings, parking lots, on-site roads and other improvements. Much of the undeveloped portions of the site will remain as undisturbed open space as part of the proposed project, as noted in the Project Description.

On October 31, 2017, the Dublin Community Development Department sent a letter to Mr. Randy Yonemura of the Ione Band of Miwok Indian tribe informing the tribe of the City of Dublin's intent to prepare a Mitigated Negative Declaration for this project as required by AB 52. As of the public date of this Initial Study, no response has been received by the City. This letter is hereby

incorporated by reference into this document and is available for review at the Dublin Community Development Department during normal business hours.

Previous EIR.

Two cultural resource impacts and an associated mitigation measure were contained in the 2003 EIR.

- Impact 4.4-1 noted that on-site construction, including building foundations, utility lines and similar improvements could disturb archeological and/or Native American underground resources. Adherence to Mitigation Measure 4-1.1 reduced this impact to a less-than-significant level by requiring that work on the project shall cease until a resource protection plan prepared by a qualified archeologist consistent with CEQA Guideline Section 15064.5 (e) is prepared and implemented. If human remains are identified, the County Coroner was to be contacted.

The proposed project will be required to comply with the above cultural resource mitigation measure.

Project Impacts

- a) *Cause substantial adverse change to significant historic resources or be listed or eligible for listing in the California Register of Historical Resources?* No New Impact. All buildings on the site have been constructed since 1978 and would not qualify as historic resources. Generally, structures 50 years old and regional requirements and EIR Mitigation Measures, there would be no new or substantially more severe significant impacts to historic resources beyond what has been analyzed in the 2003 EIR. Therefore, no further environmental review is required for this impact area.
- b-d) *Cause a substantial adverse impact or destruction to archeological or paleontological resources, human remain or disturb any human remains, including those interred outside of a formal cemetery?* No New Impact. A remote possibility exists that underground historic, pre-historic or human resources could be uncovered as part of project implementation. Adherence to Mitigation Measure 4.4-1 included in the 2003 EIR will be required as part of the project approval to reduce this impact to a less-than-significant level.

With adherence to local requirements and EIR Mitigation Measures, there would be no new or more severe significant impacts with respect to impacts to archeological resources, paleontological or human remains outside of a formal cemetery than was analyzed in the 2003 EIR.

6. Geology and Soils

Environmental Setting

Soils, geologic and seismic conditions on the site and the immediate vicinity were analyzed in Chapter 4.5 of the 2003 EIR. The Geology section of the previous EIR noted that the project site is subject to moderate to severe ground shaking as a result of movement on regional faults including the Dublin Fault, believed to exist just east of the site; however, the project site is not located within an Earthquake Fault.

The 2003 EIR also noted that portions of the site exhibited characteristics of a large landslide. Landslide damage on the site were generally remediated by previous grading on the site for current site improvements. The EIR noted that previous landslide may not have been fully remediated.

Previous CEQA documents

The 2003 EIR contained two impacts and associated impacts dealing with geology and soils, as follows.

- Impact 4-5-1 identified the potential for moderate to strong ground shaking on the project site during a seismic event. This could damage buildings, roads and other improvements with a risk to residents, employees and visitors. This was reduced to a less-than significant level by adherence to Mitigation Measure 4-5.1 that required completion of a site-specific geotechnical investigation for each future building on the site. Report(s) must address potential for seismic ground shaking, expansive site soils and the potential for future landslides.
- Impact 4-5-2 found an impact with respect to the presence of expansive soils and landslides on the site that could damage foundations and other improvements. Adherence to Mitigation Measure 4.5-1 reduced this impact to a less-than-significant level.

The proposed project will be required to comply with the above mitigation measures.

Project Impacts

- a) *Expose people or structures to potential substantial adverse impacts, including loss, injury or death related to ground rupture, seismic ground shaking, ground failure, or landslides?* No New Impact. The previous 2003 EIR noted a significant impact (Impact 4-5-1) with respect to seismic ground shaking on the site that could result in damage to buildings and risk to residences, employees and visitors to the site. The same impact also referenced

potential damage to future site buildings and occupants from previous landslides that may have not been fully remediated.

Mitigation Measure 4.5-1 contained in the 2003 EIR reduced impacts related to seismic activity, landsliding, ground failure and similar soil hazards to a less-than-significant level. Provisions included in this Mitigation Measure will be applied to the current project to reduce soil and seismic hazards to a less-than-significant level.

With adherence to previous applicable mitigation measures and regulations, there would be no new or substantially more severe significant impacts to seismic hazards beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- b) *Is the site subject to substantial erosion and/or the loss of topsoil?* No New Impact. Construction of the proposed project would modify the existing ground surface and alter patterns of surface runoff and infiltration. These actions could result in a short-term increase in erosion and sedimentation off of the site into the local and regional drainage system. The Applicant will be required to prepare an erosion control plan, consistent with City of Dublin and Regional Water Quality Control Board standards to ensure that impacts related to substantial erosion and loss of topsoil would not be significant. A Stormwater Pollution Prevention Plan (SWPPP) will also be required to be submitted to the Public Works Department to assure that there would be no long-term significant impacts with respect to erosion of polluted material. With adherence to previous applicable mitigation measures and applicable regulations, there would be no new or substantially more severe significant impacts to loss of top soil or significant erosion beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.
- c,d) *Is the site located on soil that is unstable or expansive or result in potential lateral spreading, liquefaction, landslide or collapse?* No New Impact. The 2003 EIR noted that portions of the project site may be subject to liquefaction during seismic events. As noted in subsection "a," the site contains a historic landslide that may not have been fully repaired as a result of previous site grading. Adherence to Mitigation Measure 4.5-1 will reduce impacts related to expansive soil, liquefaction, landslides and other soil hazards will be reduced to a less-than-significant level. With adherence to previous applicable mitigation measures and applicable regulations, there would be no new or substantially more severe significant impacts to

lateral spreading, liquefaction, landslide or similar hazards beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- e) *Have soils incapable of supporting on-site septic tanks if sewers are not available?*
No New Impact. The proposed caretaker unit and other non-residential land uses that would be approved as part of this project would be connected to sanitary sewers provided by DSRSD, so there would be no impacts with regard to septic systems. There would therefore be no new or substantially more severe significant impacts with respect to this topic than has been previously analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

7. Greenhouse Gas Emissions

Environmental Setting

Since certification of the Valley Christian Center EIR in 2003, the issue of contribution of greenhouse gasses to climate change has become a more prominent issue of concern as evidenced by passage of AB 32 in 2006. On March 18, 2010, amendments to the State CEQA Guidelines took effect which set forth requirements for the analysis of greenhouse gasses. The topic of the project's contribution to greenhouse gas emissions and climate change was not analyzed in the 2003 EIR. Since the VCC EIR has been certified, the determination of whether greenhouse gasses and climate change needs to be analyzed for this proposed project is governed by the law on supplemental or subsequent EIRs (Public Resources Code section 21166 and CEQA Guidelines, Sections 15162 and 15163). Greenhouse gas and climate change is not required to be analyzed under those standards unless it constitutes "new information of substantial importance," which was not known and could not have been known at the time the previous EIR was certified as complete (CEQA Guidelines Sec. 15162 (a) (3).) Greenhouse gas and climate change impacts is not new information that was not known or could not have been known at the time the VCC EIR was certified. The issue of climate change and greenhouse gasses was widely known prior to the certification of the 2003 EIR. The United Nations Framework Convention on Climate Change was established in 1992. The regulation of greenhouse gas emissions to reduce climate change impacts was extensively debated and analyzed throughout the early 1990s. The studies and analyses of this issue resulted in the adoption of the Kyoto Protocol in 1997. In the early and mid-2000s, GHGs and climate change were extensively discussed and analyzed in California. In 2000, SB 1771 established the California Climate Action Registry for the recordation of greenhouse gas emissions to provide information about potential environmental impacts. Therefore, the impact of greenhouse gases on

climate change was known at the time of the certification of the VCC EIR in 2003. Under CEQA standards, it is not new information that requires analysis in a supplemental EIR or Negative Declaration. No supplemental environmental analysis of the project's impacts on this issue is required under CEQA.

Project Impacts

a,b *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?* No New Impacts. As discussed above, no additional environmental analysis is required under CEQA Section 21166.

8. Hazards and Hazardous Materials

Environmental Setting

The VCC site is currently developed with a church, private school and associated land uses pursuant to permits granted by Alameda County (prior to City of Dublin incorporation) and the City of Dublin. Approximately half of the site has been disturbed to allow for development, which has occurred.

The project site is located in western Dublin and is surrounded primarily by residential and open space areas. There are no industrial or similar uses near the site that could have the potential for use, transport or storage of hazardous materials.

The facility currently uses small quantities of lawn and landscape care materials as well as building maintenance substances such as paints, solvents and similar materials. Such materials are normally and customarily used by this type of land use.

The project site was not listed on the Cortese List of hazardous sites as of February 7, 2018.

No public or private airports or airstrips exist near the site.

Previous EIR

The topic of hazards and hazardous materials was not included in the scope of the previous EIR for this project.

Project Impacts

a) *Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?* No Impact. There would be no impact with regard to transport, use or disposal of hazardous materials,

since the proposed project involves expansion of church and school uses and activities. There would be continued limited use, storage and transport of hazardous materials associated with the facility as is typical of these types of facilities which will be conducted in compliance with all applicable regulatory requirements. There would therefore be no significant impact with respect to this topic.

- 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?* Less-than-Significant Impact. The project site has been largely developed with buildings, parking lots, on-site roads, pathways and similar improvements. The proposed project would result in 1,300 square feet of new building area and expanded athletic fields. Proposed improvements would generally be located in areas of the site that have been previously disturbed. The possibility of the release of contaminated soil and/or groundwater during future site grading would be low and less-than-significant.

The project site is not listed by the California Environmental Protection Agency (Cal EPA) as a contaminated site as of February 28, 2018, nor is the site located near a major polluting land use, such as industrial facility, dry cleaning establishment or a similar use.

The potential for release of hazardous materials from the use, storage or transport of hazardous materials would also be less-than-significant since only limited quantities of such materials are used, stored or transported on the site, which will be conducted in compliance with all applicable regulatory requirements.

- c) *Emit hazardous materials or handle hazardous materials or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?* Less-than-Significant Impact. Approval and implementation of the proposed project would have a less-than-significant impact with respect to this topic. The site itself contains a school. However, as noted in subsection "b" above, there would be limited new ground disturbance and limited use of on-site hazardous materials. The site is not listed as a contaminated site on the Cal EPA Cortese List. This impact would be less-than-significant.
- d) *Is the site listed as a hazardous materials site?* No Impact. The VCC project site is not listed on the State of California Department of Toxic Substances Control as an identified hazardous site as of February 28, 2018. There is therefore no impact with regard to this topic.

- e,f) *Is the site located within an airport land use plan of a public airport or private airstrip?* No Impact. The nearest airport to the site is Livermore Municipal Airport, located several miles southeast of the site. The VCC project site is not located in any airport safety or referral zones for a public or private airport or airstrip. There would be no impact with respect to this topic.
- g) *Interference with an emergency evacuation plan?* No Impact. The proposed project would include the expansion of an existing church and school complex on private land. No emergency evacuation plan would be affected since no roadways would be blocked. There would therefore be no impact with respect to this topic.
- h) *Expose people and structures to a significant risk of loss, injury or death involving wildland fires or where residences are intermixed with wildlands?* No Impact. The project site is located in western Dublin and is substantially surrounded by roadways, residential land uses and open space. The proposed expansion will be reviewed by the Alameda County Fire Department to ensure that required fire protection elements are incorporated into final building plans, including but not limited to provision of adequate water supply and pressure, installation of new fire hydrants that may be required, use of fire resistance building and landscape materials and other features. With adherence to the California Fire and Building Codes, there would be no impact with respect to this topic.

9. Hydrology and Water Quality

Environmental Setting

Local and regional drainage. The site is located on a relatively steep hill. The site is connected to the City of Dublin and Zone 7 regional drainage system. Stormwater from the project site is collected and transported off-site and ultimately flows south and west to San Francisco Bay.

The project area is located within the jurisdiction of Zone 7 of the Alameda County Flood Control and Water Conservation District (Zone 7). Zone 7 provides maintenance of regional drainage facilities within this portion of Alameda County.

Surface water quality

Water quality in California is regulated by the U.S. Environmental Protection Agency's National Pollution Discharge Elimination System (NPDES), which controls the discharge of pollutants to water bodies from point and non-point sources. In the San Francisco Bay area, this program is administered by the San

Francisco Bay Regional Water Quality Control Board (RWQCB). Federal regulations issued in November 1990 expanded the authority of the RWQCB to include permitting of stormwater discharges from municipal storm sewer systems, industrial processes, and construction sites that disturb areas larger than one acre of land area. The City of Dublin is a co-permittee of the Alameda Countywide Clean Water Program (CWP). The CWP provides guidance to cities with respect to establishing programs to implement RWQCB requirements. The City of Dublin participates in the CWP and adheres to the regionally established guidelines.

In 1994, the RWQCB issued a set of recommendations for New and Redevelopment Controls for Storm Water Programs. These recommendations include policies that define watershed protection goals, set forth minimum non-point source pollutant control requirements for site planning, construction and post-construction activities, and establish criteria for ongoing reporting of water quality construction activities. Watershed protection goals are based on policies identified in the San Francisco Bay Basin Water Quality Control Plan (Basin Plan), and the entire program relies on the implementation of Best Management Practices to limit pollutant contact with stormwater runoff at its source and to remove pollutants before they are discharged into receiving waters. The California Stormwater Quality Task Force has published a series of Best Management Practices handbooks for use in the design of source control; and treatment programs to achieve the water quality objectives identified by the Basin Plan for the beneficial uses of surface waters, groundwaters, wetland and marshes.

Pursuant to Section 402 of the Clean Water Act and the Porter-Cologne Water Quality Control Act, municipal stormwater discharges in the City of Dublin are regulated under the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination Systems NPDES Permit (MRP), Order No. R2-2015-0049, NPDES Permit No. CAS612008, adopted November 19, 2015. The MRP is overseen by the San Francisco RWQCB. Provision C.3 (New Development & Redevelopment) of the MRP addresses post-construction stormwater management requirements for new development and redevelopment projects that meet certain impervious surface area thresholds. Provision C.3 requires the incorporation of site design, source control, and low impact development stormwater treatment measures in development projects to minimize the discharge of pollutants in stormwater runoff and prevent non-stormwater discharges.

Surface water quality is affected by a number of pollutants generated from existing structures, parking areas and open space uses on the project area, including but not limited to petrochemicals (oil and grease), yard and landscape chemicals (herbicides, pesticides and fertilizers), and similar sources.

Flooding

The site lies approximately 540 feet above the valley floor and is not located within a 100-year flood hazard area. City of Dublin Public Works staff note no recent issues with drainage problems or flooding on or near the site (source: Michael O'Connor, Dublin Public Works Department, 3/6/18).

Previous EIR

The following impacts and mitigation measures were included in the 2003 EIR.

- Impact 4-6.1 noted an impact with respect to short-term increases in the amount of soil erosion from the site as natural vegetation is removed for project improvements with the potential for wind and water erosion. Adherence to Mitigation Measure 4-6-1 reduced this impact to a less-than-significant level by requiring the preparation of an erosion and sedimentation control plan consistent with City of Dublin and Regional Water Quality Control Board standards.
- Impact 4-6.2 identified an impact on surface water quality through the deposition of oil, grease and other chemicals from parking areas into nearby surface waters. This impact was reduced to a less-than-significant level by adherence to Mitigation Measure 4.6-2 that required the project developer to prepare a Stormwater Pollution Prevention Plan to ensure that Best Management Practices will be employed.
- Impact 4.6-3 stated that construction of the project could impact downstream drainage facilities by increasing overall and peak storm flows. This impact was reduced to a less-than-significant level by adherence to Mitigation Measure 4.6-3 which required that the Applicant prepare a hydrology study for the project that documents the amount of current stormwater from the site, estimated amounts of increased flow and the ability of downstream facilities to accommodate any increases. If needed, improvements to downstream drainage facilities are to be identified as well as the Applicant's financial responsibility to make needed improvements.

The proposed project will be required to adhere to the above mitigation measures.

Project Impacts

- a) *Violate any water quality standards or waste discharge requirements?* No New Impact. Adherence to mitigation measures set forth in the 2003 EIR and the Alameda County Clean Water Program as enforced by the City of Dublin will ensure that construction allowed by the proposed project would not

violate water quality standards or any waste discharge requirements. The project developer has installed on-site facilities to protect water quality including but not limited to use of bioretention areas, water quality basins and similar elements.

With adherence to applicable regulations and mitigation measures, there would be no new or substantially more severe significant impacts to water quality standards or waste discharge requirements than what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- b) *Substantially deplete groundwater recharge areas or lowering of water table?* No New Impact. The project site is substantially developed. The Applicant has committed to retaining an existing 8 acre vacant portion of the site located on the west side of Inspiration Drive in a conservation easement that would preclude future development. There would be no substantial depletion of existing groundwater recharge areas with adherence to previous Mitigation Measures, and other local and regional requirements. Therefore, there would be no new or more severe significant impacts with respect to depletion of groundwater recharge areas or lowering of the water table than was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.
- c) *Substantially alter drainage patterns, including streambed courses such that substantial siltation or erosion would occur?* No New Impact. New impervious surfaces would be added to the project site to accommodate new buildings, parking areas, athletic fields and related improvements. Proposed improvements would be constructed of impervious surfaces that could increase stormwater runoff from the site that could change existing drainage patterns. Adherence to Mitigation Measure 4.6-3 will reduce this impact to a less-than-significant level by requiring completion of a hydrology study to ensure that downstream drainage facilities can accommodate future runoff. The Mitigation Measure also requires the project developer to assist in funding any downstream improvements.

Mitigation Measure 4.6-2 requires the project developer to prepare a Stormwater Pollution Prevention Plan to reduce the amount of polluted runoff from the site.

With adherence to applicable EIR Mitigation Measures and other local and regional requirements, there would be no new or more severe significant impacts with respect to this topic than was analyzed in the 2003 EIR and no

other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- d) *Substantially alter drainage patterns or substantially increase surface water runoff that would result in flooding, either on or off the project site?* No New Impact. As noted in subsection “c,” Mitigation Measure 4.6-3 contained in the 2003 EIR requires the developer to prepare a hydrology study to ensure that drainage facilities can accommodate downstream runoff and requires the developer to assist in financing any needed improvements to ensure that no on-site or off-site flooding would occur. With adherence to previous applicable mitigation measures and applicable regulations, there would be no new or substantially more severe significant impacts beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.
- e) *Create stormwater runoff that would exceed the capacity of drainage systems or add substantial amounts of polluted runoff?* No New Impact. See subsections “c” and “d,” above. With adherence to EIR Mitigation Measures and other local and regional requirements, there would be no new or more severe significant impacts with respect to stormwater impacts and the local and regional drainage systems than was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.
- f) *Substantially degrade water quality?* No New Impact. Refer to item “a” above.
- g) *Place housing within a 100-year flood hazard area as mapped by a Flood Insurance Rate Map?* No New Impact. The project site lies outside of a 100-year flood hazard zone as mapped by FEMA. The only housing proposed on the site is a single caretaker unit. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the previous CEQA documents.
- h, i) *Place within a 100-year flood hazard boundary structures that impeded or redirect flood flow, including dam failures?* No New Impact. Refer to item “g,” above.
- j) *Result in inundation by seiche, tsunami or mudflows?* No New Impact. The project site is located well inland from San Francisco Bay or other major bodies of water to be impacted by a tsunami or seiche. The project site is located at the approximate summit of a local hill and would not be subject to mudflows from other adjacent properties. With adherence to applicable regulations, there would be no new or substantially more severe significant impacts to this topic beyond what has been analyzed in the 2003 EIR and no

other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

10. Land Use and Planning

Environmental Setting

The project site is occupied by the existing Valley Christian Center complex which includes a church, private school and similar accessory uses. Approximately one-half of the site is vacant.

Surrounding uses are generally attached and detached dwellings.

The City of Dublin General Plan designates this site as Public/Semi-Public. This land use designation allows for facilities and uses operated by a public agency or non-profit organization which can include but are not limited to schools, libraries, fire stations, post offices and similar uses. The site is zoned PD-Planned Development which permits a specific list of uses as contained in the PD-Planned Development Ordinance for this site.

Previous EIR

No significant land use impacts were identified in the 2003 EIR.

Project Impacts

- a) *Physically divide an established community?* No New Impact. The VCC site is self-contained, with direct vehicular access from Dublin Boulevard via Inspiration Drive. The existing use has been on the site since the late 1970's and none of the existing neighborhoods near the site would be physically divided should the project application be approved. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the previous CEQA document. Therefore, no further environmental review is required for this impact area.
- b) *Conflict with any applicable land use plan, policy or regulation?* No New Impact. Proposed land uses are fully consistent with the City of Dublin General Plan and Zoning Ordinance and no changes to these documents have been requested. The Applicant will be required to comply with all other land use policies and regulations as a condition of project approval. No impact would result. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in previous CEQA documents. Therefore, no further environmental review is required for this impact area.

- c) *Conflict with a habitat conservation plan or natural community conservation plan?* No New Impact. No such plan has been adopted within the General Plan. There would therefore be no impact to a habitat conservation plan or natural community conservation plan for the proposed project. There would be no new or substantially more severe significant impacts to applicable habitat conservation plan(s) beyond what has been analyzed in the VCC EIR, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

11. Mineral Resources

Environmental Setting

No significant quantities of mineral resources exist on the project site according to the Dublin General Plan or the previous EIR that affects the project site.

Project Impacts

- a, b) *Result in the loss of availability of regionally or locally significant mineral resources?* No New Impact. None of the City of Dublin land use regulatory documents or the 2003 EIR indicates that significant deposits of minerals exist on the project site, therefore no impacts would occur.

12. Noise

Environmental Setting

Noise background. Noise may be defined as unwanted sound. Noise is usually objectionable because it is disturbing or annoying. The objectionable nature of sound could be caused by its pitch or its loudness. Pitch is the height or depth of a tone or sound, depending on the relative rapidity (frequency) of the vibrations by which it is produced. Higher pitched signals sound louder to humans than sounds with a lower pitch. Loudness is intensity of sound waves combined with the reception characteristics of the ear. Intensity may be compared with the height of an ocean wave in that it is a measure of the amplitude of the sound wave.

In addition to the concepts of pitch and loudness, there are several noise measurement scales which are used to describe noise in a particular location. A *decibel (dB)* is a unit of measurement which indicates the relative amplitude of a sound. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Sound levels in decibels are

calculated on a logarithmic basis. An increase of 10 decibels represents a ten-fold increase in acoustic energy, while 20 decibels is 100 times more intense, 30 decibels is 1,000 times more intense, etc. There is a relationship between the subjective noisiness or loudness of a sound and its intensity. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness over a fairly wide range of intensities. Technical terms are defined in Table 1 of the full acoustic report (see Attachment 2).

There are several methods of characterizing sound. The most common in California is the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Representative outdoor and indoor noise levels in units of dBA are shown in Table 2. Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events. This energy-equivalent sound/noise descriptor is called L_{eq} . The most common averaging period is hourly, but L_{eq} can describe any series of noise events of arbitrary duration.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about plus or minus 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends upon the distance the receptor is from the noise source. When the receptor is close to the noise source, the models are accurate to within about plus or minus 1 to 2 dBA.

Since the sensitivity to noise increases during the evening and at night (because excessive noise interferes with the ability to sleep) 24-hour descriptors have been developed that incorporate artificial noise penalties added to quiet-time noise events. The Community Noise Equivalent Level (CNEL) is a measure of the cumulative noise exposure in a community, with a 5 dB penalty added to evening (7:00 pm - 10:00 pm) and a 10 dB addition to nocturnal (10:00 pm - 7:00 am) noise levels. The Day/Night Average Sound Level (L_{dn}) is essentially the same as CNEL, with the exception that the evening time period is dropped and all occurrences during this three-hour period are grouped into the daytime period.

Background on vibration. Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One method is the Peak Particle Velocity (PPV). The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. In this report, a PPV descriptor with units of mm/sec

or in/sec is used to evaluate construction generated vibration for building damage and human complaints. Table 3 displays the reactions of people and the effects on buildings that continuous vibration levels produce.

The annoyance levels shown in Table 3 should be interpreted with care since vibration may be found to be annoying at much lower levels than those shown, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage.

Construction activities can cause vibration that varies in intensity depending on several factors. The use of pile driving and vibratory compaction equipment typically generates the highest construction related groundborne vibration levels. Because of the impulsive nature of such activities, the use of the PPV descriptor has been routinely used to measure and assess groundborne vibration and almost exclusively to assess the potential of vibration to induce structural damage and the degree of annoyance for humans.

The two primary concerns with construction induced vibration is the potential to damage a structure and the potential to interfere with the enjoyment of life. These concerns are evaluated against different vibration limits. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 in/sec PPV. Human perception to vibration varies with the individual and is a function of physical setting and the type of vibration. Persons exposed to elevated ambient vibration levels, such as people in an urban environment, may tolerate a higher vibration level.

Structural damage can be classified as cosmetic only, such as minor cracking of building elements, or may threaten the integrity of the building. Safe vibration limits that can be applied to assess the potential for damaging a structure vary by researcher and there is no general consensus as to what amount of vibration may pose a threat for structural damage to the building. Construction induced vibration that can be detrimental to the building is very rare and has only been observed in instances where the structure is at a high state of disrepair and the construction activity occurs immediately adjacent to the structure.

Existing noise environment. The Valley Christian Center is located west of Inspiration Drive and north of Dublin Boulevard in the western part of the City of Dublin. Currently, there are five buildings on the project site with existing sports fields located to the west of the buildings that are used for football, soccer, and baseball. Parking lots are located to the east, to the north, and to the south of

existing buildings. To the north and to the east of the project site, opposite Inspiration Drive, are single-family residences. Multi-family housing developments are located approximately 510 feet southwest of the project site. Designated open space is located to the northwest of the project site. Open parcels of land are also located along the southern boundary of the project site.

A noise monitoring survey, consisting of two long-term and three short-term measurements, was performed at the site beginning on Wednesday May 6, 2015 and concluding on Monday May 11, 2015. Each measurement location is shown in the Acoustic Report (Attachment 2). The noise environment at the site and in the surrounding areas results primarily from vehicular traffic along I-580, as well as neighborhood traffic along Inspiration Drive and connecting roadways. Occasional aircraft associated with the Livermore Municipal Airport also contribute to the noise environment at the project site.

Long-term noise measurement LT-1 was made along the northern boundary of the project site, approximately 75 feet south of the centerline of Inspiration Drive. LT-1 represented the existing noise environment near the location of the proposed multi-purpose recreation field. Hourly average noise levels at this location typically ranged from 48 to 60 dBA L_{eq} during the day, and from 39 to 55 dBA L_{eq} at night. The average community noise equivalent level from Wednesday May 6, 2015 through Monday May 11, 2015 ranged from 57 to 58 dBA CNEL during the weekdays and was 55 dBA CNEL on weekend days.

LT-2 was positioned in the single-family residential development to the east of the project site. LT-2 was approximately 65 feet west of the intersection of Betlen Drive and Las Palmas Way and was approximately 210 feet east of the centerline of Inspiration Drive. This measurement represented the noise-sensitive receptors located to the east and to the north of the project site. Hourly average noise levels at this location typically ranged from 41 to 54 dBA L_{eq} during the day, and from 37 to 52 dBA L_{eq} at night. The average community noise equivalent level from Wednesday May 6, 2015 through Monday May 11, 2015 ranged from 52 to 54 dBA CNEL during the weekdays and ranged from 50 to 51 dBA CNEL on weekend days.

The short-term noise measurements were made on Monday May 11, 2015 in ten-minute intervals starting at 12:20 pm. ST-1 was measured in the multi-family residential development located to the southwest of the project site. This measurement was made approximately 20 feet east of the intersection of Brigadoon Way and Sornoway Lane. The ten-minute average noise level measured at ST-1 was 53 dBA $L_{eq(10)}$, and the estimated average community noise equivalent level was 55 dBA CNEL. ST-2 was made in the single-family development to the northwest of the project site, approximately 30 feet south of the centerline of Mountain Rise Place. The ten-minute average noise level at ST-2

was 50 dBA $L_{eq(10)}$, and the estimated average community noise equivalent level was 50 dBA CNEL. The final short-term measurement, ST-3, was made opposite Inspiration Drive from LT-1 and represented the single-family development located north of the project site. ST-3 was approximately 125 feet north of the centerline of Inspiration Drive, and the ten-minute average noise level measured at this location was 56 dBA $L_{eq(10)}$. The estimated average community noise equivalent level at ST-3 was 56 dBA CNEL. Table 4 summarizes the results for the short-term measurements.

Table 4. Summary of Long-Term and Short-Term Noise Measurements (dBA)

Noise Measurement Location (Date, Time)	L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	$L_{eq(10)}$	CNEL
LT-1: northern boundary of the site, ~75 feet south of the centerline of Inspiration Drive (5/6/2015, 16:20-5/11/2015, 13:10)	58-81 ^a	56-74 ^a	45-67 ^a	41-57 ^a	39-54 ^a	47-62 ^a	57-58 ^c 55 ^d
	40-72 ^b	39-66 ^b	38-62 ^b	37-54 ^b	35-52 ^b	37-57 ^b	
LT-2: ~65 feet from intersection of Betlen Drive and Las Palmas Way (5/6/2015, 16:40-5/11/2015, 13:20)	43-79 ^a	42-71 ^a	40-64 ^a	39-58 ^a	37-54 ^a	39-59 ^a	52-54 ^c 50-51 ^d
	37-69 ^b	37-66 ^b	37-57 ^b	35-54 ^b	33-52 ^b	36-54 ^b	
ST-1: ~20 feet east of the intersection of Brigadoon Way and Sornoway Lane (5/11/2015, 12:20-12:30)	69	64	53	50	48	53	55
ST-2: ~30 feet south of the centerline of Mountain Rise Place (5/11/2015, 12:40-12:50)	66	62	52	47	44	50	50
ST-3: ~125 feet north of the centerline of Inspiration Drive (5/11/2015, 13:00-13:10)	71	67	57	53	51	56	56

^a Range of noise levels measured during daytime hours (between 7:00 a.m. and 10:00 p.m.).

^b Range of noise levels measured during nighttime hours (between 10:00 p.m. and 7:00 a.m.).

^c CNEL measured on weekdays.

^d CNEL measured on weekends.

Source: Illingworth & Rodkin, 2016

Based on the measurements made in the vicinity of the project site, existing noise levels are below 60 dBA CNEL, which meets the City of Dublin’s noise exposure limits for residential land uses and schools.

Regulatory setting

The Noise Element of the Dublin General Plan identifies the following primary sources of noise in Dublin: traffic noise from freeways and major roadways within the community and noise generated by the BART line adjacent to the I-580 freeway.

The Noise Element identifies the following maximum noise exposure levels by land use type.

Table 5. City of Dublin Land Use/Noise Compatibility Standards (decibels)

Land Use	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential	60 or less	60-70	70-75	75+
Lodging Facilities	60-70	70-80	80+	--
Schools, churches, nursing homes	60-70	70-80	80+	--
Neighborhood parks	60 or less	60-65	65-70	70+
Office/Retail	70 or less	70-75	75-80	80+
Industrial	70 or less	70-75	75+	--

Source: Dublin General Plan Noise Element, Table 9-1

The City of Dublin also enforces an interior noise standard of 45 decibels for residential dwellings.

Previous EIR

The 2003 VCC EIR identified the following noise impacts and mitigation measures.

- Impact 4.8-1 found a short-term impact on surrounding residential projects due to construction noise. Mitigation Measure 4.8-1 limited project construction noise by requiring future construction activities to adhere to a number of specific features, including but not limited to specific hours of construction, keeping noisy equipment away from nearby residences, ensuring that construction equipment is in good working order and designating a site noise coordinator to respond to complaints. Adherence to this measure reduced construction noise to a less-than-significant level.
- Impact 4.8-2 noted a potentially significant impact with respect to noise impacts on residences that were previously proposed as part of project.

Mitigation Measure 4.8-2 reduced this impact to a less-than-significant level by requiring a site-specific acoustic study for all future Site Development Review applications and including any noise reduction recommendations into that portion of the project.

- Impact 4.8-3 found that the main campus would be subject to potentially significant noise from the I-580 freeway. This was reduced to a less-than-significant level by adherence to Mitigation Measure 4.8-3, which required the completion of an acoustic analysis for the chapel portion of the site and incorporation of report recommendations into the final design of the chapel.
- Impact 4.8-4 identified a potentially significant impact with respect to future noise levels on surrounding uses during evening hours if night lighting were to be installed. Mitigation Measure 4.8-4 reduced this impact to a less-than-significant level by requiring an acoustic analysis prior to the commencement of evening activities and incorporation of report recommendations during future evening activities.

The proposed project will be required to comply with applicable noise mitigation measures contained in the previous EIR.

Project Impacts

a,c) *Would the project expose persons or generation of noise levels in excess of standards established by the General Plan or other applicable standard and result in a substantial increases in permanent in ambient noise levels?* Less-than-Significant with Mitigation. The City of Dublin does not define a stationary equipment noise level standard. Therefore, for the purpose of this project, project-generated operational noise is compared to existing ambient conditions at the surrounding noise-sensitive receptors.

Under conditions of the proposed project, a new baseball field would be located in the northwestern corner of the campus and a new multipurpose recreational field would be located in the northeastern corner of campus adjacent to Inspiration Drive. The new baseball field would be relocated approximately 360 feet northwest from the location of the existing multipurpose sports field. The new multipurpose recreational field would host football, soccer, and track and field sports activities. Currently, football practices are played on the existing multipurpose baseball field, while track and field activities occur off site. As part of the proposed project, a sound amplification system and lighting standards would also be installed at the new multipurpose recreational field.

An outdoor amphitheater is proposed on the interior of the site, southwest of the new multipurpose recreation field. This amphitheater can be used during the school year for lectures during regular school hours and for Northern California Bible College lectures during evening hours. These lectures would not require amplification or lighting. Sunday services may elect to hold church services at the amphitheater, which would require amplification, and the amphitheater may also be used for outdoor theatrical plays during summer months.

Following is an analysis of potential noise impacts from major project elements.

Multipurpose sports field. The proposed plan for the new multipurpose recreational sports field includes hosting football games, as well as track and field events, that would include seating for spectators. From mid-August through mid-November, football practices would be held Monday through Thursday from 3:00 pm to 5:30 pm. Organized football games would include one scrimmage and up to six regular season games with the potential for an additional three playoff games. Football games would be held on Friday nights from 4:00 pm to 9:00 pm. The field is proposed to be lighted for night games until 10:00 pm and would require amplified sound until 10:00 pm. Football games would occasionally occur on Saturday nights from 4:00 pm to 9:00 pm. Lighting and amplified sound would be required for the Saturday night games as well. A Condition of Approval has been added to the project that allows the use of amplified sound and lighting on Friday and Saturday nights until 10:00 pm. The proposed stadium bleacher capacity is 1,100 seats. Two speakers for the public address (PA) system would be located at both ends of the bleachers on the southwestern side of the track.

Illingworth & Rodkin, Inc. (I&R) monitored noise levels during activities at the Santa Teresa High School football stadium in San Jose, CA. Noise measurements of a football game were made on October 20, 2012. The varsity football game between Santa Teresa High School and Oak Grove High School was considered to be the "rivalry" game of the football season. The attendance was estimated by the high school to be approximately 1,600 people. Measurements of 15-minute durations were made at several locations on the Santa Teresa High School campus and in the adjacent single-family neighborhoods at distances ranging from 425 to 740 feet from the center of the football field. These measurements were attended by a qualified noise technician who documented maximum noise levels resulting from the various sources of noise generated during a varsity football game on October 20, 2012, and during band practice on October 22, 2012. Football game activities were generally the primary noise

sources at measurement locations during the varsity game. During band practice, the band was audible and measurable in the absence of local traffic at all short-term measurement locations, but was typically at levels below other noise sources in the area.

Table 6 summarizes the measurement results at the nearest locations about 425 feet from the center of the field during noisy intervals at the varsity football game on Saturday, October 20, 2012, including the average noise level (L_{eq}) and background noise level (L_{90}) measured during each interval, and the maximum noise levels measured during various noise-generating activities.

Table 6. Summary of Short-Term Noise Measurements, Football Game at Santa Teresa High School, San Jose CA, 10/20/12

Location	Average Noise Level, dBA L_{eq}	Typical Maximum Instantaneous Noise Levels, dBA L_{max}		
		Cheering/ Crowd	PA System	Whistles
425 feet, as measured from the center of the field	60	57 to 73	53 to 59	56 to 63

Source: Illingworth & Rodkin, 2016

The nearest residences to the proposed field are residences on Bay Laurel Street located about 490 feet north of the center of the field, and residences on Las Palmas Way located about 580 feet east of the center of the field. These residences are located substantially below the elevation of the proposed field. The intervening grading associated with the school itself and Inspiration Drive provides acoustical barriers created by the tops of the slopes between the proposed field and the residences. The attenuation provided by distance and the intervening topography was calculated using standard methods. Projected noise levels are summarized in Table 7.

The existing average noise levels during the evening in the residential areas range from 48 to 50 dBA L_{eq} . Noise from the football games would increase the average level by up to 1 dBA L_{eq} at the nearest residences. The cheers would be intermittently audible because the levels would exceed the existing background level, but would fall within the overall range of existing ambient levels. Noise from football games would not cause a substantial increase in noise levels at the most affected residences. This is a less-than-significant impact.

For the proposed project, calculations were made to assign a performance standard to the PA system selected by the Applicant, since a specific system has not yet been chosen. It is assumed that both speakers would be

operating simultaneously and that the noise levels from each speaker would be the same. Two speakers would be located at the multipurpose field. The speaker nearest the Bay Laurel Street residences would be approximately 500 feet south of the nearest rear yard. The speaker nearest to the Las Palmas Way residences would be approximately 500 west of the nearest rear yard. To ensure that the PA system would not exceed 55 dBA L_{max} at the nearest residences, assuming attenuation provided by distance and the intervening topography, the amplification system should not exceed 75 dBA L_{max} at a distance of 50 feet. This limitation is required as a mitigation measure.

Table 7. Projected Noise Levels at Nearest Residences During Capacity Crowd Varsity Football Game at the Proposed Multipurpose Recreational Field

Location	Average Noise Level, dBA L_{eq}	Typical Maximum Instantaneous Noise Levels, dBA L_{max}		
		Cheering/Crowd	PA System	Whistles
Bay Laurel home, 490 feet from the center of the field	42	39 to 55	35 to 41	38 to 45
Las Palmas home, 580 feet from the center of the field	40	37 to 53	33 to 39	36 to 43

Source: Illingworth & Rodkin, 2016

From mid-November to mid-February, men’s soccer would utilize the proposed multipurpose field. Practices would typically occur three days per week from 3:00 pm to 5:00 pm. Junior varsity and varsity games would be played one to two nights per week from 3:30 pm to 7:30 pm. While nighttime lighting would be required for these activities, these events would have a lower attendance than football games. The noise sources are similar in character to the football game, but with lower average and maximum instantaneous levels. VCC has indicated that they do not plan to use the amplification system for soccer games, but if they choose to in the future, the impact would be less-than-significant as long as the amplification system does not exceed 75 dBA L_{max} at a distance of 50 feet, as stated above. This limitation is required as a mitigation measure. Varsity soccer games would occasionally occur on Saturdays from 1:30 pm to 3:30 pm. Varsity women’s soccer would occur during the spring between mid-February and mid-May. Practices would typically occur Monday through Friday (depending upon game schedule) from 3:00 pm to 5:00 pm. A total of 12 home games would occur between 4:00 pm to 6:00 pm. Occasionally, a Saturday game would occur from 1:30 pm to 3:30. All soccer events would have significantly lower attendance than football games. Average

hourly noise levels resulting from soccer games are anticipated to be about 60 dBA L_{eq} at a distance of 100 feet from the center of the field, with maximum noise levels from cheering and whistles as high as 67 dBA L_{max} . At the nearest residences along Bay Laurel Street and Las Palmas Way, average hourly noise levels due to soccer games would be below 30 dBA L_{eq} , with maximum instantaneous noise levels up to 36 dBA L_{max} . This would not exceed the existing ambient levels and would be a less-than-significant impact.

The field would also be used for track and field events during the springtime from mid-February to mid-May. Practices would occur on weekdays from 3:00 pm to 5:00 pm. One track meet per month is anticipated, which would occur on a weekday from 2:00 pm to 6:00 pm. Additionally, one invitational per month is anticipated on Saturday from 9:00 am to 6:00 pm. Track meets would require amplified sound, but not lighting. These events have much lower attendance than football games. The noise sources are similar in character to the football game, but with lower average and maximum instantaneous levels. It is assumed that a starter pistol would be used during track meets and track invitationals. Typical noise levels produced by a .22 caliber starter pistol would be approximately 79 dBA L_{max} at 50 feet. From the approximate positions on the multipurpose field where the starter pistol would be used, the distances to the nearest residences would be approximately 435 feet to the Bay Laurel Street residences and approximately 475 feet to the Las Palmas Way residences. At these distances and assuming attenuation from intervening topography, the maximum instantaneous noise levels expected from the starter pistol would range from 42 to 43 dBA L_{max} , which would not exceed range of existing ambient noise levels. This would be a less-than-significant impact. Noise from sports activities on the proposed multipurpose recreational sports field would cause a less-than-significant impact on residents in the area.

Graduation ceremonies, which are currently held off-campus, could occur at the new multipurpose field. These special occasions would occur on Saturdays in the early afternoon. Noise from graduations would include cheering from the crowd and amplified sound. Attendance is expected to be less than football games; therefore, average and maximum instantaneous noise levels would be lower than those discussed for football games. Graduation ceremonies are not expected to increase existing ambient noise levels. This would be a less-than-significant impact.

Relocated baseball field. The primary use for this field would be baseball. Baseball is currently played on the existing multi-purpose field. The new field would be relocated from the south side of Building 5 to the west side

of Building 5. The level of baseball activities on the field would be similar to existing, but football and soccer would be relocated to the new multipurpose recreational field. The nearest residences to the proposed location of the baseball field are located about 500 feet to the north on Inspiration Circle. An intervening hill would continue to buffer the residences. Noise levels from activities on the field would not change from the existing conditions. Neighbors to the southwest would be located further from the new field than from the existing field. Noise levels from the new field would be equal to or lower than from the existing field. The relocation of the baseball field would cause no additional noise impacts on residents in the area over existing conditions.

Amphitheater Activities. Three types of events are anticipated at the outdoor amphitheater: theatrical plays during the summertime; daytime lectures during the school year by the Valley Christian Center schools and evening lectures by the Northern California Bible College; and church sermons on Sundays. Amplified sound would be required for the sermons and potentially during the theatrical plays. Locations around the amphitheater for the amplification system speakers were not provided at the time of this study, but for worst-case scenario calculation purposes, it is expected that a speaker would be located on each side of the seating area and at the stage. Figure 5, contained in the full acoustic report, shows the assumed worst-case scenario locations used for this study. The nearest residence along Bay Laurel Street would be approximately 540 feet from the outdoor amphitheater, and the nearest residence along Las Palmas Way would be approximately 860 feet from the outdoor amphitheater. At these distances and assuming attenuation from intervening topography, maximum instantaneous noise levels would remain at or below 55 dBA L_{max} if the performance standard for the amplification system would not exceed 75 dBA L_{max} at a distance of 50 feet. This limitation is required as a mitigation measure. The following mitigation measure shall be followed to ensure consistency with City of Dublin exterior noise standards.

Mitigation Measure NOISE-1. The following noise performance standard for Public Address (PA) systems shall be met by the Applicant.

- a. To ensure that a PA system would not exceed 55 dBA L_{max} at the nearest residences, the amplification system at the new multipurpose field should not exceed 75 dBA L_{max} at a distance of 50 feet from each speaker.
- b. To ensure that the PA system would not exceed 55 dBA L_{max} at the nearest residences, the amplification system at the new

outdoor amphitheater should not exceed 75 dBA at a distance of 50 feet from each speaker.

- b) *Exposure of people to excessive groundborne vibration or groundborne noise levels?* No New Impact. The construction of the project may generate perceptible vibration when heavy equipment or impact tools (e.g. jackhammers, hoe rams) are used. Construction activities would include site demolition, preparation work, foundation work, and new building framing and finishing. The proposed project would not require pile driving, which can cause excessive vibration.

Ground-borne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in a significant vibration impact. Table 7 contained in the full acoustic report (Attachment 2) presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet. Construction activities, such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.) may generate substantial vibration in the immediate vicinity. Vibration levels would vary depending on soil conditions, construction methods, and equipment used. The single-family residences located to the east and to the north of the project site, opposite Inspiration Drive, are at least 160 feet from the project site. The multi-family residences located to the southwest are at least 385 feet from the project site. At these distances, vibration levels would be expected to be less than 0.1 in/sec PPV, which is below the 0.3 in/sec PPV significance threshold.

According to the project Applicant, normal construction methods would be used to build the proposed project so there would be limited and less-than-significant generation of groundborne noise or vibration. With adherence to applicable regulations, there would be no new or substantially more severe significant impacts to ground vibration beyond what has been analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- d) *Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project?* Less-than-Significant with Mitigation. Noise impacts resulting from construction depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime

hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time. Where noise from construction activities exceeds 60 dBA L_{eq} and exceeds the ambient noise environment by at least 5 dBA L_{eq} at noise-sensitive uses in the project vicinity, the impact would be considered significant.

Construction activities generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. Table 8 contained in the full acoustic report (see Attachment 2) presents the typical range of hourly average noise levels generated by different phases of construction measured at a distance of 50 feet. Hourly average noise levels generated by excavation equipment associated with the project are calculated to range from 71 to 89 dBA L_{eq} measured at a distance of 50 feet. Construction generated noise levels drop off at a rate of about 6 dBA per doubling of the distance between the source and receptor. Shielding by buildings or terrain can provide an additional 5 to 10 dBA noise reduction at distant receptors.

Construction for the proposed project would include excavation, possibly some minor building construction, and foundation work for the lighting standards and the sound amplification system. Noise generated by construction activities would temporarily elevate noise levels at adjacent noise sensitive receptors. Conservatively, this would be considered a more severe impact than was included in the 2003 EIR since the current project includes an increase of up to 1,300 square feet of floor space over the approved Master Plan and a football stadium.

The 2003 EIR contains Mitigation Measure 4.8-1 that mandates a number of features to reduce construction noise, including limitations on construction activities, placing noisy stationary equipment away from nearby residences, installation of mufflers and designation of a noise coordinator to respond to issues raised by neighbors. Mitigation Measure 4.8-1 has been augmented to include the following additional measures to ensure construction noise impacts are mitigated to less-than-significant.

Mitigation Measure NOISE-2. In addition to the measures required by 2003 EIR 4.9-1, the project Applicant shall prepare a construction noise management plan that identifies measures to be taken to minimize construction noise on surrounding sensitive receptors (e.g., residential uses and schools) and includes specific noise management measures to be included into project plans and specifications subject to review and approval by the City. These measures shall include, but not be limited to the following:

- a) All construction equipment shall be equipped with mufflers and sound control devices (e.g., intake silencers and noise shrouds) no less effective than those provided on the original equipment and no equipment shall have an un-muffled exhaust.
- b) The contractor shall maintain and tune-up all construction equipment to minimize noise emissions.
- c) Stationary equipment shall be placed so as to maintain the greatest possible distance to the sensitive receptors.
- d) All equipment servicing shall be performed so as to maintain the greatest possible distance to the sensitive receptors.
- e) The project Applicant(s) shall provide, to the satisfaction of the City of Dublin Planning Department, a qualified "Noise Disturbance Coordinator." The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the Dublin Planning Department. If any notices are sent to residential units immediately surrounding the construction site by the City and all signs posted at the construction site shall include the contact name and the telephone number for the Noise Disturbance Coordinator.
- f) Select demolition method to minimize vibration, where possible (e.g. sawing masonry into sections rather than demolishing it by pavement breakers).
- g) The construction contractor shall limit all on-site noise producing construction activities, including deliveries and warming up of equipment, to the daytime hours of 7:30 am to 5:00 pm, Monday through Friday (excluding holidays) unless otherwise approved by the City Engineer.

e, f) *For a project located within an airport land use plan, would the project expose people to excessive noise levels?* No New Impact. The project site is not located within the planning area of any nearby airport land use plan. The closest airport to the project site is Livermore Municipal Airport, located several miles southeast of the site. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the previous CEQA document.

13. Population and Housing

Environmental Setting

The project site is partially developed with the Valley Christian Church and school. Other portions of the site remain vacant.

Previous EIR

The 2003 EIR identified no specific population or housing impacts associated with the project.

Project Impacts

- a) *Induce substantial population growth in an area, either directly or indirectly?* No New Impact. The project site has been planned for a combination of a religious facility, private school and related uses since 1978. The current proposal could result in construction of an increase of up to 1,300 square feet of floor space over the approved Master Plan. The previous EIR also analyzed the development of up to 22 dwellings on the site; however, the approved Master Plan does not include a residential component. The only residential use proposed as part of this project is a caretaker unit, which will not induce population growth; therefore, the impact is less significant. Proposed uses would include a new multi-use sports stadium, a baseball field, vehicle parking and similar uses. There would be no new or more severe impact with respect than was previously analyzed in the previous CEQA document, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.
- b,c) *Would the project displace substantial numbers of existing housing units or people?* No New Impact. The project site does not include any dwelling units and no impact would result with regard to displacement of dwellings or population on the site. There would be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

14. Public Services

Environmental Setting

The following provide essential services to the project site:

- Fire Protection. Fire protection services are provided by the Alameda County Fire Department. Alameda County provides fire suppression, emergency medical response, fire prevention, education, building inspection services and hazardous material control. The nearest station is Station 16, located northwest of the project area at 74940 Donohue Drive near downtown Dublin.
- Police Protection: Police and security protection is provided by the Dublin Police Services.
- Schools. The Dublin Unified School District provides public K-12 educational services for properties in the Dublin area.
- Library Services: Alameda County Library service.
- Maintenance. Maintenance of streets, roads and other governmental facilities are the responsibility of the City of Dublin.

Previous CEQA document

There is no applicable mitigation measures contained in 2003 VCC EIR addressing potential impacts to public services, since the previously proposed residential units were not approved as part of the project.

Project Impacts

- a) *Fire protection?* No New Impact. Approval and implementation of the proposed project could increase the number of fire and emergency medical calls for service that would need to be responded to by the Alameda County Fire Department. The proposed project is required to adhere to the California Building Code, the California Fire Code and other state and local fire protection standards to minimize fire hazards. The existing complex currently includes water service for firefighting purposes, fire hydrants, fire extinguishers and similar fire protection features.

The proposed project represents a minor increase in development compared to the approved Master Plan; therefore, the project would not result in a substantial change from the analyses and conclusions in the prior CEQA documents. There would therefore be no new or substantially more severe significant impacts with respect to fire protection than has been previously analyzed in the 2003 EIR.

Based on discussions with Alameda County Fire Department Staff, there would be no new or substantially more severe significant impacts with respect to fire service beyond that analyzed in previous CEQA documents (source: Bonnie Terra, Alameda County Fire Department, 8/28/17).

- b) *Police protection?* No New Impact. Similar to fire protection, there could be a small increase in the number of calls for service to the Dublin Police Services; however, the amount of proposed additional square footage is relatively small.

There would therefore be no new or substantially more severe significant impacts with respect to police protection than has been previously analyzed in the 2003 EIR.

Based on discussions with Dublin Police Services Staff, there would be no new or substantially more severe impacts with respect to police service beyond that analyzed in the previous CEQA document (source: Chief Dennis Houghtelling, Dublin Police Services, 10/24/17).

- c) *Schools?* No New Impact. The only residential included as part of the project is one caretaker unit. Therefore, there would be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the 2003 EIR.
- d) *Other governmental service, including maintenance of public facilities?* No New Impact. Maintenance of public facilities would continue to be provided by the City of Dublin. New public facilities will be required to be designed to meet City of Dublin standards to ensure that no excessive wear or other impacts would occur with respect to public facilities. Therefore, there would be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the 2003 EIR.
- e) *Adequate wastewater capacity to serve the project and other projects?* No New Impact. See subsection 17 “a” and “b,” below.
- f, g) *Solid waste generation?* This impact was found to be less-than-significant in the 2003 EIR. The proposed project includes a small increase in the amount of allowable development on the site. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the 2003 EIR.

15. Recreation

Environmental Setting

No City parks or other recreational facilities are located on the project site. Similarly, no parks or other recreational facilities are designated on the site in the Dublin General Plan.

The City of Dublin offers a range of park, recreation and cultural services to the public. Nearby City parks include the Dublin Heritage Park and Museum, Dolan Park and Mape Memorial Park.

Regional park facilities are provided by the East Bay Regional Park District (EBRPD). The EBRPD maintains a large number of regional parks, trails and similar recreation facilities in Alameda and Contra Costa Counties.

Previous EIR

No significant impacts with respect to parks or recreation were identified in the 2003 EIR.

Project Impacts

- a) Would the project increase the use of existing neighborhood or regional parks? No New Impact. The proposed project would not increase the on-site permanent population, since the project would primarily involve recreational facilities. The one exception would be the future construction of one on-site caretaker unit. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the 2003 EIR.

- b) *Does the project include recreational facilities or require the construction of recreational facilities?* No New Impact. See item "a," above. As noted in the Project Description, the Applicant is proposing to construct a major athletic field and improve other existing facilities for students of the private school. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the 2003 EIR.

16. Transportation/Traffic

Environmental Setting

This section of the Initial Study is based on traffic analysis of the proposed project completed by the firm of Omni Means Planners and Engineers. The Omni Means report is hereby incorporated by reference into this Initial Study and is included as Attachment 3.

Existing roadways

Regional access to and from the site is provided by the I-680 freeway that provides north and south regional vehicular transportation and the I-580 freeway that provides east and west service.

Local roads serving the VCC project include Dublin Boulevard, Amador Valley Boulevard, San Ramon Road, Bay Laurel Street and Inspiration Drive.

Existing transit service

Transit service to the project area is provided by Livermore-Amador Valley Transit Authority (Wheels). Wheels that provides localized service to the site and surrounding communities. Regional access throughout the Bay Area is provided by the Bay Area Rapid Transit District (BART) with a station located in West Dublin.

Previous EIR

The 2003 EIR identified the following impacts and mitigation measures with respect to traffic and transportation

- Impact 4.10-1 noted an impact with respect to traffic congestion at the Silvergate Avenue and Dublin Boulevard intersection. Mitigation Measure 4.10-1 required the project Applicant to make a fair share contribution to funding traffic signals at Dublin Boulevard and Silvergate Drive and Dublin Boulevard and Inspiration Drive. With this action, Impact 4.10-1 was deemed to be less-than-significant. Both signals have been installed and are operational.
- Impact 4.10-2 found an impact with respect to project traffic causing increased traffic on local streets near the project site. Mitigation Measure 4.10-2 reduced this impact to a less-than-significant level by requiring the Applicant to monitor peak hour turning movements at project driveways during a typical school day at six month periods to ensure that the project vehicles do not violate turning restrictions. If turning violations are found, more restrictions shall be imposed, as approved by the Public Works Director.
- Impact 4.10-3 identified an impact with the project's contribution to cumulative traffic, especially on Dublin Boulevard. Adherence to Mitigation Measure 4.10-3 reduced this impact to a less-than-significant level by requiring the project Applicant to widen Dublin Boulevard between Hansen Drive and Silvergate Drive from two to four lanes. This mitigation measure has been completed.

Project Impacts

- a) *Cause an increase in traffic which is substantial to existing traffic load and street capacity?* No New Impact. The proposed updated Master Plan includes construction of a sports field which would host football games and other sporting events. Trip generation for football games, based on survey data of other high schools, indicates the proposed seating capacity of 1,100 seats

would generate 451 trips temporarily before and after the games. Football game trips would occur during time periods when background traffic volumes are low and the volumes would remain within the carrying capacity of the street network. Trip generation for non-football sporting events, including softball, soccer, lacrosse and track and field, would be low and would not be expected to have a substantial effect on traffic operating conditions.

Based on the findings of the traffic analysis for the project (see Attachment 3), the proposed changes to the Master Plan would not result in new or more severe significant impacts than were analyzed in the 2003 EIR. Mitigation Measures included in the 2003 EIR have been implemented to minimize traffic at Dublin Boulevard intersections with Inspiration Drive and Hansen Drive. The widening of Dublin Boulevard near the project site has also been completed; therefore, no new or more severe impacts would occur from the project, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- b) *Exceed, either individually or cumulatively, a LOS standard established by the County CMA for designated roads)?* No New Impact. The 2003 EIR found a potentially significant impact with respect to cumulative traffic (see Impact 4.10-3 in the 2003 EIR). With adherence to Mitigation Measure 4.10-3, also included in the 2003 EIR, this impact was deemed to be less-than-significant. Mitigation Measure 4.10-3 required the Applicant to make a fair share contribution to the widening of Dublin Boulevard near the project site to accommodate additional project traffic. This measure has been fulfilled. Proposed changes to the VCC Master Plan would generate the same or fewer peak hour trips as analyzed in the 2003 EIR based on the project traffic analysis. No new or more significant impacts would result with respect to cumulative traffic than previously analyzed in the 2003 EIR. The major sporting events at the proposed stadium would occur after weekday peak hours or during weekends, so there will be no new impacts. A Condition of Approval has been added to the project that prohibits varsity football games from occurring during peak hours.
- c) *Change in air traffic patterns?* No New Impact. The proposed project would have no impact on air traffic patterns, since it involves the expansion of an approved church, school and similar semi-public facilities. There would be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the 2003 EIR.
- d) *Substantially increase hazards due to a design feature or an incompatible use?* Less-than-Significant with Mitigation. In order to minimize school traffic

from intruding on the local neighborhood streets north of the school, vehicle turn restrictions are in place at two of the school's three driveways (the north and middle driveways). Specifically, signs are posted prohibiting right turns in and left turns out on school days from 7:00 am to 5:00 pm. There are no turn restrictions at the school's south driveway. Observations of vehicle turning movements during the am peak hour were conducted in 2001 for the 2003 draft EIR. The observed trips were 50 turns to/from the north (20 illegal turns from the north and middle driveways plus 30 legal turns from the south driveway).

Recent (2015) traffic counts completed by Omni Means staff observed 29 turns to/from the north (14 illegal plus 15 legal) during the am peak hour. The current volume is lower than 2001, but accounting for a lower existing school population compared to the 2001 population, the percentage of trips to/from the north is nearly equal for both surveys: approximately 4.5 % of the total peak hour trips. This indicates the cut-through rate has not been increasing. It would also appear to reflect a fairly low cut-through rate, given that some of the trips are likely from residents of the neighborhood.

Future school operations could increase the possibility of greater cut-through traffic. This could be a potentially significant impact and the following measure is recommended to reduce this impact to a less-than-significant level.

Mitigation Measure TRA-1. The following steps shall be taken to ensure that project related traffic does not cut through adjacent neighborhoods as part of school operations:

- a) The school administration shall issue a letter to all students a minimum of one time per year advising household drivers not to use routes through adjacent neighborhoods.
 - b) The Applicant shall continue monitoring local driving activities as required in the 2003 EIR Mitigation Measure 4.10-2 at the completion of development phases 2, 3 and 4 to ensure that the rate of cut through traffic does not increase.
 - c) If it is determined that cut-through traffic has increased based on additional construction, increased enforcement of the illegal turns and/or prohibiting turns to/from the north at the southern driveway shall be implemented by the school with the oversight of the Dublin Public Works Department.
- e) *Result in inadequate emergency access?* No New Impact. The proposed project would maintain two driveways which provide adequate emergency access. No new or significantly more severe impacts are therefore anticipated with

respect to this topic than have been previously analyzed in prior CEQA documents.

- f) *Inadequate parking capacity?* Less-than-Significant with Mitigation. The proposed revised Master Plan would consist of three separate parking generating components: the sanctuary, the school facilities, and the new sports field activities. The parking requirements for each component have been calculated independently. A Conditional Use Permit is required by the Dublin Zoning Ordinance to establish a parking requirement for the football and multi-use sports field, since parking for this specific use is not established in the Zoning Ordinance. It is assumed the church, school, and sports field games would not be in use concurrently. To ensure this, a Minor Use Permit for shared parking is also being processed.

The 2003 EIR for the approved expansion evaluated parking based on the City of Dublin Zoning Ordinance. The parking requirements were evaluated for the Sunday worship space and for the weekday school uses. The highest parking space requirement was associated with the Sunday worship service. The required parking was calculated to be 667 spaces for the worship service based on 2,000 seats (at 1 required space per 3 seats).

The existing parking supply consists of 510 striped spaces and the approved plan was to add 250 new paved and 100 unpaved overflow spaces for a total of 860 spaces. Therefore the parking supply met the Zoning Ordinance requirement, with a surplus of 193 spaces.

For the current application, the City of Dublin Planning Staff has calculated the required number of parking spaces based on the current Zoning Ordinance requirements (see Table A-3 in Attachment 3). Pursuant to Chapter 8.76 (Off-Street Parking and Loading Regulations) of the Zoning Ordinance, a sanctuary facility requires 1 space per 3 fixed seats plus 1 space per Sunday service classroom. The existing sanctuary containing 763 seats and requires 258 parking spaces, which is met with the current supply of 510 spaces

An existing parking lot will be eliminated to allow construction of the stadium facility; however, the Applicant will be providing additional parking at a new parking area. The total number of parking spaces provided for Phases 1 and 2 is 511 parking spaces.

Proposed Phase 3 would include the construction of the baseball field in the western side of the campus and would also add additional paved parking spaces for a total of 530 spaces.

The sanctuary expansion to 1,500 seats would occur in Development Phase 4. The Zoning Ordinance requires 504 spaces for the proposed sanctuary. The parking supply would increase from 530 spaces in Phase 3 to 600 spaces in Phase 4. Therefore, the parking requirement would be met, with a surplus of 96 spaces.

Per Chapter 8.76 of the Zoning Ordinance, the parking requirement for the sanctuary is 0.33 parking spaces per seat. Recent parking surveys of the church identified a higher demand of 0.40 vehicles per person (220 vehicles for 560 people). Applying the surveyed rate to the proposed 1,500 seats equates to a parking demand of 600 vehicles if the church is fully occupied. With 600 spaces provided in Phase 4, demand based on the surveyed rate would be accommodated with maximum attendance.

For the weekday school related parking demand, without the operation of a sports stadium, the proposed plan after build-out would require 395 parking spaces to satisfy the weekday school parking requirement. The proposed plan would provide a minimum of 511 spaces (Phases 1 and 2) and up to 600 spaces (Phase 4). Therefore, the proposed plan would meet the weekday parking requirement during all of the Development Phases.

In summary, at full build-out, the proposed Master Plan revision would provide sufficient on-site paved parking that would be consistent with the Dublin Zoning Ordinance and the calculated parking for the football stadium, per the Omni-Means site specific study.

Mitigation Measure TRA-2. Prior to issuance of a building permit for the football stadium, the Applicant shall retain a California-registered Traffic Engineer to prepare a Parking Management for the operation of football games and other large activities (such as graduations) held at the proposed stadium. The Parking Management Plan shall demonstrate that all parking for football games and other large activities can be safely accommodated on the site and avoid spill-over of parking on adjacent streets. Methods that could be included in the Parking Management Plan could include but are not limited to use of parking attendants before and during games and other large activities to implement valet parking, promotion of carpooling to games and limiting sales of admission tickets to correspond with estimated parking supply. The Parking Management Plan shall be approved by the City of Dublin Community Development Department and Public Works Department prior to the issuance of the building permit for the stadium.

- g) *Hazards or barriers for pedestrians or bicyclists?* No New Impact. The proposed project includes on-site pedestrian pathways and sidewalks as well as a sidewalk along Inspiration Drive from Dublin Boulevard to the main campus. Additionally, a Condition of Approval requires that bicycle parking be provided at each phase of development consistent with CAL Green Building Code. No new or more severe significant impacts to this topic would result than was previously analyzed in the 2003 EIR.

17. Tribal Cultural Resources

Environmental Setting

As noted in the Cultural Resources section of this Initial Study, the 2003 EIR did not identify significant impacts on historic, cultural, Native American or other cultural resources. The project site has been largely disturbed for the construction of buildings, parking lots, on-site roads and other improvements. Much of the undeveloped portions of the site will remain as undisturbed open space as part of the proposed project, as noted in the Project Description.

Also, as noted in the Cultural Resources section of this document, on October 31, 2017, the Dublin Community Development Department sent a letter to Mr. Randy Yonemura of the Ione Band of Miwok Indian tribe informing the tribe of the City of Dublin's intent to prepare a Mitigated Negative Declaration for this project as required by AB 52. As of the public date of this Initial Study, no response has been received by the City. This letter is hereby incorporated by reference into this document and is available for review at the Dublin Community Development Department during normal business hours.

Previous EIR.

Two cultural resource impacts and an associated mitigation measure were contained in the 2003 EIR.

- Impact 4.4-1 noted that on-site construction, including building foundations, utility lines and similar improvements could disturb archeological and/or Native American underground resources. Adherence to Mitigation Measure 4-1.1 reduced this impact to a less-than-significant level by requiring that work on the project shall cease until a resource protection plan prepared by a qualified archeologist consistent with CEQA Guideline Section 15064.5 (e) is prepared and implemented. If human remains are identified, the County Coroner was to be contacted.

The proposed project will be required to comply with the above cultural resource mitigation measure.

Project Impacts

- a) *Listed or be eligible in the California Register of Historic Resources or in a local register of historic resources as defined in PRC Section 5020.1 (k)?* No New Impact. The project site contains an existing church and school complex with no record of historic or Native American resources present. Future development will be required to adhere to Mitigation Measure 4.4-1 contained in the 2003 EIR. No new or more severe significant impacts to this topic would result than was previously analyzed in the 2003 EIR.
- b) *Be a resource determined by the lead agency to be significant pursuant to subdivision (c) of the PRC section 5024.1, including the significance to a California Native American Tribe?* No New Impact. The City contacted the tribal representative of the Ione Band of Miwok Indians (Ltr. from M. Battaglia to R. Yonemura dated October 31, 2017). No response was received.

There are no known significant Tribal Cultural Resources on the project site. If Native American artifacts are encountered during construction, work on the project shall cease until compliance with CEQA Guidelines Section 15064.5 is demonstrated. Work on the project may commence under the guidelines of an approved resource protection plan. The County Coroner is to be contacted if human remains are uncovered as required by State Law.

With adherence to required regulatory requirements, there would be no new or more severe significant impacts to this topic beyond what has been analyzed in the 2003 EIR.

18. Utilities and Service Systems

Environmental Setting

The project area is served by the following service providers:

- Water supply: Dublin San Ramon Services District (DSRSD).
- Sewage collection and treatment; recycled water: DSRSD.
- Storm drainage: City of Dublin and Zone 7.
- Solid waste service: Amador Valley Industries
- Electrical and natural gas power: Pacific Gas and Electric Co.

Previous EIR

No significant utility impacts were identified in the 2003 EIR.

Project Impacts

- a) *Exceed wastewater treatment requirements of the RWQCB?* No New Impact The project site is located within the service area of DSRSD. The current campus receives water and wastewater service from DSRSD. Representatives of DSRSD have indicated that DSRSD facilities are adequate to accommodate any increased amount of wastewater generated by project construction (source: Stan Kolodzie, DSRSD, 9/13/17). With adherence to local and regional requirements, there would be no new or more severe significant impacts with respect to exceedances of wastewater treatment requirements than was analyzed in the 2003 EIR and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- b) *Require new water or wastewater treatment facilities or expansion of existing facilities?* No New Impact. The water and wastewater facilities needed to serve the proposed project have been constructed as part of previous development on the project site. It is anticipated that minimal upsizing will be needed to accommodate proposed project changes. The surface of the proposed athletic field would be constructed of synthetic material to minimize water demand. Based on discussions with DSRSD, it has been determined that there would be no new or substantially more severe significant impacts with respect to new water or wastewater facilities than has been previously analyzed in the prior EIR, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- c) *Require new storm drainage facilities?* No New Impact. A local storm drain system currently exists on the site, as required by the City of Dublin as part of construction of previous development phases. The Applicant may be required to construct expansions or enlargements to the existing system, which would be minor. With adherence to local and regional requirements regarding drainage flows that would be applied by the City at the time of permit issuance, there would be no new or more severe significant impacts with respect to drainage facilities was analyzed in the 2003 EIR, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- d) *Are sufficient water supplies available?* No New Impact. The current project receives domestic water from DSRSD. The proposed expansion of the campus may require small increases in the amount of water delivered to the site, but according to DSRSD, the District can provide additional water with

no significant impacts (source: Stan Kolodzie, DSRSD, 9/13/17). There would therefore be no new or substantially more severe significant impacts with respect to water supply than has been previously analyzed in the prior EIRs, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- e) *Adequate wastewater capacity to serve the proposed project?* No New Impact. See response to “a,” above.

- f) *Solid waste disposal?* No New Impact. The site is within the franchise area of Amador Valley Industries (AVI). AVI provides residential and commercial solid waste pick-up and recycling services within the City of Dublin. The Applicant is currently receiving solid waste and recycling service from AVI and the amount of increased generation resulting from the proposed project would be minor and less-than-significant. There would therefore be no new or substantially more severe significant impacts with respect to solid waste disposal than has been previously analyzed in the prior EIR, and no other CEQA standards for supplemental review are met. Therefore, no further environmental review is required for this impact area.

- g) *Comply with federal, state and local statutes and regulations related to solid waste?* No New Impact. The existing service provider will ensure adherence to federal, state and local solid waste regulations. There would therefore be no new or substantially more severe significant impacts with respect to this impact than has been previously analyzed in the prior EIR.

18. Mandatory Findings of Significance

- a) *Does the project have the potential to 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, reduce the number of 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?* Less than Significant with Mitigation. Potential impacts related to substantial reduction of fish or wildlife species or their respective species, reduce the range or number of endangered plant or animal species or eliminate examples of major period of California history or prehistory have been analyzed and mitigated in the 2003 VCC EIR. See subsection 4 of this Initial Study for a discussion of potential of impacts to biological resources and mitigation measures. With the implementation of mitigations measures under the 2003 Valley Christian Center EIR and this Supplemental MND, the proposed project would have a less-than-significant impact on these resources.

- 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 with Mitigation. No cumulatively considerable impacts were identified with the VCC project in 2004, as documented in the final EIR. The current project would make minor changes to the development program of the facility to replace an existing parking lot and undeveloped portions of the campus to a multi-use sports stadium and other minor changes. Based on the analysis in this Initial Study and with the implementation of mitigations measures under the 2003 Valley Christian Center EIR and this Supplemental MND, the project impact would be less than cumulatively considerable.
- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?* Less-than-Significant with Mitigation. With the implementation of mitigations measures under the 2003 Valley Christian Center EIR and this Supplemental MND, the proposed project would have a less-than-significant impact on human beings.

Initial Study Preparers

Jerry Haag, Urban Planner, project manager & author
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Peter Galloway, Omni Means, traffic and parking
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Agencies and Organizations Consulted

The following agencies and organizations were contacted in the course of this Initial Study:

City of Dublin

Luke Sims, AICP, Community Development Director
Jeff Baker, Assistant Community Development Director
Marnie Delgado, Senior Planner (former)
Martha Battaglia, Associate Planner
Andrew Russell, City Engineer
Obaid Khan, Transportation & Operations Manager
Tim Cremin, Assistant City Attorney
Bonnie Terra, Alameda County Fire Department
Chief Dennis Houghtelling, Dublin Police Services (former)

California Department of Toxic Substances Control (DTSC) Website

Dublin San Ramon Services District (DSRSD)
Stan Kolodzie, Senior Engineer

Applicant Representatives

Jim Goring, Goring & Straja Architects, project architects

References

Bay Area Air Quality Management District CEQA Guidelines, Revised
May 2017

Dublin General Plan, City of Dublin, Updated through 9/17

Valley Christian Center (VCC) Draft and Final EIRs, City of Dublin, 2003