



Dublin 2023-2031 Housing Element

Initial Study / Negative Declaration

October 3, 2022

Planning Application Number: PLPA-2022-00036



Kimley»Horn

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Dublin 2023-2031 Housing Element

Initial Study

Project Background

Project Title

Dublin 2023-2031 Housing Element
PLPA-2022-00036

Lead Agency

City of Dublin
Community Development Department
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Contact

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Project Location & Setting

The City of Dublin (City) is located in the San Francisco Bay Area in the eastern portion of Alameda County, California. The City of Pleasanton is located to the south, the City of San Ramon is located in to the north, and unincorporated Alameda County land is located to the east and west. Interstate 580 forms the southern boundary of the City and Interstate 680 bisects the western portion of the City in a north-south direction.

The project site includes the entirety of the City of Dublin as it relates to implementation of the Housing Element in general. Additionally, there are three sites in the proposed Housing Element that would require amendments to the General Plan, Specific Plans, Rezoning, or a combination thereof (as described below). These sites are shown in [Figures 1a -c: 2023 – 2031 RHNA Sites Inventory Map](#).

Purpose and Regulatory Context

The Housing Element is a State-mandated chapter of the City's General Plan. The purpose of the Housing Element is to identify and plan for the City's existing and projected housing needs of all economic segments of the community. The Housing Element contains a detailed outline and work program of the City's goals, policies, programs, and objectives that preserve, improve, and ensure housing for a sustainable future. Each eight-year planning cycle, the City is allocated

a specific number of housing units to plan for – this is referred to as the Regional Housing Needs Allocation (RHNA), determined by the Association of Bay Area Governments (ABAG). The RHNA quantifies current and future housing growth for all cities and counties within the ABAG region. Through research and analysis, the Housing Element identifies available candidate housing sites and establishes policies and programs to accommodate the RHNA. The Housing Element is a critical tool for the City to plan for growth within the community over the eight-year cycle, between 2023 and 2031.

Pursuant to the requirements of the California Environmental Quality Act (CEQA), an Initial Study (IS) is conducted by a lead agency to determine if a project may have a significant effect on the environment (CEQA Guidelines Section 15063[a]). If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with CEQA Guidelines Section 15064(a). However, if the lead agency determines the impacts are, or can be reduced to, less than significant, a Mitigated Negative Declaration (MND) or Negative Declaration (ND) may be prepared instead of an EIR (CEQA Guidelines Section 15070[b]). Pursuant to CEQA Guidelines Section 15070, an MND or ND is appropriate when the project's Initial Study identifies potentially significant effects, but:

- Revisions to the project were made that would avoid or reduce the effects to a point where clearly no significant effects would occur; and
- There is no substantial evidence that the project, as revised, may have a significant effect on the environment.

This Initial Study, prepared by the City of Dublin, determined that the project would not have a significant environmental effect, and the preparation of an EIR is not required. Furthermore, no impacts were identified that would require mitigation; therefore, a Negative Declaration can be prepared.

Prior CEQA Analysis

Prior CEQA analysis that are incorporated herein by reference include the following: 1) Dublin General Plan EIR (February 1984); 2) Downtown Dublin Specific Plan EIR (2010); 3) Eastern Dublin General Plan Amendment and Specific Plan EIR (1993); 4) Dublin Transit Center EIR (2001); and 5) Santa Rita Commercial Center Project (subsequently renamed Hacienda Crossing) IS/ND (1995).

General Plan Land Use Designations

The Dublin General Plan (1994, as amended) provides for a range of land use designations in the City that can accommodate residential units. These include:

Residential

- Rural Residential/Agriculture (one dwelling unit [du] per 100 gross residential acres)
- Estate Residential (0.01 - 0.8 du/acre [ac])

- Low-Density Single Family (0.5 - 3.8 du/ac)
- Single Family Residential (0.9 - 6.0 du/ac)
- Medium-Density Residential (6.1 - 14.0 du/ac)
- Medium/High-Density Residential (14.1 - 25.0 du/ac)
- High-Density Residential (25.1+ du/ac)

Specific Plan Districts

- Downtown Dublin - Village Parkway District
- Downtown Dublin - Transit-Oriented District
- Downtown Dublin - Retail District
- Dublin Crossing

Commercial/Industrial

- General Commercial (as part of a mixed-use development)
- Neighborhood Commercial (as part of a mixed-use development)
- Campus Office (as part of a master planned mixed-use development)
- Mixed-Use
- Mixed Use 2/Campus Office
- Medium/High-Density Residential and Retail Office

Zoning Designations

A significant portion of the City of Dublin is subject to Planned Development (PD) zoning through which one or more properties are planned as a unit with development standards tailored to the site. Many of the existing PD zoned properties allow residential development. Other zones that allow residential development (permitted outright) include:

- Single-Family Residential (R-1)
- Two-Family Residential (R-2)
- Multi-Family Residential (R-M)

Description of the Project

Under state law, every city and county in California must prepare a Housing Element as part of its General Plan. The Housing Element must document in detail existing conditions and projected needs in accordance with state housing law provisions. The Housing Element is also required to contain goals, policies, programs, and quantified objectives that address housing needs over the next eight-year period. The proposed 2023–2031 Housing Element will serve as

the City's guiding policy document to meet future needs of housing for all the City's economic groups and will replace the existing 2015-2023 Housing Element.

Unless stated otherwise in the following analysis, the terms "project" and "proposed project" refer to the adoption of the 2023–2031 Housing Element, associated amendments to the General Plan, including the Land Use Map and Seismic Safety and Safety Element. The project also includes amendments to the Downtown Dublin Specific Plan and Eastern Dublin Specific Plan and associated changes to the City's Zoning Map.

The Housing Element consists of a comprehensive update to the City's 5th Cycle Housing Element of the City's General Plan. The Housing Element identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under state law (California Government Code Section 65583). The Housing Element also analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies and programs that promote housing opportunities for all persons.

California Government Code, Section 65588(a)(2), Review and Revision, requires that a proposed Housing Element review the goals, policies, programs, and objectives of the existing Housing Element, and report on the attainment and disposition of the programs. In some instances, the programs from the previous Housing Element are continued through to the 2023–2031 Housing Element. Many existing programs have been amended and continue to reflect current conditions in the City as described in Chapter 2: Housing Plan of the 2023-2031 Housing Element.

The Housing Element is required to identify sites by income category to meet the City's RHNA. The sites identified in the Housing Element represent the City's ability to accommodate housing at the designated income levels during the 2023-2031 planning period.

Adequate Sites Analysis

As described in [Appendix D: Adequate Sites Analysis](#) of the Housing Element, the City's 2023-2031 RHNA can be accommodated through a variety of methods, including:

- Projects in the pipeline
- Future development of accessory dwelling units (ADUs)
- Capacity on existing, residentially-zoned sites
- Identification of land to rezone to accommodate remaining RHNA

[Table 1: Summary of Sites Inventory](#) shows the City's 2023-2031 RHNA by income category and the number of units that would be provided by each of these methods.

Table 1: Summary of Sites Inventory

	Extremely Low-/Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
RHNA (2023-2031)	1,085	625	560	1,449	3,719
Projects in the Pipeline and ADUs					
Projects in the Pipeline	535	210	2,104		2,849
Accessory Dwelling Units	96	48	16		160
Existing Zoning					
Downtown Dublin	190	50	0		240
Vacant 5th Cycle Sites	0	252	0		252
Public/Semi-Public Sites	134	0	0		134
Total Potential Capacity Based on Existing GP and Zoning	324	302	0		626
Strategies to Accommodate Remaining Need					
Alameda County Surplus Properties	358	0	357		715
Hacienda Crossings	297	0	297		594
SCS Property	100	0	0		100
Additional Rezone Capacity	755	0	654		1,409
Sites Inventory Total					
Total Units (All Categories)	1,710	560	2,774		5,044

After utilizing pipeline projects, ADUs, and existing residentially zoned land, the City has a remaining unmet housing need of 755 very low- and low-income units. To accommodate this remaining need, the City has identified a total of 24.8 net buildable acres that will require a General Plan Amendment (GPA), Specific Plan Amendment (SPA), and/or rezone, namely: 1) Alameda County Surplus Property Authority Sites (APNs 986-0034-014-00 and 986-0034-012-00); 2) Hacienda Crossings Shopping Center (APNs 986-0008-009-00 and 986-0008-010-00); and 3) SCS Dublin (APN 985-0051-006-00), which are described below. Collectively, these properties are identified as the “Remaining Needs Sites” and are shown in [Figures 1a -c: 2023 – 2031 RHNA Sites Inventory Map](#).

In addition, the City has proposed amendments to the Downtown Dublin Specific Plan to exclude two sites and a pipeline project, totaling 416 units, that are identified in the Sites Inventory to meet the City’s RHNA from the Downtown Dublin Development Pool as further discussed below.

Remaining Needs Sites

Alameda County Surplus Property Authority

The Alameda County Surplus Property Authority sites are located south of Dublin Boulevard, west of Arnold Road, and north and south of Martinelli Way. The two vacant parcels, which are owned by the Alameda County Surplus Property Authority, total 19.7 acres, of which 13.82 acres are buildable due to the approval of a Westin Hotel on the southern 5.88 acres of the site. Per the Housing Element Sites Inventory, 10.8 acres are identified for future residential development, allowing the remaining approximately three acres to be developed with another compatible use.

The project's proposed density of 66 dwelling units per acre is comparable to the average residential density within the broader Dublin Transit Center, and is based on existing development trends, proximity to high-capacity transit, and coordination with the property owner. In total, the 10.8 acres could accommodate 715 units, of which 358 units are estimated to be affordable to lower-income households and 357 units to above moderate-income households.

To accommodate housing on the two sites, the project includes: 1) a General Plan Amendment and Eastern Dublin Specific Plan Amendment to change the land use designation from Campus Office to Campus Office/High-Density Residential; and 2) a Planned Development (PD) Rezone to allow residential use.

Hacienda Crossings

The Hacienda Crossings sites (formerly known as the Santa Rita Commercial Center) are bound by Dublin Boulevard, Toyota Drive, Hacienda Crossings, and Hacienda Drive and comprise two parcels totaling 21.2 acres. The 21.2 acres are part of the total retail site (75+ acres), which currently consist of one-story retail uses and surface parking.

Of the 21.2 acres, only 12.4 acres are identified as buildable acreage for future residential development. The two parcels are envisioned to develop with residential units at an average density of 48 dwelling units per acre, which is similar in density to the nearby Waterford Place Apartments. In total, the 12.4 acres could accommodate up to 594 units, of which 297 units are estimated to be affordable to lower-income households and 297 units to above moderate-income households.

To accommodate housing on the two sites, the project includes a Planned Development (PD) Rezone to allow residential uses.

SCS Dublin Affordable Housing Site

On February 15, 2022, the City Council approved a Preferred Plan for the SCS Dublin property, which is a vacant 76.9-acre property located north of Interstate 580 between Tassajara Road and Brannigan Street and extending to the north of Gleason Drive. The Preferred Plan includes a 2.5-acre site for affordable housing that contemplates between 70 and 150 units to

accommodate a portion of the lower-income RHNA. For the purposes of this Initial Study, the SCS Dublin affordable housing site is envisioned to include 100 high-density affordable housing units at a density of 40 dwelling units per acre. A separate SCS Dublin Draft EIR was prepared based on the Preferred Plan.

Although the General Plan land use designation for the site of General Commercial allows housing as part of a mixed-use development, the project includes: 1) a General Plan Amendment and Eastern Dublin Specific Plan Amendment to change the land use designation from General Commercial to Public/Semi-Public; and 2) a PD Rezone to allow an affordable residential project.

Existing Zoning Sites

Downtown Dublin

The Downtown Dublin Specific Plan establishes development standards and design guidelines to create a mixed-use center that provides a wide array of opportunities for shopping, services, dining, working, living, and entertainment in a pedestrian-friendly and aesthetically pleasing setting that attracts both local and regional residents. Downtown Dublin consists of 284 acres and the Specific Plan designates three districts: Village Parkway, Transit-Oriented, and Retail. Although all three districts allow residential development, only the Transit-Oriented and Retail Districts allow development at a density of at least 30 dwelling units per acre.

- **Transit-Oriented District.** The Transit-Oriented District is zoned to allow a minimum residential density of 30 dwelling units per acre with a maximum of 85 dwelling units per acre.
- **Retail District.** The Retail District is zoned to allow a minimum residential density of 22 dwelling units per acre and has no maximum density.

Residential development within the Downtown Dublin Specific Plan is governed by a “Development Pool,” whereby a property owner/developer must request residential units from the Development Pool in exchange for entering into a Community Benefit Program Agreement.

The Development Pool is comprised of 2,500 units and has a projected remaining balance of 796 units. Two sites and a pipeline project, totaling 416 affordable lower-income units are identified in the Sites Inventory to help meet the City’s RHNA. To facilitate the development of these units, Program B.9 in the Housing Plan specifies that these units will not be subject to the Development Pool, nor a Community Benefit Program Agreement.

The project includes an amendment to the Downtown Dublin Specific Plan to implement Program B.9.

Summary of the Project

The existing and proposed General Plan land use changes are summarized in [Table 2: Existing and Proposed General Plan and Zoning Summary](#). The proposed net new residential

development associated with the project is shown in **Table 3: Dublin Housing Element GPA/Rezone Properties Land Use Summary**.

Table 2: Existing and Proposed General Plan and Zoning Summary

Rezone Property	Existing GP Land Use	Proposed GP Land Use	Existing Zoning	Proposed Zoning
Alameda County Surplus Property Authority Sites	CO	CO/HDR	PD	PD
Hacienda Crossings	GC	GC ¹	PD	PD
SCS Dublin Affordable Housing Site	GC	P/SP	PD	PD

CO: Campus Office

GC: General Commercial

HDR: High-Density Residential

P/SP: Public/Semi-Public

PD: Planned Development

Table 3: Dublin Housing Element GPA/SPA/Rezone Properties Land Use Summary

Property	Gross Acreage	Buildable Acreage	Rezone Density / Acre	Net Potential Units
Alameda County Surplus Property Authority Sites	19.8	10.8	66	715
Hacienda Crossings	21.2	12.4	48	594
SCS Dublin Affordable Housing Site	2.5	2.5	40	100
Total	43.5	24.7		1,409

Discretionary permits and future CEQA evaluation may be required prior to approval of future housing development facilitated by the Housing Element, except for development permitted by right such as projects seeking streamlined, ministerial approval under SB 35. This also includes emergency shelters, low barrier navigation centers, and small licensed residential care facilities for six or fewer persons. ADUs and Junior ADUs are also exempt from CEQA, pursuant to State CEQA Guidelines Section 15268 (Ministerial Projects) and Public Resources Code (PRC) Section

¹The General Commercial designation allows mixed use projects incorporating retail, service, and/or office uses, with residential uses also allowed as part of the mix when location and design ensure compatibility.

21080(b)(1) and discretionary permits per California Government Code (CGC) Sections 65852.2 and 65852.22. In addition, ADUs can be categorically exempt from CEQA pursuant to State CEQA Guidelines Sections 15301 and 15303, authority cited under PRC Sections 21083 and 21087.

Basis for the Impact Analysis

The impact analysis in this Initial Study is focused on the changes that would occur as a result of implementation of the project. With the exception of the Alameda County Surplus Properties sites, residential land uses are permitted under the General Plan and Eastern Dublin Specific Plan on the other two Remaining Needs Sites to meet the City's RHNA for lower-income households. Thus, this Initial Study analyzes the change in land use on the Alameda County Surplus Properties sites and the addition of residential development on the Hacienda Crossings and SCS Dublin Affordable Housing sites. In addition, the analysis takes into consideration the two sites and one pipeline project in Downtown Dublin Specific Plan area that would not be subject to the Development Pool and, therefore, would increase residential development allowed in Downtown Dublin.

The impact analysis takes a conservative approach and assumes that the increase in residential development would be allowed with implementation of the 2023-2031 Housing Element and there would be net new development with no credit given for development that would otherwise be allowed under existing General Plan and Specific Plan land use designations and/or zoning. As such, the assumptions used in this Initial Study analyze the incremental change of a projected 1,825 additional units and 5,457 people over the eight-year Housing Element cycle and is within the City's General Plan buildout assumptions of 83,595 people by 2040.

Note that the 1,825 additional residential units represent the maximum units allowed on the three Remaining Needs Sites and the units that would not be subject to the Downtown Dublin Specific Plan Development Pool.

For the purpose of this Initial Study, no new residential development projects are being proposed and the project does not authorize the construction of any particular development. This Initial Study only evaluates implementation of the Housing Element's policies and programs and changes in allowable land use, all with the intent of providing more affordable housing, consistent with State law. Future development would be required to comply with all City regulations and CEQA, as applicable.

Additionally, all sites identified in the Housing Element to meet the City's remaining RHNA are located in existing urban areas of the City that already have substantial infrastructure improvements and are already served by the respective public services providers.

As such, potential future development would be typical of an urban environment and consistent with the overall intent of the City's General Plan. This line of reasoning is applied to the impact analysis throughout the subsequent environmental analysis.

Other Public Agencies Whose Approval Is Required

California Department of Housing and Community Development (for the Dublin 2023-2031 Housing Element)

Environmental Factors Potentially Affected

The environmental factors that would be potentially affected by this project are:

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

Determination

On the basis of this initial evaluation:

I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the project MAY have a potentially significant or a potentially significant unless mitigated impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.	X

CITY OF DUBLIN

Michael P. Cass

October 3, 2022

Michael P. Cass, Principal Planner

Date

Aesthetics

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

Environmental Setting

Project Impacts and Mitigation Measures

(a and b) Scenic vistas, views, and resources

Dublin is visually dominated by urban areas in the lower and flatter elevations, and expanses of grassland and rolling hills in higher elevated open space intermixed with some limited residential development.

Land within the City of Dublin generally consists of flat land with a distinct but gentle slope from north to south, towards the I-580 freeway. No major visual features (hillsides and ridges or watercourses) exist on the Remaining Needs Sites.

Scenic corridors consist of land visible from the highway right-of-way and is comprised primarily of natural features and landforms. Scenic corridors are defined as corridors that possess highly scenic and natural features, as viewed from the highway. Topography, vegetation, viewing distance, and/or jurisdictional lines determine the corridor boundaries.

Scenic highways and routes in and around Dublin include I-580, I-680, San Ramon Road, Dougherty Road, Tassajara Road, Doolan Road, and Fallon Road. No scenic resources exist on the Remaining Needs Sites, including but not limited to significant stands of trees, rock outcroppings, or bodies of water.

Scenic vistas and views are protected through several guiding policy documents and regulatory requirements. The Dublin General Plan includes the following applicable policies:

- Policy 10.5.3.A: Incorporate distinctive design features along regional corridors that reinforce a positive image of Dublin. Both within the right-of-way and on adjacent private development, utilize features such as gateway elements, street trees, median planting, special lighting, separated and ample sidewalks, crosswalks, seating, special signs, street names, landscape, decorative paving patterns, and public art. Consider undergrounding utilities along these roadways.
- Policy 10.5.3.B: Maintain views through development to distant vistas (i.e. foothills) and view corridors along regional corridors, wherever feasible.
- Policy 10.5.3.C: Incorporate visual screening techniques such as berms, dense and/or fast-growing landscaping, and appropriately designed fencing where feasible, to ensure that visually challenging features, such as parking lots, loading docks, storage areas, etc. are visually attractive as seen from regional corridors.
- Policy 10.5.3.D: Provide landscaping and articulated design to soften the visual appearance of existing and new walls and fences that are adjacent to regional corridors, wherever feasible.
- Policy 10.5.3.E: Encourage attractive and high-quality landscaping along the edge of the freeways and development surrounding on- and off-ramps to provide softer and more attractive views both to and from the freeways. Landscaping on private property should complement the buildings and overall site design.

The EDSP recognizes Tassajara Road as a scenic corridor and requires that major ridgelands be maintained from scenic corridors. The EDSP goals and policies encourage development that maintains views from scenic corridors to Visually Sensitive Ridgelands, as shown in EDSP Figure 6.3: Environmental Constraints.

The Eastern Dublin Scenic Corridor Policies and Standards identifies the view looking northeast to the ridgelands from the Tassajara Road overpass as a designated viewpoint within the project area. Per the Eastern Dublin Scenic Corridor Policies and Standards, implementation of development shall maintain generally uninterrupted views and have structures that do not extend above the horizon of the Visually Sensitive Ridgelands for more than 25 percent of the total horizon line (the limits of the Visually Sensitive Ridgelands as seen from Viewpoint 2). It also requires development projects to submit a scenic design analysis as part of the Tentative Map and Site Development Review Permit application process for all development projects within 700 feet of Tassajara Road, Fallon Road, and I-580.

Future residential development would be required to demonstrate consistency with the policies and standards described above as part of their respective development review and permitting process. As such, the proposed project would not adversely affect any scenic vista, view or resource, and there would be no impact.

(c) Substantially degrade the visual character of the site or surrounding area

While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include any specific designs or proposals for development that would degrade the existing visual character of the City. Future development implemented through the policies of the Housing Element and associated land use changes would have the effect of incrementally changing the visual character in the City.

Future development would be subject to applicable General Plan policies and zoning regulations related to height, mass and scale, architectural style, materials, landscaping, and a variety of other standards that would ensure consistency with the visual character of their surrounding areas. All future projects would also be subject to subsequent CEQA analysis, as applicable. There are no policies in the Housing Element or land use changes which either permit or promote development in areas that are not currently developed with existing uses and/or are surrounded by urban development.

Therefore, the project would not substantially degrade the visual character or quality of the surrounding area, and there would be no impact.

(d) Create a new source of substantial light or glare

Outdoor lighting when viewed at night can result in glare that can be defined as “excessive, uncontrolled brightness” from a luminaire. Glare can also occur during the day due to light reflecting off building materials such as highly polished metal and reflective glass. Inappropriate installation of light and reflective materials in future housing could result in effects on nighttime and daytime views through scattering excessive light in the viewers’ eyes, causing a partial or complete inability to see due to light scattering in the eye. The effects of excessive light and glare can result in nuisance impacts ranging from viewer annoyance or an inability to see features in the night sky, to health and safety impacts such as temporary blindness while operating a motor vehicle.

The project does not directly include any specific development designs or proposals that would increase daytime glare or nighttime illumination in the City. Future development implemented through the policies of the Housing Element and associated land use changes would result in new sources of light and glare. Outdoor lighting would be required in parking lots and pedestrian pathways for security purposes as well as accent lighting in landscaping and architectural features. Indoor lighting would also likely be visible through windows. Lighting associated with vehicle travel to and from the Remaining Needs Sites would also be generated.

Future housing developed to meet local and regional housing needs would be subject to the City’s Municipal Code regulating the installation and operation of lighting. Implementation of the lighting requirements of the General Plan and Municipal Code would ensure that lighting is appropriately designed to provide necessary security while not creating undue nuisance or hazards for people at surrounding properties or on roadways in the vicinity of the Remaining Needs Sites. Additionally, Citywide Multi-Family Objective Design Standard 3.7.E requires all building-mounted and site light fixtures for multi-family residences to be fully shielded.

Furthermore, future housing would be reviewed as part of the Site Development Review Permit application process to limit the use of highly reflective materials, thereby minimizing the potential for daytime glare.

Therefore, the project would not directly create a new source of substantial light or glare, and there would be no impact.

Agricultural and Forestry Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Dept. of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment project and the Forestry Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Project Impacts and Mitigation Measures

(a-e) Convert farmland, conflict with zoning, loss of forest land

The Housing Element does not propose any land use change or rezoning of agricultural uses or forest land. In addition, the Housing Element does not propose any specific development that would result in the conversion of farmland to non-agricultural use. Furthermore, no Williamson Act Land Conservation Contract lands or forest land presently exist on the Remaining Needs Sites, nor are any agricultural operations on-going.

Therefore, the project would not directly convert farmland, conflict with zoning or result in the loss of forest land, and there would be no impact.

Air Quality

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				x
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?				x
c) Expose sensitive receptors to substantial pollutant concentrations?				x
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				x

Project Impacts and Mitigation Measures

(a) Consistent with air quality plans

Dublin is located within the San Francisco Bay Area Air Basin (Air Basin), which includes Alameda County, Contra Costa County, Marin County, Napa County, San Francisco County, San Mateo County, and Santa Clara County. The Air Basin composes of an area of approximately 5,340 square miles in the San Francisco Bay Area.

The Bay Area Air Quality Management District (BAAQMD) is responsible for local control and monitoring of criteria air pollutants throughout the Air Basin. BAAQMD, in coordination with Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG), is also responsible for developing, updating, and implementing the Bay Area Clean Air

Plan for the basin. A Clean Air Plan is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the national and/or California Ambient Air Quality Standards. The term non-attainment area is used to refer to an air basin where one or more ambient air quality standards are exceeded. The BAAQMD 2017 Clean Air Plan was approved by the Air Resources Board and is an integral part of the State Implementation Plan.

If a project is inconsistent with the growth assumptions of the regional air quality attainment plans, then it would conflict with or obstruct the implementation of such plans. Projects that result in unplanned population growth, as identified in local general plans and/or community plans, would be considered inconsistent with the respective Clean Air Plan. As described in the Population and Housing section, the project would not induce substantial unplanned population growth within the City as the future development of new housing units over the eight-year cycle (to 2031) would be consistent with ABAG's 2040 population estimate of 83,595, as used in the 2017 Clean Air Plan.

Therefore, future development would be required to comply with air quality plans, and the project has no impact.

(b) Violate air quality standards or cause cumulatively considerable air pollutants

Future residential development would result in an increase in criteria pollutants during construction activities, such as excavation and grading, and operational activities. However, residential developments are not considered a source of emission, such as odors, that would adversely affect a substantial number of people.

Operational emissions generated by both stationary and mobile sources would result from normal daily activities as part of the occupation of future residential development. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance equipment, generators, and the use of consumer products. Mobile emissions would be generated by motor vehicles traveling to and from future residential development.

BAAQMD has set its CEQA significance thresholds based on trigger levels for the federal New Source Review (NSR) Program and BAAQMD's Regulation 2, Rule 2 for new or modified sources. The NSR Program was created by the Federal Clean Air Act (FCAA) to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based National Ambient Air Quality Standards (NAAQS). NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect public health. Therefore, projects that do not exceed BAAQMD's mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

According BAAQMD's 2017 Clean Air Plan, the major air quality improvements achieved over the past several decades have greatly benefited public health in the Bay Area, even as the region's population, the amount of motor vehicle travel, and economic output have all grown

substantially. Population exposure to unhealthy ozone levels declined dramatically. In 1986–1988, the average Bay Area resident was exposed to unhealthy ozone concentrations 213 hours per year. Exposure to unhealthy ozone levels (ozone exceeding the state one-hour standard of 95 parts per billion) has been reduced to less than one hour per year during the 2012–2014 period, an overall reduction of 99.8 percent.² Ozone levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. Nitrogen oxide (NO_x) emissions (an ozone precursor) from electric utilities have also decreased due to the use of cleaner fuels and renewable energy.

The 2017 Clean Air Plan control strategy includes 85 control measures to reduce multiple pollutants and serve both to protect public health and to protect the climate. With continued implementation of the control measures, the 2017 Clean Air Plan projects continued reductions in emissions and ambient concentrations of ozone and particulate matter (PM) and decreases in population exposure to the most harmful air pollutants, such as fine PM and toxic air contaminants (TACs), in impacted communities.

In addition to BAAQMD, air quality standards are protected through a number of General Plan policies. In particular, Implementing Policy 7.5.1.A.2 requires an air quality analysis for new development projects that could generate significant air emissions on a project and cumulative level and Guiding Policy 13.3.2.A which encourages the installation of energy efficient improvements and alternative energy technology in new residential and commercial development. Additionally, Implementing Policy 13.3.2 requires the installation of conduit to serve electric vehicle parking spaces and encourages the installation of charging stations.

Future residential development would also be required to meet NAAQS and BAAQMD thresholds during construction and operation. Measures such as dust control and equipment type are applied to grading or clearing permits.

Future development associated with the project would also be subject to environmental review pursuant to CEQA, as applicable, and the City's local procedures to determine if any long-term air quality impacts would occur from the operation of a specific new development. As such, future implementation of the project would not result in a cumulative net increase of any criteria pollutant in which the project region is in nonattainment under federal and state ambient air quality standards.

Therefore, the project would not directly violate air quality standards or cause cumulatively considerable air pollutants, and there would be no impact.

² Bay Area Air Quality Management District, *Clean Air Plan 2017*, page 2/24, 2017.

(c-d) Expose sensitive receptors to pollutant concentrations or create objectionable odors

A sensitive receptor is defined by BAAQMD as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas.

The Air Basin is designated as attainment for carbon monoxide (CO). Emissions and ambient concentrations of CO have decreased dramatically in the Air Basin with the introduction of the catalytic converter in 1975. No exceedances of the California Ambient Air Quality Standards (CAAQS) or NAAQS for CO have been recorded at nearby monitoring stations since 1991.

Future development would result in an increase in criteria pollutants during construction activities, such as excavation and grading, and operational activities. However, residential developments once operational are not considered a source of emission, such as odors, that would adversely affect a substantial number of people.

Future development would be required to comply with local regulations such as the General Plan policies related to air quality, conform with the 2017 Clean Air Plan, and meet NAAQS and BAAQMD thresholds during construction and operation. Compliance with these policies and regulations is part of the construction rather than entitlement process. Measures such as dust control and equipment type are applied to grading or clearing permits.

Therefore, the project would not directly expose sensitive receptors to pollutant concentrations or create objectionable odors, and there would be no impact.

Biological Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations,				X

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
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?				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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Project Impacts and Mitigation Measures

(a-d) Substantial adverse effect on candidate, sensitive, or special status species; natural habitats and wetlands, migratory fish or wildlife.

The Housing Element itself does not specifically authorize the construction of any housing development, nor does it indicate when specific housing projects would occur. The Housing Element is a policy document that addresses the housing need in the City; no actual development is proposed as part of the Housing Element. The project would not result in the approval of any physical improvements. Future development would be subject to project-specific environmental review pursuant to CEQA, as applicable.

Furthermore, existing applicable federal, state, and/or local policies would prevent future development in areas that support sensitive or special status species, federally protected wetlands, or migration corridors. Applicable regulations include the Federal Endangered Species Act, Section 404 of the Clean Water Act, the California Endangered Species Act, and Sections 2050 through 2098 of the California Fish and Game Code.

Therefore, the project would not directly cause a substantial adverse effect on candidate, sensitive, or special status species, natural habitats and wetlands, migratory fish or wildlife, and there would be no impact.

(e) Conflict with local policies or ordinance including tree preservation or any adopted habitat conservation or natural community conservation plans.

The Dublin General Plan includes a number of policies designed to protect and preserve biological resources, particularly in riparian and stream corridors (Guiding Policies 7.2.1.A.1 and 7.2.1.A.2) and protection of oak woodlands (Guiding Policy 7.4.1.A.1).

Additionally, the Eastern Dublin Specific Plan contains a number of policies and programs associated with biological resources that would potentially apply to future development projects. These include:

- Policy 6-16: To ensure long-term protection, high- value habitat areas either should be dedicated as public open space or restricted from potentially harmful development and activities with deed restrictions and design standards.
- Policy 6-17: Impacts to sensitive wildlife species that occur in the planning area will be avoided wherever possible. Mitigation programs will be required as necessary to reduce or eliminate impacts on special status species.
- Policy 6-21: Direct disturbance or removal of trees or native vegetation cover should be minimized and should be restricted to those areas actually designated for the construction of improvements.
- Program 6L: The City shall require development applicants to conduct a pre-construction survey within 60 days prior to habitat modification (clearing construction and road site, etc.) to verify the presence or absence of sensitive species, especially the San Joaquin kit fox, nesting raptors, the red-legged frog, western pond turtles, the California tiger salamander, and other species of special concern.

The protection of heritage trees in the City of Dublin is covered by Dublin Municipal Code (DMC) Chapter 5.6 Heritage Trees. DMC Sections 5.60.080 to 5.60.100 include tree protection regulations. A tree permit is required for the removal of any heritage tree on public or private property. Furthermore, the City may require additional conditions barring the issuance of a tree removal permit including that one (1) or more replacement trees be planted of a designated species, size, and location. The proposed project does not modify these requirements and they would continue to apply to future development projects.

There are no adopted habitat conservation plans (HCPs) or natural community conservation plans (NCCPs) within the City.

Therefore, the project would not directly conflict with local policies or ordinance include tree preservation or any adopted habitat conservation or natural community conservation plans, and there would be no impact.

Cultural Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5?				X
c) Disturb any human remains, including those interred outside of dedicated cemeteries?				X

Project Impacts and Mitigation Measures

(a-c) Historic and archaeological resources

The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels but does not include specific development proposals. There are no known historic resources located on any of the Remaining Needs Sites. According to the SCS Dublin Draft EIR, there are no cultural resources on the SCS Dublin Affordable Housing Site.

Where applicable, future project development would be reviewed to ensure that conflicts with existing known cultural and historical resources are minimized. Additionally, construction activities associated with future development have the potential to uncover archaeological resources, including human remains found outside of cemeteries. Guiding Policy 7.7.1.A.2 of the General Plan requires that all development projects follow state regulations as set forth in Public Resources Code Section 21083.2 regarding discovery of archaeological sites, and Historical Resources, as defined in Section 5020.1 of the Public Resources Code. The Eastern Dublin Specific Plan also includes policies related to the protection of cultural resources, notably Policies 6-24 through 6-25. DMC Section 8.48.020 Archaeology Regulations identifies

procedures in the event that archaeological resources, prehistoric or historic artifacts are discovered during any construction or excavation.

While this information can be provided as part of the CEQA process, the code provisions apply even if the construction or activity is otherwise ministerial or exempt from CEQA. Section 15300.2(f) of the CEQA Guidelines prohibits the use of an exemption if the project affects historical resources.

Therefore, the project would not directly affect historic and archaeological resources, and there would be no impact.

Energy

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Energy. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation??				x
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				x

Project Impacts and Mitigation Measures

(a-b) Consumption of energy and energy efficiency plans

Short-term construction and long-term operational activities resulting from future development would result in energy consumption. Construction activities would consume energy to power electric-operated equipment; during transportation of construction equipment, vehicles, and construction employee passenger vehicles; and in the form of construction materials that would need to be manufactured. During operation activities, energy would be consumed for building operations (such as ventilation, heating/cooling, operation of electrical systems, etc.), and transportation of vehicles.

However, the project does not provide site-specific designs or development proposals and would not directly result in the approval of any physical improvements. Therefore, no direct consumption of energy would occur. Future development would result in more efficient consumption of electrical and natural gas energy as new structures would be required to be constructed in accordance with current energy regulations, such as Title 24 standards and applicable CALGreen requirements which are stricter than previous regulations.

California's Energy Efficiency Standards for Residential and Non-residential Buildings create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. These standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity and natural gas use. For example, requirements for energy efficient lighting, heating and cooling systems, and green building materials are expected to save additional electricity and natural gas.

Therefore, the project would not directly result in the consumption of energy nor conflict with energy efficiency plans, and there would be no impact.

Geology and Soils

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
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 Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

(a-f) Geologic resources

Construction of new housing could increase exposure for people and structures to seismic hazards, including rupture of a fault, strong seismic shaking, and seismic-related ground failure. Similarly, future development could result in construction on expansive or erosive soils, or be proposed in areas subject to landslide or collapse.

The General Plan addresses geology and soils as part of the Seismic Safety and Safety Element, and the City has adopted the California Building Code (CBC) that includes provisions for construction in seismically active areas, and on different soil types. The City ensures that compliance with these requirements occurs at the time of building permit issuance.

The Housing Element includes an inventory of sites to accommodate the City's RHNA, but it does not propose development projects. The project does not change the requirement that all existing and future development in the City must comply with the General Plan policies and the CBC, which includes the requirement to prepare a design-level geotechnical investigation for all future development projects.

No specific development is proposed, and no changes to policies resulting in increased erosion would occur. Continued adherence to the standards of the existing CBC and compliance with the National Pollutant Discharge Elimination System (NPDES) permit and Storm Water Pollution Prevention Plan (SWPPP) requirements, as well as implementation of best management practices (BMPs), would limit impacts related to soil erosion. Additionally, all future development would be required to implement BMPs for construction activities to control and minimize the volume of surface runoff.

All future development projects must comply with all City, state, and federal standards pertaining to stormwater run-off and erosion.

Therefore, the project would not directly affect geologic resources, and there would be no impact.

Greenhouse Gas Emissions

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				X
b) Conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

Project Impacts and Mitigation Measures

(a, b) Generate greenhouse gas (GHG) emissions or conflict with GHG plans or regulations

The proposed project does not include specific development designs or development proposals. Future development of housing units could result in an increase in greenhouse gas (GHG) emissions during both construction and operational activities; however, development must be consistent with the General Plan and with regional plans that are based on the land use pattern of the General Plan.

Future development as a result of the project would occur in urban areas of the City where public services and infrastructure are currently provided. This development would include direct emissions from area and mobile sources, and indirect GHG emissions from energy consumption, water demand, and solid waste.

Existing regulations would apply to any future residential development, including the California Green Building Standards Code and California's Title 24 Building Energy Efficiency Standards, and Title 20 standards which include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances. Compliance with the CBC would be implemented during the building permit process and would be verified as part of building permit issuance and construction inspections.

Additionally, future residential development would be required to include additional energy efficiency and GHG reduction design features per City's Climate Action Plan 2030. The purpose of the CAP 2030 is to meet the State's 2030 GHG emissions reductions target of at least 40 percent below 1990 levels by 2030. The CAP 2030 identifies GHG reduction strategies and measures that relate to renewable and carbon-free energy, building efficiency and electrification, sustainable mobility and land use, materials and waste management, and municipal leadership. The CAP 2030 is a qualified GHG Reduction Strategy under CEQA, which can be used to determine the significance of GHG emissions from a project (CEQA Guidelines Section 15183.5). BAAQMD also recognizes the use of a CAP as a significance threshold for a project's GHG emissions. Therefore, the project does not change these requirements and future projects would be required to be consistent with the CAP 2030.

Therefore, the project would not directly generate greenhouse gas (GHG) emissions or conflict with GHG plans or regulations, and there would be no impact.

Hazards and Hazardous Materials

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				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?				X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No 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 or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Project Impacts and Mitigation Measures

(a and b) Transport, use, release, or disposal of hazardous materials

The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels but does not include specific development proposals. To the extent there are potentially hazardous materials used in construction or during operations associated with future residential development projects, there would be no impacts due to compliance with all applicable regulatory requirements. These include federal regulations such as the Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act, the Occupational Safety and Health Administration's (OSHA) Hazardous Waste Operations and Emergency Response Standard, as well as state regulations including the Hazardous Waste Control Act and numerous regulations as administered through the Department of Toxic Substance Control and the California Office of Emergency Services.

Future residential development would not result in the transport, use or disposal of hazardous materials, since residential development does not use, store or transport significant quantities of hazardous materials.

Therefore, the project would not directly result in the transport, use, release, or disposal of hazardous materials, and there would be no impact.

(c) Emit hazardous materials within one-quarter mile of an existing or proposed school

The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within on-quarter mile of an existing or proposed school since the expansion of uses would not involve the handling of hazardous materials, as described above.

Therefore, the project would not directly emit hazardous materials within one-quarter mile of an existing or proposed school, and there would be no impact.

(d) Listed as a hazardous materials site

The project does not propose any physical change on the environment. Implementation of the project would have no direct effect on any known or potential hazardous material sites. Future development would be required to comply with all relevant regulations regarding the cleanup of hazardous sites, as regulated through the California Department of Toxic Substance Control.

Therefore, the project would not directly affect listed hazardous material sites, and there would be no impact.

(e) Proximity to a public or private airport

Portions of the City are located within the Livermore Airport's Airport Safety Zone, Airport Protection Area, and/or Airport Influence Area. Implementation of the policies and programs identified in the Housing Element would not conflict with airport's Airport Land Use Compatibility Plan (ALUP). Additionally, the Remaining Needs Sites are not located in proximity to the Airport Safety Zone, Airport Protection Area and/or Airport Influence Area and, therefore, would not cause a significant safety hazard.

Therefore, the project would not directly affect public or private airports, and there would be no impact.

(f) Impair the implementation of an emergency response plan or emergency evacuation plan

No emergency evacuation plan would be affected by the proposed project since no roadways would be blocked or otherwise altered.

Therefore, the project would not directly impair implementation of an emergency response plan or emergency evacuation plan, and there would be no impact.

(h) Expose people or structures to wildland fires

As further discussed in the Wildfire section below, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Therefore, the project would not expose people or structures to wildland fires, and there would be no impact.

Hydrology and Water Quality

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin??				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 through the addition of impervious surfaces, in a manner which would:				X
i) Result in substantial erosion or siltation on- or off-site?				X
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?				X
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				X
iv) Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality				X

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
control plan or sustainable groundwater management plan?				

Project Impacts and Mitigation Measures

(a) Violate water quality or waste discharge requirements

The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels but does not include specific development proposals. Any future development project, including development on the Remaining Needs Sites, would be required to be designed to treat all of its stormwater runoff for water quality and hydromodification management to meet current Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, Provision C.3 requirements as prescribed in the Municipal Regional NPDES Permit issued by the San Francisco Bay Regional Water Quality Control Board.

Therefore, the project would not directly violate water quality or waste discharge requirements, and there would be no impact.

(b) Substantially deplete or interfere with groundwater supplies

The project is within the Livermore Valley Groundwater Basin, which extends about 14 miles from the Pleasanton Ridge east to the Altamont Hills and about three miles from the Livermore Upland north to the Orinda Upland. The Alameda County Flood Control and Water Conservation District, known as Zone 7, extracts groundwater from the Livermore Valley Main Groundwater Basin (Main Basin), which contains high-yielding aquifers and good quality groundwater. The Main Basin has an estimated storage capacity of approximately 254,000 acre feet (af). The California Department of Water Resources (DWR) has not identified the Main Basin as a basin in overdraft or a basin expected to be in overdraft. The Main Basin is considered a storage facility and not a long-term source of water supply because Zone 7 only pumps groundwater it has artificially recharged using its surface water supplies.

As such, future water sources would rely on surface water supplies from the Dublin San Ramon Services District (DSRSD) and not local groundwater supplies. The project is required to support Zone 7's groundwater recharge program to only pump groundwater it artificially recharges using its imported surface water or locally-stored runoff from Arroyo del Valley. Compliance with this requirement would maintain groundwater at a no net loss for the Livermore Valley Groundwater Basin.

Therefore, the project would not directly result in a net increase in groundwater extraction from Livermore Valley Groundwater Basin, and there would be no impact.

(c) Substantially alter existing drainage patterns

Future development would not significantly change existing drainage patterns and proposed storm drain facilities would be required to be adequately sized for project runoff. All future development projects would be required to comply with the City's drainage system planned improvements and Watercourse Ordinance with appropriate sizing and construction of downstream facilities. Additionally, General Plan Implementing Policy 7.3.1.B.2 requires the City to review development proposals to ensure site design that minimizes soil erosion and volume and velocity of surface runoff. In addition, General Plan Guiding Policies 12.3.5.A.1 through 12.3.5.A.3 include provisions to protect the quality and quantity of surface water, and minimize stormwater runoff, and provide adequate stormwater facilities.

Therefore, the project would not directly substantially alter existing drainage patterns, and there would be no impact.

(g) Inundation by seiche, tsunami, or mudflow

The City is not located near a major body of water that could result in a seiche. The risk of potential mudflow is considered low since no historic landslides or mudflows have been identified in the City.

Therefore, the project would not directly result in inundation by seiche, tsunami, or mudflow, and there would be no impact.

(h) Conflict with water quality control or groundwater management plans

Future development would be required to incorporate and comply with the drainage system master planned improvements as designed and approved by state and local agencies. Applicable regulations include but are not limited to the Municipal Regional Stormwater NPDES Permit Provision C.3 Requirements (MRP), and the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). All future development projects would also be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. General Plan Implementing Policy 7.3.1.B.1 requires the City to enforce these and other applicable water quality control regulations for all new development projects.

DSRSD, the City of Pleasanton, the City of Livermore, and the California Water Service Company have agreements with Zone 7 limiting their extraction of the long-term sustainable yield of the Main Basin. This agreement, along with Zone 7's other groundwater management activities, keeps the groundwater budget in balance under average hydraulic conditions. Each of these entities, known as retailers, has a groundwater pumping quota (GPQ) and are responsible for a fee if they pump in excess of their GPQ.

Given these agreements, future development projects would not result in groundwater overdraft, substantial local groundwater level drawdown, or substantially redirect stormwater such that natural basin recharge would be precluded.

Therefore, the project would not directly conflict with water quality control or groundwater management plans, and there would be no impact.

Land Use and Planning

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X

Project Impacts and Mitigation Measures

(a) Physically divide an established community

The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels but does not include specific development proposals. Projects with the potential to divide a community include highways, railways, and large building or infrastructure projects that change the street grid. Future development of the Remaining Needs Sites would be infill in existing urban areas of the City and would be incorporated within the existing street grid.

Therefore, the project would not physically divide an established community, and there would be no impact.

(b) Conflict with general plan

The Housing Element is a mandatory element of the General Plan and has been prepared to ensure consistency with it. As a policy-level document, the Housing Element encourages the provision of a range of housing types and affordability levels but does not include specific development proposals

Future development of the Remaining Needs Sites would be reviewed for consistency with the Dublin General Plan, Specific Plans and Zoning Ordinance, and any applicable land use plan, policy or regulation of an agency having jurisdiction over the project. Furthermore, future development projects would be reviewed in compliance with CEQA prior to approval, as

applicable. Project and site-specific concerns would be evaluated and addressed as development projects for specific sites are proposed.

Therefore, the project would not conflict with any applicable land use plan, policy or regulation of an agency having jurisdiction over the project, and there would be no impact.

Mineral Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. 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?				X
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?				X

Project Impacts and Mitigation Measures

(a-b) Loss of known or identified mineral resource

The City does not have any mineral extraction areas so there would be no impacts to mineral resources.

Noise

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Generation of excessive groundborne vibration or groundborne noise levels?				X

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
c) 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?				X

Project Impacts and Mitigation Measures

(a-b) Exposure to or generate noise or vibration exceeding standards

Noise in Dublin comes from transportation sources, including freeways, arterials, and roadways and non-transportation sources, such as commercial/industrial activities, construction equipment and various community activities. The noise environment in Dublin is dominated by vehicular traffic including vehicular generated noise along Interstates 580 and 680 and primary and secondary arterials. In addition, a number of other sources contribute to the total noise environment such as construction activities, power tools, and gardening equipment.

The Noise Element of the City of Dublin General Plan establishes residential, commercial, and industrial land use compatibility standards for noise measured at the property line of the receiving land use. The land use compatibility noise criteria provide the basis for decisions on location of land uses in relation to noise sources and for determining noise mitigation requirements. Per the City's Land Use Compatibility for Community Noise Environments standards for residential land uses, the normally acceptable exterior noise level is 60 dBA CNEL or less, and noise levels over 70 dBA CNEL are considered normally unacceptable.

Per General Plan Implementing Policy 9.2.1.B.4, noise impacts related to all new development is required to be analyzed by a certified acoustic consultant. General Plan Implementing Policy 9.2.1.B.6 requires the City to review all multi-family development proposals within the projected 60 CNEL contour for compliance with noise standards (45 CNEL in any habitable room) as required by state law.

As no specific development projects are proposed by the project, no specific noise and vibration impacts can be evaluated. Indirect construction activity associated with future potential development could result in temporary increases in noise levels. All construction activities would be required to comply with the City's Municipal Code requirements and undergo project-level CEQA review to analyze impacts related to noise when more specific project details are known. Such compliance would reduce excessive noise levels associated with construction activities.

Operational noise associated with future residential development would be from stationary and mobile sources similar to current urban conditions and by the nature of their use would not exceed existing standards.

Therefore, the project would not result in exposure to or generate noise or vibration exceeding standards, and there would be no impact.

(c) Excessive noise level near a public or private airport

Some portions of the City are located within the Livermore Municipal Airport's Airport Safety Zone, Airport Protection Area, and/or Airport Influence Area. However, the Remaining Need Sites would not be located in proximity to the Airport Safety Zone, Airport Protection Area and/or Airport Influence Area. Furthermore, the type of (light) aircraft, the distance to the airport, and the frequency of noise would not result in significant excessive noise level impacts to future residential uses.

Therefore, the project would not result in exposure to excessive noise level near a public or private airport, and there would be no impact.

Population and Housing

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Project Impacts and Mitigation Measures

(a-b) Population growth and displacement

According to the US Census (2020), the average Dublin household size is 2.99 persons. While no specific development projects are proposed, the project includes 1,825 additional units to meet the City's RHNA, resulting in an estimated additional population of 5,457 persons. Future growth associated with the project would be within the City's population growth forecast from 72,589 (2020 US Census population) to 83,595 by 2040 (Plan Bay Area 2040). Therefore, the project's population growth would be consistent with the City's population projections.

Implementation of the project would accommodate additional housing and no housing units or people would be displaced as a result of the project.

Therefore, the project would not result in induced substantial population growth or result in existing housing displacement, and there would be no impact.

Public Services

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a) Fire protection?				X
b) Police protection?				X
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Project Impacts and Mitigation Measures

(a) Fire

The Alameda County Fire Department (“Fire Department”) provides fire protection, emergency medical services, and public assistance to the City of Dublin. The Fire Department serves approximately 508 square miles and has a service population of 394,000 people in their entire service area.

Although the addition of new residents associated with future development would increase the demand for fire services. This additional demand, which would be located within an existing urban area, has been anticipated by the Fire Department. As such, implementation of the project is not anticipated to have an adverse effect on response times for fire protection and emergency services and would not affect the Fire Department’s ability to serve the project or City at large.

The project would be required to comply with all applicable state and local building and fire codes. In accordance with California Code of Regulations Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Equipment," the California Occupational Safety and Health Administration (Cal/OSHA) has established minimum standards for fire suppression and

emergency medical services. The California Fire Code contains regulations relating to construction and maintenance of buildings and the use of premises. These codes require a development plan that provides for fire protection systems, ingress and egress, maximum occupancy limitations, and construction techniques and materials dictated by the proposed use of the structure (refer to the City of Dublin's Municipal Code, Chapter 5.08, Fire Code).

Specifically, the Fire Department would review future development plans for conformance with locally-defined performance standards including the California Fire Code, as adopted by the Fire Department, and California Building Code standards, and fund on-site and off-site improvements consistent with existing City regulations and requirements. The City would collect public facilities fees (per DMC Chapter 7.78) from future project applicants to help offset fire protection-related capital improvements and on-going maintenance expenses, such as ensuring adequate water supplies and pressure for fire suppression and minimizing wildland fire hazards.

Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or need for new or physical altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and there would be no impact.

(b) Police

The Alameda County Sheriff's Office provides law enforcement to the City of Dublin on a contract basis (known locally as "Dublin Police Services"). Dublin Police Services responded to 30,706 calls for service in 2020 with an average patrol response time of approximately 5.3 minutes (Dublin Police Services, 2021). This response time meets the Alameda County Sheriff's Office standards and the industry average of five minutes.

Although the addition of new residents in the City would increase the demand for police services, implementation of the project is not anticipated to have an adverse effect on response times for police services and would not affect the ability of Dublin Police Services to serve the project.

Future development projects would be required to pay public facilities fees (DMC Chapter 7.78) to help off-set police service capital improvements and on-going maintenance expenses prior to issuance of a building permit to ensure that future projects would not cause impacts on law enforcement services.

Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities or need for new or physical altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and there would be no impact.

(c) Schools

Dublin Unified School District (DUSD) provides Transitional Kindergarten (TK) through grade 12 educational services to the City of Dublin. During the 2020-2021 school year, DUSD had a total enrollment of 12,604 students, 689 certified staff members, 359 classified staff, and 65 administrators.

In accordance with Government Code Section 65995(h), future development projects would be required to pay school impact fees at the time of the building permit issuance. DUSD currently implements a Level 2 fee of \$7.96 per square foot of residential development and \$0.78 per square foot for commercial and industrial uses. These fees are used by DUSD to mitigate impacts associated with long-term operation and maintenance of school facilities.

Future project applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount established by DUSD. School fees from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment growth within DUSD's service area and would allow for DUSD to allocate these funds as deemed necessary. Pursuant to Government Code Section 65995, payment of development fees is "full and complete mitigation" for impacts on schools. Therefore, there would be no impact.

(d, e) Parks and other public facilities

The City of Dublin's Parks and Recreation Master Plan establishes the goals, standards, policies, and action programs to guide the acquisition, development, and management (operations and maintenance) of Dublin's park and recreation facilities through the ultimate build-out of the City in accordance with the General Plan.

Future residential development would increase the demand for neighborhood and community parks due to the projected increase in the population. The City's Public Facilities Fee would be applied to future development projects, which would vary depending on the size and location of the development, and credits for the dedication of land and funding for construction of the parks.

Construction associated with future development would incrementally increase the long-term maintenance demand for roads and other public facilities. However, such additional maintenance demands would be off set by additional City fees and property tax revenues accruing to the City.

Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or other public facilities or need for new or physical altered parks or other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and there would be no impact.

Recreation

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Project Impacts and Mitigation Measures

(a, b) Increase the use of existing recreation facilities causing deterioration or require new recreation facilities

See the Public Services section for a discussion of recreation facilities.

Transportation

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)??				X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

Project Impacts and Mitigation Measures

(a) Conflict with applicable transportation circulations plans/standards

The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels but does not include specific development proposals. These sites identified in the Housing Element for future housing development are located in existing urban areas and would not change the existing street grid if developed.

Per General Plan Guiding Policy 5.9.1.A.1, prior to issuance of any building permit, a project applicant is required to pay development impact fees that would address potential traffic impacts. This requirement is independent of the CEQA process and would be unaffected by the project. In addition, any future development projects supported by the Housing Element and land use changes would be reviewed as part of development review process to ensure compliance with state, regional, and local plans.

Therefore, the project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, and there would be no impact.

(b) Conflict with CEQA Guidelines Section 15064.3

The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels but does not include specific development proposals. Future development would be subject to project-specific environmental review pursuant to CEQA, as applicable.

Per the City of Dublin Transportation Impact Analysis (TIA) Guidelines, future development projects would be analyzed to determine if they would result in traffic impacts based on vehicle miles traveled (VMT). Section 4.2 of the City of Dublin TIA Guidelines provides criteria for land use types and intensities that can be “screened out” from requiring detailed VMT analysis because the nature of these land uses is presumed to have a less than significant VMT impact; this includes affordable housing projects. If a project contains less than 100 percent affordable housing, the portion that is affordable is screened out of needing a detailed VMT analysis.

Market-rate housing projects would be evaluated using the City’s Travel Demand Model, an area specific version of the Alameda County Transportation Commission (ACTC) Travel Demand Model, to calculate the average VMT per capita. The threshold of significance is defined at 15 percent below the regional average, or 24.7 miles. As part of the development review process, all future residential projects would be analyzed per the City’s TIA Guidelines to ensure consistency with CEQA Guidelines Section 15064.3.

Therefore, the project would not conflict with CEQA Guidelines Section 15064.3, and there would be no impact.

(c) Substantially increase hazards due to a design feature or result in inadequate emergency access

Future development projects would be reviewed to ensure that design features would not increase hazards nor result in inadequate emergency access. General Plan Guiding Policies 5.2.2.A.1, 5.2.2.A.3, 5.2.3.A.1, and 5.4.3.A.1 and Implementing Policy 5.2.2.B.2 would require pedestrian and vehicular design to ensure there is adequate emergency access. In addition, the City's Bicycle and Pedestrian Plan as well as applicable City roadway and fire design standards would be implemented, as applicable, as part of the development review process.

Therefore, the project would not substantially increase hazards due to a design feature or result in inadequate emergency access, and there would be no impact.

Tribal Cultural Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X

Project Impacts and Mitigation Measures

(a) Listed or eligible for listing in the California Register of Historical Resources

The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels but does not include specific development proposals. The Remaining Needs Sites are either undeveloped or covered with parking lots such that there are no listed or eligible for listing historical resources.

Therefore, the project would not affect any historic resources listed or eligible for listing in the California Register of Historical Resources, and there would be no impact.

(b) Significant resource pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1

Per Senate Bill 18, the City of Dublin sent letters to 14 California Native American Tribes regarding the project. No requests for consultation were received.

Furthermore, given the programmatic nature of the project, any future development would be required to comply with applicable regulatory requirements protecting tribal cultural resources, including Public Resources Code Section 5024.1.

Therefore, the project would not result in an substantial adverse change in the significance of a resource to a California Native American tribe, and there would be no impact.

Utilities and Service Systems

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or				X

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
otherwise impair the attainment of solid waste reduction goals?				
e) Comply with federal, state, and local statutes and regulations related to solid waste?				X

Project Impacts and Mitigation Measures

(a, c) Wastewater treatment requirements and facilities

The Housing Element is a policy document and would not result in the approval of any physical improvements.

Wastewater associated with future development would be accommodated within the DSRSD Wastewater Treatment Plant. Per the DSRSD 2017 Wastewater Treatment and Biosolids Facilities Master Plan, DSRSD's Wastewater Treatment Plant has a total capacity of 75 million gallons per day (mgd).

Future development associated with land use changes represent a delta from their existing commercial, or mixed-use land use designation and this incremental change is not considered significant in context to the City's General Plan buildout assumptions. Furthermore, as discussed in the Population and Housing Section, the additional population associated with the project would be consistent with the General Plan buildout projections. The DSRSD Master Plan anticipates adequate wastewater treatment capacity to meeting projected future demand during the Housing Element planning period.

General Plan Implementing Policy 4.5.1.B.1 requires that prior to project approval, developers demonstrate that adequate capacity exists in sewage treatment and disposal facilities for their projects prior to the issuance of building permits.

Eastern Dublin Specific Plan Program 9Q: Connection to Public Sewers requires all developments within the Specific Plan area to be connected to public sewers. Exceptions to this requirement, in particular septic tank systems, are allowed upon receipt of written approval from Alameda County Environmental Health Department and DSRSD.

Therefore, the project would not result in a significant impact to wastewater treatment requirements and facilities, and there would be no impact.

(b) Sufficient water supplies

The Housing Element is a policy document and would not result in the approval of any physical improvements.

DSRSD has master planned their water supply capacity, water distribution system, reservoirs and pumping in the project area in accordance with the General Plan demand levels and buildout projections as documented in the current Urban Water Management Plan (UWMP, 2020). Connection fees are based on these master plans.

General Plan Guiding Policy 12.3.1.A.1 requires the City to work with Zone 7 and DSRSD to secure an adequate water supply for, and provide water delivery to, existing and future customers in Dublin.

Per SB 610, a residential project with 500 or more units is required to prepare a Water Supply Assessment to determine water supply sufficiency for a 20-year projection in addition to the demand of existing and other planned future uses. Per SB 221, future development projects would be required to obtain written verification from DSRSD that sufficient water supply is available. This may include the use of recycled water as a way of water conservation.

Future development associated with land use changes represent a delta from their existing commercial, or mixed-use land use designation and this incremental change is not considered significant in context to the City's General Plan buildout assumptions. Furthermore, as discussed in the Population and Housing Section, the additional population associated with the project remains consistent with the General Plan buildout projections. The UWMP anticipates adequate water supply for meeting projected future demand during the Housing Element planning period.

Therefore, the project would not result in a significant impact to water supply, and there would be no impact.

(d, e) Solid waste disposal and regulatory compliance

Approval of future development projects would incrementally increase the generation of solid waste. Over the long term, the annual rate of solid waste reaching the landfill would decrease as a result of statewide regulations mandating increased recycling and organics diversion.

General Plan Implementing Policy 4.4.1.B.3 requires that prior to project approval, the applicant must demonstrate that capacity exists in solid waste disposal facilities for their project. In addition, future development projects would be required to comply with the Dublin Municipal Code regarding solid waste, which includes DMC Chapter 5.32 - Solid Waste Management; Chapter 7.30 - Waste Management Plan; and Chapter 7.98 - Solid Waste and Recycling Enclosure Standards.

Therefore, the project would not result in a significant impact to solid waste disposal and regulatory compliance, and there would be no impact.

Wildfires

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
20. Wildfires. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan??				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Project Impacts and Mitigation Measures

(a) Impair emergency response plan

Given the programmatic nature of the project, any future development projects would be required to comply with the City's Wildfire Management Plan and DMC Chapter 7.32 to ensure that emergency access and response plans are not impaired. Future development would also be reviewed as part of the development review process to ensure there is adequate fire protection and emergency response access.

Therefore, the project would not impair an adopted emergency response plan or emergency evacuation plan, and there would be no impact.

(b) Pollutants or uncontrolled spread

None of the Remaining Needs Sites are located in areas mapped as a Very High Fire Hazard Severity Zone and, therefore, potential future projects would not be exposed to wildfire risk.

Future development would be reviewed as part of the development review process to minimize the risk that any pollutant concentrations from wildfires.

Therefore, the project would not exacerbate wildfire risk due to slope, prevailing winds or other factors, and there would be no impact.

(c) Infrastructure

Potential future development would occur as infill, replacement, or new residential development within existing urban areas in the City. Thus, it is not anticipated that any future development projects would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment.

Future development would be reviewed as part of the development review process to ensure that all infrastructure is constructed according to the latest City and state fire code requirements.

Therefore, the project would not exacerbate wildfire risk due to required installation or maintenance of related infrastructure, and there would be no impact.

(d) Slope instability resulting in post-fire slope instability

None of the Remaining Needs Sites are located areas that are subject to landslides. Therefore, potential future projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As discussed in the Hydrology and Water Quality section, future development projects would be required to prepare an erosion control plan that implements slope erosion control measures during and post-construction and does not change historic drainage patterns outside of the project site.

Therefore, the project would not expose people or structures to significant risk, and there would be no impact.

Mandatory Findings of Significance

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
21 MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
a) 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				X

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.)				X
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

(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 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?

As discussed and analyzed in this document, the project would not degrade the quality of the environment. Additionally, for the reasons discussed in the Biological Resources section, the project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. Further, for the reasons identified in the Cultural Resources section, the project would not substantially affect significant cultural resources, and no impacts to such resources would occur.

(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)?

No impacts have been identified in this document and, therefore, there are none that would be cumulatively considerable.

The project includes a Housing Element Update, which is a policy-level document that encourages the provision of a variety of housing types and affordability levels. The project does not include specific development proposals. All future residential development associated with the land use changes within the City would be required to conform to local regulations, including the General Plan and Dublin Municipal Code. Environmental impacts as a result of future development projects would be considered pursuant to CEQA, as applicable.

As such, this Initial Study demonstrates that there is no substantial evidence that the project may have a significant effect on the environment and, therefore, a Negative Declaration is warranted consistent with CEQA Guidelines Section 15070.

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

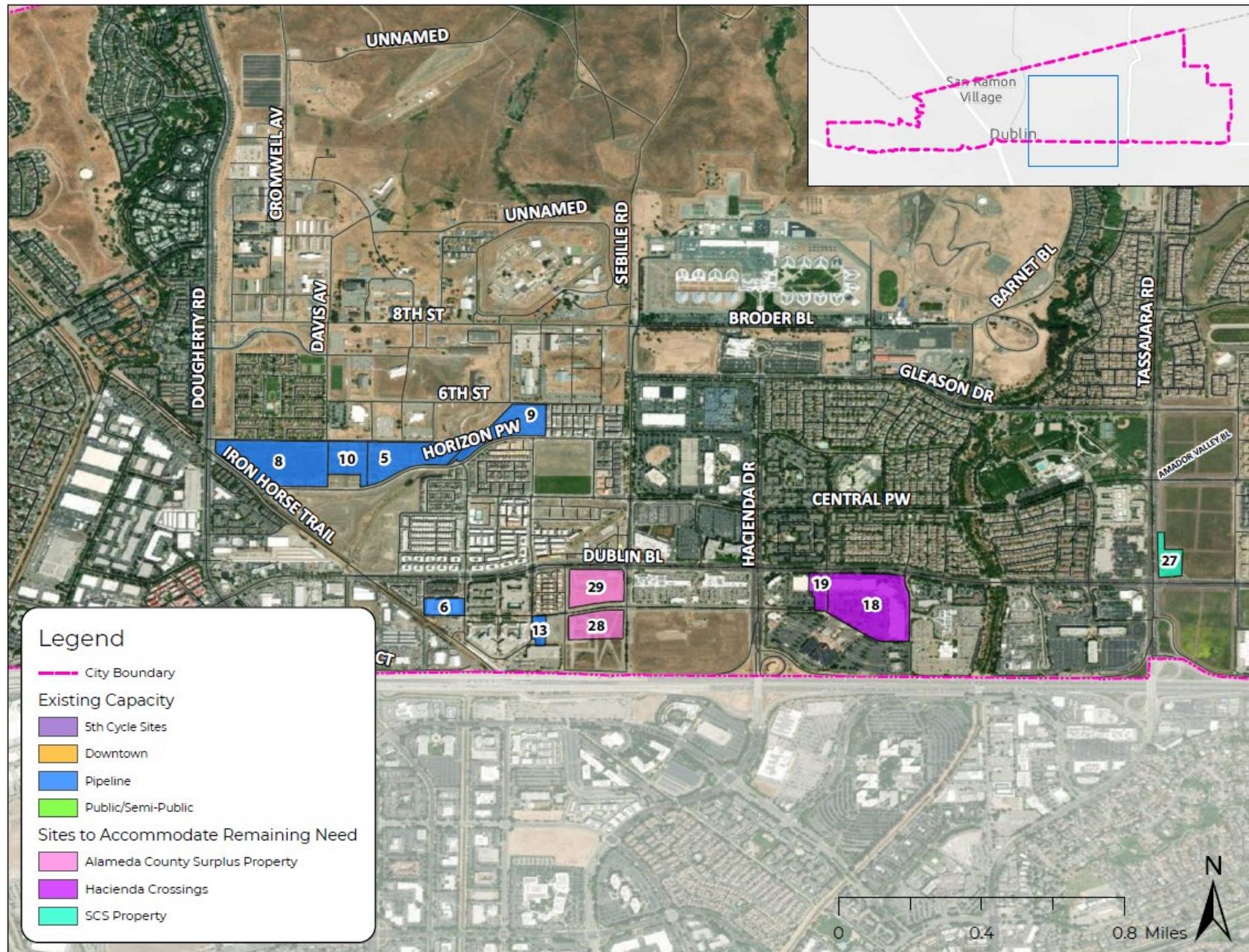
The project would not result in adverse environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

All future residential development within the City would be required to conform to local regulations, including the General Plan and Dublin Municipal Code. Environmental impacts as a result of future development projects would be considered pursuant to CEQA, as applicable. Therefore, the project would result in no environmental effects that would cause substantial direct or indirect adverse effects on human beings, and there would be no impact.

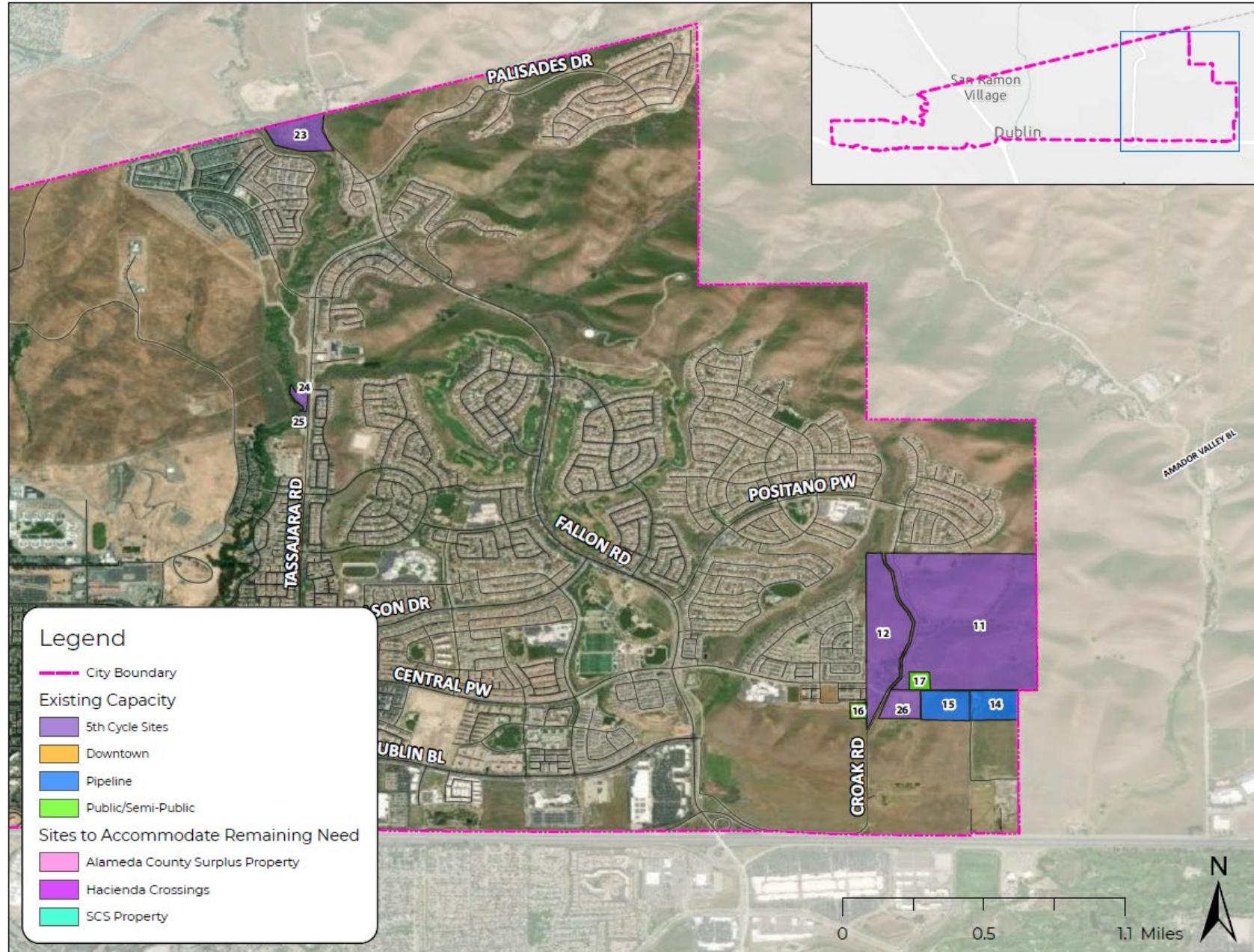
As such, this Initial Study demonstrates that there is no substantial evidence that the project may have a significant effect on the environment and, therefore, a Negative Declaration is warranted consistent with CEQA Guidelines Section 15070.



Source: Kimley-Horn, 2022



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