

4 INTRODUCTION TO ENVIRONMENTAL ANALYSIS

This chapter provides an introduction to the analysis provided in this Draft Environmental Impact Report (EIR). The environmental assessment methodology, effects found not to be significant, and cumulative approach to impact analysis are described in this chapter.

4.1 ENVIRONMENTAL ASSESSMENT METHODOLOGY

The environmental analysis provided in **Chapter 5.0, Environmental Impact Assessment**, describes the potential environmental impacts associated with construction and operation of the Project. The analysis considers public comments received during the scoping process (see **Appendix A** of this Draft EIR). In general, the analysis of each environmental topic consists of five sections: introduction, regulatory setting, existing conditions, impacts and mitigation measures (including cumulative impacts), and references. An overview of the information included in these sections is provided below.

INTRODUCTION

The introduction section outlines the topic being analyzed and the contents of the analysis. It provides the sources used to evaluate the potential impacts associated with the Project. Additionally, it lists issues and concerns identified by the public and agencies during the EIR scoping process.

REGULATORY SETTING

The overview of regulatory considerations for each resource topic is organized by agency, including applicable federal, state, regional, and local laws and policies. Local regulatory discussions include plans, policies, and regulatory documents from the City of Dublin (Dublin), Alameda County (County), and the City of Livermore (Livermore), as applicable.

EXISTING CONDITIONS

Existing conditions establishes the study area for the topic and describes the environmental setting in the study area. Study areas vary by topic, to ensure an appropriate geographic area is taken into consideration. Existing conditions provide a baseline for comparing “before the Project” and “after the Project” scenarios. According to Section 15125(a) of the California Environmental Quality Act (CEQA) Guidelines, the environmental setting is typically the on-the-ground condition at the time the Notice of Preparation (NOP) is published. The NOP for this Project was published in May 2017. Existing conditions in 2017 are used as the baseline for comparing existing conditions to conditions with implementation of the Project. Where specific changes to the existing environment have occurred since 2017, and those changes could affect the results of the impact analysis in this Draft EIR, the baseline conditions have been updated. This primarily applies to residential development which has been constructed north and west of the Project site, and the opening and subsequent closure of a school on North Canyons Parkway.

IMPACTS AND MITIGATION MEASURES

This section lists significance criteria that are used to evaluate impacts, followed by a discussion of the methodology used to evaluate impacts against the significance criteria. This section then discusses impacts that would result from implementation of the Project. Significance criteria are assigned a letter in each section, to make navigation in the impacts discussion more efficient for the reader. The impact discussion is organized as follows:

“No Impact Summary”: At the beginning of each impact analysis, a summary of significance criteria with a “no impact” determination is provided, and the significance criterion is not discussed further. If there were no “no impact” determinations for the topic, a statement to that effect can be found under this header.

“Impacts of the Project”: After the summary of “no impact” determinations, the remaining significance criteria are presented. For each significance criteria, potentially significant impacts are discussed first along with mitigation, followed by less-than-significant impacts.

Significance criteria define specific thresholds used to determine whether a Project impact would be significant under CEQA. The impact evaluation in this Draft EIR takes into account the whole action associated with the Project, including offsite and onsite, Project and cumulative, direct and indirect, and construction and operational impacts.

Classification of Impacts

Under CEQA, a variety of terms are used to describe adverse impacts. The definition of terms used in this Draft EIR is presented below.

Significant and Unavoidable Impact

A significant and unavoidable impact is an impact that exceeds the defined standards of significance and cannot be avoided or reduced to a less-than-significant level through implementation of reasonable and feasible mitigation measures.

Significant Impact

A significant impact is an impact that exceeds the defined standards of significance and can be avoided or reduced to a less-than-significant level through implementation of reasonable and feasible mitigation measures.

Less-Than-Significant Impact

A less-than-significant impact is an impact that is adverse but that does not exceed the specified standards of significance.

No Impact

A “no impact” determination is provided when there would not be an impact to the existing environment.

Mitigation

For potential significant impacts, mitigation measures are provided and identify the means by which impacts could be reduced or avoided. Standard existing regulations, requirements, permits, programs, and procedures that are applied to all similar projects are taken into account in the Project analysis prior to identifying additional Project-specific mitigation that may be needed to reduce significant impacts. Where reasonable and feasible mitigation would not be sufficient to reduce impacts to a less-than-significant level, a significant unavoidable impact is identified.

MITIGATION MONITORING

Public Resources Code Section 21081.6 establishes two distinct requirements for agencies involved in the CEQA process. Subdivisions (a) and (b) of the section relate to mitigation monitoring and reporting, and the obligation to mitigate significant effects where possible. Pursuant to subdivision (a), whenever a public agency completes an EIR and makes a finding pursuant to Section 21081(a) of the Public Resources Code taking responsibility for mitigation identified in the EIR, the agency must adopt a program of monitoring or reporting which will ensure that mitigation measures are complied with during implementation of the Project. After public circulation of the Draft EIR, public comments will be addressed and a Final EIR will be prepared. Based on the Final EIR, a mitigation monitoring and reporting program (MMRP) will be prepared and will identify responsible parties and timing for all mitigation measures.

4.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

Pursuant to the CEQA Guidelines Section 15128, “An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.” Based on the scope of the Project, comment letters in response to the NOP, site visits, and review of Project plans and technical reports, the following resource topics were found to not have impacts that would be considered potentially significant. Therefore, these topics are not discussed further in this Draft EIR.

AGRICULTURAL RESOURCES

Federal Regulations

The Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that, to the extent possible, federal programs are administered to be compatible with state and local units of government and private programs and policies adopted to protect farmland. Federal agencies are required to develop and review their policies and procedures to implement the FPPA every two years.

State Regulations

The California Land Conservation Act of 1965

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value.

Local Regulations

City of Dublin

Dublin has established an Urban Limit Line and is also part of a Development Elevation Cap as a long-term commitment by Dublin to manage growth and protect agricultural uses east of Dublin. Dublin's General Plan and the Eastern Dublin Specific Plan include development of urban uses in eastern Dublin, within the Urban Limit Line.

Alameda County

The County has established an Urban Growth Boundary for the purpose of concentrating development and preserving undeveloped land for open space and agricultural uses. The East County Area Plan includes policies that support the maintenance of the Urban Growth Boundary, specifically in relation to the permanent protection of the agricultural area between Dublin and Livermore.

City of Livermore

Livermore is completely surrounded by an Urban Growth Boundary. The boundary is intended to protect existing agricultural uses and natural resources outside Livermore from future urban development.

Existing Conditions

The Farmland Mapping and Monitoring Program (FMMP) designates the Project site as entirely grazing land, on which the existing vegetation is suited to the grazing of livestock. The Project site is defined in **Chapter 3.0, Project Description**, and shown on **Figure 3-7** and **Figure 3-11**. Site visits confirmed areas of the Project site are used for livestock grazing. The areas surrounding the Project site to the west of Fallon Road, south of Interstate I-580 (I-580), and east of Doolan Road are designated primarily as Urban and Built-Up land. No Prime or Unique farmlands, or farmlands of local or statewide importance, exist within or adjacent to the Project site. Mapping for agricultural land protected under Williamson Act contracts was also reviewed. The Project site and adjacent properties do not contain any agricultural land protected under the Williamson Act, and the Project site is entirely designated as "Non-Enrolled Land"; land not enrolled in a Williamson Act contract and not mapped by FMMP as Urban and Built-Up Land or Water. Additionally, there are no forest resources or Timber Production Zones within the Project site or on nearby parcels.

Project Impacts

No protected farmlands or timberlands exist within the Project site or vicinity. The Project would not include any change in land use, or any development of uses incompatible with existing land uses or the land use policies contained in each jurisdiction's General Plan. The Project would support implementation of the General Plans of each jurisdiction, which include the extension of Dublin Boulevard eastward to connect with North Canyons Parkway. The Project would not directly or indirectly introduce new, unplanned development in Dublin, County or Livermore, and would therefore not conflict with the urban growth limits established by those jurisdictions. Therefore, no impact would occur.

MINERAL RESOURCES

The Project site lies within Mineral Resource Zone 1 (MRZ-1), as mapped by the California Geological Survey (formerly the California Division of Mines and Geology). MRZ-1 zones are "areas where adequate information indicates that no significant mineral despoils are present, or where it is judged that little likelihood exists for their presence". The northern extent of the Project's construction footprint may overlap with Mineral Resource Zone 4 (MRZ-4), which is defined as "areas where available information is inadequate for assignment to any other MRZ zone". The Project site is not a mineral resource recovery site. Therefore, no impacts to mineral resource recovery would occur.

Due to the high value of sand and gravel deposits in the vicinity of Livermore, the California Geological Survey has mapped and classified the aggregate resources of the Livermore-Amador Valley. Most of the valley floor south of I-580 is classified as an area of significant mineral resources. This portion of the valley floor includes areas classified as Mineral Resource Zone 2 (MRZ-2) and Mineral Resource Zone 3 (MRZ 3). An MRZ-2 is an area where adequate information indicates that significant mineral deposits are present. Areas classified as MRZ-3 are considered to contain mineral deposits, but the significance of the deposits cannot be determined on the basis of available information. The Project would not indirectly impede access to these sites, based on the distance between these resources and the Project site, and the project type. Therefore, the Project would not indirectly interfere with mineral resource recovery. No impact would occur.

4.3 CUMULATIVE IMPACTS

Under CEQA, cumulative impacts are defined as two or more individual effects, which when considered together, are considerable or that compound or increase other environmental impacts. A cumulative impact is the change in the environment that results from the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (CEQA Guidelines Section 15355).

CUMULATIVE IMPACT ANALYSIS METHODOLOGY

Consistent with CEQA Guidelines, Section 15130(a), the discussion of cumulative impacts in this Draft EIR focuses on significant and potentially significant cumulative impacts and whether the Project would have a considerable contribution to those impacts. According to CEQA Guidelines, Section 15130(b), “the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great a detail as provided for the effects attributable to the Project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.”

A contribution to a cumulative impact may be considered less than significant if the project will include implementation of a plan or program designed to avoid the cumulative impact (CEQA Guidelines Section 15064[h]), or if the project will implement or fund its fair share of a mitigation measure designed to alleviate the cumulative impact (CEQA Guidelines Section 15130[a]).

The majority of the analysis presented in this Draft EIR uses the City of Dublin’s General Plan and EIR, the County’s East County Area Plan, and Livermore’s General Plan to identify cumulative impacts and to determine whether the Project would make a considerable contribution to an identified cumulative impact. Additionally, this Draft EIR considers relevant development projects within the Project vicinity (within a 1,000 foot radius), as summarized in **Table 4-1**. This approach is used for all topics evaluated in this Draft EIR minus air quality, noise, and traffic. The cumulative impact approach for air quality, noise, and traffic uses traffic volumes based on forecasts from the Alameda County Transportation Commission Countywide traffic model. The most recent version of the countywide model is based on land use assumptions from the Association of Bay Area Governments’ Projections 2013 (Plan Bay Area) with a base year of 2013, an interim year of 2025 and a long-range year of 2040. The interim year (2025) represents the anticipated opening year for the Project. The 2040 volumes are used for cumulative analysis. This model anticipates future land use changes within the region and future roadway improvements expected to occur by 2040.

Table 4-1 Present and Reasonably Foreseeable Projects

Project	Description	Status and Timing
Dublin		
Grand View Project	Mixed-use development on 122 acres, including residential, retail, dining, hotel, fitness, office, and private recreational uses.	Under Review
Alameda County		
None		
Livermore		
1000 Airway Boulevard	Demolish existing hotel and construct two new hotels, one containing 122 guest rooms and one containing 119 guest rooms	Approved
2000 Freisman Road	Up to 244,152 square feet of new retail, restaurant, hotel, and auto dealership uses	Under Construction
5200 Wolf House Drive (2000 Freisman Road)	New hotel with 122 guest rooms	Approved
5400 Wolf House Drive (2000 Freisman Road)	New hotel with 104 guest rooms	Approved

Source: City of Dublin, 2018; Alameda County, 2018; City of Livermore, 2018

4.4 REFERENCES

California Department of Conservation. 2018. *Farmland Mapping and Monitoring Program*. Available: <http://www.conservation.ca.gov/dlrp/fmmp>. Accessed: 11/27/18.

CA Department of Mines and Geology. 2018. *California Geological Survey*. Accessed at <http://www.conservation.ca.gov/cgs>. Accessed: 11/27/18.

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