

## 7 OTHER CEQA CONSIDERATIONS

As required by the California Environmental Quality Act (CEQA) and discussed in Section 15126 of the CEQA Guidelines, this chapter discusses growth-inducing impacts of the Project, significant irreversible environmental changes, and significant unavoidable impacts. Additionally, this section provides a discussion of vehicle miles traveled (VMT), Senate Bill (SB) 743, and how the Project would change VMT in the immediate Project vicinity and regional roadway network.

### 7.1 GROWTH INDUCEMENT

CEQA requires a discussion of the ways in which a project could induce growth. CEQA Guidelines Section 15126.2(d) identifies a project as growth inducing if it would “foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Furthermore, the CEQA Guidelines require that an environmental impact report (EIR) address the ways a project could be growth inducing by discussing how the project may “encourage and facilitate other activities that could significantly affect the environment.” However, the CEQA Guidelines do not require a prediction or speculation of where, when, and in what form such growth would occur.

According to the CEQA Guidelines, a project would have potential to induce growth if it would:

- A. Remove obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through the provision of new access to an area, or a change in a restrictive zoning or General Plan land use designation.
- B. Result in economic expansion and population growth through employment opportunities and/or construction of new housing.

CEQA does not require separate mitigation for growth inducement as it is assumed that these impacts are already captured in the analysis of environmental impacts.

- A. Remove obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through the provision of new access to an area, or a change in a restrictive zoning or General Plan land use designation.

Growth in an area may indirectly result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include non-existent or inadequate access to an area, or the lack of essential public services (e.g., water, wastewater, etc.).

The Project would not include or result in a change in any zoning or land use designation. The Project would include extension of the transportation network into developable areas of eastern Dublin, and would include the extension of utilities within the roadway to provide future service to

developable areas in Dublin. The Project would connect eastern Dublin to Livermore through an undeveloped area of unincorporated Alameda County (County). Within the County, land use development other than minor agricultural-related uses is prohibited. Within Livermore, the area adjacent to the Project is currently developed with business and commercial uses.

The Project would not reasonably be expected to induce unplanned growth in Dublin. The Project would not directly affect the rate, type, or amount of planned growth in eastern Dublin, as the Project includes a roadway extension only. The Project would indirectly support the rate, type, and amount of growth planned in eastern Dublin.

## CITY OF DUBLIN

The Project is included in the Land Use and Circulation elements of Dublin's General Plan and the Eastern Dublin Specific Plan (EDSP). The Project is allowed in the Open Space Initiative Protection Area in Dublin. In addition to the Project itself, future land uses surrounding the Project site in Dublin are planned for in these documents. As discussed in the *Community Impact Assessment (CIA)*<sup>1</sup> prepared for the Project, planned growth in the region has been included and fully evaluated through Plan Bay Area and in the applicable CEQA documents for each jurisdiction's adopted General Plan, as well as the EDSP.

The Project would include installation of new water and wastewater lines within the Project site to support planned development in Dublin. Installation of utilities as a part of the Project would avoid or minimize additional, future utility trenching at the Project site. Wastewater lines would be extended from the Dublin Boulevard/Fallon Road intersection to the eastern edge of Dublin in order to support planned growth in eastern Dublin. Water lines would be extended from the Dublin Boulevard/Fallon Road intersection to the Doolan Road/North Canyons Parkway intersection. Water lines would be extended to intertie with the existing water system in Livermore to provide additional water service capacity to both jurisdictions in the event of an emergency (also known as an emergency intertie). These utility lines would support future land use development in Dublin as described in Dublin's General Plan and the EDSP. For a detailed discussion of utilities, refer to **Section 5.15, Utilities**.

## ALAMEDA COUNTY

The Project would not reasonably be expected to indirectly induce growth in the County, as it would include a roadway only which would traverse County land designated for agricultural and resource conservation uses. The Project would not include alterations to the County's urban growth limit, which prohibits urban development in unincorporated areas designated for agricultural and resource management uses. Further, the Project would not connect to any existing roadways within unincorporated County land, and therefore would not provide expanded access to unincorporated areas of the County, but would rather provide a roadway connection through the County.

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<sup>1</sup> The CIA is available on file with the City of Dublin at 100 Civic Plaza, Dublin, California.

## CITY OF LIVERMORE

The Project would not reasonably be expected to induce unplanned growth in Livermore. The Project would provide new local access between Dublin and Livermore, which would indirectly make Priority Development Areas (PDAs) in Livermore more accessible. The Project and growth within PDAs is planned for in Livermore's General Plan and regional planning documents.

## CONCURRENCE FROM RESPONSIBLE AGENCIES

In the CIA, a screening analysis was used to evaluate potential growth-related impacts. It was determined that indirect, Project-related growth in Dublin is reasonably foreseeable but would not impact resources of concern. This analysis was vetted with each jurisdiction (Dublin, the County, and Livermore) in September 2018, and received concurrence on the determination that the Project would indirectly support planned growth in eastern Dublin. As discussed in **Section 5.12, Public Services**, and **Section 5.15, Utilities** of this Draft EIR, implementation of the Project would not result in significant impacts related to the provision of public services or utilities. This includes growth-related impacts and cumulative impacts.

- B. Result in economic expansion and population growth through employment opportunities and/or construction of new housing.

Typically, the growth-inducing potential of a project is considered significant if it fosters growth in a secondary location, or exceeds assumptions established by pertinent land use plans or regional projections. **Section 5.11, Population and Housing**, addresses indirect population growth as a result of the Project. The Project would not include new employment opportunities beyond those temporary opportunities created during the construction period. Employment opportunities provided by construction of the Project would not reasonably result in the relocation of construction workers to the region. Therefore, the employment opportunities provided by construction are not anticipated to induce indirect growth in the region. The Project would not include any new housing. The Project would indirectly support development of planned uses and associated planned growth in eastern Dublin, County, and Livermore consistent with local and regional planning documents as described above. Therefore, the Project is not anticipated to result in indirect impacts related to growth.

## 7.2 VEHICLE MILES TRAVELED

### BACKGROUND

On September 27, 2013, Governor Brown signed Senate Bill 743 (SB 743). Among other things, SB 743 creates a process to change analysis of transportation impacts under CEQA. Historically, environmental review of transportation impacts has focused on the delay that vehicles experience at intersections and on roadway segments. That delay is measured using a metric known as "level of service," or LOS. Mitigation for increased delay often involves increasing capacity (i.e., the width of a roadway or size of an intersection), which may increase auto use and emissions and discourage

alternative forms of transportation. Under SB 743, the focus of transportation analysis shifts from driver delay to reduction in vehicle miles traveled, creation of multimodal networks, and promotion of a mix of land uses which will result in a reduction of greenhouse gas emissions.

In January 2018, the Office of Planning and Research (OPR) transmitted its proposed changes to the CEQA Guidelines implementing Senate Bill 743 to the California Natural Resources Agency. In December 2018, new CEQA Guidelines were adopted and are now in effect. Lead Agencies have until April 2019 to begin using the new CEQA Guidelines. In addition to the April 2019 timeline, Lead Agencies have until July 1, 2020 to apply updates to the Guidelines related to VMT analysis. As such, analysis of VMT is not required under CEQA at this time, and VMT analysis is not required for this Project specifically because the Notice of Preparation was issued before any final guidelines had been adopted. Moreover, given the evolving nature of VMT analysis under CEQA, the analysis in this Draft EIR is not being formally adopted as a CEQA policy or significance criteria by Dublin as the Lead Agency at this time. The analysis and significance criteria used in this Draft EIR are not binding on Dublin in future EIRs. Accordingly, this Draft EIR provides an assessment of the VMT that would be generated by the Project for informational purposes only.

## CHANGES TO THE CEQA GUIDELINES

The revised text of the CEQA Guidelines includes the following:

(b) Criteria for Analyzing Transportation Impacts.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

## SIGNIFICANCE CRITERIA

In addition to changes to the CEQA Guidelines, OPR published a Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018. The Technical Advisory contains OPR’s technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. It also includes guidance on consideration of the effects of transportation projects on vehicle travel, and provides the following as one option for evaluation of VMT impacts: “A lead agency that uses the VMT metric to assess the transportation impacts of a transportation project may simply report that change in VMT as the impact”. Therefore, for the purposes of this EIR, the significance threshold for evaluating the potential VMT impact of the Project is as follows:

An impact may occur if the project results in a significant increase in VMT compared with the no project condition.

## METHODOLOGY

To estimate changes in VMT as a result of the Project, two analyses were completed by Kittelson & Associates in 2018. The first examined how the Project may influence VMT regionally, and the second examined VMT changes in the immediate Project area. The Alameda County Transportation Commission (ACTC) Countywide model was used to calculate regional and local VMT changes with implementation of the Project in the years 2025 and 2040. The resulting metric is the total VMT and a summary of the average VMT per household and service population (residents and workers) for “No Project” and “Plus Project” conditions. This allows for a calculation of the net change in VMT with the Project.

The regional evaluation of VMT with implementation of the Project shows a negligible decrease in VMT attributable to the Project under the 2025 Plus Project scenario, and a similarly negligible increase in VMT attributable to the Project in the 2040 Plus Project scenario. A comparison of “No Project” and “Plus Project” VMT for the region is shown in **Table 7-1** below and the regional study area is shown in **Figure 7-1**.

**Table 7-1 Regional VMT Comparison**

VMT	2025				2040			
	2025 No Project	2025 Plus Project	Change over 2025 No Project	Percent Change	2040 No Project	2040 Plus Project	Change over 2040 No Project	Percent Change
Daily VMT	5,168,804	5,168,581	-223	0.0%	5,858,023	5,859,720	1,697	0.0%
Annual VMT	1,349,057,818	1,348,999,732	-58,086	0.0%	1,528,944,016	1,529,387,024	443,008	0.0%

VMT	2025				2040			
	2025 No Project	2025 Plus Project	Change over 2025 No Project	Percent Change	2040 No Project	2040 Plus Project	Change over 2040 No Project	Percent Change
AM Peak 1 Hour VMT	500,044	500,316	272	0.1%	561,362	562,026	664	0.1%
PM Peak 1 Hour VMT	533,716	533,400	-317	-0.1%	610,243	609,918	-325	-0.1%

Source: Kittelson & Associates, 2018

As shown above, the Project would result in minimal change to VMT at a regional level. Given the relatively small size of the Project (1.5 miles) within the overall network and the type of project (a local roadway) it is understandable that the Project would not result in notable changes to regional VMT. Taking into consideration the expected margin of error from the Countywide model and expert professional judgement, it is determined that the VMT reductions and increases of 0.0-0.1 percent are negligible and would not represent a significant increase in VMT as a result of the Project.

To further support the VMT analysis for the Project, a “select link” analysis was prepared using the same Countywide model as the regional analysis. This allows for a clearer, more accurate understanding of how the Project would affect VMT. Specifically, the select link analysis evaluated how local drivers would use the Project, and if – and to what extent – drivers would use the Project as an alternative to completing local trips using Interstate 580 (I-580). Local trips were defined as trips with localized origins and destinations occurring north of I-580. For example, under current conditions eastbound drivers travel locally by leaving Dublin Boulevard, entering I-580, and then exiting in Livermore. This requires a longer trip (.52 miles) than would be required with Project implementation. With implementation of the Project, drivers would have the option to complete a shorter local trip using the Dublin Boulevard extension.

The select link analysis determined there are typically 63 vehicles per hour during the AM peak and approximately the same number eastbound during the PM peak that would continue to divert onto I-580 without the Project. The net VMT reduction associated with these trips with implementation of the Project would be 33 VMT during the AM peak hour and 33 VMT during the PM peak hour. This equates to a reduction of about 328 VMT daily. This is generally consistent with the results of the year 2040 regional analysis above, and demonstrates that VMT changes as a result of the Project would be localized.

**CONCLUSION**

Results of the VMT analysis indicate that the Project would contribute to a localized reduction in VMT as the Project adds a local alternative to diverting onto I-580. Regionally, the Project would have a negligible effect on VMT. Because the Project is expected to contribute to decreased VMT, the VMT impact of the Project would be less than significant based on the proposed significance criteria.

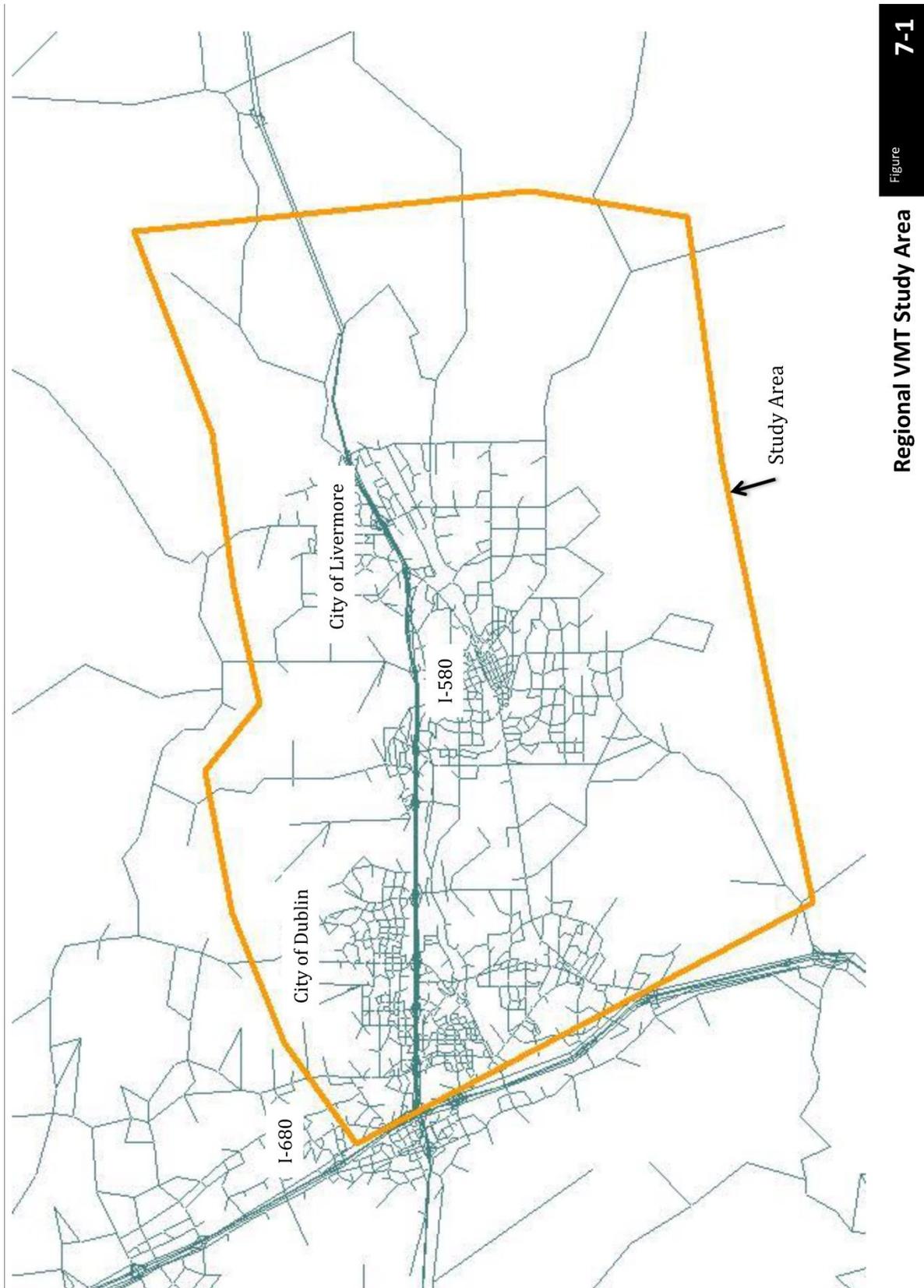


Figure 7-1

Regional VMT Study Area

Source: Kittelson & Associates, 2018

### 7.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

According to Section 15126.2(c) of the CEQA Guidelines, an EIR must identify, evaluate, and justify significant irreversible changes that may result from full implementation of a project. There are three categories of irreversible changes identified in the CEQA Guidelines:

- Consumption of nonrenewable resources
- Primary and secondary impacts that commit future generations to similar uses
- Irreversible damage caused by environmental accidents associated with the project

#### CONSUMPTION OF NONRENEWABLE RESOURCES

Construction of the Project would require the consumption of nonrenewable resources, including electricity, natural gas, asphalt, steel, and other construction materials that are considered to be available in finite supply. Operation of the Project would not directly require commitment of notable nonrenewable resources; however, roadway maintenance over the operational life of the

Project would require some additional commitment of nonrenewable resources. Neither construction nor operation would consume nonrenewable resources in amounts substantially different from or greater than typical transportation projects in the region. The Project would not affect agricultural resources, mineral resources, or access to such resources. Therefore, the Project would not involve a large commitment of nonrenewable resources.

#### LAND USE WHICH WOULD COMMIT FUTURE GENERATIONS

The Project would not include changes to land use. The Project would provide access to developable areas of eastern Dublin, and would indirectly contribute to development of planned land uses outlined in Dublin's General Plan and the EDSP. Planned land uses in eastern Dublin include office, commercial, open space, residential, and light industrial. Planned land uses in Livermore, within PDAs, vary and generally consist of a mix of residential, commercial, and retail uses. However, development of those land uses would continue to be dependent on a variety of market factors, and specific development is not reasonably foreseeable as a result of the Project. The Project would not prevent Dublin, the County, or Livermore from changing land use designations in the future. The Project would provide access through the County to Livermore, and would indirectly support the continuation of existing land uses in Livermore. As discussed in **Section 5.9, Land Use**, the indirect effects of the Project are consistent with local long-range planning documents. Therefore, the Project would not reasonably commit future generations to particular land uses.

#### IRREVERSIBLE DAMAGE

As discussed in **Section 5.7, Hazards and Hazardous Materials**, construction of the Project would require the temporary presence of small amounts of hazardous materials on the Project site, such as diesel fuel. All hazardous materials would be subject to existing storage, handling, and disposal

regulations that limit the potential for exposure to workers and the public. During operation, no storage or use of hazardous materials would be required. Vehicles traveling along the roadway would not represent a hazard in relation to irreversible environmental damage. As discussed in **Section 5.5, Geology and Soils**, the Project is not reasonably anticipated to contribute to hazards such as landslides or other exacerbation of existing geologic conditions. Therefore, the Project would not reasonably result in irreversible damage to the environment.

## 7.4 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project would result in the following significant unavoidable impacts related to traffic:

- **Existing (2017) Plus Project Traffic Conditions:** The change in travel patterns resulting from the Project would result in unacceptable traffic operations at the intersection of Airway Boulevard and North Canyons Parkway in Livermore (labeled intersection #8 in the traffic analysis) during the AM peak hour when compared to existing conditions. With implementation of the Project, this intersection would experience significant growth to the northbound left turn with the demand exceeding 800 vehicles per hour during the AM peak hour. The existing lane configuration of a single shared left and through lane for the northbound approach is insufficient to handle this demand. The Project would cause the level of service (LOS) at this intersection to degrade from LOS D to LOS F in the AM peak hour. An intersection operation of LOS F would be below the LOS E standard for this intersection. This would be a significant impact. Implementation of **Mitigation Measure TRAF-3** would improve the operation of this intersection to LOS D during the AM peak hour. However, because the intersection is in Livermore, outside of Dublin's jurisdiction, Dublin as the Lead Agency cannot guarantee the implementation and timing of the mitigation measure. Therefore, this impact would be significant and unavoidable.
- **2025 Plus Project Traffic Conditions:** The Project would result in unacceptable operations at the intersection of Airway Boulevard and North Canyons Parkway (#8) in Livermore during the AM peak hour under 2025 Plus Project conditions. As one of the primary access points for the Project, this intersection would experience significant increased demand in the northbound left turn, with the demand exceeding 800 vehicles per hour during the AM peak hour. The existing lane configuration is insufficient to handle this demand. This would be a significant impact. Implementation of **Mitigation Measure TRAF-3** would improve the operation of this intersection to LOS D during the AM peak hour. However, because the intersection is in Livermore, outside of Dublin's jurisdiction, Dublin as the Lead Agency cannot guarantee the implementation and timing of the mitigation measure. Therefore, this impact would be significant and unavoidable.
- **Cumulative (2040 Plus Project) Traffic Conditions:** The Project would result in unacceptable operations at the intersection of Airway Boulevard and North Canyons Parkway in Livermore (#8) during the AM and PM peak hours under the cumulative (2040 Plus Project) condition. Implementation of **Mitigation Measure TRAF-3** would improve the operation of this intersection to LOS C during the AM peak hour and LOS D during the PM peak hour, reducing this impact to less than significant. However, because the intersection

is in Livermore, outside of Dublin's jurisdiction, Dublin as the Lead Agency cannot guarantee the implementation and timing of the mitigation measure. Therefore, this impact would be significant and unavoidable.

- **Cumulative (2040 Plus Project) Queuing Impact:** The Project would cause the westbound queue at Airway Boulevard and North Canyons Parkway (#8) in Livermore to extend beyond the capacity of the turn pocket by 29 feet during the PM peak hour under the cumulative (2040 Plus Project) condition. The queue length modeled at this intersection for 2040 No Project would exceed the available storage, and implementation of the Project would further extend the queue length. This represents a significant impact. Implementation of **Mitigation Measure TRAF-3** would reduce this impact to a less-than-significant level. However, because the intersection is in Livermore, outside of Dublin's jurisdiction, Dublin as the Lead Agency cannot guarantee the implementation and timing of the mitigation measure. Therefore, this impact would be significant and unavoidable.
  
- **Cumulative (2040 Plus Project) Queuing Impact:** The Project would cause the westbound right turn queue at the intersection of Isabel Avenue and I-580 Westbound off-ramps (labeled intersection #11 in the traffic analysis) to exceed the available turn pocket storage by 58 feet during the AM peak hour under cumulative conditions. This represents a significant impact. Implementation of **Mitigation Measure TRAF-4** would reduce this impact to a less-than-significant level. However, this intersection is under the jurisdiction of Caltrans and outside of Dublin's jurisdiction. Therefore, Dublin as the Lead Agency cannot guarantee the implementation and timing of the mitigation measure and this impact would be significant and unavoidable.