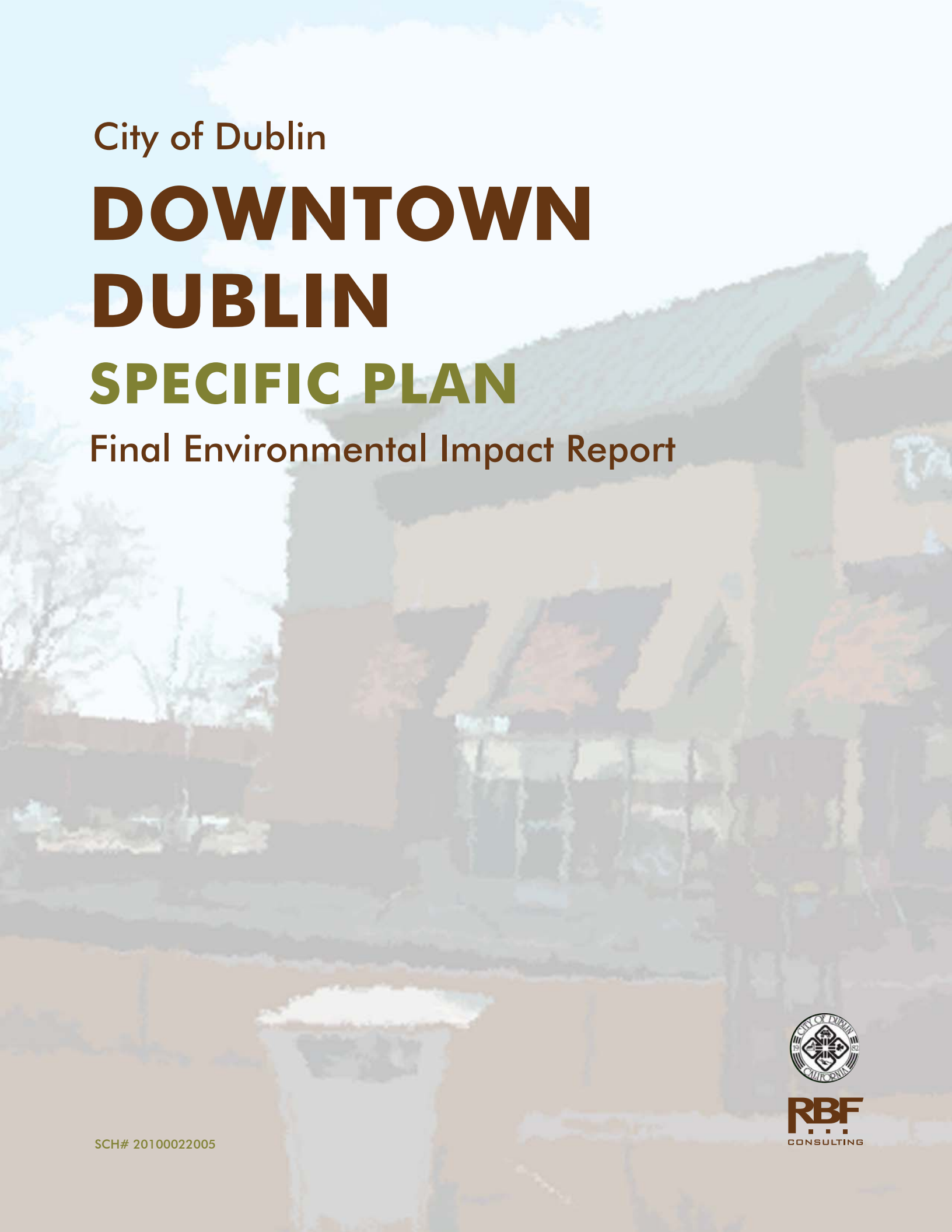
City of Dublin

DOWNTOWN DUBLIN

SPECIFIC PLAN

Final Environmental Impact Report



SCH# 20100022005

RBF CONSULTING

DOWNTOWN DUBLIN SPECIFIC PLAN

Final Environmental Impact Report

December 2010

The Downtown Dublin Specific Plan Draft EIR has been financed in part by grants from the U.S. Department of Transportation, as provided through the Metropolitan Transportation Commission (MTC). The contents of the Draft EIR do not necessarily reflect the official views or policy of the U.S. Department of Transportation.

SCH # 2010022005

Table of Contents

1. Introduction

The Downtown Dublin Specific Plan Draft Environmental Impact Report (DEIR) was circulated for a 45-day review period from September 20, 2010 through November 4, 2010, consistent with CEQA statutes and guidelines. Copies of the document were distributed to the State Clearinghouse, regional and local agencies, and interested organizations and individuals, for their review and comment.

Section 15088 (a) of the State California Environmental Quality Act (CEQA) Guidelines states that:

> The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extension and may respond to late comments.

In response to the State Guidelines, the City as Lead Agency has evaluated the comments received on the DEIR. Written responses to the comments related to environmental issues are included in this Final EIR.

Chapter 2, provides a list of all those who submitted comments on the DEIR during the public review period. This is followed by a copy of each comment letter and the respective responses to comment.

Text changes resulting from comments on the DEIR are presented in Chapter 3, *Revisions to the DEIR*, by chapter and section. Revisions to the *DEIR* text are indicated by <u>underline</u> for new text and ~~strikeouts~~ for deleted text.

This Final EIR document in conjunction with the *DEIR*, dated September 2010 and incorporated herein by reference, constitutes the Final EIR for the project.

2. Response to Comments

All commenters on the DEIR are listed in the table below. This table identifies a number designation for each comment letter received, the author of the comment letter, the comment letter date, a number designation for each comment, and the general topic for each comment.

Letter	Commenter	Date	Number	Summary of Issue
State Agencies				
1	Department of Transportation (Caltrans)	11/4/10	1-1	Project-related traffic impacts to Interstates 680 and 580 and associated ramps
			1-2	Cumulative traffic impacts on Interstates 680 and 580
			1-3	Stormwater Treatment Construction Improvement Project adjacent to Interstate 680
Local Agencies				
2	Alameda County Transportation Commission	11/3/10	2-1	Delete reference to Alameda County Congestion Management Agency
			2-2	Mitigation measures and their effect on Alameda County transportation projects and programs
			2-3	Transportation Demand Management Program implementation
			2-4	Applicable City General Plan and Bicycle Master Plan policies that would be implemented by the developer
			2-5	Implementation of the Downtown Dublin Transportation Impact Fee (TIF)
3	Alameda County Flood Control and Water Conservation District	11/1/10	3-1	Recommended text revision
4	County of Alameda Public Works Agency	9/13/10	4-1	Potential stormwater runoff impacts on the Alameda Creek Federal Project in western Alameda County
			4-2	Measures to prevent the discharge of contaminated materials into public drainage facilities
5	Contra Costa County Public Works Department	11/4/10	5-1	Traffic analysis of Dougherty Road roadway segment in Contra Costa County
			5-2	Traffic Control Plan requirement for future projects
			5-3	Roadway impacts on haul routes for future projects

Comment Letter #1

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 622-5491
FAX (510) 286-5559
TTY 711

Flex your power!
Be energy efficient!

November 4, 2010

ALAGEN247
SCH #2010022005

Ms. Kristi Bascom
City of Dublin – Community Development Department
100 Civic Plaza
Dublin, CA 94568

Dear Ms. Bascom:

Downtown Dublin Specific Plan – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Downtown Dublin Specific Plan (DDSP). The DDSP consists of a comprehensive set of incentives, standards, and requirements that will implement the vision for future development in downtown Dublin. The following comments are based on the Draft Environmental Impact Report (DEIR) dated September 2010.

Transportation and Circulation

The text of the DEIR does not adequately discuss traffic impacts to the Interstate 680 (I-680) and Interstate 580 (I-580) freeway mainline and ramp intersections from diverted Specific Plan area traffic. Additionally, the Trip Generation Appendix does not include traffic assigned to freeway mainline and ramps. The impact to the following State facilities should be discussed in greater detail:

1. I-680
2. I-580
3. I-680/I-580 interchange
4. I-680/St. Patrick Way ramps
5. I-680/Village Parkway ramp
6. I-580/San Ramon Road ramps
7. I-580/Foothill Road ramps

1-1

Additional project generated trips on I-680 and I-580 will result in heavy weaving movements and a worse Level of Service. The cumulative impact of traffic on the mainline from other projects in the vicinity of the study area should be evaluated and appropriate mitigation measures should be identified.

1-2

Hydraulics/Water Quality

The Department of Transportation and the City of Dublin are implementing Stormwater Treatment Construction Improvement projects within the limits of the DDSP area. The work includes hydrodynamic separators to treat approximately 60 acres of impervious area and retrofitting an existing culvert pipe located along Village Parkway both within City right of way. In addition, a biofiltration swale will be constructed within the State's right of way. Future development should not adversely impact these environmental commitments. See Cooperative Agreement 4-2274 between the Department and the City for further detail. 1-3

Should you have any questions regarding this letter, please contact Yatman Kwan of my staff via email at Yatman_Kwan@dot.ca.gov or by phone at (510) 622-1670.

Sincerely,

Lisa Carboni

LISA CARBONI
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Response to Comment #1
CA Department of Transportation (Caltrans)
November 4, 2010

1-1: Project-related traffic impacts to Interstates 680 and 580 and associated ramps

Impacts to the two freeways are covered in Draft EIR Section 3.9 in the CMA/MTS system analysis, which covers I-580 and I-680 in the vicinity of the Specific Plan, and also via the intersection analysis for intersections that constitute freeway ramp terminals. The CMA/MTS system analysis provides PM peak hour volumes both with and without the Specific Plan, for the Near-Term and Cumulative cases, in Tables 3.9-14 and 3.9-15, respectively. An analysis is also provided specifically for I-580 and I-680 for the AM peak hour, for the Near-Term and Cumulative cases, in Tables 3.9-16 and 3.9-17, respectively.

Impacts 3.9-1, 2 and 3 describe the impacts to these systems for the Near-Term/Base FAR Project, the Near-Term/Max FAR Project, and the Cumulative/Max FAR Project, respectively. Two freeway segment impacts are identified in Impact 3.9-2 (the Near-Term/Max FAR Project case): I-580 eastbound, west of San Ramon Road, in the PM peak hour, and I-580 westbound, west of San Ramon Road in the AM peak hour. Mitigation Measure 3.9-1 applies to all 3 impacts and outlines the actions the City will take to help reduce congestion on the freeways and CMA/MTS systems, thereby reducing these impacts. However, as noted in Mitigation Measure 3.9-1, the City's ability to restore acceptable LOS on these segments cannot be assured by the actions, so the impacts remain significant and unavoidable after mitigation.

Regarding analysis of the freeway interchange ramps: while a direct assessment of ramp capacity was not performed, the analyses of intersections #13 (Saint Patrick Way/Amador Plaza Road/I-680 Southbound Ramps) and #14 (I-680 Northbound Ramps/Village Parkway) provide an assessment of the operation of the ramp "terminals". In addition, the analysis of intersection #7 (Dublin Boulevard/San Ramon Road) provides an assessment of the operation of the closest control point adjacent to the I-580/San Ramon Road/Foothill Boulevard interchange, at which most of the ramps themselves are free-flow (i.e., not regulated by traffic control devices. These analyses, along with the CMP segment analyses described above, provide an adequate assessment of the Project's impacts on the freeway system, for a program-level EIR.

A Project Study Report (PSR) to modify both the City of Pleasanton and Dublin portions of the Interstate 580/Foothill Road interchange was approved by Caltrans in December 2000 and a Project Report (PR) was approved by Caltrans in July 2002. Subsequently, the City of Dublin has constructed the north side improvements in anticipation of accommodating increased development in the Downtown area.

The City of Pleasanton is currently preparing Plans, Specifications and Estimate (PSE) for improvements to the portion of the interchange located in Pleasanton. The traffic forecasts

being used to evaluate planned improvements to the interchange represent buildout of the Cities of Pleasanton and Dublin according to their current General Plans. Analysis results indicate that the eastbound and westbound ramp terminal intersections at Foothill Road/San Ramon Road would operate at LOS C or better with the improvements that have already been implemented (in Dublin) and the planned improvements in Pleasanton. Additional capacity would be provided to accommodate the potential traffic growth associated with buildout of the Downtown Specific Plan and implementation of the Specific Plan would have a less-than-significant impact on the interchange.

The comment does not say what additional detail is sought nor does it identify any inadequacies in the DEIR. As shown above, the DEIR addresses potential impacts and mitigations at all of the facilities mentioned in the comment. No additional discussion is required for CEQA compliance.

1-2: Cumulative traffic impacts on Interstates 680 and 580

The analysis described above in response to comment 1-1 includes cumulative traffic projections. Please see also DEIR Tables 3.9-14 through 3.9-17. The DEIR adequately analyzes cumulative traffic impacts at a program level; no additional discussion is required for CEQA compliance. Detailed assessments of freeway operations, such as weaving, merge and diverge analyses, are typically performed for the traffic operations studies supporting freeway improvement projects, such as the PSR discussed in response to comment 1-1.

1-3: Stormwater Treatment Construction Improvement Project adjacent to Interstate 680

Comment noted. For any project located within or adjacent to the Stormwater Treatment Construction Improvement Project will be carefully reviewed by the City of Dublin to ensure that hydrodynamic separators, culvert pipes, and biofiltration swale are not adversely affected.

ALAMEDA
County Transportation Commission

ACCMA ■ 1333 Broadway, Suite 220 ■ Oakland, CA 94612 ■ PH: (510) 836-2560
ACTIA ■ 1333 Broadway, Suite 300 ■ Oakland, CA 94612 ■ PH: (510) 893-3347

www.AlamedaCTC.org

November 3, 2010

Ms. Kristi Bascom
Principal Planner
Community Development Department
City of Dublin
100 Civic Plaza
Dublin, CA 94568
Kristi.bascom@dublin.ca.gov

SUBJECT: Comments on the Draft Environmental Impact Report for the Downtown Dublin Specific Plan

Dear Ms. Bascom:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Downtown Dublin Specific Plan. The Plan consists of a set of incentives standards and requirements that will implement the vision for future development in downtown Dublin. It will include three districts and include a commercial and mixed use center, retail, transportation improvements, and open space.

The ACCMA respectfully submits the following comments:

- For Mitigation Measure 3.9-1 (pp. 3-172, 3-173, 3-174, and 3-175,
  - Please delete "As required by the Alameda County Congestion Management Agency". The Alameda County Congestion Management Agency (now the Alameda County Transportation Commission) does not require specific mitigation measures to reduce traffic congestion on the MTS system. 2-1
  - :Please explain how, specifically, this mitigation measure would support Alameda County's projects and programs. Would the developer be required to pay their fair share of fees to construct specific transportation improvements for the project's contribution to significant increases in traffic on the MTS roadways? 2-2
  - How would developers be encouraged to voluntarily develop a Transportation Demand Management Program to reduce trips? 2-3
  - Which policies would the developer implement in the City's Master Plan and General Plan related to bikeways in the project area? 2-4
  - Please explain how mitigation measures in this EIR will be incorporated into the Downtown Dublin Transportation Impact Fee (TIF), which will be revised after the Specific Plan has been adopted (as stated on p. 3-150). Which transportation improvements will be constructed or implemented 2-5

within the current or revised TIF? Will recommended mitigation measures in this EIR be incorporated in the TIF? How will the TIF be updated "in the near future to ensure that the program is consistent with the goals of the Downtown Dublin Specific Plan" (p. 3-150)

2-5 (cont.)

Thank you for the opportunity to comment on this Draft EIR. Please do not hesitate to contact me at 510.836.2560 if you require additional information.

Sincerely,

Diane Stark
Senior Transportation Planner

cc: Beth Walukas, Manager of Planning
file: CMP - Environmental Review Opinions - Responses - 2010

Response to Comment Letter #2
Alameda County Transportation Commission
November 3, 2010

2-1: Delete reference to Alameda County Congestion Management Agency

Comment noted. The first sentence of MM 3.9-1 is hereby revised as follows wherever it appears in the DEIR to reflect the correction and the fact that the City will continue to impose the identified mitigation measure.

> "MM 3.9-1: ~~As required by the Alameda County Congestion Management Agency, the~~ *The* City of Dublin shall do the following…"

Other references to the Alameda County Congestion Management Agency have been corrected to ACTC through the Final EIR, but may still be referenced in these responses where helpful to locate specific discussion in the DEIR.

2-2: Mitigation measure 3.9-1 support of Alameda County transportation projects and programs

All new development in the Downtown Dublin Specific Plan (DDSP) project area is subject to the City of Dublin's Site Development Review process. Some projects, depending on their size and scope, will also require additional traffic and circulation analysis to ensure that the proposed development works on the site and with the existing transportation infrastructure. For all projects in the DDSP, City staff will be reviewing project proposals with an eye for the inclusion of trip reduction programs, good pedestrian and bicycle circulation and facilities, and transit accessibility. Where appropriate, conditions of approval will be added to the Site Development Review permit to ensure that such programs and designs are included in the project.

Through the Site Development Review process, a finding must be made which states that the project is consistent with the General Plan and any applicable Specific Plans. A finding also needs to be made that the site has been adequately designed for pedestrians and bicyclists. Therefore, future projects in the DDSP project area will be required to incorporate measures to help improve circulation, reduce vehicle trips, and therefore traffic congestion on the MTS system.

In addition, project developers would be required to pay into the Tri-Valley Transportation Development Fee (TVTDF) and the Downtown Traffic Impact Fee (TIF), both of which would contribute toward improvements to MTS roadways.

2-3: Transportation Demand Management Program implementation

Please see response to comment 2-2. As part of the Site Development Review Process, the City will work with developers to design TDM programs that will ensure that findings can be made that the projects are consistent with the Specific Plan. TDM program

elements may include alternative mode use incentives (bike lockers and showers in commercial buildings), carpool and vanpool matching services, Zipcar sites, bike-share programs, bus shelters and amenities, site TDM coordinators, as well as other options.

2-4: Applicable City General Plan and Bicycle Master Plan policies that would be implemented by the developer

The City of Dublin's Bikeways Master Plan (2007) includes several policies that would be applicable to development projects to be built within the Specific Plan:

> Policy 4.6 – As a condition of project approval, require major development projects with major transportation impacts to construct adjacent bicycle facilities included in the proposed bicycle system
>
> Policy 4.7 – Evaluate the needs of the community for bicycle parking on a project-by-project basis
>
> Policy 4.8 – Consult the Recommended Bikeways map prior to implementation of street improvement projects
>
> Policy 4.9 – Install bicycle stencils and bicycle-sensitive loop detectors (or other detector type) on bikeways as part of new signals, signal upgrades, and resurfacing/restriping projects
>
> Policy 4.10 – Provide appropriately-signed detours for bicyclists during construction projects.

2-5: Implementation of the Downtown Dublin Traffic Impact Fee (TIF)

The current TIF was adopted in 2004, and includes the following improvements within the DDSP Study area (refer to Table B-3 from the 2004 Downtown Dublin Traffic Impact Fee Study Update Memorandum dated September 2004):

- Project 1 – St. Patrick Way Extension
- Project 2 – Golden Gate Drive Widening
- Project 3 – Dublin Boulevard/Golden Gate Drive Intersection Improvements
- Project 4 – Dublin Boulevard/Amador Plaza Road Intersection Improvements
- Project 5 – Dublin Boulevard/Dougherty Road Intersection Improvements
- Project 6 – San Ramon Road/Dublin Boulevard Intersection Improvements

The City plans to update the TIF following adoption of the DDSP to include additional improvement projects and to recalculate the fee with consideration of the land use development changes identified by the DDSP. The DEIR identifies MMs 3.9-1 and -4, neither of which requires specific roadway improvements. However, it is the intent of the City to incorporate improvements that are in the Bikeways Master Plan, as well as other

improvements that support the goals and policies of the Specific Plan. Thus, development that is constructed within the DDSP area will be subject to the TIF and will contribute a fair share toward these improvements.

ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

100 NORTH CANYONS PARKWAY LIVERMORE, CA 94551 PHONE (925) 454-5000 FAX (925) 454-5727

November 1, 2010

Ms. Kristi Bascom, Principal Planner
City of Dublin - Community Development Department
100 Civic Plaza
Dublin, Ca. 94568

Subject: Comments on the Draft Environmental Impact Report for the Downtown Dublin Specific Plan

Dear Ms. Bascom:

Zone 7 Water Agency (Zone 7) has reviewed the referenced Draft Environmental Impact Report (DEIR) in the context of Zone 7's mission to provide drinking water, non-potable water for agriculture/ irrigated turf, flood protection, and groundwater and stream management within the Livermore-Amador Valley. We have the following comment for your consideration.

On page 3-89, under Project Impacts and Mitigation Measures - Place Housing or Structures Within a 100-year Flood Hazards Area Which Would Impede or Redirect Flood Flows, the third sentence should be revised to the following:

> "In addition, the Zone 7 Stream Management Master Plan proposes projects to retrofit culverts that carry waters from Dublin Creek under Donlon Way and the unnamed drainage feature (Line J-1) which runs parallel to Interstate 680 and crosses under Interstate 680 just north of Dublin Blvd. These proposed retrofits would increase culvert capacities and reduce the risk of flooding in the DDSP area. While the projects are proposed by Zone 7's Stream Management Master Plan, they are not Zone 7 specific projects."

3-1

We appreciate the opportunity to comment on your project. If you have any questions or comments, please feel free to contact me at your earliest convenience at 925-454-5036 or by e-mail at mlim@zone7water.com.

Sincerely,

Mary Lim
Environmental Services Program Manager

cc: Kurt Arends, Joe Seto, Jeff Tang, Carol Mahoney

Response to Comment Letter # 3
Alameda County Flood Control and Water Conservation District
November 1, 2010

3-1: Recommended text revision

Comment noted. Page 3-89 of the Final EIR has been revised to reflect the recommended text revision.

COUNTY OF ALAMEDA
PUBLIC WORKS AGENCY
CONSTRUCTION AND DEVELOPMENT SERVICES DEPARTMENT
951 Turner Court
Hayward, CA 94545-2698
(510) 670-5450 Construction Services
(510) 670-6601 Development Services
(510) 670-5269 FAX

October 13, 2010

Kristi Bascom, Principal Planner
Community Development Department
City of Dublin
100 Civic Plaza
Dublin, CA 94568

Dear Ms. Bascom:

Subject: Downtown Dublin Specific Plan - Notice of Availability of Draft Environmental Report (DEIR)

Reference is made to your transmittal on September 17, 2010, of a copy the Notice of Availability of the Draft EIR and Notice of Public Meeting for the subject project .The Downtown Dublin Specific Plan consists of a comprehensive set of incentives, standards, and requirements that will implement the vision for the future development in downtown Dublin.

Per our cursory review of the transmitted material, we hereby offer the following comments regarding storm drainage that should be considered in the determination of project status:

1. Although the project site is located in Zone 7, runoff ultimately drains to the Alameda Creek Federal Project in western Alameda County. This flood control facility is maintained by the Alameda County Flood Control District. The District is concerned with augmentation in runoff from the site that may impact flow capacity in the Federal Project and in the watercourses between the site and the Federal Project, as well as the potential for runoff from the project to increase the rate of erosion along those same watercourses that could cause localized damage and result in deposition of silt in the Federal Project. There should be no augmentation in runoff quantity or duration from the project site that will adversely impact downstream drainage facilities. 4-1

2. The applicant should provide measures to prevent the discharge of contaminated materials into public drainage facilities. It is the responsibility of the applicant to comply with Federal, State, or local water quality standards and regulations. 4-2

Thank you for the opportunity to review the Draft Environmental Report for this project. If you have questions, please call me at (510) 670-5209.

Very truly yours,

Rosemarie De Leon
Assistant Engineer
Land Development

Response to Comment Letter #4
County of Alameda Public Works Agency
October 13, 2010

4-1: Potential stormwater runoff impacts on the Alameda Creek Federal Project in western Alameda County

Potential drainage and runoff impacts are addressed in Section 3.5 of the DEIR which notes that the Specific Plan project area is largely built-out with buildings, parking lots, streets, and sidewalks, with associated landscaping. The goal of the specific plan is to facilitate redevelopment of the area overtime in a manner that is more pedestrian, bicycle, and transit friendly, however the area will remain urbanized as it is now. Because the project area is largely built-out, stormwater flows to collection and distribution systems are expected to be similar to that which currently exists. The flow capacity is not expected to increase in quantity or duration, but rather is expected to be reduced with future development due to improved design and practices and the implementation of better onsite stormwater detention and management (see especially, Impacts 3.5-3, -4).

4-2: Measures to prevent the discharge of contaminated materials into public drainage facilities

Comment noted. The DEIR addresses construction and post construction water quality impacts in Impact 3.5-1.

Subsequent project-specific development applications will be reviewed as to their consistency with the Downtown Dublin Specific Plan and current City and State regulatory requirements to control to minimize stormwater runoff and to improve stormwater quality, consistent with MMs 3.5-1a and -1b. These regulations include the requirement to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) to prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters.

From: Rene Urbina [mailto:rurbi@pw.cccounty.us]
Sent: Thursday, November 04, 2010 4:37 PM
To: Kristi Bascom
Cc: Mary Halle; Monish Sen; Chris Lau; Jerry Fahy
Subject: Downtown Dublin Specific Plan Draft Environmental Impact Report (EIR)

Hello Ms Bascom,

We provide the following comments on the DEIR for the Dublin Specific Plan:

We understand that the proposed City of Dublin Specific Plan will replace and combine 5 specific plans: Downtown Core Specific Plan, Dublin Downtown Specific Plan, San Ramon Road Specific Plan, Village Parkway Specific Plan and West Dublin BART Specific Plan. The Transportation Engineering Division of Contra Costa County Public Works Department has the following comments on the Draft Environmental Impact Report (DEIR) for the Downtown Dublin Specific Plan project:

1. The traffic analysis should include the section of Dougherty Road in unincorporated Contra Costa County to determine the increase demand on this road due to the ultimate build out of the Specific Plan areas. Mitigation measures should be included to address any impacts. 5-1

2. For construction projects in the City of Dublin that would directly impact County roads, a Traffic Control Plan (including any temporary lane closure, flagging, haul routes, detour plans, etc.) would be required to be submitted to Contra Costa County Public Works Department for review and approval. The document must address the impacts of any lane closure. 5-2

3. On future projects with hauling routes that would impact County roads, a mitigation requirement should be identified in the report to describe a process where a pre-project survey of haul route(s) is conducted, thereafter damaged or deteriorated pavement resulting from the project truck traffic is identified on the haul route(s), and measures are implemented to bring the pavement back to pre-project conditions by the project sponsor at their own cost. 5-3

Thank you,

Rene Urbina, PE
Civil Engineer

Contra Costa County
Public Works
Department

Transportation Engineering Division
255 Glacier Drive
Martinez, CA 94553
Phone: (925) 313-2308
Fax: (925) 313-2333

Response to Comment Letter #5
Contra Costa County Public Works Department
November 4, 2010

5-1: Traffic analysis of Dougherty Road roadway segment in Contra Costa County

Consistent with the professional opinion of the traffic consultant and the City's Traffic Engineer, Dougherty Road was not included in the traffic analysis because the estimated project trip distribution to this roadway was very low: for commercial trips, 1 percent in the AM peak hour and 2 percent in the PM peak hour, and for residential trips, 3 percent in both peak hours. These percentages were derived from select-zone evaluations for zones in the DDSP area in the Contra Costa Transportation Authority Travel Demand Model.

5-2: Traffic Control Plan requirement for future projects

Comment noted. The proposed project is a programmatic review of the Draft Downtown Dublin Specific Plan and does not involve approval of any project specific development application. For future project-specific development projects that would directly impact City and/or County roads, a Traffic Control Plan, including any temporary lane closure, flagging, haul routes, detour plans, etc. would be required to be submitted to the City and forwarded to the Contra Costa County Public Works Department, consistent with the development review practices and standard conditions of approval of the City of Dublin.

5-3: Roadway impacts on haul routes for future projects

Comment noted. The proposed project is a programmatic review of the Draft Downtown Dublin Specific Plan and does not involve approval of any project specific development application.

As part of any Traffic Control Plan, as discussed in response to comment 5-2, above, the applicant would be required, consistent with the development review practices and standard conditions of approval of the City of Dublin, to identify hauling routes that would impact City and/or County roads. A pre-project survey of haul route(s), identification of any damaged or deteriorated pavement resulting from the project truck traffic, and completion of improvements to bring the pavement back to pre-project conditions by the project sponsor at their own expense, would be required if the truck traffic is estimated to be significant.

3. Revisions to the EIR

Text changes resulting from comments on the DEIR are presented below. Revisions to the *DEIR* text are indicated by underline for new text and ~~strikeouts~~ for deleted text.

VMT would be 23.4 percent in the same time frame. The VMT estimate is based on the scenario where not all development is built out in order to be consistent with the 2009-2015 time frame. Additionally, the DDSP proposes downtown development near transit and includes extensive policies intended to reduce VMT. The DDSP policies would reduce VMT by creating a pedestrian-friendly downtown, accommodate alternative transportation modes (i.e., BART, bus, bicycle, and pedestrian), promote transit-oriented development, and incorporate mixed-use development into the Specific Plan area. As a result, the growth rate of VMT under the DDSP would not exceed the growth rate of the population. According to the current BAAQMD *CEQA Guidelines*, the VMT growth rate compared to the City's population growth rate over the same time frame would not hinder progress towards achieving the goals of the *2005 Ozone Strategy*. Therefore, the DDSP is consistent with the applicable air quality plan, and a **less than significant impact** would result.

Long-Term Operational Emissions - Toxics Air Contaminants

Impact 3.2-3: No major existing stationary or area sources of toxic air contaminants (TACs) were identified in the vicinity of the project area. The DDSP would result in the development of mixed-use and commercial uses at the project site, which may generate sources of TACs from stationary sources. The proposed project would not result in increased exposure of sensitive land uses in excess of applicable standards. This is considered a less than significant impact.

To address community risk from air toxics, the BAAQMD initiated the Community Air Risk Evaluation (CARE) program in 2004 to identify locations with high levels of risk from TACs co-located with sensitive populations and use the information to help focus mitigation measures. Through the CARE program, the Air District developed an inventory of TAC emissions for 2005 and compiled demographic and heath indicator data. According to the findings of the CARE Program, diesel particulate matter, mostly from on and off-road mobile sources, accounts for over 80 percent of the inhalation cancer risk from TACs in the Bay Area. As of November 2009, the impacted communities include the urban core areas of Concord, eastern San Francisco, western Alameda County, Redwood City/East Palo Alto, Richmond/San Pablo, and San Jose.

The CARB *Air Quality and Land Use Handbook* (April 2005) offers advisory recommendations for locating sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, chrome platters, dry cleaners, gasoline stations, and other industrial facilities, to reduce exposure of sensitive populations. No major existing stationary or area sources of TACs were identified in the project vicinity. The DDSP would result in development within Downtown Dublin, which may generate sources of TACs from stationary sources. The development of any new stationary sources of TAC's associated with the DDSP project area would be subject to BAAQMD rules and regulations and permitting requirements.

~~Living close to high traffic and associated emissions may lead to adverse health effects. A number of studies conducted have identified an association between health effects and~~

~~living or attending school near heavily traveled roadways. One study conducted in the San Francisco Bay Area found that most related health effects associated with traffic were experienced within 300 feet of the traveled roadway.[11] The nearest residential area of the DDSP area is located approximately 650 feet north of Interstate 580 (I-580). Therefore, as the DDSP area with proposed residential uses is greater than 300 feet from I-580, exposure of sensitive receptors to TACs would be~~ **~~less than significant.~~**

To assist Lead Agencies in evaluating air quality impacts at the neighborhood scale, the Bay Area Air Quality Management District (BAAQMD) has established thresholds of significance for local community risks and hazards associated with Toxic Air Contaminants (TAC) and fine particulate matter (PM2.5). These thresholds apply for siting a new source and/or receptor and for assessing both individual source and cumulative multiple source impacts. For all State highways within the San Francisco Bay Area Air Basin (SFBAAB), the BAAQMD has made available a set of maps and tables that provide screening-level risks and PM2.5 concentrations. To develop these tables, the BAAQMD selected conservative assumptions and inputs with the following methodology:

- Hourly vehicle miles traveled (VMT) and emissions for 2012 were developed for each county using the EMFAC model, based on default vehicle mix and full range of vehicle speeds.
- Highest vehicle traffic volumes for each roadway are based on Caltrans's 2007 Traffic Volumes on California State Highways and were scaled based on VMT to develop hourly vehicle volumes.
- Hourly vehicle volume and emissions were input into a roadway model, CAL3QHCR, to estimate annual average concentrations using the most conservative meteorological data collected from monitoring locations within each county. CAL3QHCR is an advanced model that process up to a year of hourly meteorological, vehicular emissions, and traffic volume and signalization data in one model run. In addition, 1-hour and running 8-hour averages of CO or 24-hour and annual block averages of particulate matter can be calculated.

For the screening tables, the peak one hour of traffic was used to develop hourly vehicle volumes that totaled to the annual average daily traffic while risk and hazard tables are based on annual average daily vehicle volumes. The screening tables are based on the highest annual average daily traffic (AADT) for each highway. It should be noted that the AADT fluctuates depending on postmile; in some cases, the traffic may decrease by an order of magnitude. Therefore, the BAAQMD recommends adjusting the values listed in the screening tables to reflect the AADT for a particular postmile. As a result, the ratio of

[11] California Air Resources Board, *Air Quality and Land Use Handbook: A Community Heath Perspective*, April 2005.

the actual AADT to the AADT used by the BAAQMD was applied to the screening values to determine the appropriate values for the project site. For example, the screening tables are based on an AADT of 218,000 and 266,000 vehicles for I-580 and I-680, respectively. Based on Caltrans data, the AADT at these locations would be 169,000 and 165,000 for I-580 and I-680, respectively.

As indicated in the DDSP, a large portion of the project area is in the vicinity of I-580 and I-680. Based on the adjusted values in the screening tables, the cancer risk and noncancer hazards generated from the highways would exceed the BAAQMD thresholds at 1,000 feet, which is the BAAQMD recommended screening distance. Therefore, any new receptors (e.g., residences, schools, etc.) within the 1,000-foot buffer of the highways would implement specific development standards to reduce exposure to highway pollution. These development standards are specified within the DDSP and include the following:

- Configure the proposed buildings so that the bulk of the building is located farther from the highway.
- Place heating ventilation and air conditioning (HVAC) system intakes as far away from highway as feasible.
- Include high efficiency filters in the HVAC system (rated with a minimum efficiency rating value [MERV] of at least 13). This would also include a commitment to regular maintenance and replacement of filters as needed.
- Provide positive pressure with the HVAC system in all occupied spaces to prevent the incursion of outside air that bypasses the HVAC filters.
- To reduce the amount of outside unfiltered air indoors, do not place operable windows in close proximity to the highway. In addition, signs should be posted to keep exterior doors closed when not in use.

The identification of diesel particulate matter (DPM) as a toxic air contaminant in 1998 led the California Air Resources Board (CARB) to adopt the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (Risk Reduction Plan) in October 2000. The Risk Reduction Plan's goals include an 85 percent reduction in DPM by 2020 from the 2000 baseline. The Risk Reduction Plan includes regulations to establish cleaner new diesel engines, cleaner in-use diesel engines (retrofits), and cleaner diesel fuel. It should be noted that the current emissions factors (EMFAC2007) utilized for the BAAQMD screening tables do not include emissions reductions from the implementation of the various measures included in CARB's Risk Reduction Plan. As a result, implementation of the CARB DPM reduction measures, the 1,000-foot buffer is anticipated to shrink over time. Based on an 85 percent reduction in DPM at full implementation of the Risk Reduction Plan, the risk would be reduced accordingly. The Transit Oriented District has the greatest exposure to I-580, and upon full implementation of the Risk Reduction Plan, the 1,000-foot buffer would be reduced to 700 feet.

Because any new receptors (e.g., residences, schools, etc.) within the 1,000-foot buffer of the highways would be required to implement specific development standards as defined in the DDSPP to reduce exposure to highway pollution, and implementation of the CARB DPM reduction measures is expected to be reduce this 1,000 foot buffer distance over time, the exposure of sensitive receptors to TACs would be **less than significant.**

In addition, all projects must implement any applicable air toxics control measures (ATCM). For example, projects that have the potential to disturb asbestos (from soil or building material) must comply with all the requirements of CARB's ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. Compliance with applicable regulatory standards is required as part of the permitting process for development and operation of future development within the DDSP, and would ensure a **less than significant impact.**

Long-Term Operational Emissions - Localized Carbon Monoxide (CO)

Impact 3.2-4: Carbon monoxide concentrations are low in the project vicinity and the proposed project would result in carbon monoxide concentrations that would be well below the State and Federal standards. Therefore, the proposed project would have a less than significant impact on localized carbon monoxide concentrations.

Local air quality is a major concern along roadways. Carbon monoxide (CO) is a primary pollutant, and unlike ozone, is directly emitted from a variety of sources. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of its impacts upon the local air quality. Areas of vehicle congestion have the potential to create "pockets" of CO called "hot spots." These pockets have the potential to exceed the State 1-hour standard of 20 parts per million (ppm) and/or the 8-hour standard of 9 ppm.

The BAAQMD requires that proposed projects are analyzed for the potential to cause localized CO hotspots. Per the BAAQMD CO screening guidelines, a project would have CO impacts if the following were to occur:

- Project traffic would impact intersections or roadway links operating at level of service (LOS) D, E or F or would cause LOS to decline to D, E or F.
- Project traffic would increase traffic volumes on nearby roadways by 10 percent or more.
- Project would contribute to CO concentrations exceeding the State Ambient Air Quality Standard of 9 parts per million (ppm) averaged over 8 hours and 20 ppm for one hour.

Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections. Based on the *Traffic Impact Analysis*, the intersections listed in Table 3.2-7: Project Buildout Carbon Monoxide Concentrations, would require a CO hotspot analysis. The BAAQMD thresholds for CO emissions require projects to perform localized CO modeling. In order

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- 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;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood-hazards area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or
- Inundation by seiche, tsunami, or mudflow.

Methodology

Impacts evaluated in this section were assessed based on previously published reports by the Regional Water Quality Control Board, the California Department of Water Resources, and information from the *City of Dublin General Plan*. Impacts to surface and groundwater quality were analyzed by reviewing existing groundwater and surface water quality literature that pertain to the project area; identifying existing on-site ground and surface waters, and evaluating existing and potential sources of water quality pollutants based on the types of land uses and operational activities that occur or could occur in the DDSP area. Additionally, the applicability of federal and state regulations, ordinances, and/or standards to surface and groundwater quality of the project area and subsequent receiving waters was assessed. The impacts of the proposed project on water resources and water quality are evaluated qualitatively.

Project Impacts and Mitigation Measures

Place Housing or Structures Within a 100-Year Flood-Hazards Area Which Would Impede or Redirect Flood Flows

Several properties within the DDSP area are located within the Federal Emergency Management Agency (FEMA) 100-year floodplain. As previously discussed, new construction will be subject to floodplain regulations. ~~In addition, the Zone 7 Stream Management Plan contains plans to retrofit the culvert that carries water from Dublin Creek under Donlon Way. This retrofit will increase the culvert capacity and reduce the risk of flooding in the DDSP area.~~ In addition, the Zone 7 Stream Management Master Plan proposes project to retrofit culverts that carry waters from Dublin Creek under Donlon Way and the unnamed drainage feature (Line J-1) which runs parallel to Interstate 680 and crosses under Interstate 680 just north of Dublin Blvd. These proposed retrofits would increase culvert capacities and reduce the risk of flooding in the DDSP area. While

the projects are proposed by Zone 7's Stream Management Master Plan, they are not Zone 7 specific projects. Future construction would be required to comply with the existing floodplain regulations to ensure that the structures do not impede or redirect flows. **No impacts** would occur.

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Inundation by Seiche, Tsunami, or Mudflow

The proposed project is located well inland from the San Francisco Bay or other major bodies of water to be impacted by a tsunami or seiche. The site and surrounding properties are also relatively flat and would not be subject to mudflows. **No impacts** would occur.

Violate Water Quality Standards or Waste Discharge Requirements

Impact 3.5-1 Future construction associated with the proposed project may violate water quality standards or waste discharge requirements. This is considered a potentially significant impact.

The project area is a primarily urbanized, developed area, which likely already contributes non-point source pollution such as motor oil, fertilizers and pesticides, human littering, animal waste and other pollutants typical of developed commercialized areas. These pollutants are typically washed from streets, parking lots, and garages during rainfall events that create sufficient runoff to carry the waste materials. These pollutants have the potential to degrade water quality and may result in potentially significant impacts to the extent that they are generated by new development. Although the majority of the project area is built-out, the construction of individual projects would include grading and other earth moving activities which would expose on-site soils to erosion processes. Additionally, construction activities could lead to exposure of contaminated materials/soils which if present within the project area that could impact surface water quality during storm events. Individual development projects within the project area greater than one acre would be required to mitigate short-term construction impacts pursuant to the NPDES criteria and standards on a project-by-project basis. The purpose of the NPDES permit is to ensure that the proposed project would eliminate or reduce construction-related sediments and pollutants during stormwater runoff.

Construction sediment erosion can be adequately controlled through the application of standard construction BMPs. The goal of BMPs is to capture and treat "first flush" stormwater run-off generated by surrounding and on-site watersheds. Water quality management BMPs for grading and construction scenarios may include the use of sand bags and straw bales for run-off diversion and velocity reduction, mulch topping, hydro-seeding and siltation fencing to prevent soil loss and measures to minimize vehicular leaking and spilling. Design guidelines identified in the DDSP encourage increased percolation through the use of vegetated swales, curb extension, reconfigured parking lots with increased landscaping, and the use of pervious materials (e.g. pervious pavers) in parking lots.

CMA/MTS System Analysis Results

The Alameda County ~~Congestion Management Agency~~Transportation Commission (~~ACCMA~~ACTC) requires analysis of project impacts to Metropolitan Transportation System (MTS) roadways for development projects that would generate more than 100 PM peak hour trips. The ~~ACCMA~~ACTC requires that the baseline forecasts be represented by the model run completed by the ~~ACCMA~~ACTC for 2015 and 2035 conditions. To complete this analysis, the project traffic, generated and distributed outside of the model as described in the preceding section, was added directly to the ~~ACCMA~~ACTC 2015 and 2035 peak hour model runs. It is noted that a review of the 2015 and 2035 ~~ACCMA~~ACTC model land use files showed very little growth in the Plan area; thus, this approach gives a reasonably accurate assessment of the net new traffic added by the Plan on the MTS roadways.

The MTS system analysis differs from the intersection analysis in the following aspects:

- The regional and local land use data sets used for the intersection forecasts and the MTS forecasts are different, since the CCTA Countywide Model was used to develop intersection volumes and the ~~ACCMA~~ACTC Countywide Model was used to develop the MTS system forecasts
- The MTS roadway analysis reports the outputs of the ~~ACCMA~~ACTC model on a roadway segment level, as compared to the more detailed intersection turning movement level forecasts developed for the intersection analysis.

The MTS roadway system in the vicinity of the Project includes I-580, I-680, Dublin Boulevard, and San Ramon Road. The ~~ACCMA~~ACTC Congestion Management Plan (CMP) requires this analysis only be done for the PM peak hour; however, Caltrans requires that it be done for the AM peak hour as well for all Caltrans' facilities. Tables 3.9-14: Near-Term PM Peak Hour MTS Arterial Level of Service and 3.9-15: Cumulative PM Peak Hour MTS Arterial Level of Service summarize the results of the analysis on various segments of the four MTS roadways for the Near-Term and Cumulative Conditions scenarios, respectively, during the PM peak hour. Tables 3.9-16: Near-Term AM Peak Hour MTS Arterial Level of Service and 3.9-17: Cumulative AM Peak Hour MTS Arterial Level of Service summarize the results of the analysis on Caltrans' facilities only for the Near-Term and Cumulative Conditions scenarios, respectively, during the AM peak hour.

Table 3.9-18: Project Transit Trip Summary

All Transit Trip (Bus + BART)			
Case	Daily	AM Peak Hour	PM Peak Hour
Entitled Projects in Plan Area	2,160	180	220
No Project (Existing Specific Plans)	14,450	350	1,250
Base FAR Project	2,200	50	200
Max FAR Project	13,800	350	1,200

Source: Transit trip generation calculations by Fehr & Peers, assuming 25% transit use for residential uses and 15% transit use by retail uses. See technical appendix for detailed trip generation calculations.

Impacts and Mitigation Measures

Intersection Impacts

As shown in Tables 3.9-10 to 3.9-13, with the proposed amendment to the General Plan, the Project would result in no significant impacts to intersections.

Metropolitan Transportation System

Impact 3.9-1: In the Near-Term, the Base FAR Project results in sub-standard LOS on one Metropolitan Transportation System roadway segment, when compared to the Near-Term Without Project scenario. This is a significant impact:

- San Ramon Road northbound, north of Amador Valley Boulevard (PM peak hour). As shown on Table 3.9-14, the intersection would drop from LOS E under the No Project scenario to LOS F with the Project under the Base FAR and Maximum FAR scenarios.

It should be noted that the intersection of San Ramon Road/Amador Valley Boulevard is projected to operate acceptably with the Base FAR Project in the Near-Term scenario. This result, which appears inconsistent with the above impact finding for San Ramon Road, is due to the different analysis methods and models used to conduct the intersection and MTS system analyses.

Mitigation Measure:

MM 3.9-1: ~~As required by the Alameda County Congestion Management Agency, the~~The City of Dublin shall do the following to help reduce traffic congestion on the MTS system:

- Support Alameda County's projects and programs which are aimed at reducing traffic congestion.
- Encourage developers to voluntarily develop a Transportation Demand Management (TDM) Program to reduce trips associated with their project. Strategies that could be included in the program could include additional bicycle

parking, shower facilities, HOV parking, direct building access for pedestrians, commute alternative incentives and convenient transit waiting areas.

- Implement the policies outlined in the City's Bicycle Master Plan and General Plan Land Use and Circulation Element related to bikeways. Support public transit improvements, including but not limited to re-routing, schedule adjustments, new vehicles, upgraded waiting areas, and transit information signs, to encourage use of alternative modes.
- Collect fees from developers in the Specific Plan Area for the Tri-Valley Transportation Development Fee as well as the Downtown TIF programs prior to issuance of Building Permits, which fund local and regional transportation improvements.

Even with mitigation, the City's ability to restore acceptable LOS on the identified roadways/freeways cannot be assured because some projects are the County's, and some the City can encourage but not require (e.g. employer TDM programs). Therefore, this impact remains **significant and unavoidable** after mitigation.

Impact 3.9-2: In the Near-Term, the Maximum FAR Project results in sub-standard LOS on five Metropolitan Transportation System roadway segments, when compared to the Near-Term Without Project scenario. This is a significant impact:

- San Ramon Road northbound, north of Amador Valley Boulevard (PM peak hour)
- San Ramon Road northbound, between Dublin Boulevard and I-580 (PM peak hour)
- Dublin Boulevard westbound, east of Village Parkway (PM peak hour)
- I-580 eastbound, west of San Ramon Road (PM peak hour)
- I-580 westbound, west of San Ramon Road (AM peak hour)

It should be noted that the San Ramon Road/Amador Valley Boulevard and Dublin Boulevard/Village Parkway intersections are projected to operate acceptably with the Maximum FAR Project in the Near-Term scenario. These results, which appear inconsistent with the above impact findings for San Ramon Road and Dublin Boulevard, are due to the different analysis methods and models used to conduct the intersection and Metropolitan Transportation System analyses.

Mitigation Measure:

MM 3.9-1: ~~As required by the Alameda County Congestion Management Agency, the~~The City of Dublin shall do the following to help reduce traffic congestion on the MTS system:

- Support Alameda County's projects and programs which are aimed at reducing traffic congestion.

Mitigation Measure:

MM 3.9-1: ~~As required by the Alameda County Congestion Management Agency, the~~ The City of Dublin shall do the following to help reduce traffic congestion on the MTS system:

- Support Alameda County's projects and programs which are aimed at reducing traffic congestion.
- Encourage developers to voluntarily develop a Transportation Demand Management (TDM) Program to reduce trips associated with their project. Strategies that could be included in the program could include additional bicycle parking, shower facilities, HOV parking, direct building access for pedestrians, commute alternative incentives and convenient transit waiting areas.
- Implement the policies outlined in the City's Bicycle Master Plan and General Plan Land Use and Circulation Element related to bikeways. Support public transit improvements, including but not limited to re-routing, schedule adjustments, new vehicles, upgraded waiting areas, and transit information signs, to encourage use of alternative modes.
- Collect fees from developers in the Specific Plan Area for the Tri-Valley Transportation Development Fee as well as the Downtown TIF programs prior to issuance of Building Permits, which fund local and regional transportation improvements.

For the same reasons as noted above, the City's ability to restore acceptable LOS on the identified roadways/freeways cannot be assured. Therefore, this impact remains **significant and unavoidable** after mitigation.

Transit

Impact 3.9-4: The Base FAR Project will increase transit demand, generating an estimated 2,200 weekday daily transit trips (bus and BART combined). This will create the need for bus route adjustments and increased bus frequency. This is a significant impact on bus transit.

A portion of the projected demand would be served by the new West Dublin/Pleasanton BART station. BART projects ridership of approximately 6,000 weekday boardings/6,000 alightings at this station, based on expectations of current and future ridership generated by transit-oriented and transit-proximate development like that proposed by the project. Therefore, the demand generated by the Maximum FAR project falls within the BART ridership projection and does not constitute a significant impact on BART.

The Livermore-Amador Valley Transit Authority is planning increased bus service via a Bus Rapid Transit service, scheduled to begin operation in January 2011. The service will run eight buses in each direction along Dublin Boulevard during the peak hours, with BART transfers occurring at the East Dublin/Pleasanton Station. It is reasonable to assume that