

**CITY OF DUBLIN GENERAL PLAN**

**Supplement to Environmental Impact Report  
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## TABLE OF CONTENTS

	Page
<b>SUMMARY</b>	1
Traffic	1
Jobs/Housing Balance	1
Air Quality	2
<b>CHANGES IN THE PROJECT</b>	3
<b>TRAFFIC</b>	6
Freeways	6
Arterial Street System	7
Transit	8
Transportation System Management	9
<b>JOBS/HOUSING BALANCE</b>	10
Dublin Planning Area	
Jobs/Housing Balance	10
Tri-Valley Jobs/Housing Balance	11
<b>AIR QUALITY</b>	13
<b>REPORT PREPARATION</b>	14

## TABLES

Business Park Land Use Changes: Extended Planning Area	3
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## FIGURES

Dublin General Plan Extended Planning Area	4
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## **SUMMARY**

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The EIR on the Draft Dublin General Plan (February 1984) was based on designation of industrial park area in the eastern Extended Planning Area (Sphere of Influence) accommodating 21,000 employees at full development. Proposed revisions to the Draft Plan (July 1984), resulting from public hearings held by the City Council and a request by Alameda County, would increase the area designated for business park by 660 acres, adding an estimated 19,800 employees. This supplemental EIR examines the effects of the proposed plan change on traffic, jobs/housing balance, and air quality.

Neither the Draft EIR or this supplement consider the adequacy of public utilities and services. Plans would have to be prepared and improvements financed prior to any development.

Total employment holding capacity of sites designated for business park or industrial development in the Tri-Valley substantially exceeds the Association of Bay Area Governments' (ABAG) anticipated 20-year demand with or without the business park acreage added by the proposed revision to the Draft Dublin General Plan. Thus, buildout at any one location may not occur within 20 years. Further uncertainty is introduced by proposed General Plan policies that designate the northern portion of the eastern Extended Planning Area for residential/open space, leaving the number of residential units to be determined by General Plan refinement studies.

**Traffic.** Potential arterial street development in the Extended Planning Area would provide just enough capacity to serve the 40,800 employees that could work in Dublin's Extended Planning Area, but presently proposed I-580 and I-680 freeway capacities would be inadequate if all "planned jobs" in the Tri-Valley materialize. Projections indicate that significant adverse impacts would not occur until after the year 2005 unless trafficways improvements lag behind development. The potential for changes in employment or housing densities, energy costs, and transportation modes over more than 20 years make long-term impacts somewhat speculative.

### **Summary of Mitigation:**

- Require demonstration of availability of adequate transportation capacity prior to approval of major development increments in all Tri-Valley jurisdictions.
- Prepare detailed arterial street plan prior to development approval in the Extended Planning Area.
- Plan for maximum local and regional transit service.
- Require assured Transportation System Management (TSM) measures as a condition of development approval.

**Jobs/Housing Balance.** Within a 20-year projection period, added capacity to accommodate jobs in the Dublin planning area is not likely to have much effect on the total number of jobs in the Tri-Valley because land supply will exceed demand. However, removal of land from the supply potentially available for residential development

would reduce the volume and increase the price of new housing. The total number of employed persons residing in the Dublin planning area at full development would be significantly less than the number of persons employed in the planning area. Although no reliable estimates of the total number of housing units that might ultimately be built in the Tri-Valley are available, projections of potential employment with or without the proposed revision to the Dublin General Plan indicate that valley-wide jobs/housing balance will not likely be attained, and that there will be a net in-commute at full development.

Although Government Code Section 65913.1 calls for designation of sufficient residential land to meet housing needs, available studies do not conclusively demonstrate that jobs/housing balance within the Tri-Valley is essential to avoidance of significant adverse environmental effects. Each city or county has differing ability to attain jobs/housing balance within an efficient land use and transportation plan, so absolute balance within each jurisdiction is illogical and unattainable.

If valley-wide jobs-housing balance is sought, the following mitigation measures are appropriate.

**Summary of Mitigation:**

- Negotiate reductions in the number of planned jobs and/or increases in the amount of planned housing. Allocations would need to be apportioned among jurisdictions, taking into account land capability, transportation availability, and fiscal resources.
- Require assurance of availability of housing to balance jobs created as a condition of each project approval.
- Increase residential densities to attain jobs/housing balance on designated residential land.

**Air Quality.** Jobs/housing imbalance causing longer journeys to work would increase mobile source emissions and decrease air quality. Impacts would not be significant at the regional scale. Alternative distributions of jobs and housing within the Bay Area that might result in better air quality could be analyzed with the modeling capability of the Bay Area Air Quality Management District.

**Summary of Mitigation:**

- Reduce development intensity if air quality model indicates need.

## **CHANGES IN THE PROJECT**

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This supplemental Environmental Impact Report (EIR) analyzes the potential impacts of changes to the draft General Plan prepared following public hearings on adoption. These changes relate to the Extended Planning Area, that part of Dublin's designated sphere of influence outside the current city limits.

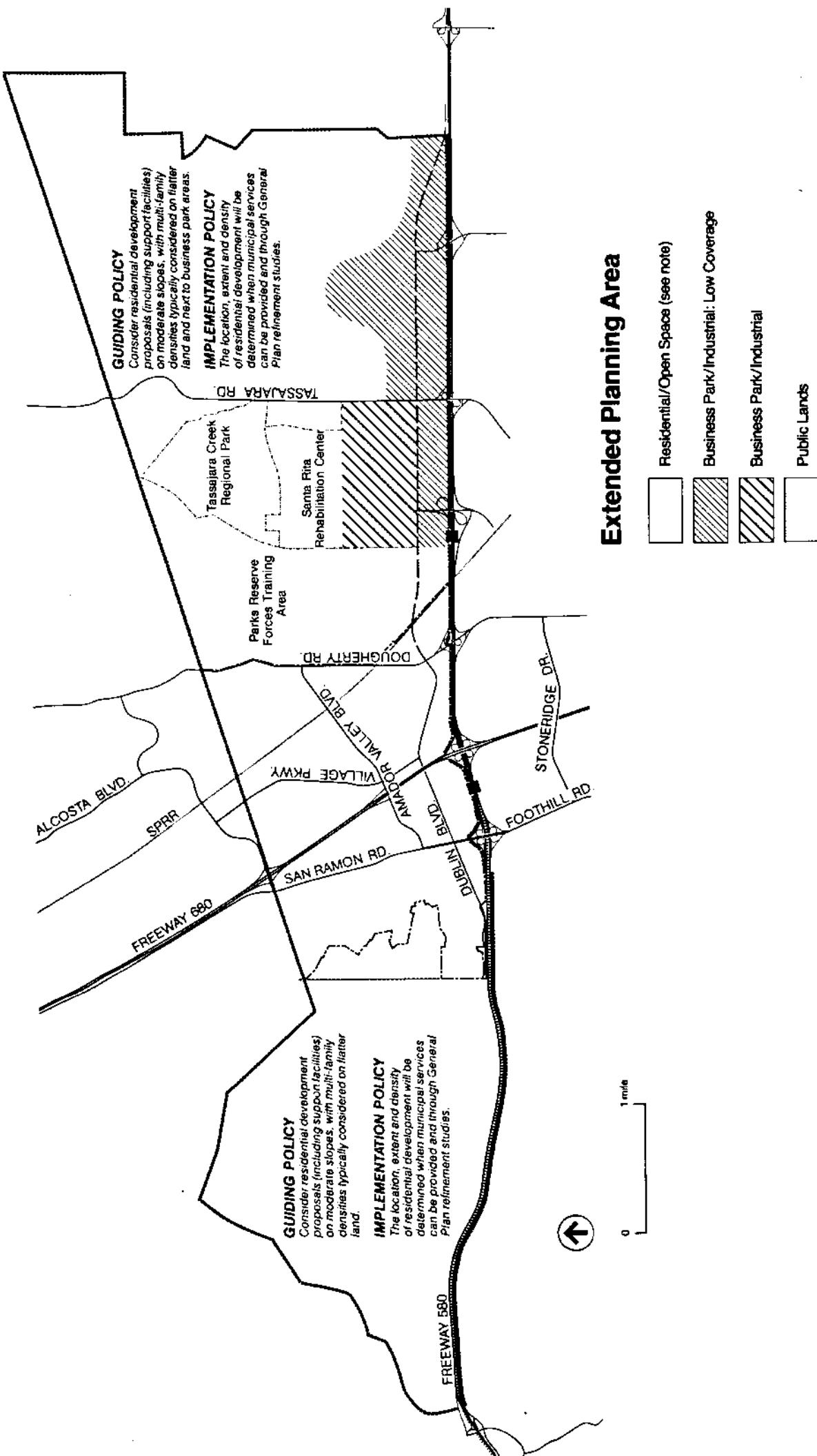
Draft General Plan designations for the Extended Planning Area are depicted in the figure on the following page. The Extended Planning Area has been revised to be consistent with the 1984 actions of the Alameda County Local Agencies Formation Commission (LAFCO) establishing Dublin's Sphere of Influence. The Extended Planning Area and the city's sphere extend east to a boundary between Croak and Doolan roads, and do not extend south of I-580 in any part of the planning area. The revised western boundary of the sphere and the Extended Planning Area follows the ridge between Eden Canyon and Hollis Canyon.

The draft General Plan assumed that a 180-acre portion of the Santa Rita Rehabilitation Center land owned by Alameda County would be declared surplus and available for private development. The County has since developed plans for rebuilding the Santa Rita facility, and indications are that as much as 600 acres of the site will likely be declared surplus. The revised draft General Plan designates this area for business park, including 200 acres designated for low coverage. The area designated for business park east of the current county land has also been increased by approximately 240 acres.

### **BUSINESS PARK LAND USE CHANGES: EXTENDED PLANNING AREA**

	<b>Gross Acres</b>	
	<b>Draft</b>	<b>Revised Draft</b>
	<b>February 1984</b>	<b>July 31, 1984</b>
Business/Industrial Park (all categories)	700	-
Business Park/Industrial: Low Coverage	-	960
Business Park/Industrial	-	400
	<b>700</b>	<b>1,360</b>

# Dublin General Plan



General Plan land use classifications set a building floor area ratio (FAR) for low coverage business park at .25 to .37 and for other business park at .35 to .40. Low coverage business parks are expected to be mainly corporate offices with four or more employees per 1,000 feet of gross floor area, while the higher FAR business park is expected to include warehousing and distribution and is likely to average fewer than two employees per 1,000 gross square feet of building area. The low coverage area designated by the General Plan includes some moderate slopes that may limit ability to attain maximum allowable FAR without parking structures, thereby reducing employment density. For General Plan analysis, an average employment density of 30 persons per gross acre is a reasonable worst case assumption for both types of business park.

The western portion of the Extended Planning Area and the eastern portion north of the business park area would no longer include specific areas designated for single family and rural residential development or open space as on the February 1984 draft. Rather, the plan would establish the following policies:

**Guiding Policy.** Consider residential development proposals (including support facilities) on moderate slopes, with multifamily densities typically considered on flatter land and next to business park areas.

**Implementation Policy.** The location, extent and density of residential development will be determined when municipal services can be provided and through general plan refinement studies.

This impact analysis focuses on the changes in impacts resulting from increasing the area designated for business park. Traffic, jobs/housing balance and air quality are discussed. Detailed analysis of the impact of residential development in the Extended Planning Area will occur during General Plan refinement studies or as part of environmental assessment of proposed projects.

## **TRAFFIC**

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Significant traffic impacts were described in the February 1984 Draft EIR on the General Plan. These impacts would be increased by adding 19,800 employees to the 21,000 previously assumed in the east Extended Planning Area at buildout.

An employee produces approximately three vehicular trips per day, so the 40,800 employees in the Extended Planning Area would produce 122,400 vehicular trips per day. This corresponds to some 14,000 vehicular trips in the peak hour, even after considering allowances for car-pooling, flexible work hours, transit usage and other means to reduce peak hour trips. This would require approximately 15 outbound traffic lanes, at full capacity.

In addition, there would be trips caused by the residential development in the hill area to the north of the planned business park area. This development pattern would result in a continuation of the Tri-Valley's positive arrangement of having the employment related land uses closest to the major transportation network and the residential uses further removed from the major transportation facilities. This would require that residential traffic travel through the industrial/business park area to reach the freeway rather than forcing employees to travel through residential areas to reach their jobs. In addition, residences located north of the business parks would "capture" some of the employment trips, to the extent that Dublin employees would live as well as work in the Extended Planning Area.

Due to the increased development, both freeway and arterial congestion can be expected, particularly if careful specific planning of transportation facilities and their interrelationships with land development itself is not accomplished.

### **Mitigation**

Key features required for minimizing congestion include: expanding capacity of the I-580 freeway; developing improved I-580 interchange systems; developing a high-grade parallel arterial system; developing good access between the parallel arterials and the freeway interchanges; providing high quality public transit facilities; and providing strong transportation system management measures to discourage single-occupancy vehicles.

**Freeways.** Caltrans has published a draft "Route Concept Report" (undated, but released in September 1984) for route I-580 that includes the Dublin area. That report recommends that I-580 be widened to 10 lanes between Vasco Road east of Livermore and I-680. Since auxiliary lanes are already planned between Santa Rita Road and I-680, the combined effect of the plans and the recommendation could be to widen the freeway to a total of 12 lanes west of Santa Rita-Dougherty Road and 10 lanes easterly. Earlier, a detailed analysis in the Tri-Valley Transportation Study (TJKM, 1983) indicated that congestion would result under build-out conditions that did not assume any employment in Dublin's eastern Extended Planning Area. If freeway capacities are increased, severe congestion would not occur until more than 145,000 of the potential 221,700 employees are at work. This would not occur until after the year 2005 under ABAG projections. The Tri-Valley Transportation Study projects

satisfactory peak-hour traffic conditions on I-580 (LOS-D or better) in the year 2005 with 145,000 employees and unsatisfactory conditions with assumed 241,000 employees at build-out (up to 17,000 vehicles in the peak direction during the peak hour).

Because the Dublin Extended Planning Area would have better access to both freeways and potential housing to the east, it might develop faster than some of the other areas designated as business park. However, a determination that the Dublin General Plan proposal is the specific cause of freeway congestion would not be supportable.

Although the Alameda County General Plan designates the proposed Dublin business park sites as open space, it is not logical to assume that flat land adjoining a freeway with minimal agricultural potential would remain unincorporated and undeveloped over the long term, under current County and City regulatory systems.

In a multi-jurisdictional traffic shed, no site or agency is entitled to a disproportionate share of freeway or arterial capacity. Development of all business parks within the Tri-Valley should be monitored and intensity reduced, uses shifted, or development delayed unless traffic capacity is available. San Rafael and Cupertino are among the Bay Area communities that apportion available traffic capacity to sites and regulate development intensity accordingly.

The interchanges along I-580 having direct or indirect effects on the Extended Planning Area include: Dougherty Road/Hopyard Road; the proposed Hacienda Drive interchange; Tassajara Road/Santa Rita Road; Fallon Road/El Charro Road; and Airway Boulevard. Proposed transportation improvements in north Pleasanton will result in major improvements to the Hopyard Road/Dougherty Road interchange, the Santa Rita Road/Tassajara Road interchange and the construction of the Hacienda Drive interchange. The City of Livermore is planning to improve the Airway Boulevard interchange (while also constructing a new interchange at Collier Canyon Road to the east) as part of a pending major assessment district. The El Charro Road/Fallon Road interchange is being studied for improvement to serve gravel operations from the gravel pits located near El Charro Road, and development proposed for eastern Pleasanton and western Livermore. Therefore, improvement of all interchanges directly or indirectly effecting the Extended Planning Area is now planned or being considered. It is important that the links between the interchanges and the Extended Planning Area be also properly sized and planned.

Caltrans and MTC are also investigating the need for a freeway route on the eastside of the Tri-Valley area, generally following the Vasco Road alignment from I-580 north to the Brentwood area. Such a route could prove valuable in connecting likely future residential development in the Brentwood-Pittsburg-Antioch area with employment opportunities in Dublin, Pleasanton and Livermore.

**Arterial Street System.** The City of Dublin may be dependent upon a single east-west arterial to serve the Extended Planning Area, the extension of Dublin Boulevard. For the purposes of this analysis, this extension is referred to as Dublin Parkway. Dublin Parkway would extend from Dublin Boulevard at Dougherty easterly through the Extended Planning Area to the eastern boundary at the City of Livermore. At this point, it would connect with the City of Livermore's planned North Parkway which is being constructed as a part of the Triad development.

Since Dublin Parkway could be the only arterial, its location, design and planned operating characteristics should be very carefully developed. The roadway should be a divided arterial with a minimum of six lanes, three in each direction, with single or double left-turn lanes at major north-south streets (connecting to the freeway interchanges) and separated right turns. Direct access to the roadways should be minimized and restricted to well-designed streets and major driveways.

The parkway concept has the potential for off-street bicycle lanes and pedestrian corridors to further serve transportation needs while preserving the needed capacity for vehicles. Any signals along Dublin Parkway should be well planned and fully coordinated in order to optimize traffic flow along the arterial. Planning for the specific location of the roadway should precede development of the area so that land and street planning can be fully integrated.

This roadway should be a continuous link across the valley to provide alternatives to freeway traffic, particularly for trips of short length or for times when emergencies or other causes of severe congestion may exist on the freeway. The connection at Dougherty Road is important and should be done with high geometric standards encompassing sufficient capacity so as to not create a congestion point blocking either of the two arterials at their intersection. Because of the increased emphasis upon development in the Extended Planning Area, the design and connection of this area is now of greater importance than when considered by the City during the early General Plan hearings.

Other arterials serving the Extended Planning Area will be primarily north-south. The City has already adopted plans for Dougherty Road and its future widening. Generally, all north-south roadways should be at least six lanes between I-580 and the proposed Dublin Parkway. This would include Tassajara Road and Fallon Road. The size of the streets to the north of Dublin Parkway would be in the four- to six-lane range to serve both the employment generating business parks and the residential development beyond. In the case of Tassajara Road, a high capacity connection between the I-580 corridor and the Tassajara Valley and possible residential development in the San Ramon-Danville area will also be necessary.

With Dublin Parkway at six lanes, Tassajara Road at six, and Fallon Road at three lanes southbound, the Extended Planning Area would have 15 lanes to deliver employment related trips to or across I-580 or to Contra Costa County via Tassajara Road. Secondary arterials and collectors will be necessary to serve the Extended Planning Area and should be developed as part of specific or project plans.

**Transit.** The proposed BART extension to the Tri-Valley area extends from the Bay Fair station in San Leandro along the I-580 median with stations in Castro Valley and west Dublin-Pleasanton and an additional station in the vicinity of the proposed Hacienda Drive interchange. To the east no final choice has been made between two primary alternative routes: either continuation along the I-580 corridor or a connection via a diagonal routing to reach downtown Livermore. The Extended Planning Area would best be served by a BART extension which continues along the I-580 corridor at least to the Fallon Road-El Charro Road interchange area.

Prior to the development of BART, the expansion of express bus service along with potential Park and Ride lots at the future station locations is being considered and would help to meet the needs of the Extended Planning Area.

The Southern Pacific Railroad corridor running generally north-south through the Tri-Valley area has been discussed as a possible route for light rail transit. Such a facility could connect with the proposed east-west BART connection in Dublin near the Hacienda Drive interchange. The LRT facility could be very useful in providing necessary capacity for peak hour travel.

A local bus transit system will also be necessary to adequately serve the Extended Planning Area and provide a connection with it and the existing portion of Dublin as well as adjoining communities. The initial portion of this route is under study and preliminary commitments for the operation of this system have been made by the cities to be served.

**Transportation System Management.** The City of Dublin should consider effective measures to minimize use of single-occupancy vehicles during peak hour periods. Such measures as car-pooling, van-pooling, shuttle busses, staggered work hours and related measures are effective in reducing the impacts of peak hour congestion. The City of Pleasanton recently adopted a TSM ordinance which has provisions for voluntary compliance in its earlier years and potential mandatory provisions in the future if compliance is not strong.

The City of Dublin should consider at least a voluntary TSM measure which would affect future development within the Extended Planning Area. This would put Dublin on par with adjoining communities and would also assist in dealing with the otherwise likely congestion.

It is noted that many of the measures described as mitigation measures for development in the Extended Planning Area are not under the sole control of the City of Dublin. Effective regional and subregional coordinated transportation planning will be necessary.

## **JOBS/HOUSING BALANCE**

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The term "jobs/housing balance" describes the relationship between the number of persons employed and employed persons residing in a given area. A 1:1 ratio would equalize the number of in-commuters and out-commuters.

### **Dublin Planning Area Jobs/Housing Balance**

Maintaining jobs/housing balance in relatively small jurisdictions such as Dublin may be questioned as a public policy unless specific benefits can be shown. The major potential benefit is reduction of travel with resulting energy, time, and cost savings, and avoidance of adverse effects on air quality.

At build-out, the Primary Planning Area is expected to have 8,400 jobs and 7,900 housing units. If the number of workers per household continues at 1.45, the present average, 11,455 employed persons would be housed in the city, indicating a net out-commute ( $11,455 - 8,400 = 3,055$ ).

When anticipated development of the Extended Planning Area is included in a jobs/housing balance calculation for Dublin, a different picture emerges. While the General Plan designations for the Extended Planning Area are only schematic, the proposals suggest as many as 40,800 jobs and an unknown number of housing units could exist there. Adding these figures to the total anticipated jobs and housing units for the Primary Planning Area results in a projection of 49,200 total jobs in the Dublin planning area, requiring 26,030 housing units in the Extended Planning Area, if jobs/housing balance is to be achieved.

There are currently about 4,400 dwelling units in the City of Dublin. The average density is approximately 4.25 dwelling units per gross residential acre. With full residential development in the Primary Planning Area, there will be about 7,900 dwelling units at a density of 4.90 units per acre.

The number of housing units that might be built in the Extended Planning Area has not been determined. If 4,000 units could be built in the western Extended Planning Area (a probable high estimate), 22,030 would have to be added to the eastern Extended Planning Area to achieve jobs/housing balance. With a maximum of 2,700 residential acres under 30 percent slope available (MacKay & Samps, July 1984, Parks RFTA and designated business park excluded, 20 percent of residential area allocated for schools, parks, and other nonresidential acreage) the average density would have to be 10.20 dwelling units per gross residential acre.

An average density of 10.20 dwelling units per gross residential acre would be comparable to much of San Francisco and would be attained on this site only with significant changes in development economics and public policies. Whether or not such changes could occur if the jobs existed is too speculative for evaluation, but it appears unlikely that a sufficient number of housing units for achievement of jobs/housing balance within the planning area would be constructed.

## Mitigation

An obvious mitigation would be reduction of the acreage in the Extended Planning Area designated for employment so that the number of housing units could be increased. Because the northern boundary of the area designated for business park and the southern boundary of the area within which housing might be built does not follow any major geographic barrier, it could be shifted as needed to attain balance if initial business park development were near I-580.

For example, if 4,000 housing units could be built in the western Extended Planning Area, the following adjustments/development would need to occur in the eastern Extended Planning Area to approach a jobs/housing ratio close to 1.0:1.0 while maintaining a density of 4.9 dwelling units per gross residential acre.

Business Park	900 acres
General Residential	3,100 acres
Dwelling Units	12,150
Jobs/Housing Ratio	1.07:1.0

Under this example, the eastern Extended Planning Area would be fully developed. The area designated for general residential use would need to be more than 1.5 times the area so designated in the existing city, and more than 2.5 times the existing number of dwelling units would need to be built.

## Tri-Valley Jobs/Housing Balance

ABAG's June 1983 projections anticipate 228,300 Tri-Valley residents by the year 2000. This would result in 80,150 housing units and 116,200 employed residents (at 1.45 per unit). ABAG projects 124,400 jobs in the Tri-Valley, so the ratio of jobs to employed residents would be about 1:1. If, however, all of the 108,620 "planned jobs" listed in the Draft Housing Element (Table 3-1) materialize and are added to the 50,400 jobs existing in 1980, the job total will be 160,000 instead of 124,400 and the jobs to employed residents ratio will rise to 1.4:1 unless housing construction also exceeds ABAG's projection.

The ABAG projections do not assume development in the Dublin Extended Planning Area. If 40,800 jobs in the Dublin Extended Planning Area are added, the jobs/employed residents ratio would be 1.73:1, assuming there are 1.45 employed persons per household and only 80,150 Tri-Valley housing units. With 200,800 jobs (160,000 + 40,800) 138,500 housing units would be needed to achieve balance — more than 2.5 times the number existing, and 70 percent above the number projected for the year 2000.

Provision for up to 49,200 jobs in the Dublin planning area would not necessarily increase travel. Because a Tri-Valley job holding capacity of 200,800 jobs greatly exceeds ABAG year 2000 projections of demand, it is likely that designation of

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<sup>a</sup> (Dublin, Pleasanton, Livermore, San Ramon, Danville, Alamo.)

additional business park acreage would have little effect on the total number of jobs in the Tri-Valley during the next 20 years. Jobs that may locate in Dublin rather than in Pleasanton or Livermore would not have different environmental effects related to jobs/housing balance. However, designation of additional land for employment might cause less housing to be supplied by removing readily developable sites from the land inventory.

A surplus of business park land in the Tri-Valley may result in lower prices and more rapid relocation of certain offices and manufacturing facilities currently located on the Bay plain, particularly in Santa Clara County's Silicon Valley. Jobs/housing imbalance there currently results in excessively long journeys to work, so relocation to the Tri-Valley would reduce travel. An extension of this reasoning would suggest that jobs be relocated to Stockton or Tracy, locations with large supplies of residential land, to reduce job related travel. However, currently available evidence suggests that a large proportion of relocating industries do not regard the Central Valley as a satisfactory alternative location.

A different reason for requiring jobs/housing balance would be to achieve fiscal equity among jurisdictions on the frequently provable assumption that jobs have a favorable impact and residents an unfavorable impact on the ability of local governments to pay for needed services. A contention that Dublin is seeking more than its "share" of jobs and that this would have an adverse environmental impact related to fiscal resources can be sustained only if another jurisdiction that is deprived of those jobs would suffer environmental harm because it would be unable to pay for adequate public services. It does not appear that this can be said of any Tri-Valley Community. Oakland or one or more of the older cities on the northern Alameda County Bay Plain may suffer, but it cannot be predicted that reduction of job potential in Dublin would translate to job maintenance or job growth there.

### **Mitigation**

Over the long term, travel savings would result if jobs/housing balance were attained in the Tri-Valley and if balance there did not contribute to longer work trips to other employment centers. Balance is likely to result only from a Valley-wide system of determining and enforcing "fair shares." Each jurisdiction does not have the same capacity to accommodate jobs/housing balance and the will to achieve balance will be weak unless local benefit can be demonstrated. Dublin, with lower per household income than Pleasanton, cannot be expected to volunteer to accept more market minimum housing so that Pleasanton can devote similarly situated land to employment if both cities believe jobs are fiscally advantageous and no near-term adverse environmental differences are evident.

Because the total number of planned jobs appears to exceed the number of employees that could live in planned housing, residential densities would have to be increased, employment densities reduced or land redesignated from business park to residential use. Once each jurisdiction's jobs/housing responsibilities were established, it would be possible to make additions to the housing supply a condition of business park project approval. Business park approval could require commitment of a specific quantity of land or a specific site to housing.

## **AIR QUALITY**

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This section supplements the discussion of air quality in the Conservation Element of the Dublin General Plan (pp. 4-7 et seq of the Technical Supplement to the General Plan) and the impact analysis presented in the Environmental Impact Report (p. 6).

Air Quality effects of additional employment in the Dublin Extended Planning Area are closely related to the total travel effects described under Jobs/Housing Balance heading and freeway congestion expected by the Tri-Valley Transportation Study to exist when about two-thirds of the 221,700 projected jobs are filled. Although improved control of automobile emissions has reduced the importance of vehicle miles of travel (VMT) as a determinant of air quality with resulting improvements in Tri-Valley air, VMT still is an important variable. Because the proposed plan is not expected to increase VMT significantly, at least during the next 20 years, it would not generate vehicle emissions that would degrade air quality to a significantly greater extent than under a "no project" alternative.

An August 1983 Draft EIR-Amendment of the Pleasanton General Plan Growth Management Element and Supplemental EIR-Hacienda Business Park concluded that air pollutant emissions (ozone precursors) related to commute trips by approximately 150,000 employees would not be significant at the regional scale. Three residential alternatives and two transportation mode alternatives were analyzed to show a range variation of 0.2 to 0.6 percent of Alameda-Contra Costa emissions. (Table 33, p. 3.4-9)

As vehicle emissions are mitigated, stationary pollution sources become a larger component of the air quality problem. Relocation to the Tri-Valley of industries that emit pollutants to the Tri-Valley will have a positive effect on air quality in the region for two reasons:

1. All new plants must meet current stringent emissions standards.
2. New plants that add to total emissions must provide offsetting mitigation that reduces total emissions. This usually is accomplished by improvements or cessation of operations at noncomplying facilities.

Quantitative analysis of the non-localized air quality effects of land use decisions is beyond the capability or logical initiative of individual local governments. The Bay Area Air Quality Management District maintains a regional model that is updated every two years and provides a rational basis for any needed controls on the location of jobs and housing to maintain acceptable air quality. The 1982 Bay Area Air Quality Plan and the update now being prepared establish a comprehensive program for achievement and maintenance of air quality standards. The proposed expansion of the business park designation in the Extended Planning Area — the project that is the subject of this Supplemental EIR — would not affect implementation of these programs if it would not attract activities that otherwise would locate outside the Bay Area. At some point, possibly before full development of all Tri-Valley business parks, the Bay Area may reach the limit of development consistent with air quality standards.

### **Mitigation**

Reduce development intensity if air quality model indicates need.