



# 2040 Union City General Plan Update

Draft Environmental Impact Report

SCH#2018102057

*prepared by*

**City of Union City**

Planning Division, Economic and Community Development

34009 Alvarado-Niles Road

Union City, California 94587

Contact: Carmela Campbell, AICP, Planning Manager

*prepared with the assistance of*

**Rincon Consultants, Inc.**

4825 J Street, Suite 100

Sacramento, California 95819

**June 2019**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

[rinconconsultants.com](http://rinconconsultants.com)

# 2040 Union City General Plan Update

Draft Environmental Impact Report

SCH#2018102057

*prepared by*

**City of Union City**

Planning Division, Economic and Community Development

34009 Alvarado-Niles Road

Union City, California 94587

Contact: Carmela Campbell, AICP, Planning Manager

*prepared with the assistance of*

**Rincon Consultants, Inc.**

4825 J Street, Suite 100

Sacramento, California 95819

**June 2019**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

[rinconconsultants.com](http://rinconconsultants.com)

*This report prepared on 50% recycled paper with 50% post-consumer content.*

# Table of Contents

---

Executive Summary .....	ES-1
Project Synopsis.....	ES-1
Project Applicant.....	ES-1
Project Location .....	ES-1
Project Description.....	ES-1
Project Objectives/Guiding Principles.....	ES-2
Required Discretionary Approvals .....	ES-3
Summary of Impacts and Mitigation Measures.....	ES-4
1 Introduction.....	1-1
1.1 Environmental Impact Report Background.....	1-1
1.2 Overview of the 2040 Union City General Plan .....	1-2
1.3 Purpose and Legal Authority.....	1-3
1.4 Scope and Content.....	1-4
1.5 Intended Uses of the EIR.....	1-5
1.6 Lead, Responsible, and Trustee Agencies .....	1-6
1.7 Environmental Review Process.....	1-6
2 Project Description .....	2-1
2.1 2040 General Plan.....	2-1
2.1.1 Greater Station District.....	2-2
2.1.2 Union City Boulevard District.....	2-2
2.1.3 Historic Alvarado District / Horner-Veazy Area .....	2-3
2.1.4 Additional City Growth .....	2-3
2.2 Project Proponent/Lead Agency.....	2-3
2.3 Project Location .....	2-3
2.4 Land Use and Regulatory Setting.....	2-4
2.5 Project Objectives/Guiding Principals.....	2-9
2.6 Characteristics of the Proposed 2040 General Plan .....	2-10
2.6.1 Economic Development Element .....	2-10
2.6.2 Health and Quality of Life Element.....	2-11
2.6.3 Land Use Element .....	2-11
2.6.4 Community Design Element .....	2-17
2.6.5 Mobility Element .....	2-17
2.6.6 Safety Element.....	2-18
2.6.7 Public Facilities and Services Element .....	2-18
2.6.8 Resource Conservation Element.....	2-19
2.6.9 Special Areas Element .....	2-19
2.6.10 Housing Element.....	2-20
2.7 General Plan Buildout .....	2-20
2.7.1 Required Discretionary Approvals.....	2-22
3 Environmental Setting .....	3-1

3.1	Regional Setting .....	3-1
3.2	Physical Setting .....	3-1
3.2.1	General Geographic Setting.....	3-1
3.2.2	Topography and Drainage .....	3-2
3.2.3	Climate.....	3-2
3.3	Demographics .....	3-2
3.4	Cumulative Development .....	3-2
4	Environmental Impact Analysis .....	4-1
4.1	Aesthetics.....	4.1-1
4.1.1	Setting.....	4.1-1
4.1.2	Impact Analysis .....	4.1-9
4.2	Air Quality .....	4.2-1
4.2.1	Setting.....	4.2-1
4.2.2	Impact Analysis .....	4.2-7
4.3	Biological Resources.....	4.3-1
4.3.1	Setting.....	4.3-1
4.3.2	Impact Analysis .....	4.3-16
4.4	Cultural Resources .....	4.4-1
4.4.1	Setting.....	4.4-1
4.4.2	Impact Analysis .....	4.4-7
4.5	Energy .....	4.5-1
4.5.1	Setting.....	4.5-1
4.5.2	Impact Analysis .....	4.5-14
4.6	Geology and Soils.....	4.6-1
4.6.1	Setting.....	4.6-1
4.6.2	Impact Analysis .....	4.6-10
4.7	Greenhouse Gas Emissions/Climate Change .....	4.7-1
4.7.1	Setting.....	4.7-1
4.7.2	Impact Analysis .....	4.7-11
4.8	Hazards/Hazardous Materials.....	4.8-1
4.8.1	Setting.....	4.8-1
4.8.2	Impact Analysis .....	4.8-12
4.9	Hydrology and Water Quality .....	4.9-1
4.9.1	Setting.....	4.9-1
4.9.2	Impact Analysis .....	4.9-9
4.10	Land Use and Planning.....	4.10-1
4.10.1	Setting.....	4.10-1
4.10.2	Impact Analysis .....	4.10-10
4.11	Noise .....	4.11-1
4.11.1	Setting.....	4.11-1
4.11.2	Impact Analysis .....	4.11-5
4.12	Population and Housing.....	4.12-1
4.12.1	Setting.....	4.12-1
4.12.2	Impact Analysis .....	4.12-4
4.13	Public Services and Recreation .....	4.13-1
4.13.1	Setting.....	4.13-1
4.13.2	Impact Analysis .....	4.13-8

4.14	Transportation .....	4.14-1
4.14.1	Setting.....	4.14-1
4.14.2	Impact Analysis .....	4.14-23
4.15	Tribal Cultural Resources .....	4.15-1
4.15.1	Setting.....	4.15-1
4.15.2	Impact Analysis .....	4.15-2
4.16	Utilities and Service Systems .....	4.16-1
4.16.1	Setting.....	4.16-1
4.16.2	Impact Analysis .....	4.16-13
4.17	Wildfire.....	4.17-1
4.17.1	Setting.....	4.17-1
4.17.2	Impact Analysis .....	4.17-6
4.18	Effects Found Not to Be Significant .....	4.18-1
4.18.1	Agriculture and Forestry Resources .....	4.18-1
4.18.2	Mineral Resources .....	4.18-2
5	Other CEQA Required Discussions.....	5-1
5.1	Growth Inducement.....	5-1
5.1.1	Population and Employment Growth.....	5-1
5.1.2	Removal of Obstacles to Growth.....	5-1
5.2	Irreversible Environmental Effects.....	5-2
6	Alternatives.....	6-1
6.1	Development of Alternatives .....	6-1
6.2	Project Objectives/Guiding Principles.....	6-1
6.3	Alternatives Evaluated in the Draft EIR.....	6-2
6.4	Alternative 1: No Project Alternative.....	6-3
6.4.1	Description.....	6-3
6.4.2	Impact Analysis .....	6-4
6.5	Alternative 2: Reduced Density Alternative.....	6-10
6.5.1	Description.....	6-10
6.5.2	Impact Analysis .....	6-11
6.6	Alternative 3: Enhanced Employment Alternative .....	6-17
6.6.1	Description.....	6-17
6.6.2	Impact Analysis .....	6-18
6.7	Alternatives Considered but Rejected .....	6-24
6.7.1	No Construction of the Quarry Lakes Parkway Alternative.....	6-24
6.7.2	Designate Vacant Parcels Currently Identified for Residential and Employment Generating Uses as Open Space.....	6-25
6.8	Environmentally Superior Alternative .....	6-25
7	References .....	7-1
7.1	Bibliography .....	7-1
7.2	List of Preparers .....	7-14

**Tables**

Table ES-1	Summary of Environmental Impacts and Mitigation Measures.....	ES-4
Table 2-1	Description of Land Use Designations .....	2-12

Table 2-2	Projected Dwelling Units .....	2-21
Table 2-3	Projected Population Growth.....	2-22
Table 2-4	Projected Non-Residential Development by Sector .....	2-22
Table 4.2-1	Federal and State Ambient Air Quality Standards.....	4.2-4
Table 4.2-2	Ambient Air Quality Data.....	4.2-5
Table 4.2-3	2017 Clean Air Plan Control Measures .....	4.2-10
Table 4.3-1	Vegetation Communities and Land Cover Types in Union City .....	4.3-2
Table 4.3-2	Special-Status Species Within Five Miles of the City Limits.....	4.3-9
Table 4.4-1	Known Historical Resources within Union City.....	4.4-4
Table 4.5-1	2017 Annual Gasoline and Diesel Consumption.....	4.5-7
Table 4.5-2	2017 Annual Electricity Consumption .....	4.5-8
Table 4.5-3	2017 Annual Natural Gas Consumption .....	4.5-8
Table 4.5-4	Direct Transportation Energy Use in Union City.....	4.5-15
Table 4.5-5	Annual Natural Gas and Electricity Consumption in Union City.....	4.5-16
Table 4.5-6	2040 General Plan Consistency with the Union City Climate Action Plan.....	4.5-20
Table 4.6-1	Geologic Units and Paleontological Sensitivity in Union City .....	4.6-17
Table 4.7-1	Estimated Greenhouse Gas Construction Emissions .....	4.7-16
Table 4.7-2	Estimated 2040 General Plan Emissions.....	4.7-16
Table 4.7-3	2040 General Plan Consistency with the Union City Climate Action Plan.....	4.7-21
Table 4.8-1	Open or Active Hazardous Materials Contamination Sites in Union City.....	4.8-6
Table 4.10-1	Distribution of Existing Land Uses .....	4.10-1
Table 4.10-2	General Plan Consistency with Plan Bay Area 2040 Goals .....	4.10-14
Table 4.11-1	Maximum Allowable Noise Exposure By Land Use.....	4.11-4
Table 4.11-2	Human Response to Different Levels of Groundborne Vibration .....	4.11-6
Table 4.11-3	Vibration-Related Building Damage Thresholds.....	4.11-6
Table 4.11-4	Typical Noise Levels for Construction Equipment .....	4.11-8
Table 4.11-5	Vibration Source Levels for Construction Equipment .....	4.11-14
Table 4.12-1	Union City Population, Dwelling Units, and Employment .....	4.12-2
Table 4.12-2	Regional Housing Needs Assessment 2014-2022.....	4.12-3
Table 4.13-1	NHUSD Schools in Union City .....	4.13-5
Table 4.14-1	Roadway Segment Level of Service Thresholds.....	4.14-15
Table 4.14-2	Study Roadway Segments Level of Service: AM Peak Hour .....	4.14-16
Table 4.14-3	Study Roadway Segments Level of Service: PM Peak Hour.....	4.14-18

Table 4.14-4 Daily VMT and VMT per Service Population..... 4.14-26

Table 4.14-5 2040 AM Peak Hour Road Segment Levels of Service..... 4.14-31

Table 4.14-6 2040 PM Peak Hour Road Segment Levels of Service ..... 4.14-34

Table 4.16-1 ACWD Projected Water Supply and Use: Normal Year (Acre-Feet per Year)..... 4.16-5

Table 4.16-2 Annual Solid Waste Disposal – Union City..... 4.16-7

Table 4.16-3 Projected Total Water Demand by Development Type..... 4.16-16

Table 4.16-4 Projected Total Wastewater Generation by Development Type ..... 4.16-19

Table 4.16-5 Annual Solid Waste Disposal Per Capita – Union City ..... 4.16-21

Table 6-1 Alternative 1 – Trip Generation Comparison..... 6-9

Table 6-2 Comparison of Density Facilitated by Alternative 2 ..... 6-11

Table 6-3 Alternative Comparison..... 6-27

**Figures**

Figure 2-1 Regional Location ..... 2-5

Figure 2-2 Project Site and General Plan Area ..... 2-6

Figure 2-3 2002 General Plan Land Use Map ..... 2-7

Figure 2-4 General Plan Proposed Land Use Map ..... 2-8

Figure 2-5 2040 General Plan Special Areas ..... 2-20

Figure 4.1-1 Eden Landing Ecological Reserve..... 4.1-2

Figure 4.1-2 East Bay Hills Looking Toward San Francisco Bay ..... 4.1-2

Figure 4.1-3 Alameda Creek Regional Trail Looking Northeast..... 4.1-3

Figure 4.1-4 Union Landing Shopping Center, Alvarado-Niles Road and Interstate 880 ..... 4.1-4

Figure 4.1-5 Station District with Multi-family Housing in Background ..... 4.1-5

Figure 4.1-6 Union City Gateways and State-Designated Scenic Corridor ..... 4.1-7

Figure 4.1-7 Nighttime Lighting in Commercial District in Union City..... 4.1-8

Figure 4.1-8 Potential Station District Development Design..... 4.1-14

Figure 4.3-1 Vegetation Communities and Land Cover Types in Union City ..... 4.3-3

Figure 4.3-2 Wetlands in Union City ..... 4.3-8

Figure 4.5-1 Petroleum Infrastructure in the City Limits..... 4.5-2

Figure 4.6-1 Regional Faults ..... 4.6-2

Figure 4.6-2 Geologic Units Mapped in Union City ..... 4.6-5

Figure 4.6-3 Paleontological Sensitivity of Geologic Units Mapped in Union City ..... 4.6-18

Figure 4.8-1 Existing Union City Schools with 1/4-Mile Buffer..... 4.8-4

Figure 4.8-2 Open or Active Hazardous Materials Contamination Sites in Union City ..... 4.8-5



Figure 4.9-1	Major Drainages and Floodplains in Union City .....	4.9-2
Figure 4.9-2	Tsunami Inundation Zone.....	4.9-5
Figure 4.13-1	Alameda County Fire Department Stations in Union City.....	4.13-2
Figure 4.13-2	Union City Police Department Stations.....	4.13-4
Figure 4.14-1	Existing and Planned Bicycle Facilities.....	4.14-5
Figure 4.14-2	Existing and Planned Pedestrian Facilities .....	4.14-6
Figure 4.14-3	BART and Amtrak Routes and Stations .....	4.14-7
Figure 4.14-4	AC Transit Bus Routes.....	4.14-10
Figure 4.14-5	Union City Transit Bus Routes .....	4.14-11
Figure 4.14-6	Union City Study Roadway Segments.....	4.14-14
Figure 4.17-1	SRA Fire Hazard Severity Zones .....	4.17-3

## Appendices

Appendix A	Notice of Preparation and Comments Received
Appendix B	Union City General Plan Buildout Methodology
Appendix C	California Emission Estimator Model Data
Appendix D	Traffic Counts
Appendix E	Tribal Consultation Correspondence

# Executive Summary

---

The section summarizes the characteristics of the 2040 Union City General Plan Update, referred to herein as the 2040 General Plan or proposed project, as well as the 2040 General Plan's environmental impacts and recommended mitigation measures.

## Project Synopsis

### Project Applicant

City of Union City  
34009 Alvarado-Niles Road  
Union City, California 94587

### Project Location

Union City is located in Alameda County on the east side of the San Francisco Bay. Union City is bounded by the city of Hayward to the north, the city of Fremont to the south, the Bay lands on the west, and hillsides to the east. Union City encompasses approximately 18 square miles (11,520 acres) and is surrounded on all sides by incorporated lands of other cities or the San Francisco Bay waters. As a result, future growth in Union City will occur within the current City limits. The Planning Area for the 2040 General Plan is, therefore, the current City limits. Accordingly, this EIR uses the current City limits as the land use boundary for the 2040 General Plan as it represents the potential area where land use changes and/or physical changes to the environment may occur as a result of implementation of the 2040 General Plan. For the purposes of this EIR the area inside the City limits is defined as the "General Plan Area" for the 2040 General Plan.

### Project Description

The 2040 General Plan builds on the current 2002 General Plan, but also is a comprehensive effort to update the current General Plan. The update responds to the current needs, values, and preferences of the community, as well as changes in State law that may not have been in effect when the current General Plan was last updated. The General Plan Housing Element was last updated in January 2015, covering the period from January 2015 through January 2023, and was subject to a separate environmental review process. The 2040 General Plan incorporates the adopted 2015 Housing Element. No substantive changes are being proposed to the Housing Element as part of its incorporation into the 2040 General Plan.

The 2040 General Plan defines the policy framework by which the City's physical and economic resources are to be managed and used through the planning horizon year, which is 2040. The 2040 General Plan clarifies and articulates the City's intentions with respect to the rights and expectations of various community stakeholders, including residents, property owners, and business owners. Through the General Plan, the City informs these groups of its goals, policies, and standards, and thereby communicates expectations of the public and private sectors for meeting community objectives.

The 2040 General Plan has been organized into ten elements: Land Use; Economic Development; Community Design; Mobility; Health and Quality of Life; Safety; Public Facilities and Services; Resource Conservation; and Housing. These ten elements describe the existing conditions and context for the related topic areas, followed by goals, policies, and implementation programs to guide the City's management and development into the future.

## Project Objectives/Guiding Principles

The 2040 General Plan presents a vision for the future of Union City and a set of guiding principles for how the City will achieve that vision. This vision and guiding principles capture the City's key values and aspirations for the future. They reflect the collective ideas from community members and City leaders that provided input to help shape the 2040 General Plan.

The 2040 General Plan vision for the future is as follows:

Union City is the heart of the Bay Area and a regional center for commerce, community, and culture. Our economy is strong and diverse and provides high paying jobs across a broad range of local businesses, high profile companies, and emerging industries. Our residents and neighborhoods are safe and healthy and our community is celebrated for its diversity and equitable treatment of everyone. Union City provides effective and efficient public services and is fiscally stable.

The 2040 General Plan guiding principles are contained in the 2040 General Plan Introduction and abbreviated below:

- **Economic Development:** Promote Union City as a civic, cultural, and economic destination within the greater Bay Area to attract new businesses and facilitate new economic development opportunities and succeed in global marketplace; expand the skills and knowledge of the workforce, protect and expand economic assets in Union City, and expand the job base.
- **Health and Quality of Life:** Promote a healthy and safe way of life in Union City; prioritize education; promote access to healthy foods; attract and retain accessible, affordable, and quality health services and facilities; support and expand Youth and Family Services programs.
- **Land Use:** Maintain a balanced mix of residential, employment, and commercial uses; create a vibrant 24-hour Station District; ensure livable, healthy, and well-designed neighborhoods that are walkable and bicycle friendly; encourage higher-density developments and mixed-use projects in appropriate areas; promote and increase infill and reuse, while maintaining quality of life and important community character; and implement sustainable and resilient development practices.
- **Community Design:** Enhance gateways into the community; ensure new development respects the community's natural setting; ensure new development is compatible with the scale and character of existing neighborhoods; preserve and protect important historic and cultural resources; create attractive commercial and mixed-use corridors and centers; create vibrant public places that serve as gathering places; and locate and design buildings, streetscapes, and public spaces that contribute to walkable neighborhoods, corridors, and districts.
- **Housing:** Promote a mix of housing types and affordability; and include a mix of housing types within neighborhoods to promote a diversity of household types and housing choices.
- **Mobility and Access:** Develop a balanced, integrated, multimodal transportation system that is efficient and safe; create a safe and convenient transportation network that incorporates complete streets concepts; continue providing a variety of transportation choices that promote

alternatives to the automobile; and support the integration of emerging transportation technologies and modes.

- **Sustainability and Resiliency:** Reduce greenhouse gas (GHG) emissions to help achieve reduction goals to address climate change; protect natural resources; continue to promote sustainable levels of energy, water, and resource consumption; encourage residents and businesses to live, work, and operate in a more sustainable manner; and enhance the understanding of future risks ability to absorb, respond to, and recover from emergencies or other changes.
- **Parks and Recreation:** Maximize public access and use of city and regional open space and recreational areas; support the development of regional open spaces that connect Union City to the Bay Area; support the development of additional parkland for active recreational uses; expand and improve existing pedestrian and bike trails; and provide innovative recreational and sports facilities, services, and programs.
- **Public Safety:** Improve coordination among residents and businesses and City Departments to address security issues and maintain a safe community; support and expand the City’s Youth Violence Prevention Program and community policing unit; minimize vulnerability to natural disasters and manmade hazards; strengthen emergency response capabilities; modernize older public facilities to improve seismic safety; support and expand the Community Emergency Response Team (CERT) program; and ensure public facilities and infrastructure investment contribute to the safety and security of residents.
- **Services and Facilities:** Provide quality public services, facilities, and infrastructure throughout the city; expand and enhance telecommunication and broadband access; maintain transparency and improve accountability in all City decisions, practices, and service areas; promote opportunities for community education and involvement; ensure the fair treatment of residents of all races, cultures, and incomes with respect to City plans and policies; promote joint use of public facilities; ensure City revenues are sufficient to maintain and enhance City services, programs, and facilities; and ensure new development is fiscally neutral or positive to the City and provides a net social or economic benefit to the community.

## Required Discretionary Approvals

With recommendations from the City’s Planning Commission, the City Council would need to take the following discretionary actions in conjunction with the proposed project:

- Certification of the Final EIR
- Adoption of the proposed 2040 Union City General Plan

The City adopted its current Housing Element in January 2015, covering the period of January 2015 through January 2023. This Housing Element was submitted to the HCD for review and comment, and the City received certification of the Housing Element from HCD in February 19, 2015 (HCD 2015). The 2040 General Plan incorporates the adopted 2015 Housing Element. No substantive changes are being proposed to the Housing Element as part of its incorporation into the 2040 General Plan.

## Summary of Impacts and Mitigation Measures

Table ES-1 lists the environmental impacts of the proposed 2040 General Plan, the proposed mitigation measures, and residual impacts or significance after mitigation. Impacts are defined as significant, unavoidable adverse impacts that require a statement of overriding consideration, pursuant to Section 15093 of the *CEQA Guidelines* if the proposed 2040 General Plan is approved; significant, adverse impacts that can be feasibly mitigated to less than significant levels and that require findings to be made under Section 15091 of the *CEQA Guidelines*; adverse impacts that are less than those allowed by adopted significance thresholds; and no impact.

**Table ES-1 Summary of Environmental Impacts and Mitigation Measures**

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Aesthetics</b>		
<p><b>Impact AES-1.</b> The 2040 General Plan will facilitate development in some areas of the city with a view of the hillside area, marshlands along the bay, or other open space areas. Adherence with goals and policies in the 2040 General Plan would maintain some visual access to natural features surrounding the City but would not reduce impacts to scenic vistas related to the hillside area and Bayshore. Impacts on scenic vistas would be significant and unavoidable.</p>	None available	Significant and unavoidable
<p><b>Impact AES-2.</b> There are no designated state scenic highways in union city. The 2040 General Plan would not facilitate new land uses or growth in areas of the city adjacent to State Route 84, a designated state scenic highway. Therefore, the 2040 General Plan would have no impact.</p>	None required	Less than significant without mitigation
<p><b>Impact AES-3.</b> Goals and policies from the 2040 General Plan indicate that development would integrate into the community visually and protect and enhance the neighborhoods in which development occurs. Adherence to the prescribed goals and policies in Land Use, Community Design, and Special Areas Elements of the 2040 General Plan for new construction, parking, gateways, and streetscapes would direct the quality of the City’s visual character. However, the 2040 General Plan envisions more intensive future development including buildings that are taller than what is generally existing in the urbanized areas of Union City. Impacts to visual character and quality would be significant and unavoidable.</p>	None available	Significant and unavoidable
<p><b>Impact AES-4.</b> New development facilitated by the 2040 General Plan would result in new sources of light and glare. New development would occur in already urbanized areas of the City, where lights are</p>	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>glare are already common. Light and glare would also be minimized by the 2040 General Plan policies. Impacts would be less than significant.</p>		
<p><b>Air Quality</b></p>		
<p><b>Impact AQ-1.</b> The 2040 General Plan would be consistent with BAAQMD’s 2017 Clean Air Plan and the rate of increase for vehicle miles traveled under buildout of the 2040 General Plan would not exceed the rate of service population increase associated with the 2040 General Plan. This impact would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Impact AQ-2.</b> Buildout of the 2040 General Plan would result in the temporary generation of air pollutants during construction, which would affect local air quality. The 2040 General Plan policies incorporate the BAAQMD Basic Construction Mitigation Measures, which would reduce construction emissions. Therefore, impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Impact AQ-3.</b> Buildout of the 2040 General Plan may expose sensitive receptors to additional sources of toxic air contaminants. Impacts would be less than significant with mitigation incorporated.</p>	<p><b>AQ-1 Health Risk Assessments.</b> Implement Bay Area Air Quality Management District (BAAQMD) <i>CEQA Air Quality Guidelines</i> and State Office of Environmental Health Hazard Assessment policies and procedures requiring health risk assessments (HRAs) for new residential development and other sensitive receptors, as defined in the BAAQMD <i>CEQA Air Quality Guidelines</i>, within 1,000 feet of sources of toxic air contaminants, including freeways and roadways with over 10,000 vehicle trips per day. Based on the results of the HRA, identify and implement measures, such as air filtration systems, to reduce potential exposure to particulate matter, carbon monoxide, diesel fumes, and other potential health hazards in accordance with the receptor thresholds contained in BAAQMD’s <i>CEQA Air Quality Guidelines</i>, Table 2-6.</p>	<p>Less than significant</p>
<p><b>Impact AQ-4.</b> Buildout of the 2040 General Plan would not introduce new odor-generating land uses intermixed with residential or mixed-use land uses. Compliance with 2040 General Plan policies would ensure that new odor-generating land uses do not generate objectionable odors off-site. Impacts related to odors would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Biological Resources</b></p>		
<p><b>Impact BIO-1.</b> Development facilitated by the 2040 General Plan could result in isolated impacts to habitat for special-status species and impacts to migratory bird nest sites. Impacts would be less than significant with mitigation incorporated.</p>	<p><b>*BIO-1 Nesting Bird Protection Policy.</b> The following policy shall be added to the 2040 General Plan Resource Conservation Element as Policy RC-2.10:  The City shall require project applicants to retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to all new</p>	<p>Less than significant</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	development that may remove any trees or vegetation that may provide suitable nesting habitat for migratory birds or other special-status bird species. If nests are found the qualified biologist(s) shall identify appropriate avoidance measures, and these measures shall be incorporated into the project and implemented accordingly.	
<p><b>Impact BIO-2.</b> The 2040 General Plan would facilitate development that could result in construction within riparian habitat, and direct placement of fill in wetlands. However, compliance with existing regulations, and implementation of 2040 General Plan policies would reduce potential impacts to a less than significant level.</p>	None required	Less than significant without mitigation
<p><b>Impact BIO-3.</b> Development facilitated by the 2040 General Plan could result in construction within streams and associated riparian zones that serve as wildlife movement corridors. However, implementation of 2040 General Plan policies preserving streams and wildlife movement corridors, as well as open space would reduce impacts to less than significant.</p>	None required	Less than significant without mitigation
<p><b>Impact BIO-4.</b> Development facilitated by the 2040 General Plan would result in removal of trees. However, the 2040 General Plan policies require new development to comply with the City’s Tree Conservation Ordinance. With adherence to the Tree Conservation Ordinance, impacts would be less than significant.</p>	None required	Less than significant without mitigation
<p><b>Impact BIO-5.</b> There are no Habitat Conservation Plans or Natural Community Conservation Plans applicable to the 2040 General Plan. Therefore, the 2040 General Plan would have no impacts.</p>	None required	Less than significant without mitigation
<b>Cultural Resources</b>		
<p><b>Impact CR-1.</b> Development facilitated by the 2040 General Plan would have the potential to impact historical resources and unique archaeological resources. Impacts would be potentially significant but mitigable.</p>	<p><b>*CR-1 Cultural Resources Study Implementation Program.</b> The following Implementation Program shall be added to Resource Conservation Element of the 2040 General Plan:          If a project requires activities that have the potential to impact cultural resources, the City shall require the applicant to retain a qualified archaeologist meeting the Secretary of the Interior’s (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest</p>	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
	Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources. These recommendations shall be implemented and incorporated in the project.	
<b>Impact CR-2.</b> Ground-disturbing activities associated with development facilitated by the 2040 General Plan could result in damage to or destruction of human burials. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Energy</b>		
<b>Impact E-1.</b> The development and population growth facilitated by the 2040 General Plan would result in overall consumption of energy beyond existing conditions. However, the 2040 General Plan is based on a land-use strategy that promotes greater overall energy efficiency in community and municipal operations. 2040 General Plan policies and implementation programs would ensure that development under the 2040 General Plan would comply with existing energy efficiency regulations, and would encourage new development to take advantage of voluntary energy efficiency programs. Wasteful, inefficient, or unnecessary consumption of energy would not occur and impacts would be less than significant.	None required	Less than significant without mitigation
<b>Impact E-2.</b> The 2040 General Plan would be consistent with energy efficiency goals contained in the Union City Climate Action Plan. Construction and operation of projects facilitated by the 2040 General Plan would comply with relevant provisions of the State's CalGreen and Title 24 of the California Energy Code. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Geology and Soils</b>		
<b>Impact GEO-1.</b> Construction and occupancy of development facilitated by the 2040 General Plan could result in exposure of people or structures to a risk of loss, injury, or death from seismic events. However, required adherence to the requirements of the CBC, Union City Municipal Code, and implementation of the goals and policies of the 2040 General Plan would minimize the potential for loss, injury, or death following a seismic event. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Impact GEO-2.</b> Construction of development facilitated by the 2040 General Plan would include ground disturbance such as	None required	Less than significant without



Impact	Mitigation Measure (s)	Significance After Mitigation
<p>excavation and grading that would result in loose or exposed soil, increasing the potential for erosion and soil loss. Compliance with applicable regulations, including the Clean Water Act, and implementation of the goals and policies of the 2040 General Plan would minimize the potential for erosion and loss of topsoil and would reduce this impact to less than significant.</p>		mitigation
<p><b>Impact GEO-3.</b> Development facilitated by the 2040 General Plan may result in the construction of structures on expansive soils, which could create a substantial risk to life or property. However, development would be required to comply with the CBC, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand the forces of expansive soil. With mandatory compliance with the CBC, impacts would be less than significant.</p>	None required	Less than significant without mitigation
<p><b>Impact GEO-4.</b> Development facilitated by the 2040 General Plan would occur where existing sewer systems are in place. There would be no impact.</p>	None required	Less than significant without mitigation
<p><b>Impact GEO-5.</b> Development facilitated by the 2040 General Plan has the potential to impact paleontological resources. Impacts would be less than significant with mitigation incorporated.</p>	<p><b>*GEO-1 Protection of Paleontological Resources.</b> The following Policy shall be added to the Resource Conservation Element of the 2040 Union City General Plan:</p> <p><b>Policy: Protection of Paleontological Resources.</b> Require avoidance and/or mitigation for potential impacts to paleontological resources for any development in Union City that occurs within high sensitivity geologic units, whether they are mapped at the surface or occur at the subsurface. High sensitivity geology units include Great Valley Sequence (Panoche and Knoxville Formations), Monterey Group (Claremont Shale and Hambre Sandstone), Briones Formation, Orinda Formation, and Pleistocene age alluvial fan and fluvial deposits. When paleontological resources are uncovered during site excavation, grading, or construction activities, work on the site will be suspended until the significance of the fossils can be determined by a qualified paleontologist. If significant resources are determined to exist, the paleontologist shall make recommendations for protection or recovery of the resource.</p> <p>The City shall require the following specific requirements for projects that could disturb geologic units with high paleontological sensitivity:</p> <ul style="list-style-type: none"> <li>▪ <b>Retain a Qualified Paleontologist to Prepare a PMMP.</b> Prior to initial ground disturbance in previously undisturbed strata of geologic units with high sensitivity, as shown on Figure 4.6-3, the project applicant shall retain a Qualified Paleontologist, as defined by the SVP (2010), to direct all mitigation measures related to paleontological resources and design a Paleontological Mitigation and Monitoring</li> </ul>	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
<p>Program (PMMP) for the project. The PMMP should include measures for a preconstruction survey, a training program for construction personnel, paleontological monitoring, fossil salvage, curation, and final reporting, as applicable.</p>		
<p><b>Greenhouse Gas Emissions/Climate Change</b></p>		
<p><b>Impact GHG-1.</b> Development facilitated by the 2040 General Plan would generate GHG emissions that would exceed the 2040 efficiency threshold of 1.12 MT of CO<sub>2</sub>e per service population per year. Implementation of policies contained in the 2040 General Plan and Mitigation Measure GHG-1 would minimize GHG emissions under buildout of the 2040 General Plan; however, this impact would remain significant and unavoidable.</p>	<p><b>GHG-1 Update to Climate Action Plan.</b> In accordance with Implementation Program RC-7.A of the 2040 General Plan, the City of Union City shall update its Climate Action Plan (CAP). The updated CAP shall demonstrate a pathway to achieving the GHG reduction targets for Union City’s fair share contribution consistent with SB 32 and Executive Order S-3-05. Implementation measures in the updated CAP may include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>▪ Develop and adopt Zero Net Energy requirements for new residential and non-residential development</li> <li>▪ Develop and adopt a building electrification ordinance</li> <li>▪ Implement VMT reduction measures such as improvements to public transit, full buildout of the Pedestrian and Bicycle Master Plan, and incentivization of transit-oriented development</li> <li>▪ Expand charging infrastructure for electric vehicles</li> <li>▪ Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens</li> <li>▪ Purchase carbon offsets from a validated source<sup>1</sup></li> </ul>	<p>Significant and unavoidable</p>
<p><b>Impact GHG-2.</b> The 2040 General Plan would be consistent with GHG reduction measures contained in the City’s Climate Action Plan and ABAG/MTC’s Plan Bay Area 2040. Impacts would be less than significant.</p>	<p>Mitigation Measure GHG-1 would apply to this impact.</p>	<p>Significant and unavoidable</p>
<p><b>Hazards/Hazardous Materials</b></p>		
<p><b>Impact HAZ-1.</b> Implementation of the 2040 General Plan could result in an incremental increase in the overall routine transport, use, storage, and disposal of hazardous materials in Union City and increase the risk of hazardous materials releases. Compliance with applicable regulations related to hazardous materials and compliance with General Plan policies would minimize the risk of releases and exposure to these substances. Impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Impact HAZ-2.</b> Implementation of the 2040 General Plan could result in hazardous emissions or handling of hazardous or</p>	<p>None required</p>	<p>Less than significant without</p>

<sup>1</sup> Validated sources are carbon offset sources that follow approved protocols and use third-party verification. At this time, appropriate offset providers include only those that have been validated using the protocols of the Climate Action Registry, the Gold Standard, or the Clean Development Mechanism (CDM) of the Kyoto Protocol. Credits from other sources will not be allowed unless they are shown to be validated by protocols and methods equivalent to or more stringent than the CDM standards.

Impact	Mitigation Measure (s)	Significance After Mitigation
acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school; however, compliance with existing regulatory requirements would minimize risks to schools and students, resulting in a less than significant impact.		mitigation
<b>Impact HAZ-3.</b> Implementation of the 2040 General Plan could facilitate development on hazardous materials sites. However, compliance with applicable regulations relating to site cleanup and the 2040 General Plan policies would minimize hazards from development on contaminated sites. Impacts would be less than significant impact.	None required	Less than significant without mitigation
<b>Impact HAZ-4.</b> There are no airports within two miles of Union City, and the City is not within the influence area of an airport. There would be no impact.	None required	Less than significant without mitigation
<b>Impact HAZ-5.</b> The 2040 General Plan policies address maintaining a Local Hazard Mitigation Plan and emergency access implementation. Therefore, the 2040 General Plan would not result in interference with these types of adopted plans. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Hydrology and Water Quality</b>		
<b>Impact HWQ-1.</b> Development projected by the 2040 General Plan could result in violation of water quality standards or waste discharge requirements or degradation of groundwater quality. Compliance with applicable laws and regulations and implementation of the goals and policies of the 2040 General Plan would reduce this impact to a less-than-significant level.	None required	Less than significant without mitigation
<b>Impact HWQ-2.</b> Development projected by the 2040 General Plan could result in the depletion of groundwater supplies or the interference with groundwater recharge. Implementation of the goals and policies of the 2040 General Plan would reduce this impact to a less-than-significant level.	None required	Less than significant without mitigation
<b>Impact HWQ-3.</b> Development facilitated by The 2040 General Plan would not alter the course of a stream or river but has the potential to add impervious surfaces that may alter drainage patterns and increase runoff. However, this increase would be minimal. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Impact HWQ-4.</b> Development facilitated by the 2040 General Plan could increase the risk of pollutant release due to project inundation within flood hazard zones. Compliance with applicable regulations and	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
implementation of the goals and policies of the 2040 General Plan would minimize the potential for adverse effects and would reduce this potential impact to a less than significant level.		
<b>Impact HWQ-5.</b> Development facilitated by the 2040 Union City General Plan would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Land Use and Planning</b>		
<b>Impact LU-1.</b> Implementation of the proposed 2040 General Plan would provide for orderly development in Union City and would not physically divide an established community. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Impact LU-2.</b> Implementation of the 2040 General Plan would be generally consistent with applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental effects, such as ABAG/MTC's <i>Plan Bay Area 2040</i> . Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Noise</b>		
<b>Impact N-1.</b> Construction of individual projects facilitated by the 2040 General Plan would temporarily generate increased noise levels, potentially affecting nearby noise-sensitive land uses. Provisions in the Union City Municipal Code and 2040 General Plan policies would limit noise disturbance to the extent feasible. However, construction noise may still exceed noise standards and impacts would be significant and unavoidable.	<p><b>N-1 Construction Noise Reduction.</b> For projects involving impact pile-drivers that are located within 400 feet of noise-sensitive receptors, projects involving sonic pile-drivers that are located within 200 feet of construction, and projects without pile-driving that are located within 175 feet from noise-sensitive receptors, the following mitigation would be required:</p> <ul style="list-style-type: none"> <li>▪ <b>Equipment Staging Areas.</b> Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.</li> <li>▪ <b>Electrically-Powered Tools and Facilities.</b> Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.</li> <li>▪ <b>Smart Back-up Alarms.</b> Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.</li> <li>▪ <b>Additional Noise Attenuation Techniques.</b> During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and</li> </ul>	Significant and unavoidable

Impact	Mitigation Measure (s)	Significance After Mitigation
	the sensitive receptors. Temporary sound barriers shall consist of sound blankets affixed to construction fencing or temporary solid walls along all sides of the construction site boundary facing potentially sensitive receptors.	
<p><b>Impact N-2.</b> Development projected by the 2040 General Plan would introduce new on-site noise sources associated with residential, commercial, and industrial land uses and would contribute to increases in traffic noise. The continued regulation of on-site noise, consistent with the Union City Municipal Code, and implementation of goals and policies in the 2040 General Plan would minimize disturbance to adjacent land uses. Impacts would be less than significant.</p>	None required	Less than significant without mitigation
<p><b>Impact N-3.</b> Construction of individual projects facilitated by the 2040 General Plan could temporarily generate groundborne vibration, potentially affecting nearby land uses. Policies in the 2040 General Plan would limit vibration disturbance and ensure that high vibration levels during working construction hours to the extent feasible. However, construction vibration from pile-drivers may disturb people or damage buildings. Impacts would be significant and unavoidable.</p>	<b>N-1 Construction Noise Reduction</b> , listed above.	Significant and unavoidable
<b>Population and Housing</b>		
<p><b>Impact PH-1.</b> Implementation of General Plan 2040 would facilitate the construction of new housing in Union City, which would allow the City's population to increase over time and slightly exceed ABAG population forecasts. However, the 2040 General Plan is intended to accommodate and plan for population growth and includes policies to manage new development. Therefore, impacts would be less than significant.</p>	None required	Less than significant without mitigation
<p><b>Impact PH-2.</b> Implementation of General Plan 2040 would not result in the displacement of substantial numbers of housing or people. To the contrary, General Plan 2040 would facilitate the development of new housing in accordance with State and local housing requirements, while preserving existing residential neighborhoods. Impacts would be less than significant.</p>	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Public Services</b>		
<b>Impact PS-1.</b> Development facilitated by the 2040 General Plan would increase population in Union City, generating additional need for fire protection and Police Protection services. However, adherence to the 2040 General Plan policies would reduce impacts related to the construction of fire and police protection facilities to a less than significant level.	None required	Less than significant without mitigation
<b>Impact PS-2.</b> Development facilitated by the 2040 General Plan would result in an increase in population of school-aged children in Union City. This would increase demand for school services and potentially create the need for new school facilities. Compliance with 2040 General Plan policies would reduce impacts related to the construction of school facilities and new development would be required to pay impact fees which would result in less than significant impacts with regard to the provision of school facilities.	None required	Less than significant without mitigation
<b>Impact PS-3.</b> Development facilitated by the 2040 General Plan would result in an increase in the City’s population. This would increase demand for library services and potentially create the need for new library facilities. Compliance with 2040 General Plan policies would reduce impacts related to the construction of library facilities to a less than significant level.	None required	Less than significant without mitigation
<b>Impact PS-4</b> Development facilitated by the 2040 General Plan would result in an increase in the City’s population. This would increase demand for parks and potentially create the need for new park facilities. Compliance with 2040 General Plan policies would reduce impacts related to the construction of park facilities to a less than significant level.	None required	Less than significant without mitigation
<b>Transportation</b>		
<b>Impact T-1.</b> New development facilitated by the 2040 General Plan would accommodate increases in traffic throughout Union City. This traffic increase would not conflict with policies contained in the <i>Plan Bay Area 2040</i> or the City’s Pedestrian and Bicycle Master Plan. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Impact T-2.</b> Development and population growth facilitated by the 2040 General Plan would increase VMT in Union City and VMT per service population would not be 15 percent below the nine bay area regional VMT per service population. Therefore, the 2040 General Plan would be inconsistent	None available	Significant and unavoidable

City of Union City  
 2040 Union City General Plan Update

Impact	Mitigation Measure (s)	Significance After Mitigation
with CEQA Guidelines Section 15064.3, subdivision (B). Impacts would be significant and unavoidable. .		
<b>Impact T-3.</b> The proposed 2040 General Plan is a program-level plan that does not directly address project-level design features. Roadway improvements and site access measures would be designed and reviewed in accordance with City standards. This impact would be less than significant.	None required	Less than significant without mitigation
<b>Impact T-4.</b> The proposed 2040 General Plan identifies circulation improvements and policies that would support emergency access throughout the City. This impact would be less than significant.	None required	Less than significant without mitigation
<b>Impact T-5.</b> New development facilitated by the 2040 General Plan would increase traffic in Union City. This traffic may cause delays that conflict with applicable City LOS standards. Impacts would be significant and unavoidable.	None available	Significant and unavoidable
<b>Impact T-6.</b> New development facilitated by the 2040 General Plan would increase traffic on CMA roadways surrounding Union City. This traffic may conflict with the LOS standards of the Alameda County CMA. Impacts would be significant and unavoidable.	None available	Significant and unavoidable
<b>Tribal Cultural Resources</b>		
<b>Impact TCR-1.</b> Development projected by General Plan 2040 may involve excavation, which has the potential to impact previously unidentified tribal cultural resources. Impacts on tribal cultural resources would be less than significant.	None required	Less than significant without mitigation
<b>Utilities and Service Systems</b>		
<b>Impact UTL-1.</b> Development projected by the 2040 General Plan would increase demand for electric power, natural gas, telecommunications, and stormwater drainage. However, development facilitated by the 2040 General Plan would occur in developed areas of the City where these facilities exist and relocation, if applicable, would occur in previously disturbed or developed areas generally. Impacts would be less than significant.	None required	Less than significant without mitigation
<b>Impact UTL-2.</b> Development projected by the 2040 General Plan would increase demand for water supply. However, with adherence to the 2040 General Plan policies and ACWD drought contingency plans, water supplies would be adequate to support new development. Impacts would be less than significant.	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
<p><b>Impact UTL-3.</b> Development projected by the 2040 General Plan would increase demand for wastewater treatment. However, the existing wastewater treatment plant has sufficient capacity for future development, and the 2040 General Plan contains policies to ensure treatment is adequate. Impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Impact UTL-4.</b> Development facilitated by the 2040 General Plan would increase the volume of solid waste generated in Union City. However, local infrastructure serving Union City has adequate capacity to accept the additional waste. Further, the 2040 General Plan contains policies to increase recycling and comply with federal, State, and local management reduction regulations. Therefore, impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Wildfire</b></p>		
<p><b>Impact WFR-1.</b> The 2040 General Plan policies address emergency access, response, and preparedness. The policies enforce maintaining an emergency management plan. Therefore, the 2040 General Plan would not impair an emergency response plan or emergency evacuation plan. Impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Impact WFR-2.</b> The 2040 General Plan does not facilitate urban development in areas most susceptible to wildfire. Prevailing wind and slopes would generally spread fire and related smoke away from areas where urban development is envisioned. Additionally, the 2040 General Plan policies would reduce the potential for the uncontrolled spread of a wildfire. Impacts would be less than significant.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Impact WFR-3.</b> The 2040 General Plan facilitates growth primarily as infill and redevelopment within urbanized areas of the City where infrastructure and roads currently exist. The General Plan policies require maintenance of fire access roads, which could have temporary or ongoing noise impacts and vegetation removal impacts. Impacts would be less than significant because maintenance would be infrequent and would reduce the potential for fire risk.</p>	<p>None required</p>	<p>Less than significant without mitigation</p>
<p><b>Impact WFR-4.</b> If a severe wildfire were to occur in the hillside area of Union City, structures downslope would not be at risk of flooding or landslides. The 2040 General</p>	<p>None required</p>	<p>Less than significant without mitigation</p>



Impact	Mitigation Measure (s)	Significance After Mitigation
Plan does not include changes to the land use designations in the hillside area or areas adjacent to the base of the hillside area that would allow for more or increased development. In addition, 2040 General Plan policies would reduce the potential for wildfire in the hillside area. Therefore, impacts would be less than significant.		
<hr/> <p>Notes: Mitigation measures indicated by asterisks (*) are new or revised policies or implementation measures recommended for incorporation into the 2040 General Plan.</p> <hr/>		