

Addendum to the 2040 General Plan Environmental Impact Report (State Clearinghouse No. 2018102057)

Sixth Cycle (2023-2031) Draft Housing Element Related Amendments to the Union City 2040 General Plan and Zoning Ordinance

1 INTRODUCTION

1.1 BACKGROUND

In November 2019, the City of Union City (City) certified the Final Environmental Impact Report (EIR) (State Clearinghouse No. 2018102057) for the Union City 2040 General Plan (2040 General Plan). Pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code (PRC) § 21000, et seq.), the EIR for the 2040 General Plan (General Plan EIR) evaluated the potential environmental impacts that would result from the 2040 General Plan update.

The City is currently in the process of updating the Housing Element for the 2023 to 2031 planning period (Housing Element). An important part of State housing element law is the determination of the City's ability to accommodate forecasted housing demand for all income levels, known as the Regional Housing Needs Allocation (RHNA). The RHNA quantifies the need for housing in each region statewide and is determined by HCD. The Association of Bay Area Governments (ABAG) is responsible for allocating the RHNA to each city and county in its region, which includes the Union City. On December 16, 2021, the Association of Bay Area Governments (ABAG) adopted the 2023-2031 RHNA Plan. Through the RHNA Plan, ABAG allocates a "fair share" by income category based on projected housing need for each jurisdiction. Each jurisdiction is required to report to HCD on how the fair share allocation can be accommodated within the planning period. It should be noted that the RHNA projection period is June 30, 2022 – December 31, 2030, which differs slightly from the Housing Element planning period of January 31, 2023 – January 31, 2031. The allocations are intended to be used by jurisdictions when updating their housing elements as the basis for assuring that adequate sites and zoning are available to accommodate at least the number of units allocated.

Table 3-1 shows the RHNA assigned to Union City for the 2023-2031 Housing Element. As shown in the table, ABAG allocated 2,728 new housing units to Union City, which includes 862 very low-, 496 low-, 382 moderate-, and 988 above moderate-income units. State law also requires the City to identify the projected need for extremely low-income housing. The City assumes that 50 percent of the very low-income housing need is equal to the extremely low-income housing need. As such, there is a projected need for 431 extremely low-income housing units.

Table 3-1 Regional Housing Needs Allocation, Union City (2023-2031)

	Very Low-Income Units ¹	Low-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
2023-2031 RHNA	862	496	382	988	2,728

¹Extremely low-income allocation is equal to 50 percent of very low-income allocation (431 units).

Source: Association of Bay Area Governments (ABAG), Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031 (Adopted December 2021).

As part of the Housing Element update, the City is obligated under State law to develop an inventory of vacant and underutilized land suitable for residential development that can accommodate the 2,728 housing units allocated through the RHNA which, includes 1,358 total lower-income units. In order to accommodate the RHNA, the City is rezoning and/or redesignating nine sites and making associated amendments to the 2040 General Plan and the Title 18 of the Union City Municipal Code (Zoning Ordinance). The City is rezoning and redesignating these sites in advance of adopting the Housing Element to make the sites available at the start of the planning period (January 31, 2023). The City is proposing the additional General Plan and Zoning Ordinance amendments for consistency with the 2040 General Plan. These actions are hereinafter referred to as the "project".

As the lead agency under CEQA, the City has prepared this Addendum in accordance with State CEQA Guidelines Section 15164 to evaluate whether the proposed project's effects were adequately examined in the previous environmental analysis in the General Plan EIR or whether any changes trigger supplemental or subsequent review under State CEQA Guidelines Section 15162 or 15163. This Addendum considers whether the environmental conditions that exist today have changed such that new or substantially more severe environmental impacts would occur as a result of the project compared to that evaluated in the General Plan EIR. As described below, no changes associated with the proposed project, and no changes in circumstances, trigger subsequent or supplemental review.

1.2 PREVIOUS ENVIRONMENTAL ANALYSES

The environmental process for the General Plan involved the preparation of the following documents that are relevant to the consideration of the proposed project.

- ▶ Draft EIR for the Union City 2040 General Plan, June 2019; and
- ▶ Final EIR for the Union City 2040 General Plan, November 2019.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES REGARDING AN ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Altered conditions, changes, or additions to the description of a project that occur after certification of an EIR may require additional analysis under CEQA. The legal principles that guide decisions regarding whether additional environmental documentation is required are provided in the State CEQA Guidelines, which establish three mechanisms to address these changes: 1) a subsequent environmental impact report (SEIR), 2) a Supplement to an EIR, or 3) an Addendum to an EIR.

Section 15162 of the State CEQA Guidelines describes the conditions under which a SEIR would be prepared. In summary, when an EIR has been certified for a project, no Subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR;

- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the State CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a Subsequent EIR if:

- (1) any of the conditions described above for Section 15162 would require the preparation of a SEIR; and
- (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

Under Section 15164, an addendum is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in significant new or substantially more severe environmental impacts, consistent with CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164, and 15168.

Based on the criteria above and the results of the following EIR conformity evaluation, the City has determined that an addendum to the General Plan EIR is the appropriate CEQA document. The EIR conformity evaluation is intended to review relevant environmental topic areas for any changes in circumstances or the substantial new information as defined under State CEQA Guidelines Section 15162 (stated above), as compared to the environmental impacts identified in the certified EIR prepared for the General Plan.

The proposed project consists of rezoning and/or redesignating nine specific sites in the city to allow residential development or intensify residential land uses. Some of these sites were already designated for housing or mixed use upon adoption of the 2040 General Plan in 2019 and only need to be rezoned for consistency with the General Plan while other sites are proposed for both Zoning and General Plan amendments to allow for housing on sites that otherwise would not allow housing (e.g., commercial-only sites) or to allow for housing at higher densities than what is currently allowed. The project does not include an action that would result in any ground disturbance that was not already analyzed in the General Plan EIR. For this reason, this checklist excludes detailed evaluation of the following environmental topic areas:

- ▶ **Agriculture/Forestry.** While no areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occur within Union City, the 2040 General Plan designates agricultural land uses in the southwest corner of the city, and throughout much of the hillside area east of State Route 238. The proposed project would not result in any changes to land in the hillside area or land with an agricultural use designation and would not result in any ground disturbance that was not previously evaluated in the General Plan EIR; therefore, the project would not result in any new or more severe significant impacts beyond what was evaluated in the General Plan EIR.
- ▶ **Biological Resources.** As described in the General Plan EIR, there are a variety of vegetation communities in Union City. Areas that may provide habitat for special-status species are primarily located in the open space and undeveloped hillside areas of the City and the marshes and wetlands adjacent to San Francisco Bay in the western part of the City (Union City 2019a). The General Plan EIR found that implementation of the 2040 General Plan development pursuant to other local and regional planning efforts within the greater cumulative impact area (adjoining cities such as Fremont and Alameda County) could result in regional impacts on special-status species, riparian, wetland, or other sensitive natural communities, as well as wildlife movement. The 2040 General Plan sets forth goals and policies for surveys and required actions to be taken if biological resources have potential to be impacted by development. The project does not include changes to the land use designations in the hillside area of the city and would not result in any additional ground disturbance than what was evaluated in

the General Plan EIR and the project would implement all applicable policies described in the EIR. Therefore, the proposed project would not result in a new or more severe significant impact than what was analyzed in the General Plan EIR.

- ▶ **Cultural Resources.** Based on CEQA Guidelines Section 15064.5, the 2040 General Plan – and future development activities facilitated by the plan – would have a significant impact on historical cultural resources if it would cause a substantial adverse change in the significance of a historical cultural resource. The General Plan EIR found that development under the proposed 2040 General Plan could affect known or unknown historical and/or archaeological resources. Goals, policies, and implementation programs contained in the Resource Conservation element of the 2040 General Plan would reduce the potential for cultural resources to be adversely impact from development. In addition, the implementation of Mitigation Measure CR-1 would reduce impacts to historical and unique archeological resources to a less than significant level by including an implementation program in the 2040 General Plan requiring cultural resource studies for projects within the city and implementation of further requirements to avoid or reduce impacts to such resources on a project by-project basis. Moreover, the 2040 General Plan requires compliance with existing regulations relating to the treatment of human remains should ground-disturbing activities associated with development result in damage to or destruction of human burials. The proposed project would comply with the required policies and procedures from the 2040 General Plan and General Plan EIR and would not result in any additional ground disturbance beyond what was previously analyzed. Therefore, the project would not result in any new or more severe significant impacts.
- ▶ **Geology/Soils.** The General Plan EIR analyzed the potential impacts of development facilitated by the 2040 General Plan and concluded that most potential impacts to geology and soils were less than significant with compliance with existing federal, state, and local laws and ordinances. The 2040 General Plan includes goals and policies in the Safety Element to minimize the risks associated with geologic and soil hazards. Implementation of these policies, in addition to compliance with applicable laws and regulations, would minimize the potential for erosion and loss of topsoil (Union City 2019a). Chapter 15.85 of the Union City Municipal Code also contains erosion control requirements that include slope protection and dust control. Additionally, growth and development facilitated by the 2040 General Plan would occur in the urbanized areas of Union City west of State Route 238, which is relatively flat with low potential for soil erosion. 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 (Union City 2019a). However, development would be required to comply with the California Building Code, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand the forces of expansive soil. The implementation of Mitigation Measure GEO-1 would reduce impacts to paleontological resources to a less than significant level by including an implementation program requiring paleontological resource studies for projects in high sensitivity geological units within Union City and implementation of further requirements to avoid or reduce impacts to such resources on a project-by-project basis. The proposed project would not result in any changes to the level of ground disturbance beyond what was anticipated in the General Plan and evaluated in the General Plan EIR. Implementation of policies and regulations identified in the General Plan EIR would still be required and would minimize any potential impacts related to seismic and other unstable soils and geologic conditions. The project would not result in any new or more severe significant impacts.
- ▶ **Hydrology/Water Quality.** The General Plan EIR indicated that development facilitated by the 2040 General Plan could potentially result in violation of water quality standards or waste discharge requirements, depletion of groundwater supplies or interference with groundwater recharge, and increased risk of pollutant release in flood hazard areas. Compliance with applicable laws and regulations and implementation of goals and policies from the Safety Element, Public Facilities and Services Element, Resource Conservation Element, and Special Areas Element of the 2040 General Plan would reduce hydrology/water quality impacts associated with new development to the maximum extent practicable. The 2040 General Plan facilitates development within urbanized areas of the city, primarily as infill and redevelopment. Wetlands, streams, and rivers do not occur on parcels that have previously or are currently developed and that may be redeveloped. Additionally, any development facilitated by the 2040 General Plan within streams or rivers, as well as wetlands, would be required to obtain the necessary permits from regulatory agencies, which would avoid impacts to streams or rivers. The

proposed project would comply with applicable laws and regulations in addition to the required policies and procedures from the 2040 General Plan and Union City Municipal Code and would not result in any additional ground disturbance beyond what was previously analyzed. Therefore, the project would not result in any new or more severe significant impacts.

- ▶ **Mineral Resources.** While development on areas containing mineral resources could result in the permanent loss of those minerals, the 2040 General Plan did not include land use designation changes in the hillside area east of State Route 238, where the known mineral deposit occurs. Therefore, the 2040 General Plan would not facilitate new or additional development within the area of the mineral deposit. The proposed project would not propose a change in land use designations in the hillside area; therefore, the project would not result in new or more severe significant impacts beyond what was evaluated in the General Plan EIR.
- ▶ **Tribal Cultural Resources.** The General Plan EIR indicated that development projected by General Plan 2040 would have less than significant impacts related to tribal cultural resources. The General Plan EIR anticipates some development projects that may involve excavation, which will have the potential to impact previously unidentified tribal cultural resources. Effects on tribal cultural resources can only be known once a specific project has been proposed because the effects are highly dependent on the individual project site conditions, and the characteristics of the proposed activity, including but not limited to the level of ground disturbance associated with construction activities. In accordance with Assembly Bill (AB) 52 and Senate Bill (SB) 18, Union City prepared and mailed letters to local Native American contacts informing them of the General Plan 2040 on October 8, 2018. None of the tribes contacted responded to request consultation. This project includes redesignation of nine sites in the General Plan. New tribal cultural resources may be identified or established during the development process on an individual site, but it is assumed that future development would be consistent with regulations pertaining to tribal cultural resources, and impacts would be of similar type and severity as what could occur under the current zoning district and land use designation. No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification.
- ▶ **Wildfire.** The General Plan EIR concluded that the impact related to wildland fires under the 2040 General Plan would be less than significant. Wildfire risk in Union City is limited to the hillside area east of State Route 238 because this area is undeveloped and contains large tracts of vegetation cover that can act as fire fuel. The project does not include changes to the land use designations in the hillside area that would allow for more or increased development compared to what is currently allowed under the 2040 General Plan, which is the area of the city most susceptible to wildfire. Therefore, the land use scenario envisioned by redesignating sites LM-7 through LM-15 would not exacerbate existing wildfire risks or expose residents or business occupants to pollutant from a wildfire beyond existing conditions. In addition, the Safety Element of the 2040 General Plan includes policies to reduce the potential for uncontrolled wildfires in the hillside area and to reduce the potential for structural damage from uncontrolled fire. The nine affected sites are all located in urban areas and are surrounded by existing development. Therefore, the proposed change in allowed use would not result in any changes to potential wildfire risk or environmental impacts resulting from wildfire than under existing conditions. Future housing projects would continue to be reviewed through the City's entitlement process and the CEQA process to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to wildfire. No new or more severe significant impacts related to wildfire risk would occur beyond what was previously analyzed in the General Plan EIR.

2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The City is currently in the process of updating the Housing Element for the 2023 to 2031 planning period. As part of this update, the City is obligated under State law to develop an inventory of vacant and underutilized land suitable for residential development that can accommodate a total of 2,728 housing units, including 1,358 lower-income units, as part of its RHNA. In order to accommodate the RHNA, the City is considering rezoning and/or redesignating nine sites, listed below in Table 1, and will be considering these General Plan and Zoning Ordinance amendments in advance of adopting the 2023-2031 Housing Element. Some of these sites were already designated for housing or mixed use upon adoption of the 2040 General Plan in 2019 and only need to be rezoned for consistency with the General Plan. Other sites are proposed for both Zoning and General Plan amendments to allow for housing on sites that otherwise wouldn't allow housing (e.g., commercial-only sites) or to allow for housing at higher densities than what is currently allowed. The proposed sites all have existing residential and commercial land use designations; open space areas are not being proposed for redesignation or rezoning. Table 1 provides details on each of these nine sites, including information on whether a General Plan and/or Zoning amendment is being considered. Figure 1 shows the location of the sites being proposed for a General Plan and/or Zoning amendment.

Table 1: Sites with Proposed General Plan and/or Zoning Amendment

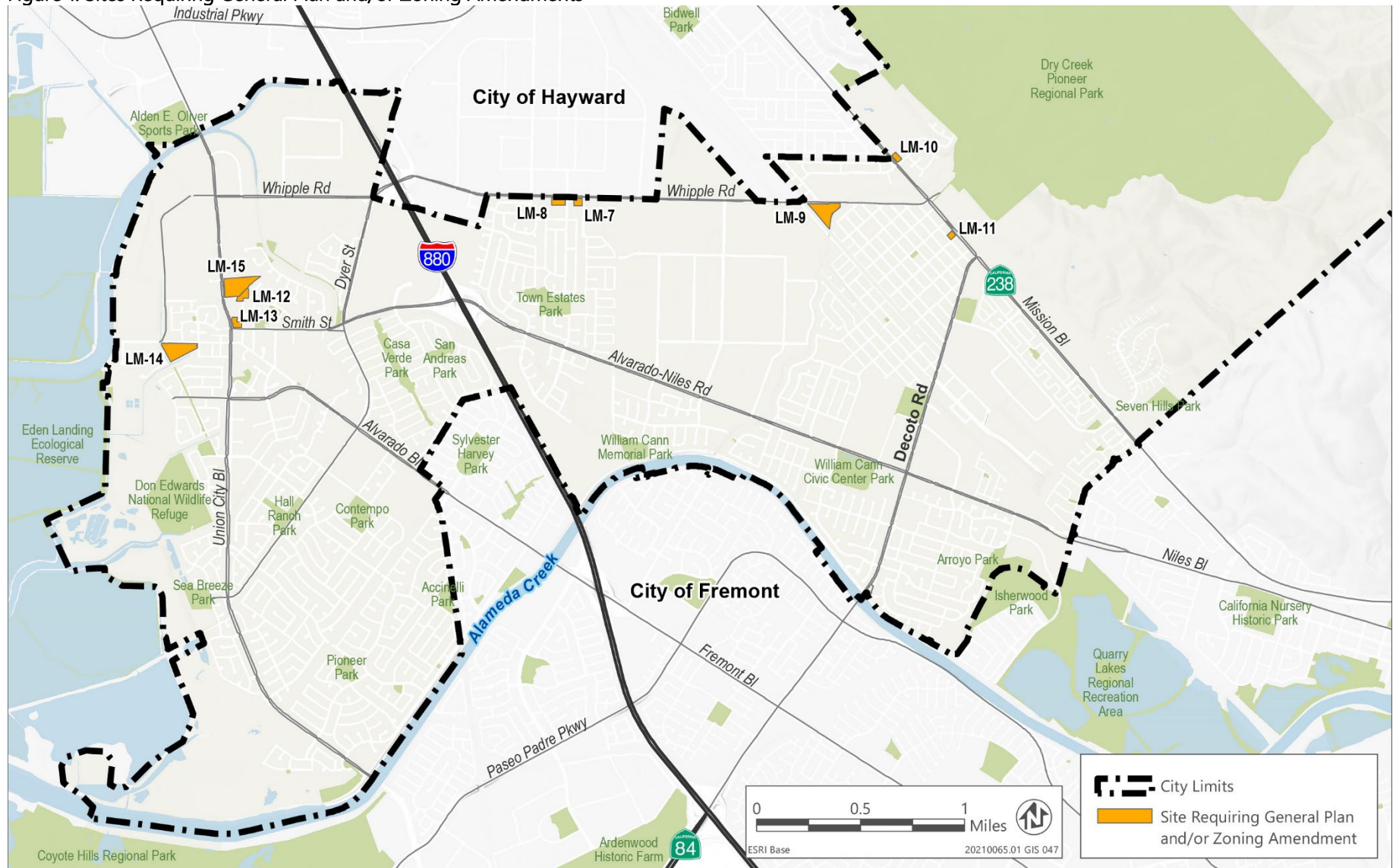
Site ID	Address	APN	Parcel Acres	General Plan Amendment	Zoning Amendment
LM-7	1780 Whipple Rd	475-141-13-2	0.85	X	X
LM-8	1800 Whipple Rd	475-141-2	1.45	X	X
LM-9	920, 900, 884, 854, 884 Whipple Road	486-18-59, 486-18-60, 486-18-61, 486-18-62, 486-18-63, 486-18-69, 486-18-70, 486-18-71	5.21		X
LM-10	33090 Mission Boulevard	87-36-148, 87-36-149	0.75	X	X
LM-11*	33549 Mission Boulevard	486-6-30	0.58		X
LM-12	30793 Vallejo Street	483-10-12-1	1.26	X	X
LM-13	3995, 3969, 3955 Smith Street	483-10-22-3, 483-10-21-1, 483-10-20, 483-10-19-1	1.08		X
LM-14	4400 Horner Street	482-27-16-1	5.93	X	X
LM-15	30500-30600 Union City Boulevard	483-5-11-2, 483-5-12, 483-5-9-2, 483-5-10, 483-5-7-7, 483-5-8-1	6.76	X	X

*This site was included in the previous Housing Element and is subject to Policy HE-1.5 in the Draft 2023-2031 Housing Element, By-right Housing on Prior Housing Element Sites.

Source: City of Union City and Ascent, 2022

In addition to the rezoning/redesignation of the above nine sites, the City is proposing additional General Plan and Zoning Ordinance amendments as part of this project. The additional amendments will include text modifications to the Land Use Element, Special Areas Element, and Economic Development Element of the 2040 General Plan to maintain consistency with the proposed actions of this project (see Section 2.4.2 Additional General Plan Amendments). Furthermore, the City is proposing amendments to the Zoning Ordinance for consistency with the 2040 General Plan and Housing Element update (see Section 2.4.3 Additional Zoning Code Amendments).

Figure 1: Sites Requiring General Plan and/or Zoning Amendments



Source: Union City and Ascent, 2022.

2.2 PROJECT LOCATION

Union City is located in southern Alameda County on the east side of the San Francisco Bay. Union City is bounded by the City of Hayward to the north and west, the City of Fremont to the south, and unincorporated lands of Alameda County to the east. Union City encompasses approximately 18 square miles (11,520 acres). The location of specific site redesignations are described below in Section 2.4.1.

2.3 SUMMARY OF GENERAL PLAN LAND USE DESIGNATIONS

The following is a summary of the 2040 General Plan land use designations relevant to this project:

- ▶ **Commercial (C) – 0.25 to 1.0 Floor Area Ratio:** This designation allows retail uses, personal services, professional offices, banks, restaurants, and entertainment uses. Multiple zoning designations apply within this category to distinguish between community-serving, neighborhood-serving, and professional office commercial areas. Office uses above first floor retail are allowed. The allowed floor area ratio (FAR) range for buildings located in this designation is between 0.25 and 1.00. The minimum parcel size for this designation is 5,000 square feet.
- ▶ **Corridor Mixed-Use Commercial (CMU) – 17 to 45 Dwelling Units per Acre:** This designation allows stand-alone commercial uses and residential uses that are vertically integrated with ground floor commercial uses. It applies to properties along the Mission Boulevard Corridor, but could apply to other areas along major arterials. The purpose of this designation is to allow for the construction of commercial uses and mixed-use higher-density residential development that will support the commercial uses and create vibrant places for people to live, work, shop, and play. The allowed FAR range for mixed-use buildings is between 0.5 and 1.50, and the allowed residential density range is 17-45 units per acre. Ground floor commercial is required in mixed-use buildings along arterials. The allowable FAR for stand-alone commercial is 0.3 to 1.0.
- ▶ **Mixed Use Employment (EMU) – 0.40 to 2.0 Floor Area Ratio:** This designation allows a mix of employment uses, including but not limited to light industrial, research and development, office, and “flex” space, as well as supportive commercial uses that are vertically or horizontally integrated. Residential/commercial mixed-use development may be allowed where it has been identified by the City as part of the development of an Area Plan.¹ The EMU designation is intended to foster innovation and emerging technologies; promote the creation of an employment district with travel patterns that are oriented toward pedestrian, transit, and bicycle use; and provide amenities to employees as well as surrounding neighborhoods. The allowed floor area ratio (FAR) range for buildings located in this designation is between 0.40 and 2.0.
- ▶ **Residential – 3 to 6 Dwelling Units per Acre (R 3-6):** This designation allows single family detached homes and accessory dwelling units. This is the predominant residential development type in Union City. The allowed density range is 3 to 6 units per gross acre. The lot size range for this designation is 6,000 to 10,000 square feet.
- ▶ **Residential – 10 to 17 Dwelling Units per Acre (R 10-17):** This designation allows duplexes and multifamily dwellings. This designation is typically applied to transitional areas between higher intensity uses and lesser density single family residential areas. The allowed density range is 10 to 17 units per net acre.
- ▶ **Residential – 17 to 30 Dwelling Units per Acre (R 17-30):** This designation allows multifamily dwellings. This designation is typically applied to areas where a mixture of higher intensity activities is desired, such as near major transportation routes and facilities and core shopping areas. This designation also serves as a transitional land use between single family and higher intensity non-residential areas. The allowed density range is 17 to 30 units per net acre.
- ▶ **Village Mixed-Use Commercial (VMU) – 17 to 30 Dwelling Units per Acre:** This designation allows stand-alone commercial uses and residential uses that are vertically integrated with ground floor commercial uses. It applies

¹ The language allowing residential/commercial mixed-use development following preparation of an Area Plan is proposed to be removed from the EMU designation description.

to properties within the Historic Alvarado District but could be applied to other areas where mixed-use is appropriate. The allowed floor area ratio (FAR) range for mixed-use buildings is between 0.5 and 1.50, and the allowed residential density range is 17-30 units per acre. Ground floor commercial is required in mixed-use buildings along arterials. The allowable FAR for stand-alone commercial is 0.3 to 1.0.

2.4 SUMMARY OF GENERAL PLAN AND ZONING AMENDMENTS

2.4.1 Sites with Proposed General Plan and/or Zoning Amendments

The following is a description of the nine sites being proposed for a General Plan and/or Zoning amendment.

SITE LM-7 WHIPPLE AND LISTON WAY SITE

This 0.85-acre site is located at 1780 Whipple Road. There is currently a two-story office building surrounded by a surface parking lot. Two existing businesses are located on this site: Coker & Arias Insurance, a small family business established in 1976; and Carson Consulting Corp. This site is proposed to be redesignated and rezoned to CMU, increasing the maximum FAR to 1.5 for a mixed-use development and the allowed density to 45 dwelling units per acre (du/acre). The CMU designation allows for standalone commercial and residential as part of a mixed-use project that includes ground floor commercial on the site, which could include residential amenities or other space that activates the ground floor.

APN for Site LM-7: 475-141-13-2		
	Current	Proposed
General Plan	Commercial (C)	Corridor Mixed Use (CMU)
Zoning	Neighborhood Commercial (CN)	Corridor Mixed Use (CMU)
Density/Intensity Standards	FAR 0.2-1.0	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-45 du/ac
Maximum Development Capacity	37,026 sq. ft.	A combination of 37,026 sq. ft. and/or 38 dwelling units

Figure 2. Whipple And Liston Way Site



Source: Union City, 2022.

SITE LM-8 WHIPPLE AND MEDALLION DRIVE SITE

This 1.45-acre existing commercial strip is located at 1800 Whipple Road. The site contains a donut shop, dry cleaners, liquor store, convenience store, a few restaurants, and a few hair and nail salons. This site is proposed to be redesignated and rezoned to CMU, increasing the maximum FAR to 1.5 for a mixed-use development and the allowed density to 45 du/acre. The CMU designation allows for standalone commercial and residential uses as part of a mixed-use project that includes ground floor commercial on the site, which could include residential amenities or other space that activates the ground floor.

APN for Site LM-8: 475-141-2		
	Current	Proposed
General Plan	Commercial (C)	Corridor Mixed Use (CMU)
Zoning	Neighborhood Commercial (CN)	Corridor Mixed Use (CMU)
Density/Intensity Standards	FAR 0.2-1.0	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-45 du/ac
Maximum Development Capacity	63,162 sq. ft.	A combination of 63,162 sq. ft. and/or 65 dwelling units

Figure 3. Whipple and Medallion Drive Site



Source: Union City, 2022.

SITE LM-9 WHIPPLE/CEMEX SITE

This 5.48-acre site, located at 920, 900, 884, 854, 884 Whipple Road, contains a building occupied by Cemex. There is currently a cement plant occupied by Cemex and a single-family home on the site. A portion of this site was included in the above moderate-income inventory and was listed in the 2002, 2010, and 2015 Housing Elements. Most of the parcels that make up this site were redesignated in the 2040 General Plan to Residential 17-30 and are being rezoned to RM 1500 for consistency with the General Plan. The two easternmost parcels (486-18-64 and 486-18-65-2) are currently designated Commercial and zoned Neighborhood Commercial and are proposed to be redesignated to Residential (17-30) and RM 1500 consistent with the adjacent parcels.

APNs for Site LM-9: 486-18-59, 486-18-60, 486-18-61, 486-18-62, 486-18-63, 486-18-64, 486-18-65-2, 486-18-69, 486-18-70, 486-18-71		
	Current	Proposed
General Plan	Residential (17-30 du/acre) and Commercial (C)	Residential (17-30 du/acre) <i>[no change except to parcels 486-18-64 and 486-18-65-2]</i>
Zoning	Neighborhood Commercial (CN) and R 5000 (6-10 du/ac)	RM 1500 (17-30 du/acre)
Density/Intensity Standards	17-30 du/ac	17-30 du/ac
Maximum Development Capacity	156 dwelling units and 11,760 sq. ft. commercial	164 dwelling units

Figure 4. Whipple/Cemex Site



Source: Union City, 2022.

SITE LM-10 MISSION AND TAMARACK DRIVE SITE

This 0.75-acre site is located at 33090 Mission Boulevard. The site is currently home to a gas station, auto repair shop, and a farm stand. This site is proposed to be redesignated and rezoned to CMU, increasing the maximum FAR to 1.5 for a mixed-use development and the allowed density to 45 du/acre. The CMU designation allows for standalone commercial and residential uses as part of a mixed-use project that includes ground floor commercial on the site, which could include residential amenities or other space that activates the ground floor. The site is surrounded by residential uses on three sides. The property owner has expressed support and interest in the land changing to mixed use.

APNs for Site LM-10: 87-36-148, 87-36-149		
	Current	Proposed
General Plan	Commercial (C)	Corridor Mixed Use (CMU) (17-45 du/acre)
Zoning	Neighborhood Commercial (CN)	Corridor Mixed Use (CMU) (17-45 du/acre)
Density/Intensity Standards	FAR 0.2-1.0	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-45 du/ac
Maximum Development Capacity	32,670 sq. ft.	A combination of 32,670 sq. ft. and/or 33 dwelling units

Figure 5. Mission and Tamarack Drive Site



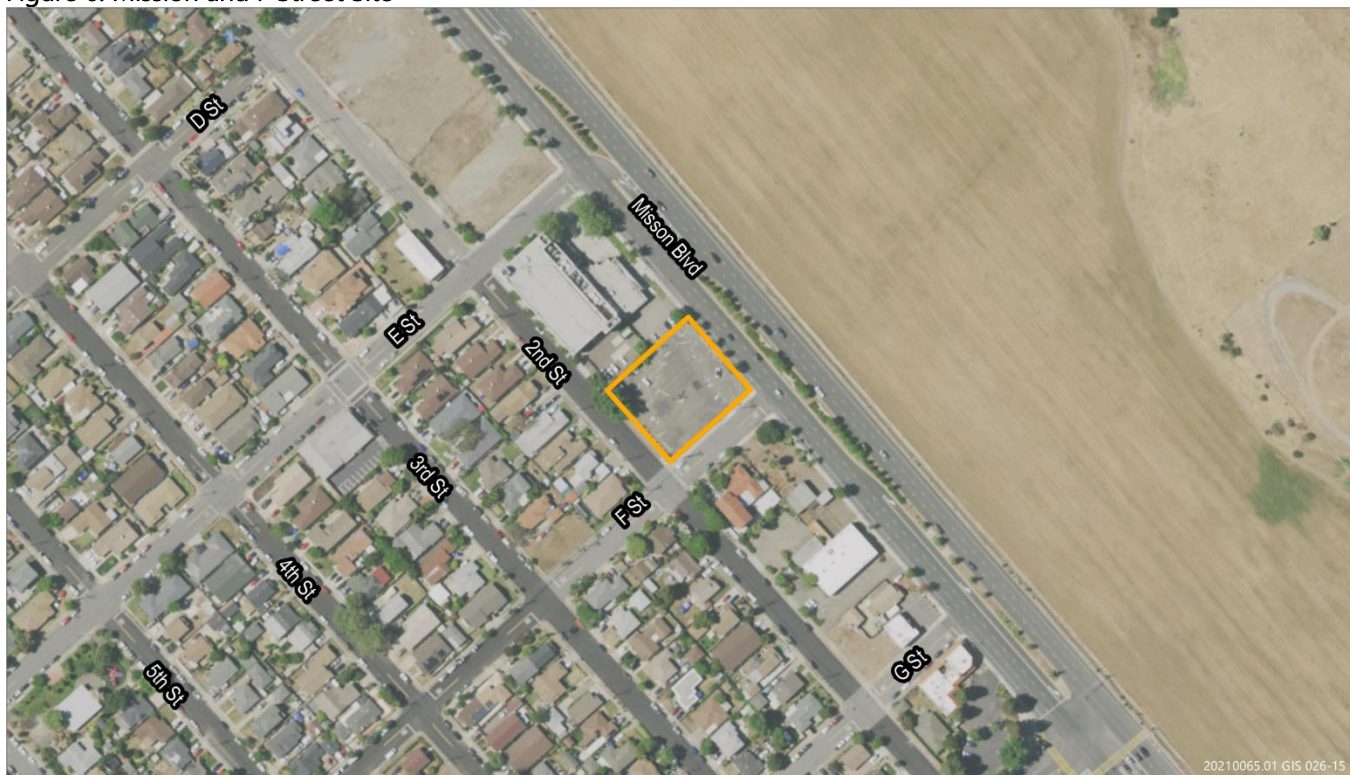
Source: Union City, 2022.

SITE LM-11 MISSION AND F STREET SITE

This 0.58-acre site is currently an unused parking lot at 33549 Mission Boulevard. The site was redesignated under the 2040 General Plan from CC to CMU, which increased the maximum FAR to 1.5 for a mixed-use development and the allowed density from 30 du/acre to 45 du/acre. The CMU designation allows for standalone commercial and residential uses as part of a mixed-use project that includes ground floor commercial on the site, which could include residential amenities or other space that activates the ground floor. The site is proposed to be rezoned to CMU for consistency with the General Plan.

APN for Site LM-11: 486-6-30		
	Current	Proposed
General Plan	Corridor Mixed Use (CMU) (30-45 du/acre)	Corridor Mixed Use (CMU) (17-45 du/acre) <i>[no change]</i>
Zoning	Community Commercial (CC)	Corridor Mixed Use (CMU) (17-45 du/acre)
Density/Intensity Standards	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-45 du/ac	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-45 du/ac
Maximum Development Capacity	A combination of 25,264 sq. ft. and/or 26 dwelling units	A combination of 25,264 sq. ft. and/or 26 dwelling units (no change)

Figure 6. Mission and F Street Site



Source: Union City, 2022.

SITE LM-12 VALLEJO ST. AND GRANGER AVE. SITE

This 1.26-acre parcel is located at 30793 Vallejo Street and is currently zoned for single-family homes with a maximum allowable density of 6 du/acre. The site is proposed to be redesignated and rezoned to Residential (10-17 du/acre).

APN for Site LM-12: 483-10-12-1		
	Current	Proposed
General Plan	Residential (3-6 du/acre)	Residential (10-17 du/acre)
Zoning	RS 6000 (3-6 du/acre)	RM 2500 (10-17 du/acre)
Density/Intensity Standards	3-6 du/acre	10-17 du/acre
Maximum Development Capacity	7 dwelling units	21 dwelling units

Figure 7. Vallejo St. and Granger Ave. Site (Historic Alvarado District)



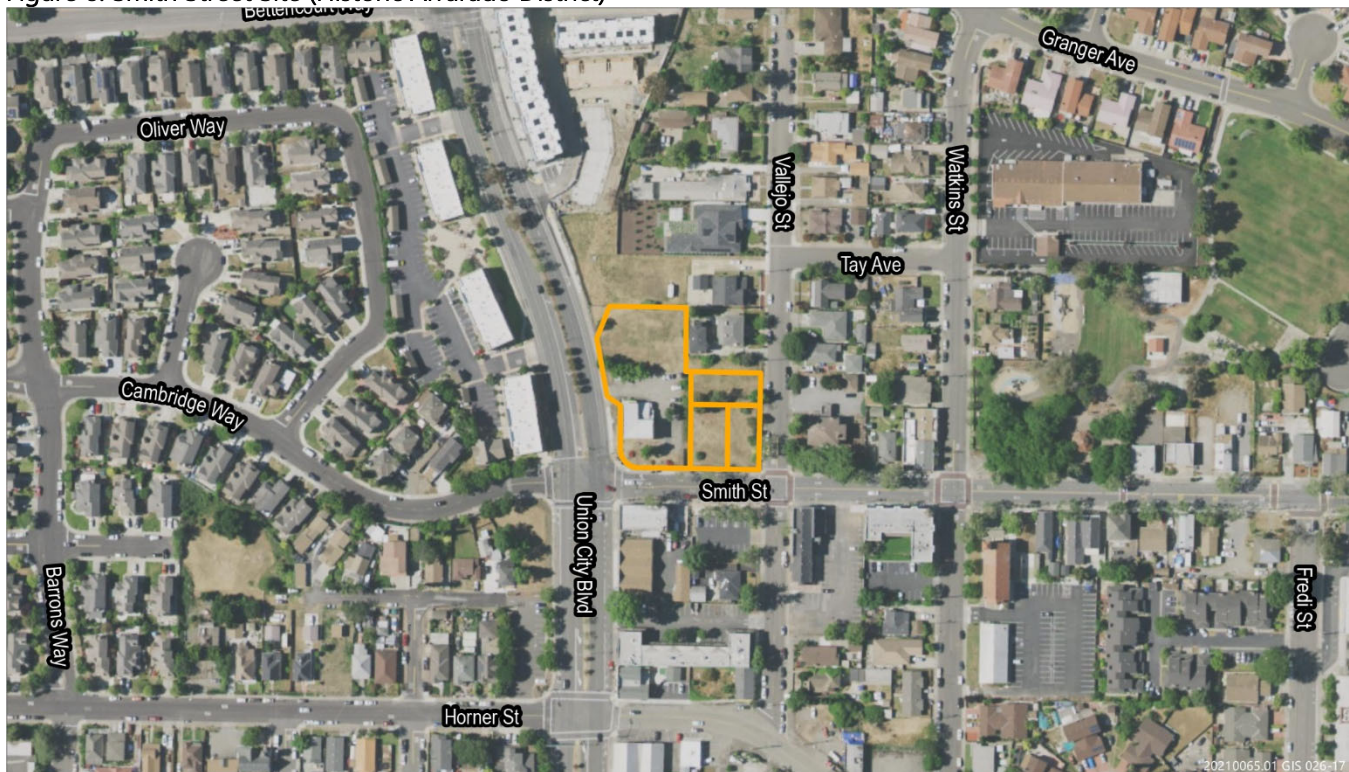
Source: Union City, 2022.

SITE LM-13 SMITH STREET SITE

This 1.08-acre site, located at 3995, 3969, and 3955 Smith Street, is made up of four adjacent parcels. The largest parcel, located on the corner of Union City Boulevard and Smith Street, was built in 1863 and is currently used as an office building. Based on a historic resource survey conducted in preparation of the historic overlay zone, the building is not considered a historic building/contributor of substantial value due to the extent of renovations/remodels over the years. About half of the parcel is vacant, as are the three adjacent parcels that make up the site. This site was redesignated in the General Plan from C to VMU and the site is proposed to be rezoned for General Plan consistency.

APNs for Site LM-13: 483-10-22-3, 483-10-21-1, 483-10-20, 483-10-19-1		
	Current	Proposed
General Plan	Village Mixed Use Commercial (VMU) (17-30 du/acre)	Village Mixed Use Commercial (VMU) (17-30 du/acre) <i>[no change]</i>
Zoning	Specialty Commercial (CS)	Village Mixed Use Commercial (VMU) (17-30 du/acre)
Density/Intensity Standards	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-30 du/ac	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-30 du/ac
Maximum Development Capacity	A combination of 47,044 sq. ft. and/or 32 dwelling units	A combination of 47,044 sq. ft. and/or 32 dwelling units (no change)

Figure 8. Smith Street Site (Historic Alvarado District)



Source: Union City, 2022.

SITE LM-14 DIAMOND MINE MINI-STORAGE SITE

This 5.93-acre site, located at 4400 Horner Street in a residential neighborhood, is currently occupied by a mini-storage facility. The site was redesignated from Industrial to Residential 10-17 in the 2040 General Plan. Policy LU-5.9 in the Land Use Element of the 2040 General Plan allows for up to 20 du/ac. The site is proposed to be rezoned to Residential 17-30.

APNs for Site LM-14: 482-27-16-1		
	Current	Proposed
General Plan	Residential (10-17 du/acre)	Residential (17-30 du/acre)
Zoning	Light Industrial (ML)	Multi-Family Residential (RM-1500) (17-30 du/acre)
Density/Intensity Standards	10-20 du/ac*	17-30 du/ac
Maximum Development Capacity	118 dwelling units	178 dwelling units

* Policy LU-5.9 allows up to 20 du/acre. This policy is proposed to be removed from the General Plan consistent with the action to increase the density of the site to Residential 17-30.

Figure 9. Diamond Mine Mini-Storage Site (Historic Alvarado District)



Source: Union City, 2022.

SITE LM-15 UNION CITY BOULEVARD SITE

This 6.76-acre industrial site is located at 30500-30600 Union City Boulevard surrounded by industrial uses to the west, a new residential mixed-use development to the south, and single-family homes to the east off Granger Avenue. The site is currently occupied by a used auto parts store, a print shop, and a mattress store. The site would be redesignated and rezoned to VMU, which would allow stand-alone commercial uses and residential uses that are vertically integrated with ground floor commercial uses along Union City Boulevard, allowing a range of 17-30 du/acre.

APNs for Site LM-15: 483-5-11-2, 483-5-12, 483-5-9-2, 483-5-10, 483-5-7-7, 483-5-8-1		
	Current	Proposed
General Plan	Mixed Use Employment (EMU)	Village Mixed Use Commercial (VMU) (17-30 du/acre)
Zoning	Special Industrial (MS)	Village Mixed Use Commercial (VMU) (17-30 du/acre)
Density/Intensity Standards	FAR 0.4-2.0	Non-residential: FAR 0.3-1.0 Residential mixed-use: FAR 0.5-1.5, 17-30 du/acre
Maximum Development Capacity	588,930 sq. ft.	A combination of 294,465 sq. ft. and/or 203 dwelling units

Figure 10. Union City Boulevard Site (Historic Alvarado District)



Source: Union City, 2022.

2.4.2 Additional General Plan Amendments

The City is proposing the following text amendments to the Land Use Element, Special Areas Element, and Economic Development Element of the 2040 General Plan. The proposed amendments are to maintain consistency with the proposed actions of this project.

Land Use Element

- ▶ Amend the Land Use Diagram (Figure LU-1) to reflect proposed land use changes outlined in Section 3.4.1 of the Addendum.
- ▶ Modify land use description for Mixed-use Employment to remove reference to the development of an Area Plan (Program SA-7A).
- ▶ Remove Policy LU-5.9 which limits the density on the Diamond Mine site to 20 du/ac.

Special Areas Element

- ▶ Amend map of the Special Areas (Figure SA-1) to modify the district boundaries for the Union City Boulevard District and Historic Alvarado District, as described below.
- ▶ Amend map of Union City Boulevard District (Figure SA-7.1) to modify the district boundary to remove Site LM-15 and reflect proposed land use changes outlined in Section 3.4.1 of the Addendum.
- ▶ Amend Policy SA-7.3 and remove Program SA-7.A in the Union City Boulevard District to remove references to the Area Plan and to more generally cover improvements within the Union City Boulevard District.
- ▶ Amend map of Historic Alvarado District (Figure SA-11.1) to modify the district boundary to add site LM 15 and Site LM 12 reflect proposed land use changes outlined in Section 3.4.1 of the Addendum.
- ▶ Amend map of Historic Alvarado District sub-areas (Figure SA-11.2) to modify the district boundary to include sites LM-12 and LM-15.

Economic Development Element

- ▶ Modify Policy ED-1.4 and Program ED-1.B, which requires the City to conduct a comprehensive evaluation of land use changes, so that it does not apply to opportunity sites identified in the Housing Element.

2.4.3 Additional Zoning Code Amendments

The City is proposing the following amendments to the Zoning Code for consistency with the 2040 General Plan and to clean up discrepancies in development standards.

- ▶ Create a new Village Mixed Use (VMU) district to implement the General Plan VMU designation.
- ▶ Revise Chapter 18.35 Corridor Mixed Use Commercial (CMU) District to correct minor internal inconsistencies and for consistency with the Housing Element.
- ▶ Revise Chapter 18.36 Commercial Districts for consistency with the new VMU zoning designation and the Housing Element.

3 EIR CONFORMITY EVALUATION

As described in the Introduction, the purpose of this EIR conformity evaluation is to review relevant environmental topic areas for any changes in circumstances or the substantial new information as defined under State CEQA Guidelines Section 15162 (stated above), as compared to the environmental impacts identified in the certified EIR prepared for the General Plan. Several environmental issue areas were dismissed from further evaluation (see Introduction for the reasons why each section was eliminated from the detailed conformity evaluation). The following relevant environmental issue areas are evaluated below:

- ▶ Aesthetics
- ▶ Air Quality
- ▶ Energy
- ▶ Greenhouse Gas Emissions
- ▶ Hazards and Hazardous Materials
- ▶ Land Use and Planning
- ▶ Noise
- ▶ Population and Housing
- ▶ Public Services and Recreation
- ▶ Transportation
- ▶ Utilities and Service Systems

3.1 AESTHETICS

The General Plan EIR anticipated that development under the 2040 General Plan would have significant and unavoidable impacts on the visual resources in some areas of the city, specifically those with a view of the hillside area, marshlands along the bay, or other open space areas and in the existing urbanized areas of the city. The following goals and associated policies from the 2040 General Plan Community Design Element and Resource Conservation Element would reduce potential impacts to views of scenic open space in the city and provide protection of open space areas in the city, including scenic vistas of these areas.

Community Design Element Goals and Policies

- ▶ Goal CD-2: Protect and enhance the visual and physical access to the hillsides, Baylands, and creeks.
 - Policy CD-2.1 Frame Visual Access to Hillside Views. As the city redevelops, the City shall use the layout of streets, blocks, and pedestrian corridors to provide visual access to hillside views.
 - Policy CD-2.2 Minimize Hillside Viewshed Impacts. The City shall minimize the viewshed impacts of development at the base of the hillsides.
 - Policy CD-2.5 Minimize Visual Impact on Baylands. The City shall ensure that new development near the Baylands respects its natural setting by maintaining visual harmony with the Baylands and using buffers such as pedestrian trails, linear parks, and landscaped rights-of-way.
 - Policy CD-2.8 Provide Visual Access to Creeks. Wherever practical, new development shall provide visual access to creeks.

Resource Conservation Element Goals and Policies

- ▶ Goal RC-1: To provide for a continuous system of open spaces for the preservation, enhancement, and protection of open space land.
 - Policy RC-1.1 Provide for a Variety of Open Spaces. The City shall provide a variety of open spaces including open space for public use and enjoyment and for the protection of agricultural uses including grazing, wildlife habitats, and scenic vistas.
 - Policy RC-1.2 Protect Scenic Views. The City shall strive to protect areas of outstanding natural scenic qualities and outstanding views of natural or man-made significance, such as ridgelines and valley sides in the eastern hillsides and the critical wetland areas at the western end of the city through regulation, public acquisition, or dedication of development rights or scenic easements.
 - Policy RC-1.3 Observation Areas. The City shall encourage observation areas with outstanding vistas be provided in coordination with recreational trails

The General Plan EIR indicated that the 2040 General Plan would have less than significant impacts related to new sources of light and glare. The General Plan EIR indicated that the 2040 General Plan would have less than significant impacts related to damage of other scenic resources within a state scenic highway.

The project consists of rezoning/redesignating nine sites in the city (LM-7 through LM-15) to increase land use densities. The type of new development envisioned on Sites LM-7 through LM-15 also have the potential to block scenic vistas and reduce views of the hillside area and Baylands. If approved, the new land use designations would increase maximum height allowances at each of the sites. The greatest change would be from a minimum of 30 feet in the Neighborhood Commercial (CN) and Single-Family Residential (RS-6000) zones to 55 feet in sites that would be designated Corridor Mixed Use (CMU) or Village Mixed Use (VMU). All affected sites are surrounded by existing development, and none of the sites, except for one, are located in an area that would affect a scenic view identified for protection by General Plan Policy RC-1.2. Site LM-10, located at Mission Boulevard and Tamarack Drive Site, is approximately 0.75 acres and is located east of Mission Boulevard, such that a tall structure could affect views of the eastern hillsides for travelers on Mission Boulevard. At this location, the maximum height currently allowed is 30 feet; the proposed project would increase the allowable height at this site to 55 feet.

The General Plan EIR concluded that development under the General Plan would result in a significant and unavoidable impact related to scenic views, including hillside views. The EIR also concluded that there were no mitigation measures available to reduce the potential visual impact associated with increased maximum height limits to a less than significant level. However, the applicable goals and policies in the 2040 General Plan, listed above, would address and minimize the potential intrusion into scenic vistas. The General Plan EIR indicates that non-residential development facilitated through the 2040 General Plan could result in buildings ranging in height from 40 to 75 feet in the City's business parks and up to 160 feet in the Greater Station District (Union City 2019a). The EIR's analysis assumes that new residential development would be between three and eight stories (Union City 2019a: 4.1-10); this equates to a building height between 30 and 80 feet. Therefore, even in the event that a structure was developed on one of the rezoned/redesignated sites at the proposed maximum allowed height of 55 feet, it would still be consistent with the analysis of the General Plan EIR and would not result in an increase in severity of a significant impact.

In addition, future housing projects would continue to comply with General Plan policies and will be reviewed through the City's development standards (e.g., Municipal Code and design review process), entitlement process and the CEQA process to ensure consistency with all relevant federal and State policies and related to aesthetic resources.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on visual aesthetics would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

3.2 AIR QUALITY

The General Plan EIR found that implementation of the 2040 General Plan would be consistent with the Bay Area Air Quality Management District (BAAQMD) 2017 Clean Air Plan. In addition, the rate of increase for vehicle miles travelled during buildout of the 2040 General Plan would not exceed the rate of service population increase associated with the 2040 General Plan. The EIR indicated that there would be less than significant impacts related to the following: additional sources of toxic air contaminants exposed during buildout of the 2040 General Plan, generation of air pollutants during construction, and the introduction of new odor-generating land uses.

The following mitigation measure was included in the General Plan EIR analysis and would continue to apply to subsequent development:

- ▶ **Mitigation Measure AQ-1: Health Risk Assessments.** Implement Bay Area Air Quality Management District (BAAQMD) CEQA Air Quality Guidelines 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 CEQA Air Quality Guidelines, 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 CEQA Air Quality Guidelines.

The project includes redesignating nine sites (LM-7 through LM-15) to increase residential capacity beyond the level identified in the 2040 General Plan. These nine sites are currently developed and zoned/designated for urban development; therefore, the proposed project would not change the level of ground-related construction that would occur, and emissions levels associated with mass grading, including dust and particulate matter emissions, would not be substantially similar compared to the levels identified in the General Plan EIR analysis. Regarding operational criterion pollutant emissions, some policies in the 2040 General Plan Resource Conservation Element are aimed at reducing vehicle emissions and energy use, which are two major drivers of criteria air pollutant emissions. For example, Policy RC-6.1 would increase energy efficiency and conservation in residential, commercial, industrial, and public buildings. Furthermore, Policy RC-7.5 aims to reduce greenhouse gas emissions from new development by encouraging development that lowers VMT, discouraging auto-dependent development patterns; promoting development that is compact, mixed-use, pedestrian friendly, and transit oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio; and other methods of reducing emissions (Union City, 2019a). The 2040 General Plan goals, policies, and implementation programs in the Resource Conservation Element would limit air quality impacts through reduction in vehicle trips and thus emissions by providing alternate modes of transportation. As stated in the General Plan EIR, development projected by the 2040 General Plan would be designed to promote active transportation in the community, further reducing vehicle emissions (Union City 2019a: 4.2-9). This project includes increasing residential capacity in urbanized areas that are well-served by transit and/or within existing employment-rich areas, which, in turn, results in greater VMT efficiency and lower mobile-source emissions. Further, Mitigation Measure AQ-1 would apply to any residential use proposed within 10,000 feet of a source of toxic air contaminants.

The project would not result in physical changes affecting implementation of air quality plans, increases in criteria air pollutants, exposure to pollutant concentrations, or result in exposure of other emissions, such as odors. Development would be consistent with regulations pertaining to air quality, and impacts would be of similar type and severity as what could occur under the current zoning district and land use designation.

Future housing projects would continue to be reviewed through the City's entitlement process, compliance with BAAQMD rules and guidance and the CEQA process to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to air quality.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, no new or more severe significant impacts related to air quality would occur beyond what was previously analyzed in the General Plan EIR.

3.3 ENERGY

The General Plan EIR indicated that the 2040 General Plan would not result in potentially significant environmental impacts related to consumption of energy and conflicts with applicable plans. 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. 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.

The 2040 General Plan contains goals, policies, and implementation programs that would help minimize the occurrence of inefficient, wasteful, and unnecessary energy consumption during construction and operation of development facilitated by the General Plan. The 2040 General Plan goals, policies, and implementation programs that present the greatest potential for reducing wasteful, inefficient, and unnecessary energy consumption are as follows:

Resource Conservation Element Goals and Policies

- ▶ Goal RC-6: The City shall continue to promote programs and initiatives that support and maximize energy conservation and the use of renewable energy in Union City.
 - Policy RC-6.1: Reduced Energy Consumption. The City shall support measures to reduce energy consumption and increase energy efficiency in residential, commercial, industrial, and public buildings.
 - Policy RC-6.6: Energy-Efficient Lighting. The City shall employ energy-efficient lighting technology to reduce the energy required to light parks, streets, and public facilities.
 - Policy RC-6.7: Green Building. The City shall encourage new development to adopt and incorporate green building features included in the CalGreen Tier 1 checklist in project designs, and shall consider future amendments to the municipal Code to adopt CalGreen Tier 1 requirements consistent with the State building code.
 - Policy RC-6.8: Zero Net Energy. The City shall encourage Zero Net Energy (ZNE) building design for new residential and non-residential construction projects, and consider future amendments to the Municipal Code to adopt ZNE requirements consistent with the State building code.
 - Policy RC-6.9: Water Heater Replacement. The City shall encourage the use of high-efficiency or alternatively-powered water heater replacements at time of replacement in existing residential development.
 - Implementation Program RC-6.A: High-Efficiency or Alternatively-Powered Water Heater Replacement Program. The City shall provide educational material and information on the City website and through the Building Division on high-efficiency and alternatively-powered water heater replacement options available to current homeowners considering water heater replacement. The City shall streamline the permitting process for high-efficiency and alternatively-powered water heater replacement, and develop appropriate financial incentives by working with energy utilities or other partners. Replacement water heaters could include high-efficiency natural gas (i.e., tankless), or other alternatively-powered water heating systems that reduce or eliminate natural gas usage such as solar heating systems, tankless or storage electric water heaters, and electric heat pump systems.

Implementation of the 2040 General Plan policies and implementation programs listed above, as well as other policies and implementation programs contained in the 2040 General Plan that would result in indirect energy conservation, such as the promotion of alternative transportation, water conservation, and waste reduction, would promote greater energy efficiency in municipal and community operations and development (Union City 2022: 4.5-19). Furthermore, the 2040 General Plan contains a land-use strategy that actively promotes infill mixed-use and

transit-oriented development, which would result greater energy efficiency overall for City residents, businesses, and City operations. For these reasons the EIR concludes that the 2040 General Plan would not result in potentially significant environmental effects from wasteful, inefficient, or unnecessary consumption of energy, and the impact is less than significant.

The project includes rezoning and/or redesignating nine sites which would not result in physical changes affecting energy resources or conflicts with energy-related plans. Increasing residential density in urbanized areas that are well-served by transit and/or within existing employment-rich areas, generally results in a reduction of VMT, which, in turn, results in lower fuel consumption.

Also, since certification of the General Plan EIR, the 2019 Title 24 Part 6 Building Energy Efficiency Standards took effect on January 1, 2020. The standards are designed to move the State closer to its zero net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the site electricity needs of each residential unit (CCR, Title 24, Part 6, Section 150.1(c)14). CEC estimates that the combination of mandatory on-site renewable energy and prescriptively required energy efficiency features will result in new residential construction that uses 53 percent less energy than the 2016 standards. Nonresidential buildings are anticipated to reduce energy consumption by 30 percent compared to the 2016 standards primarily through prescriptive requirements for high-efficacy lighting. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary in response to local climatologic, geologic, or topographic conditions, provided that these standards are demonstrated to be cost effective and exceed the energy performance required by Title 24 Part 6. Future housing projects will continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to energy.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on energy resources would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

3.4 GREENHOUSE GAS EMISSIONS

The General Plan EIR indicated that there would be significant and unavoidable impacts associated with development facilitated by the 2040 General Plan and the overall generation of greenhouse gas emissions (GHGs). Based on the growth factors prepared by Mintier Harnish (2018), as well as traffic modeling and vehicle miles traveled (VMT) data provided by Hexagon Transportation Consultants (2018), emissions facilitated through the 2040 General Plan would exceed the 2040 efficiency threshold of 1.12 metric tons of carbon dioxide equivalent (MT CO_{2e}) per service population per year. Likewise, construction activities associated with buildout of the 2040 General Plan would generate temporary short-term GHG emissions primarily due to the operation of construction equipment and worker and hauling trips.

Goals, policies, and implementation programs included in the Resource Conservation Element, Public Facilities Element, and Mobility Element with the direct purpose of reducing GHG emissions are listed below.

Mobility Element Goals and Policies

- ▶ Goal M-3: Provide an accessible, sustainable, efficient, and convenient public transit system for residents, workers, and visitors in Union City.
 - Policy M-3.21: Greening the Bus Fleet. The City shall continue to increase the use of alternative fuel vehicles in the bus fleet and shall support opportunities for in-route charging infrastructure for electric transit vehicles.
 - Implementation Program M-3.C: Convert Bus Fleet. The City shall convert the bus fleet to a zero-emission fleet as vehicle replacement funds become available through the Metropolitan Transportation Commission and the Federal Transit Administration.
- ▶ Goal M-4: Establish a safe, convenient, and efficient street network that facilitates vehicle travel throughout Union City.
 - Policy M-4.19: Electric Vehicle Charging Stations. The City shall support electric vehicles and other low-emissions/zero-emissions vehicles by working with third-party vendors to provide easily accessible charging stations within the city.

Resource Conservation Element Goals and Policies

- ▶ Goal RC-6: The City shall continue to promote programs and initiatives that support and maximize energy conservation and the use of renewable energy in Union City.
 - Policy RC-6.1: Reduced Energy Consumption. The City shall support measures to reduce energy consumption and increase energy efficiency in residential, commercial, industrial, and public buildings.
 - Policy RC-6.2: Renewable Energy. The City shall support measures to reduce energy consumption and increase energy efficiency in residential, commercial, industrial, and public buildings.
 - Policy RC-6.3: Solar Technology on Private Buildings. The City shall encourage the incorporation of solar panels and other solar technology on parking structures and residential, industrial, and commercial buildings.
 - Policy RC-6.4: Solar Panels on City Facilities. The City shall install solar panels on City facilities, as appropriate and feasible.
 - Policy RC-6.5: Use of Landfills for Renewable Energy. The City shall encourage the reuse of closed landfills within the City, including the Turk Island Landfill, as a site for solar or other renewable energy generation.
 - Policy RC-6.6: Energy-Efficient Lighting. The City shall employ energy-efficient lighting technology to reduce the energy required to light parks, streets, and public facilities.
 - Policy RC-6.7: Green Building. The City shall encourage new development to adopt and incorporate green building features included in the CalGreen Tier 1 checklist in project designs, and shall consider future

amendments to the municipal Code to adopt CalGreen Tier 1 requirements consistent with the State building code.

- Policy RC-6.8: Zero Net Energy. The City shall encourage Zero Net Energy (ZNE) building design for new residential and non-residential construction projects, and consider future amendments to the Municipal Code to adopt ZNE requirements consistent with the State building code.
- Policy RC-6.9: Water Heater Replacement. The City shall encourage the use of high-efficiency or alternatively-powered water heater replacements at time of replacement in existing residential development.
 - Implementation Program RC-6.A: High-Efficiency or Alternatively-Powered Water Heater Replacement Program. The City shall provide educational material and information on the City website and through the Building Division on high-efficiency and alternatively-powered water heater replacement options available to current homeowners considering water heater replacement. The City shall streamline the permitting process for high-efficiency and alternatively-powered water heater replacement, and develop appropriate financial incentives by working with energy utilities or other partners. Replacement water heaters could include high-efficiency natural gas (i.e., tankless), or other alternatively-powered water heating systems that reduce or eliminate natural gas usage such as solar heating systems, tankless or storage electric water heaters, and electric heat pump systems.

Public Facilities and Services Element Goals and Policies

- ▶ Goal PF-2: To operate and function in a sustainable manner, use public revenues and resources efficiently, and provide professional, high-quality service to residents and businesses.
 - Policy PF-2.13: New Technology in City Facilities. As financially feasible, the City shall incorporate new technology into public buildings and operations on an ongoing basis to increase efficiency and productivity, reduce operating costs, enhance customer service, improve communication with residents, and facilitate access to City services.
 - Policy PF-2.14: Sustainable Practices. The City shall consider the following as part of everyday operations:
 - Implementation of green infrastructure systems that reduce impacts on the environment;
 - Purchasing decisions that minimize the generation of waste;
 - Recycling programs that reduce waste;
 - Energy efficiency and conservation practices that reduce water, electricity, and natural gas use; and
 - Fleet operations that reduce gasoline consumption.
 - Policy PF-2.15: Energy Efficient Buildings and Infrastructure. The City shall continue to improve energy efficiency of City buildings and infrastructure through efficiency improvements, equipment upgrades, and installation of clean, renewable energy systems to achieve climate action goals and reduce operating costs.
 - Policy PF-4.3: Renewable Energy Generation at Wastewater Treatment Facility. The City shall support efforts by Union Sanitary District to supply the energy demand from the wastewater treatment facility through renewable energy generation.
- ▶ Goal PF-7: Ensure the provision of a reliable, efficient, cost-effective, and environmentally-sound gas and electric service within Union City.
 - Policy PF-7.1: Community Choice Energy. The City shall participate in regional efforts to provide competitive electricity rates and cleaner energy that reduces GHG emissions to Union City residents and businesses.
 - Policy PF-7.6: Expedite Solar Energy Installation. The City shall expedite the review and permitting of solar installations.

In addition to the above policies and implementation programs, the 2040 General Plan encourages infill and transit-oriented development and active transportation to reduce overall GHG emissions throughout the city. The 2040

General Plan contains land-use strategies to encourage high-density and mixed-use development adjacent to the Intermodal Station, along transit corridors, and near job centers. The 2040 General Plan further identifies infill development and creative reuse and redevelopment of existing sites as the primary means for accommodating future growth. Although the 2040 General Plan encourages placing services and amenities close to where people live and work, buildout is still anticipated to result in GHG emissions above the per service population target established for the 2040 General Plan to meet statewide goal trajectories. Therefore, the following mitigation measure was included in the General Plan EIR analysis and would continue to apply to subsequent development:

- ▶ Mitigation Measure GHG-1 Update to Climate Action Plan. 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:
 - Develop and adopt Zero Net Energy requirements for new residential and non-residential development
 - Develop and adopt a building electrification ordinance
 - 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
 - Expand charging infrastructure for electric vehicles
 - 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
 - Purchase carbon offsets from a validated source²

Mitigation Measure GHG-1 requires updating the City's CAP to reflect the most recent GHG reduction regulations and establish a Citywide GHG reduction target. In the absence of the updated CAP the General Plan EIR establishes per service population GHG emission thresholds for the year 2040, specific to the 2040 General Plan.

The proposed project includes rezoning/ redesignating nine sites (LM-7 through LM-15). Increasing residential density in urbanized areas that are well-served by transit and/or within existing employment-rich areas, generally results in a reduction of VMT, which is considered beneficial to regional GHG emissions. As stated in the General Plan EIR, mixed-use, transit-oriented, and high-density development places residents closer to places of employment, businesses those residents patronize, and public transit facilities, which potentially reduces the need to drive and reduce associated GHG emissions (Union City 2019a: 4.7-19).

Future development would be consistent with regulations pertaining to GHG emissions, and impacts would be of similar type and severity as what was analyzed in the General Plan EIR. Future housing projects will continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with all relevant State policies and consistency with all relevant City General Plan policies related to GHGs.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on greenhouse gas emissions would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

² 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.

3.5 HAZARDS AND HAZARDOUS MATERIALS

The General Plan EIR indicated that there would be less than significant impacts resulting from: the routine transport, use, or disposal of hazardous materials; reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; and being located on a site included on a list of hazardous materials sites and, as a result, creating a significant hazard to the public or the environment. 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 in this topic area of Appendix G. The General Plan EIR also determined that there would be less than significant impacts related to hazards from wildfires because the 2040 General Plan policies address maintaining a Local Hazard Mitigation Plan along with emergency access implementation.

Mobility Element Goals and Policies

- ▶ Goal M-7: Encourage the safe and efficient movement of goods to support the local economy while minimizing impacts on residential neighborhoods and local traffic patterns.
 - Policy M-7.1: Designated Truck Routes. The City shall protect residential neighborhoods from intrusion by truck traffic by establishing, maintaining, and enforcing an efficient system of designated truck routes.
 - Policy M-7.2: Whipple Road as Truck Route. The City shall require all new development projects in the Central Bay Business Park to use Whipple Road from Central Avenue to Union City Boulevard as a truck route.

Safety Element Goals and Policies

- ▶ Goal S-2: Ensure efficient, effective, and coordinated response to natural and man-made disasters.
 - Policy S-2.2: Comprehensive Emergency Management Plan. The City shall maintain an up-to-date Comprehensive Emergency Management Plan that is consistent with the State and Federal disaster preparedness requirements.
 - Policy S-2.3: Hazard Mitigation Plan. The City shall maintain a FEMA- [Federal Emergency Management Agency] and State-approved Local Hazard Mitigation Plan and shall make it available for review on the City's website.
 - Policy S-2.4: Emergency Operations Center. The City shall maintain an Emergency Operations Center, either in an existing facility or a newly construction facility.
 - Policy S-2.5: Emergency Preparedness Staffing. The City shall seek funding for a staff person dedicated to managing emergency preparedness activities, including coordinating training activities for City staff and community members and coordination with outside agencies.
- ▶ Goal S-7: To protect public health and safety, property, and the environment by promoting the safe management of hazardous substances and controlling the use, storage, handling and disposal of the most toxic and hazardous substances.
 - Policy S-7.3: Environmental Site Assessment. The City shall require applications subject to Site Development Review or applications for development on sites where there is potential for contamination to exist to include submittal of a Phase 1 Environmental Site Assessment and Phase 2 Environmental Site Assessment (if required). Any recommendations contained in these documents, including the need for remediation activities or additional study, shall be completed consistent with applicable federal, State, and local regulations.

The project consists of redesignating nine sites (LM-7 through LM-15) in the city to increase residential capacities. Site LM-7, located at Whipple Road and Liston Way, and Site LM-8, located at Whipple Road and Medallion Drive, are both located near industrial manufacturing/distribution warehouses to the north and east. These warehouses are primarily used for distribution services and are not associated with the emission or handling of hazardous materials.

The General Plan EIR states that compliance with existing applicable regulations, programs, standards such as the Fire Code and Building Code, and implementation of 2040 General Plan goals and policies would minimize risks from routine transport, use, and disposal of hazardous materials, including potential hazards from the accidental release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these materials (Union City 2019a:4.8-16). All of these City policies and federal, state, and local regulations would apply to any development that would occur on the affected sites. Therefore, the proposed changes to land use designations would not change the level of impact identified in the General Plan EIR.

Future housing projects would continue to be reviewed through the City's entitlement process and the CEQA process to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to hazards and hazardous materials.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on hazards and exposure to hazardous materials would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

3.6 LAND USE AND PLANNING

The General Plan EIR states that the 2040 General Plan would have less than significant impacts on land use and planning. Implementation of the 2040 General Plan would provide for orderly development in Union City and would not physically divide any established community.

Based on the full buildout anticipated under the 2040 General Plan, an estimated 11,486 new residents and 4,330 new dwelling units would be added to Union City through 2040. The residential growth is anticipated to result in up to 444 new single-family residences and 3,886 new multi-family housing units (Union City 2019a). Because the majority of new development in existing neighborhoods would occur within existing subdivisions or other approved project areas, implementation of the 2040 General Plan would not physically divide an existing established community.

The 2040 General Plan encourages infill and transit-oriented development along with the creative reuse and redevelopment of existing sites as the primary means for accommodating future growth in Union City. Some of the key goals and policies related to land use are listed below:

Land Use Element Goals and Policies

- ▶ Goal LU-1: Strategically support infill development and redevelopment to transform Union City into a distinctive community with a dynamic, transit-oriented city center, attractive shopping and entertainment areas, and thriving and innovative work places.
 - Policy LU 1.1: Healthy Balance of Land Uses. The City shall promote and support the development of a healthy balance of residential, commercial, open space, institutional, and industrial businesses within the city.
 - Policy LU 1.2: Promote Infill and Enhance Neighborhoods. The City shall promote infill development and redevelopment of underutilized parcels while maintaining or enhancing the positive qualities of the surrounding neighborhoods.
 - Policy LU-1.3: Strategic Infill Areas. The City shall encourage redevelopment and infill in strategic areas, including the Historic Alvarado District and along Union City Boulevard, Union Landing, the Greater Station District, and Mission Boulevard.
 - Policy LU-1.4: Public-Private Partnerships. The City shall use public investment and partnerships with the private sector, as appropriate, to incentivize infill development.
 - Policy LU-1.5: Land Banking. Consistent with State law, the City shall strive to take advantage of opportunities to acquire key vacant or underutilized infill properties for future development that would serve as a catalyst for private investment in the surrounding area or meet other long-term City goals.
 - Policy LU-1.6: Integrate New Development into the Community. The City shall require new large-scale development projects to be integrated into the fabric of the existing community rather than allowing projects to be self-contained, walled off, or physically separated/segregated from surrounding uses. To the extent feasible, circulation networks and open spaces in such developments should be linked to existing streets and open spaces to improve connectivity between neighborhoods.
- ▶ Goal LU-2: Provide a land use framework that promotes transit-oriented development and walkable communities and reduces reliance on cars.
 - Policy LU-2.1: Becoming a More Transit-Oriented City. The City shall plan for Union City's transition to a community that includes a mix of established lower-density residential neighborhoods and new higher-density mixed-use neighborhoods with access to high-quality transit.
 - Policy LU-2.2: Transportation and Development Balance. The City shall ensure that future land use and development decisions are in balance with the capacity of the City's transportation system and consistent with the City's goal of reducing greenhouse gas emissions.

- Policy LU-2.3: Planning that Reduces VMT. The City shall strive to reduce vehicle miles travelled (VMT) by providing a mix of land uses, through site planning and design practices, and with circulation improvements that reduce or shorten vehicle trips and maximize transit ridership.
- Policy LU-2.4: Land Use That Maximizes Transit Use. The City shall encourage new land uses and project designs to minimize automobile dependence and maximize transit usage, walking, and bicycling.
- Policy LU-2.5: Mixed-use and Higher-Density Development Around Transportation Nodes. The City shall support mixed-use development, pedestrian-friendly environments, and higher density around the major transportation nodes and corridors.
- Policy LU-2.6: Land Use Regulations that Embrace New Transportation Technologies. The City shall maintain flexible land use regulations that accommodate new transportation technologies (e.g., autonomous vehicles, electric vehicles, car sharing).

Overall, the 2040 General Plan would promote orderly development in Union City by encouraging growth in designated focused areas and at infill sites near transit and other amenities and promote the enhancement of the City's multimodal circulation system, maximizes connections, and minimizes barriers to connectivity.

The project consists of rezoning or redesignating nine sites (LM-7 through LM-15) in the city to increase land use densities. Some of these sites were already designated for housing or mixed use upon adoption of the 2040 General Plan in 2019 and only need to be rezoned for consistency with the General Plan. Other sites are proposed for both Zoning and General Plan amendments to allow for housing on sites that otherwise wouldn't allow housing (e.g., commercial-only sites) or to allow for housing at higher densities than what is currently allowed. The proposed sites all have existing residential and commercial land use designations. Therefore, these changes would align with the General Plan EIR's conclusion regarding potential division of an established community. Also, with the project's approval, revisions to the Zoning Ordinance and Zoning Map would be required to ensure consistency with the 2040 General Plan. Specifically, revisions to the Zoning Map would need to be consistent with the 2040 General Plan, incorporating revisions to the land use categories and other recommended design and development standards. Refer to the Project Description for more information on amendments to the Zoning Ordinance. Future development would be consistent with regulations pertaining to land use and planning.

Future housing projects would continue to be reviewed through the City's development standards (Municipal Code), entitlement process, and CEQA to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to land use.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on land uses would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

3.7 NOISE

The General Plan EIR indicated that there would be significant and unavoidable impacts related to development projected under the 2040 General Plan and the temporary generation of increased noise levels and groundborne vibrations during construction. The following mitigation measure was included in the General Plan EIR analysis and would continue to apply to subsequent development:

- ▶ Mitigation Measure N-1 Construction Noise Reduction. For projects involving impact pile-drivers that are located within 400 feet of noise-sensitive receptors, projects involving sonic piledrivers 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:
 - Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction related noise sources and noise-sensitive receptors.
 - Electrically-Powered Tools and Facilities. 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.
 - Smart Back-up Alarms. 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.
 - Additional Noise Attenuation Techniques. 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 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.

Even after implementation of identified mitigation measures, the General Plan EIR concludes that buildout of the 2040 General Plan would result in significant and unavoidable impacts related to construction noise. The proposed redesignation of nine sites to expand residential capacity allowed under the General Plan would not change the amount of ground disturbance assumed in the General Plan EIR; therefore, the overall level of construction noise would be substantially similar.

The General Plan EIR concludes that impacts related to new on-site noise sources associated with residential, commercial, and industrial land uses, which considers potential increase traffic noises, are less than significant. As discussed elsewhere in this document, increasing residential density in urbanized areas that are well-served by transit and/or within existing employment-rich areas, generally results in a reduction in the reliance of automobiles. One of the key statewide strategies to reduce GHG emissions is to build new housing in transportation-efficient areas by enabling mixed-use, walkable, and compact infill development (CARB 2022: 5-8). Beyond having a direct impact on GHG emissions from cars, reducing individuals' need to drive to fulfill daily needs and moving away from low-density, auto-oriented residential and commercial development, can also support emissions reductions in other sectors and support statewide climate, equity, health, and affordability goals (CARB 2022). As stated in the General Plan EIR, mixed-use, transit-oriented, and high-density development places residents closer to places of employment, businesses those residents patronize, and public transit facilities, which potentially reduces the need to drive and reduce associated GHG emissions (Union City 2019a: 4.7-19). Also, a doubling of traffic volumes on a given roadway is required for a noticeable increase in traffic noise to occur; therefore, the proposed project would not result in an increase in traffic levels that would change the level of significance identified in the General Plan EIR.

Future housing projects will continue to be reviewed through the City's noise standards, entitlement process, and CEQA to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to noise and vibration.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on noise and vibration would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

3.8 POPULATION AND HOUSING

The General Plan EIR indicated that implementation of the 2040 General Plan would facilitate the construction of new housing in the city which would increase the City's population over time. However, the General Plan EIR determined that the 2040 General Plan accommodates and plans for population growth and includes policies to manage new development. The General Plan EIR indicated that implementation of the 2040 General Plan would not result in the displacement of substantial numbers of persons or housing and concluded the impact to be less than significant.

The 2040 General Plan assumes that the City's population will grow approximately 15 percent between 2018 and 2040. This translates into an estimated 11,486 new residents by 2040. New dwelling units are expected to increase 21 percent between 2018 and 2040, for a total of increase of 4,330 units (Mintier Harnish 2018).

In accordance with State law and local housing requirements, the purpose of the Housing Element in a local General Plan is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community, consistent with the RHNA regulations described in the Background section of the Introduction. The General Plan EIR evaluated the 2015-2023 Housing Element, certified by the California Department of Housing and Community Development (HCD) on February 19, 2015. At the time the EIR was prepared for the 2040 General Plan, no substantive changes were being proposed to the Housing Element as part of its incorporation into the 2040 General Plan. The General Plan EIR concluded that development allowed under the General Plan is intended to accommodate projected growth, rather than induce growth, and concluded that the impact related to inducement of unplanned population growth is less than significant.

Table 3-1 shows the RHNA assigned to Union City for the 2023-2031 Housing Element. As shown in the table, ABAG allocated 2,728 new housing units to Union City, which includes 862 very low-, 496 low-, 382 moderate-, and 988 above moderate-income units. State law also requires the City to identify the projected need for extremely low-income housing. The City assumes that 50 percent of the very low-income housing need is equal to the extremely low-income housing need. As such, there is a projected need for 431 extremely low-income housing units.

Table 3-1 Regional Housing Needs Allocation, Union City (2023-2031)

	Very Low-Income Units ¹	Low-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
2023-2031 RHNA	862	496	382	988	2,728

¹Extremely low-income allocation is equal to 50 percent of very low-income allocation (431 units).

Source: Association of Bay Area Governments (ABAG), Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031 (Adopted December 2021).

The proposed project consists of intensifying residential land uses on nine specific sites (Sites LM-7 through LM-9, see Project Description) in the city in conjunction with the update to the 2023-2031 Housing Element to provide enough capacity to meet the RHNA. One of the fundamental purposes of General Plan 2040 is to direct future development in such a way as to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas, thus minimizing pressure to develop on the remaining open space in the city and directing growth and redevelopment to infill areas, consistent with General Plan 2040 Policy LU-1.2 and Policy LU-1.3, listed below.

Land Use Element Goals and Policies

- ▶ Goal LU-1: Strategically support infill development and redevelopment to transform Union City into a distinctive community with a dynamic, transit-oriented city center, attractive shopping and entertainment areas, and thriving and innovative work places.
 - Policy LU-1.2: Promote Infill and Enhance Neighborhoods. The City shall promote infill development and redevelopment of underutilized parcels while maintaining or enhancing the positive qualities of the surrounding neighborhoods.

- Policy LU-1.3: Strategic Infill Areas. The City shall encourage redevelopment and infill in strategic areas, including the Historic Alvarado District along Union City Boulevard, Union Landing, the Greater Station District, and Mission Boulevard.

The General Plan EIR projects that approximately 15 housing units would be demolished as a result of development facilitated under the 2040 General Plan. Site LM-9 (Whipple/Cemex Site) is the only site within this project that currently has an existing dwelling unit on the property. The loss of one single-family unit would not be substantial, especially considering that buildout of the site under the proposed new zoning designation of RM 1500 (17-30 du/acre) could result in up to 156 new dwelling units. Because the number of potential new dwelling units would far exceed the number potentially removed units, and because all future development on Sites LM-7 through LM-9 would comply with the policies of the 2040 General Plan, promoting infill development and preservation of existing neighborhoods, impacts related to displacement of existing residents would be consistent with the analysis and conclusion of the General Plan EIR.

Also, as described above, the proposed project increases residential capacity to meet the projected need identified in the RHNA. Therefore, it would accommodate, rather than induce, population growth. Therefore, the proposed project would be consistent with the analysis and conclusion of the General Plan EIR.

With the project's approval, the impact on population and housing would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

3.9 PUBLIC SERVICES AND RECREATION

The General Plan EIR indicated that there would be less than significant impacts related to the construction of fire and police protection facilities, school facilities, libraries, and park facilities. The General Plan EIR found that development facilitated by the 2040 General Plan would increase the overall population in Union City, which would generate additional need for fire protection, and police protection services. With an increase in the population, there would be a subsequent increase in the population of school-aged children in the city, increasing demand for school services and potentially creating the need for new school facilities. The increase in population from implementing the 2040 General Plan would further increase the demand for library services and potentially the need for new library facilities in addition to increased demand for parks with the potential need for new park facilities.

The 2040 General Plan contain a number of goals and associated policies, listed below, for providing adequate and needed public and recreational services in Union City. Additionally, the Special Areas Element and Health and Quality of Life Element includes goals and policies related to parks and recreation. Adherence to the policies included in the 2040 General Plan would reduce related impacts to less than significant.

Public Facilities and Services Element Goals and Policies

- ▶ Goal PF-1: Ensure the timely provision of public facilities and services that are adequately funded to meet the needs of existing and future city residents.
 - Policy PF-1.1: Ensure Adequate Facilities and Services. The City shall ensure through the development review process that adequate public facilities and services are available to serve new development when required. The City shall not approve new development where existing facilities are inadequate to support the project unless the applicant can demonstrate that all necessary public facilities (including water service, sewer service, storm drainage, transportation, police and fire protection services) will be installed or adequately financed and maintained (through fees, special taxes, assessments, or other mean).
 - Policy PF-1.2: On-site and Off-site Infrastructure. The City shall require all new development and major modifications to existing development to construct necessary onsite and off-site infrastructure to serve the project in accordance with City standards.
 - Policy PF-1.3: Development Fair Share. The City shall require, to the extent legally possible, that new development or major modification to existing development pays the fair share cost of providing new public facilities and services and/or the cost for upgrading existing facilities.
- ▶ Goal PF-9: Provide exceptional public safety and crime reduction services to maintain a safe and secure community, and continue to uphold police-community trust, engagement, and collaboration.
 - Policy PF-9.1: Police Staffing. The City shall strive to maintain Police Department staffing levels in line with population growth by using a baseline staffing benchmark based on the average staffing-to-population ratio of cities within Alameda County (sworn officers and civilian support staff).
 - Policy PF-9.2: Police Equipment and Facilities. The Police Department shall provide and maintain equipment, technologies, and facilities to meet modern standards of safety, dependability, and efficiency.
 - Policy PF-9.6: Coordinate Emergency Response Services with Local Agencies. The City should continue to coordinate and maintain mutual aid agreements with emergency response services with Alameda County, other jurisdictions within the county, special districts, service agencies, voluntary organizations, and state and federal agencies.
 - Policy PF-9.8: Provide Periodic Updates on Police Statistics. The City shall continue to provide updates to the City Council and the community regarding statistics such as crime rates, types of crime committed, and police accountability and use of force. Crime data shall also be mapped and made available to the public.
- ▶ Goal PF-10: Ensure high quality fire and emergency response to prevent injury, loss of life, and property damage.

- Policy PF-10.1: Maintain Agreement with Alameda County Fire Department (ACFD). The City shall review and refine the agreement with ACFD, as needed. Levels of service provided under the contract, may be subject to budgetary limitations.
- Policy PF-10.2: Fire Department Resources. The City shall encourage ACFD to evaluate operations and deployment of services to efficiently use resources.
- Policy PF-10.3: Development Fees. The City shall require new development to build or fund its fair share of fire protection facilities, personnel, operations, and maintenance that, at minimum, maintains the above service standards.
- Policy PF-10.5: Fire Department Review of Development Projects. The City shall engage fire personnel in the review of proposed development to identify necessary fire prevention and risk reduction measures.
- Policy PF-10.7: Routine Fire Hydrant Maintenance. The City shall continue to work with ACWD to ensure that all fire hydrants are maintained and in a state of operational readiness.
- Policy PF-10.8: Emergency Medical Services. The City shall ensure the provision of high-quality emergency medical response services, including paramedics and emergency medical technicians.
- Policy PF-10.9: Coordinate Emergency Response Services with Local Agencies. The City should continue to coordinate and maintain mutual aid agreements with emergency response providers from local, State, and federal fire agencies.
- ▶ Goal PF-11: Ensure excellent schools that provide high-quality educational services, foster civic pride, and serve as neighborhood and community centers.
 - Policy PF-11.1: High-Quality Education Facilities. The City shall support New Haven Unified School District (NHUSD) in their efforts to provide high-quality and modern education facilities that will accommodate projected changes in student enrollment.
 - Policy PF-11.2: Monitor School Enrollment Trends. The City shall work cooperatively with NHUSD in monitoring housing, population, and school enrollment trends.
 - Policy PF-11.3: Engage NHUSD on Long Range Planning Efforts. The City shall engage NHUSD in its long-range planning efforts to ensure the adequacy of existing school facilities to serve new development.
- ▶ Goal PF-12: Enhance and expand Union City's library facilities and services to meet the educational and life-long learning needs of the community.
 - PF-12.1: Library Modernization. The City shall work with Alameda County Library to implement the 2016 Facilities Master Plan as it applies to Union City.
 - PF-12.2: Extended Library Hours. The City should encourage, and fund extended hours of operation at the library to serve the City's diverse population.
 - PF-12.3: Library Accessibility. The City shall ensure that library facilities are easily accessible by foot, bicycle, and transit to promote equitable access to library resources.
 - PF-12.4: Support Library Bond Measures. The City shall support State and local library infrastructure bond measures for the construction of new libraries.

Safety Element Goals and Policies

- ▶ Goal S-4: To provide increased fire safety through the provision of adequate fire protection infrastructures, public education, and outreach programs.
 - Policy S-4.1: Time Future Development to Ensure Adequate Fire Infrastructure. The City shall not approve new development unless the development will be protected by adequate fire control facilities and equipment by the time of occupancy.

- Policy S-4.2: Require Sprinkler Systems and Smoke Detectors. The City shall require sprinkler systems and/or smoke detectors according to the adopted City building and fire codes.

Special Areas Element Goals and Policies

- ▶ Goal SA-2: To develop the core of the Station District surrounding the Intermodal Station as a major transit hub, business center, and residential address that is well connected with the rest of the City.
 - Policy SA-2.2: Strong Public Spaces. The City shall ensure that the Core Station District includes strong public spaces, including inviting parks, plazas, and community gathering places, which are integrated with ground floor retail uses and complement the Intermodal Station.
- ▶ Goal SA-4: To transform the Station East area into a vibrant, 21st century employment district that is a center of prosperity and innovation, focused on providing a quality experience for those who live and work in Union City.
 - Policy SA-4.22: Parkland and Public Spaces. New residential development within the Station East area shall contribute its fair share towards the development of parkland. The City shall consider allowing plazas, civic spaces, and other gathering spaces that contribute to the public realm as a contribution towards meeting parkland requirements. Recreational pathways may also be considered.
- ▶ Goal SA-5: To provide for a variety of housing opportunities and create additional open space and park opportunities along the East-West Connector site that will serve as a new gateway to Union City.
 - Policy SA-5.4: Provide a City Park. The City shall seek to provide a new City park on the Gateway Site that is adequate in size to accommodate sports activities, such as soccer and/or baseball. Any new residential development on the Gateway Site shall contribute its fair share to park improvements. The City shall consider locating the park so that it buffers residential uses from the East-West Connector and provides recreation facilities to serve the neighborhood and the community as space allows.
 - Policy SA-5.5: Purchase Remnant Lands to Connect to Arroyo Park. The City shall make efforts to acquire from Caltrans remnant lands from the East-West Connector to expand access to Arroyo Park.

Health and Quality of Life Element Goals and Policies

- ▶ Goal HQL-2: Maintain, expand, and improve Union City's parks and recreation facilities to meet existing and future needs.
 - Policy HQL-2.1: Increase Parkland. The City shall strive to increase the number and/or size of neighborhood and/or community parks.
 - Policy HQL-2.2: Parkland Dedication for Ownership Housing. The City shall require new residential subdivisions (i.e., ownership housing) to dedicate parkland at a ratio of 3.0 acres per 1,000 new residents or pay an equivalent in-lieu fee to offset the increase in park needs resulting from new residents. Where on-site parkland is dedicated, it shall be improved by the developer and accessible to the general public. The City may use in-lieu fees to purchase land for new parks or to renovate or expand existing parks and recreation facilities.
 - Policy HQL-2.3: Park Impact Fees for Rental Housing. The City shall continue to collect Park Facilities Fees on new multifamily rental housing to offset the increase in park needs resulting from new residents. Park Facilities Fees shall only be used to build new parks.
 - Policy HQL-2.4: Acquire New Land for Parks and Recreational Facilities. The City shall strive to meet growing recreational needs of residents and their neighborhoods through the acquisition of land for the addition of new parks and recreation facilities.
 - Policy HQL-2.7: Park and Recreation Master Plan. The City shall comprehensively update the Parks and Recreation Master Plan to take inventory of existing parks and recreational facilities; evaluate the recreational

needs of Union City residents, workers, and visitors; and set priorities for the improvement of existing parks and development of new parks to accommodate the diverse needs of existing and future users.

- Policy HQL-2.8: Creative Approaches to Providing Parks and Open Space. The City shall encourage creative approaches to expand parks and open space in the city, including the development of plazas, courtyards, pocket parks, parklets, pedestrian promenades, community gardens, rooftop patios, and civic spaces.
- Policy HQL-2.9: School Collaboration to Maximize Access to Recreational Facilities. The City shall collaborate with the New Haven Unified School District to maximize public access to school recreational facilities and grounds, as appropriate.
- Policy HQL-2.14: Promote Park Stewardship. The City shall promote pride of ownership in local parks by involving residents and neighborhood groups in park maintenance and improvements, recreation programs, community outreach, and special events.
- Policy HQL-2.16: Collaborate to Expand Regional Parks. The City shall collaborate with the East Bay Regional Park District, Alameda County Flood Control District, and other regional agencies to expand access to regional parks and open space in and around Union City, promote greater public awareness of regional parkland, and improve access to regional park facilities.
- Policy HQL-2.17: Support Expansion of Regional Trail System. The City shall support the expansion of a regional trail system in and around Union City, including the Bay Trail and the Ridge Trail. The City shall work with the appropriate regional agencies to improve access from Union City neighborhoods to these trails by improving existing trails, and developing new trail connections, bike lanes, parking, and signage.

The proposed project consists of increasing residential capacity on nine specific sites. The project would facilitate development within areas of Union City that are currently developed. Consistent with the 2040 General Plan Policy PF-10.2, as future buildout occurs under the 2040 General Plan, the City will evaluate operations and deployment of services to efficiently use resources. Additionally, new development under buildout of the 2040 General Plan would be required to comply with all applicable federal, State, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants. The additional population in Union City would also increase the demand for police protection services. The League of California Cities recommends a police service ratio standard of 1.4 to 1.6 sworn officers per 1,000 residents. The addition of 11,486 residents through the year 2040, reaching a total of 84,477 residents, would require the City to employ a total of 119 sworn officers, in order to meet the police service ratio of at least 1.4 police officers per 1,000 residents. According to the General Plan EIR, the City would need to incrementally increase their police services by 38 sworn officers through the year 2040, which could require the construction of a new facility to house subsequent personnel, equipment, and vehicles (Union City 2019a: 4.13-9).

Goals PF-1 and PF-9 as well as Policies PF-1.1, 1.2, 1.3, 9.1, and 9.2 of the 2040 General Plan are aimed at maintaining level of service through coordinating infrastructure and public services planning efforts between the City, developers and other provider agencies. Policy 9.6, Coordinate Emergency Response Services with Local Agencies, ensures that the City provides appropriate emergency response services for the community. Policy 10.5, Fire Department Review of Development Projects, calls for the city to review all new development proposals that have potential for safety concerns and may affect demand for fire prevention and protection to maintain adequate fire services and community safety. Policy 10.8, Emergency Medical Services, ensures that the City provides appropriate emergency medical response services for the community. These policies would allow for the City to continue to provide emergency and medical services and to ensure adequate police and fire service available under future development and associated population growth.

NHUSD utilizes the student generation rate of 0.7 per single family residence, consistent with the rate set by the State of California Office of Public School Construction to estimate future facility needs. Assuming each single-family residence houses one household, 3,021 new students will be added to Union City by 2040 under implementation of the 2040 General Plan. These additional students would increase enrollment in schools in Union City, potentially

requiring the construction of new or expansion of existing school facilities. Policies from the Public Facilities and Services Element of the 2040 General Plan would ensure that the City and NHUSD coordinate on long range planning efforts to accommodate future growth. Furthermore, developers are required to pay school impact fees for all new development in Union City.

Goal PF-12 and Policies PF-12.1, 12.2, 12.3, and 12.4, listed above, support the City's collaboration with Alameda County to provide adequate library facilities and ensure that funding is available for infrastructure to meet the needs of the proposed growth through 2040. Regarding the potential demand for new parks and park facilities, the Union City Municipal Code requires any project that includes a residential subdivision to provide three acres of property (or an equivalent in-lieu fee) for every additional one thousand residents that the project will generate to be devoted to neighborhood and community parks. Fees and dedication of parkland would assist in providing sufficient facilities to meet the needs of the projected City population in 2040.

Future housing projects would continue to be reviewed through the City's development standards, entitlement process, and the CEQA process to ensure consistency with all relevant federal and State policies and consistency with all relevant County General Plan policies related to public services and recreation facilities.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impacts on public services and recreation would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

3.10 TRANSPORTATION

The General Plan EIR indicated that the 2040 General Plan would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (B) and have significant and unavoidable impacts on vehicle miles travelled (VMT) in Union City. New development would also have significant and unavoidable impacts on traffic on roadways in and surrounding the city. Additionally, the General Plan EIR indicated that the 2040 General Plan would have less than significant impacts related to the provision of emergency access; and conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, and the performance or safety of such facilities.

With limited opportunities for new development in Union City, the 2040 General Plan emphasizes infill and reuse development within the city limits, encourages higher-density and mixed use projects where appropriate, and supports walkable design that compliments the existing natural and built environment to reduce VMT per service population. The 2040 General Plan further provides the policy framework to guide future development toward land uses that support walking, biking, and transit ridership, including a Vision Zero policy. The 2040 General Plan places a greater emphasis on active transportation infrastructure such as protected bike lanes and enhanced pedestrian crossings, improved transit facilities and services, and ADA accessibility. In addition to the 2040 General Plan's land use strategy, the 2040 General Plan contains several policies and implementation programs intended to minimize or avoid VMT generated by Union City residents. While the 2040 General Plan encourages infill development and redevelopment in urbanized areas of the city, including near transit and the BART station, the additional population growth would result in a net increase in the total VMT within the city.

The 2040 General Plan establishes the following goals and policies that are intended to result in roadway designs that safely accommodate all users:

Mobility Element Goals and Policies

- ▶ Goal M-1: Design and maintain streets to be safe and accessible for all categories of users.
 - Policy M-1.3: Planning for Complete Streets. The City shall incorporate "complete streets" practices as a routine part of everyday operations, and a factor to be considered in every projects, program, and practice relating to the transportation network for all categories of users, and work in coordination with other departments, agencies, and jurisdictions to maximize opportunities for complete streets, connectivity, and cooperation.
 - Policy M-1.4: Safe Travel for All Users. The City shall ensure complete streets infrastructure sufficient to enable reasonably safe travel along and across the right of way for each category of users is incorporated into all planning, funding, design, approval, and implementation process for any construction, reconstruction, retrofit, maintenance, operations, alteration, or repair of streets, except that specific infrastructure for a given category of users may be excluded if an exception is approved by the Public Works Director.
- ▶ Goal M-2: To provide a robust and interconnected bicycle and pedestrian circulation system throughout the City.
 - Policy M-2.9: Safe Pedestrian Environment. The City shall implement improvements to create a safe pedestrian environment.
 - Policy M-2.11: Minimize Cub Cuts. The City shall require new development to minimize the number and width of curb cuts for vehicle traffic to reduce vehicle conflicts with pedestrians.
 - Policy M-2.12: Safety in Sidewalk Design. The City shall prioritize safety in the design of sidewalk improvements along major arterials, including separating sidewalks from vehicle travel lanes where possible.
- ▶ Goal M-4: Establish a safe, convenient, and efficient street network that facilitates vehicle travel throughout Union City.
 - Policy M-4.5: Require Projects to Address Transportation Impacts. The City shall require developers to address the impacts that their projects will have on the City's transportation system and implement all feasible mitigation measures, including impact fees, street improvements, traffic signal and intelligent

transportation systems improvements, transportation demand management, and improvement of non-automobile transportation modes.

- Policy M-4.6: Transportation Impact Fee and Other Funding. The City shall establish a transportation impact fee to ensure new development pays its fair share contributions to transportation improvements and shall continue to explore other funding sources to assist large-scale capital projects.
- Policy M-4.11: Support Quarry Lakes Parkway. The City shall pursue the timely construction of Quarry Lakes Parkway as a partially depressed and at grade parkway from Mission Boulevard to Interstate 880 to resolve current circulation deficiencies, improve the area's regional access and visibility, and stimulate the market for region serving retail, light industrial/ service commercial, and office uses.
- Policy M-4.14: Dyer Street Extension. The City shall plan for the extension of Dyer Street to link the Calaveras Landing and Union Landing shopping centers.

The project includes the rezoning/redesignation of nine sites in the General Plan to increase residential capacity. The proposed project would result only in changes to the allowed land use type and intensity of these sites and would not involve changes related to the future site design, access, or circulation and would therefore not result in changes to the Draft EIR's analysis and conclusion related to hazardous design features, inadequate emergency access, or conflicts with a program, plan, ordinance or policy addressing the circulation system.

Increasing residential density in urbanized areas that are well-served by transit and/or within existing employment-rich areas, generally results in a reduction of VMT and impacts on transportation in the city by promoting the enhancement of connectivity (Union City, 2019a). Therefore, the proposed project would not result in an increase in the severity of the impact related to VMT efficiency compared to the level evaluated in the General Plan EIR. No substantial changes would occur beyond what was addressed in the General Plan EIR that would substantially alter city-wide anticipated under the General Plan. Development would be consistent with regulations pertaining to transportation.

Future housing projects will continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to transportation.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on transportation would not be more severe than the impact identified in the General Plan EIR. Increasing residential density in urbanized areas that are well-served by transit and/or within existing employment-rich areas, generally results in a reduction of VMT; therefore, there would be no new impacts beyond what the EIR evaluated.

3.11 UTILITIES AND SERVICE SYSTEMS

The General Plan EIR indicated that there would be less than significant impacts related to wastewater treatment, new or expanded utility infrastructure, wastewater generation, water supply, solid waste generation, and demand for utility services.

The project includes redesignating nine sites in the city to intensify land uses and allow residential development, which could result in physical changes affecting construction of new utility infrastructure, water supply, wastewater treatment capacity, generation of solid waste, or compliance with solid waste regulations beyond what was addressed in the General Plan EIR. Please refer to Chapter 2, "Project Description," which summarizes the types of changes contemplated with the site redesignation.

It is assumed that future development on the individual sites would be consistent with regulations pertaining to utilities and service systems, and impacts would be of similar type and severity as what could occur under the current zoning district and land use designation.

As described in the Public Review Draft of the 2023-2031 Housing Element, availability of infrastructure is not expected to pose a constraint on residential development within the time frame of the Housing Element. The following paragraphs summarize the status of each of those services essential to residential development.

- ▶ **Water.** Union City is served by the Alameda County Water District (ACWD), which obtains its water supply from both surface water and ground water sources. The district's service area also includes Fremont and Newark and covers a total area of 105 square miles. As of 2020 the population within the district's service area was about 357,000, and according to ABAG/MTC projections in Plan Bay Area 2050, the population is expected to grow to about 371,000 by 2030 and 387,000 by 2040. Sixty-seven percent of supplies are used by residential customers, with the remainder used by commercial, industrial, institutional, and dedicated landscape customers.

Long-range water planning for the ACWD service area is provided in the 2020-2025 Urban Water Management Plan (UWMP). Due primarily to water conservation efforts and plumbing code advancements, the District anticipates reduced future demands for water compared to previous forecasts as well as in comparison to demonstrated past levels of actual demand. These reductions in total demand come despite a net increase in population and total housing per City and ABAG projections. Based on the analysis if the UWMP, ACWD has sufficient supply (estimated at around 68,200-acre feet/year+/-) to meet projects demands through 2045 (estimated at 67,600-acre feet per year).

Although the ACWD has no control on water service hookups, there are no constraints on providing service in its service area relative to pipe sizes, age of pipes, or other infrastructure issues (Union City 2022).

- ▶ **Sewer.** The Union Sanitary District (USD) operates a 33-acre wastewater treatment facility in Union City and provide wastewater collection, treatment, and disposal services to residents in Union City, Fremont, and Newark. The treatment facility has undergone several upgrades and expansions as these cities have grown. The District maintains over 830 miles of underground pipeline in its service area. On average the District treats approximately 25 million gallons per day (MGD) out of its permitted plant capacity of 33 MGD. The Union Sanitary District has capacity to meet the projected housing needs through the Housing Element Planning Period. All of the sites in the sites inventory for the Draft 2023-2031 Housing Element, including sites LM-7 through LM-15, have adequate sewer access (Union City 2022).
- ▶ **Solid Waste.** Republic, a private company, is responsible for the collection of all municipal solid waste generated in Union City. Republic collection vehicles deliver the material to the Fremont Recycling and Transfer Station in Fremont, California. The solid waste is then transferred onto larger trucks and transported to the Altamont Landfill and Resource Recovery Facility, located 48 miles east of Union City in Livermore, California. A disposal agreement with Waste Management, owner/operator of the Altamont Landfill, ensures long-term disposal capacity at the landfill for Union City and neighboring jurisdictions. As stated in the General Plan EIR, solid waste generated by the population of Union City would account for less than 0.1 percent of the permitted daily capacity

of the landfill therefore, the Altamont Landfill has sufficient capacity to accommodate the solid waste disposal needs that would be anticipated from the growth envisioned in the 2040 General Plan (Union City 2019a: 4.16-21).

- ▶ **Dry Utilities.** Electricity and gas are provided to Union City by Pacific Gas and Electric (PG&E). Telephone, cable and broadband services are provided by a variety of services providers, including AT&T, Comcast, and Verizon. All of the sites identified in the Draft 2023-2031 Housing Element inventory, including sites LM-7 through LM-15, have adequate access to dry utilities (Union City 2022).

Future housing projects will continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with all relevant federal and State policies and consistency with all relevant City General Plan policies related to utilities.

No substantial changes in circumstances have occurred, nor has any new information of substantial importance been identified requiring new analysis or verification. With the project's approval, the impact on utilities and service systems would not be more severe than the impact identified in the General Plan EIR, and there would be no new impacts beyond what the EIR evaluated.

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