
SECTION 2: MASTER RESPONSES

2.1 - Introduction

Master responses address similar comments made by multiple persons through both written comments submitted to the City of San Ramon and oral comments made at the May 4, 2010 Planning Commission meeting. One master response is provided below.

2.2 - Master Responses

Master Response 1 –Tassajara Valley/Eastside Specific Plan

Multiple authors and speakers referenced the Draft EIR’s analysis of environmental effects associated with the proposed Urban Growth Boundary and Sphere of Influence adjustments in the Tassajara Valley. These individuals claimed that the Draft EIR did not adequately evaluate the environmental impacts of potential new development that could occur as a result of these adjustments, including effects associated with aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology, hydrology and water quality, noise, public services, recreation, transportation, and utility systems. Several individuals noted that the Draft EIR indicated that future development and land use activities in the Tassajara Valley would be evaluated as part of the Eastside Specific Plan and associated environmental review, and they asserted that this constituted deferred analysis. At least one commenter alleged that the text of two project objectives indicate that General Plan 2030 contemplates development in the Tassajara Valley, which conflicts with various statements in the EIR about no additional development being contemplated in the Tassajara Valley.

Analysis of Potential Future Impacts Within the Eastside Specific Plan Area

At a programmatic level, CEQA does not require specificity in the analysis of possible future development, particularly where such development has not been proposed and is uncertain. Rather, where future development is possible, but not defined, an EIR should focus on the reasonably foreseeable secondary effects of such development. With regard to growth inducing impacts, “[n]othing in the [CEQA] Guidelines, or in the cases, requires more than a general analysis of projected growth” (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* [2001] 91 Cal. App. 4th 342, 369).

Specifically, the CEQA Guidelines counsel that “[t]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy. (b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption, or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that

might follow” (CEQA Guidelines, Section 15146). In addition, “[a]n EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible” (CEQA Guidelines, Section 15151).

As explained on page 2-9 of the Draft EIR, the proposed Urban Growth Boundary and Sphere of Influence adjustments constitute the next logical step in establishing the City’s future physical boundary and serve to provide a systematic approach to land use controls associated with future development processes. As set forth in General Plan 2030 Implementing Policy 4.7-I-3, any future land use and development activities proposed for the Tassajara Valley would be guided by the Eastside Specific Plan. Furthermore, General Plan 2030 maintains the existing land use designation of “Open Space” for all parcels within the Tassajara Valley and, therefore, does not confer any development rights or entitlements that would permit or otherwise facilitate urban development within the Tassajara Valley. Any proposed General Plan land use map changes for parcels within the Tassajara Valley would be addressed as part of the Eastside Specific Plan process, which would assess the change in land use from Open Space to any proposed developed use, if and when such process is initiated.

Since the Tassajara Valley is currently within the County’s Sphere of Influence, the County has approval authority over project applications in that area. Inclusion of the Tassajara Valley within City’s Urban Growth Boundary and Sphere of Influence allows the City to have control over development applications in the affected area. Thus, extension of the Urban Growth Boundary is necessary now to ensure that development that is inconsistent with the City’s General Plan is not approved prior to initiation of the Eastside Specific Plan area.

Notably, the Tassajara Valley was included in the City’s Planning Area in its 2020 General Plan. Further, Policy 4.7-I-3 in the General Plan 2030, which calls for the preparation of an Eastside Specific Plan, is nearly identical to Policy 4.7-I-3 in the City’s existing General Plan.

Contrary to some commenter’s claims, the EIR does not defer analysis of the potential environmental effects that might occur if portions of the Tassajara Valley are developed in accordance with a future Eastside Specific Plan. Indeed, the Draft EIR does consider the potential for some development of the Tassajara Valley in accordance with a future Eastside Specific Plan and discloses existing conditions and related potential environmental impacts, particularly secondary effects, to the extent such conditions and impacts can be identified at this stage of the planning process. Table 2-1 sets forth the EIR’s disclosures of those environmental effects that have the potential to result from any future development within the Eastside Specific Plan planning area:

Table 2-1: EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
Aesthetics, Light and Glare	
Impact AES-1: Development and land use activities contemplated by the General Plan 2030 would not have substantial adverse impacts on scenic vistas.	Page 3.1-9 discloses that the slopes of the Tassajara Valley contain scenic resources. Page 3.1-10 discloses that Tassajara Valley and its associated slopes contain ridgeline resource conservation zones as defined by Ordinance 197 policies and as shown on Exhibit 3.1-1. Page 3.1-10 also discloses that development within Tassajara Valley has the potential for adverse effects on a scenic vista.
Impact AES-2: Development and land use activities contemplated by the General Plan 2030 would not degrade scenic resources within the viewshed of a State Scenic Highway.	Page 3.1-11 explains that the only Scenic Highway in the planning area is I-680 and that Tassajara Valley is not within view of I-680; therefore, any potential/future development and land use activities in this area would not have any adverse impacts on Scenic Highway viewsheds.
Impact AES-3: Development and land use activities contemplated by the General Plan 2030 would not degrade the visual character of the Planning Area or its surroundings.	Page 3.1-12 discloses that ridgelines and creek corridors are designated as visual resources by the General Plan 2030 and that some of these visual resources are located along the slopes of the Tassajara Valley, which may be subject to future land use changes. Page 3.1-13 discloses that Tassajara Valley and its associated slopes contain ridgeline resource conservation zones as defined by Ordinance 197, and that any potential/future development within Tassajara Valley has the potential for adverse effects on these resources.
Impact AES-4: Development and land use activities contemplated by the General Plan 2030 would not create new sources of light and glare that may adversely affect views.	Page 3.1-14 discloses that the Tassajara Valley contains agricultural and rural residential uses with very low levels of light and glare, and that any potential/future development within Tassajara Valley has the potential for adverse effects related to light and glare levels and compatibility with surrounding land uses.
Agricultural Resources	
Impact AG-1: Development and land use activities contemplated by the General Plan 2030 would not result in the loss of Important Farmland.	Exhibit 3.2-1 discloses those portions of Tassajara Valley that qualify as “Important Farmland.” Exhibit 3.2-2 discloses those Prime Farmland and Non-Prime farmland portions of Tassajara Valley that are subject to Williamson Act contracts. Page 3.2-9 discloses that, within Tassajara Valley, Prime Farmland totals 127 acres, Unique Farmland occupies 10 acres, and Farmland of Local Importance occupies 1,022 acres. Page 3.2-9 also discloses that any potential/future development within Tassajara Valley has the potential to result in the loss of Important Farmland.

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
<p>Impact AG-2: Development and land use activities contemplated by the General Plan 2030 would not conflict with existing agricultural zoning or a Williamson Act contract.</p>	<p>Exhibit 3.2-2 discloses those Prime Farmland and Non-Prime farmland portions of Tassajara Valley that are subject to Williamson Act contracts. Page 3.2-10 discloses that Tassajara Valley includes agricultural land that is designated as Open Space, Rural Conservation, or Parks by the General Plan 2030. Page 3.2-10 discloses that development activities in the Tassajara Valley could convert agricultural land to non-agricultural uses. Page 3.2-10 discloses that 1,312 acres in the Tassajara Valley are encumbered by active Williamson Act contracts and that Policy 8.7-I-2 prohibits the City from processing development applications involving such land, unless there are 3 years or less remaining on the life of the contract.</p>
<p>Impact AG-3: Development and land use activities contemplated by the General Plan 2030 would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.</p>	<p>Exhibit 3.2-1 discloses those portions of Tassajara Valley that qualify as “Important Farmland.” Exhibit 3.2-2 discloses those Prime Farmland and Non-Prime farmland portions of Tassajara Valley that are subject to Williamson Act contracts. Page 3.2-11 discloses that there are 127 acres of Prime Farmland and 35 acres of Unique Farmland within the Planning Area, with most of the acreage being located in the Tassajara Valley. Page 3.2-11 discloses that a concern with future development and land activities in the Tassajara Valley is that pressures may be created to prematurely convert viable agricultural land as a result of land use conflicts posed by nearby urban uses. Page 3.2-11 discloses that Implementing Policy 8.7-I-2 establishes that the City can only process development applications involving land encumbered by Williamson Act contracts if there are 3 years or less remaining on the life of the contract, and that this policy will ensure that agricultural land uses in Tassajara Valley are not prematurely converted to non-agricultural use. Page 3.2-11 discloses that Implementing Policy 8.7-I-3 requires that land use conflicts between agricultural and any potential/future urban uses in Tassajara Valley would be minimized through site planning techniques that avoid potential complaints associated with noise, odors, or early morning operations by using buffers and screening measures.</p>
<p>Air Quality/Greenhouse Gas Emissions</p>	
<p>Impact AIR-1: Development and land use activities contemplated by the General Plan 2030 may conflict with or obstruct implementation of the applicable air quality plan.</p>	<p>Page 3.3-32 discloses that future development under the General Plan 2030 would affect emissions of ozone precursor pollutants and particulate matter (PM2.5 and PM10), both of which affect regional air quality. Page 3.3-32 discloses that, while future changes in development patterns that affect regional air quality are</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
	<p>accounted for in the Bay Area 2005 Ozone Strategy, increased development under the General Plan 2030 could lead to greater vehicle use than assumed in the 2010 Clean Air Plan.</p> <p>Table 3.3-9 and page 3.3-33 disclose ABAG’s projections through 2030 for City population, households, jobs, and vehicle miles traveled.</p> <p>Table 3.3-10 and page 3.3-33 disclose projected population, household, and jobs under the General Plan 2030 and disclose that such projections are greater than ABAG’s projections.</p> <p>Page 3.3-34 discloses that, although vehicle miles traveled would decline from 18.5 miles per day per capita in 2005 to 17.4 miles per day per capita by 2030 (a 5.6-percent decrease) through the implementation of the General Plan 2030 Implementing Policies, the discrepancy between the General Plan 2030 growth projections and ABAG’s growth projection is considered a significant and unavoidable impact.</p>
<p>Impact AIR-2: Development and land use activities contemplated by the General Plan 2030 would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.</p>	<p>Page 3.3-34 discloses that construction associated with development activities contemplated by the General Plan 2030 would include grading, demolition, building construction, and grading and that such activity would generate pollutants intermittently.</p> <p>Page 3.3-34 and Page 3.3-35 disclose that, if left uncontrolled, air pollutant emissions associated with development activities could lead to both health and nuisance impacts, and temporarily create emissions of equipment exhaust and other pollutants. The EIR’s discussion of Impact AIR-2 concludes that these impacts will be reduced to acceptable levels by requiring future development to comply with General Plan 2030 Implementing Policies 11.5-I-3 and 11.3-I-3.</p> <p>Page 3.3-35 discloses that operation emissions associated with building out of the General Plan 2030 planning area would be reduced to acceptable levels by requiring such development to comply with the General Plan 2030 Implementing Policies described in Table 3.3-8, as well as the policies of the Climate Action Plan prepared concurrently and as an implementation tool of the General Plan 2030.</p> <p>Pages 3.3-36 through 3.3-38 disclose that buildout under the General Plan 2030 would meet the BAAQMD Guidelines screening criteria for localized carbon monoxide (CO) and thus project impacts related to the emission of CO would be less than significant.</p>
<p>Impact AIR-3: Development and land use activities contemplated by the General Plan 2030 may result in a cumulatively considerable net increase of any criteria pollutant for which</p>	<p>Pages 3.3-38 through 3.3-39 disclose that buildout under the General Plan 2030 would result in a cumulatively considerable net increase of one or more criteria pollutants for which the project region is non-attainment</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
<p>the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).</p>	<p>under an applicable notional or state ambient air quality standard. Specifically, the EIR discloses that the buildout under the General Plan 2030 would not be consistent with the BAAQMD Clean Air Plan and thus would result in a significant and unavoidable impact.</p>
<p>Impact AIR-4: Development and land use activities contemplated by the General Plan 2030 would not expose sensitive receptors to substantial pollutant concentrations.</p>	<p>Page 3.3-40 and Exhibit 3.3-1 disclose the toxic air contaminant (TAC) sources in the City and discloses the main source of TAC in the City is traffic traveling along the I-680 freeway.</p> <p>Page 3.3-45 discloses that compliance with General Plan 3020 Air Quality Element Policy 11.5.I.1 will ensure that sources of hazardous emissions will be located an adequate distance from sensitive receptors to ensure that this potential impact is less than significant.</p> <p>Pages 3.3-45 through 3.3-46 disclose that construction in areas of rock formations or soils that contain naturally occurring asbestos could release asbestos into the air and pose a health hazard, but that compliance with BAAQMD’s Air Quality Guidelines and General Plan 2030 Policy 11.5.I.3 would reduce such exposure.</p> <p>Page 3.3-46 discloses that review of the Department of Conservation’s map containing areas more likely to have rock formations containing naturally occurring asbestos in California indicates that the Planning Area is not in an area that is likely to contain naturally occurring asbestos, that the nearest location of naturally occurring asbestos is east of Alamo, and that it therefore can be reasonably concluded that naturally occurring asbestos is not present at large quantities in the City.</p> <p>Pages 3.3-46 through 3.3-47 disclose that structures to be demolished sometimes contain asbestos, but that demolition of existing buildings and structures would be subject to BAAQMD Regulation 11, Rule 2 (Asbestos Demolition, Renovation, and Manufacturing), which are intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with BAAQMD Regulation 11, Rule 2, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.</p> <p>Page 3.3-47 discloses that renovation activities, such as sanding, cutting, and demolition, can create hazardous lead dust and chips by disturbing lead-based paint, which can be harmful to adults and children, but that compliance with all regulatory requirements and the policies contained within the proposed General Plan 2030 will ensure that future development and land use activities contemplated by the General Plan 2030 would not expose sensitive receptors to substantial pollutant concentrations or result in significant impacts.</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
<p>Impact AIR-5: Development and land use activities contemplated by the General Plan 2030 would not create objectionable odors affecting a substantial number of people.</p>	<p>Pages 3.3-47 through 3.3-52 and Exhibit 3.3-2 disclose the odor overlay zones within the City, none of which are located in Tassajara Valley, and disclose those regulatory requirements that will be imposed on all future development to ensure that such development will not create objectionable odors affecting a substantial number of people or result in significant impacts.</p>
<p>Impact AIR-6: Development and land use activities contemplated by the General Plan 2030 would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.</p>	<p>Pages 3.3-52 through 3.3-55 disclose that greenhouse gas emissions impacts associated with future development under the General Plan 2030 would be less than significant because such development must comply with the policies and regulations set forth in the General Plan 2030 and its related Clean Air Plan.</p>
<p>Impact AIR-7: Development and land use activities contemplated by the General Plan 2030 would not be significantly affected by climate change impacts, including increased wildfires, increase flooding, decreased water supply, and sea level rise.</p>	<p>Pages 3.3-55 and 3.3-57 disclose that climate change could result in increased wildfires in California, and that Tassajara Valley is among the areas in San Ramon that poses the greatest risk of increased wildfires. Page 3.3-58 discloses that the Tassajara Valley is associated with “very high” fire threat and a “very high” fire threat to people, but that San Ramon Valley Fire Protection District already provides fire protection for the City as well as the Tassajara Valley; therefore, the General Plan 2030 would not alter existing fire protection responsibilities or increase susceptibility to wildfires. Page 3.3-59 discloses that the Tassajara Valley contains undeveloped areas; thus, any future development activities have the potential to contribute downstream flooding and that any changes in the land use designations within the Eastside Specific Plan area that would be exposed to potential to potential flooding would be addressed as part of a future environmental review process. Page 3.3-59 discloses that the Tassajara Valley is not served by an urban water supplier, that land uses within Tassajara Valley rely on groundwater or surface water impoundments.</p>
<p>Biological Resources</p>	
<p>Impact BIO-1: Development and land use activities contemplated by the General Plan 2030 would not have a substantial adverse effect on special status plant or wildlife species.</p>	<p>Exhibit 3.4-1a discloses the sensitive habitat areas potentially in the Tassajara Valley. Exhibit 3.4-1b discloses the sensitive habitat areas and special status wildlife species in potentially in the Tassajara Valley. Page 3.4-11 discloses that special-status plant and wildlife species have occurred throughout the Planning Area, with the most reported occurrences associated with creek corridors and within the Tassajara Valley, among other areas.</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
	<p>Page 3.4-11 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.2-I-1, 8.2-I-2, and 4.7-I-3.</p>
<p>Impact BIO-2: Development and land use activities contemplated by the General Plan 2030 would not have a substantial adverse effect on sensitive natural communities or riparian habitat.</p>	<p>Exhibit 3.4-1a discloses the sensitive habitat areas potentially in the Tassajara Valley. Exhibit 3.4-1b discloses the sensitive habitat areas and special status wildlife species in potentially in the Tassajara Valley. Page 3.4-12 discloses that sensitive natural communities consist of oak woodland and riparian habitat, and that oak woodland areas and riparian habitats are located in the Tassajara Valley. Page 3.4-12 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.4-I-1, 8.4-I-2, and 4.7-I-3.</p>
<p>Impact BIO-3: Development and land use activities contemplated by the General Plan 2030 would not have a substantial adverse effect on federally protected wetlands.</p>	<p>Exhibit 3.4-1a discloses the sensitive habitat areas potentially in the Tassajara Valley. Exhibit 3.4-1b discloses the sensitive habitat areas and special status wildlife species in potentially in the Tassajara Valley. Page 3.4-13 discloses that wetland areas are located along the various creek corridors and drainages in the Tassajara Valley, and that the Tassajara Valley contains riparian corridors and undeveloped land and, thus, likely contains wetlands eligible for protection under the Federal Clean Water Act. Page 3.4-13 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.4-I-2, and 4.7-I-3.</p>
<p>Impact BIO-4: Development and land use activities contemplated by the General Plan 2030 would not have a substantial adverse effect on wildlife movement.</p>	<p>Exhibit 3.4-1a discloses the sensitive habitat areas potentially in the Tassajara Valley. Exhibit 3.4-1b discloses the sensitive habitat areas and special status wildlife species in potentially in the Tassajara Valley. Page 3.4-14 discloses that the undeveloped and open space areas of the Tassajara Valley allow for substantial wildlife movement, including creek corridors, ridgelines, and undeveloped land. Page 3.4-14 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.4-I-1, 8.4-I-2, 8.4-I-5, 8.4-I-6, and 4.7-I-3.</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
<p>Impact BIO-5: Development and land use activities contemplated by the General Plan 2030 would not conflict with any local policies or ordinances.</p>	<p>Exhibit 3.4-1a discloses the sensitive habitat areas potentially in the Tassajara Valley. Exhibit 3.4-1b discloses the sensitive habitat areas and special status wildlife species in potentially in the Tassajara Valley. Page 3.4-15 discloses that the proposed General Plan 2030 establishes a number of policies that concern protection of biological resources, and that the General Plan sits atop the hierarchy of planning documents used by the City, thus requiring subsequent specific plans and Municipal Code updates to be consistent with the policies established in the General Plan. As such, the proposed General Plan 2030 would be internally consistent with the City’s existing and proposed local policies protecting biological resources. Impacts would be less than significant.</p>
<p>Cultural Resources</p>	
<p>Impact CUL-1: Development and land use activities contemplated by the General Plan 2030 would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.</p>	<p>Page 3.5-9 discloses that the Tassajara Valley contains agricultural and rural residential uses, including structures that may be at least 45 years or older. Page 3.5-9 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.9-I-1, and 4.7-I-3.</p>
<p>Impact CUL-2: Development and land use activities contemplated by the General Plan 2030 would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.</p>	<p>Page 3.5-10 discloses that the Tassajara Valley is undeveloped land that may contain undiscovered archaeological resources. Page 3.5-10 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.9-I-1, and 4.7-I-3.</p>
<p>Impact CUL-3: Development and land use activities contemplated by the General Plan 2030 would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	<p>Page 3.5-11 discloses that the Tassajara Valley is undeveloped land that may contain undiscovered paleontological resources. Page 3.5-11 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.9-I-1, and 4.7-I-3.</p>
<p>Impact CUL-4: Development and land use activities contemplated by the General Plan 2030 would not disturb any human remains, including those interred outside of formal cemeteries.</p>	<p>Page 3.5-12 discloses that the Tassajara Valley is undeveloped land and may contain undiscovered burial sites. Page 3.5-12 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 8.9-I-1, and 4.7-I-3, requiring an Eastside</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
	Specific Plan process, including necessary environmental review, to address the presence of any undiscovered burial sites associated with these undeveloped lands.
Geology, Soils, and Seismicity	
Impact GEO-1: Development and land use activities contemplated by the General Plan 2030 would not expose people or structures to potential substantial adverse effects associated with seismic hazards.	Exhibit 3.6-1 discloses the location of geological hazards within Tassajara Valley. Page 3.6-12 discloses that the Planning Area, including Tassajara Valley, is susceptible to strong ground shaking and contains an active earthquake fault, areas susceptible to liquefaction, and areas susceptible to landsliding, but that compliance with applicable General Plan 2030 policies would reduce this risk to acceptable levels.
Impact GEO-2: Development and land use activities contemplated by the General Plan 2030 would not result in substantial soil erosion or the loss of topsoil.	Exhibit 3.6-1 discloses the location of geological hazards within Tassajara Valley. Page 3.6-13 discloses that the Tassajara Valley contains undeveloped areas with steep slopes, and that future development activities would need to address related seismic hazards. Page 3.6-13 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 9.2-I-6 through 9.2-I-11, and 4.7-I-3.
Impact GEO-3: Development and land use activities contemplated by the General Plan 2030 would not expose persons or property to hazards associated with unstable geologic units or soils.	Exhibit 3.6-1 discloses the location of geological hazards within Tassajara Valley. Page 3.6-14 discloses that the Tassajara Valley contains undeveloped areas with steep slopes, and that future development activities would need to address related soil hazards. Page 3.6-14 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 9.2-I-1 through 9.2-I-11, and 4.7-I-3.
Impact GEO-4: Development and land use activities contemplated by the General Plan 2030 would not be exposed to unacceptable risks associated with expansive soils.	Exhibit 3.6-1 discloses the location of geological hazards within Tassajara Valley. Page 3.6-15 discloses that the Tassajara Valley contains native soils and, thus, any future development activities would need to address potential expansive soil hazards. Page 3.6-15 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policies 9.2-I-1, 9.2-I-6, 9.2-I-10, and 4.7-I-3.

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
Hazards and Hazardous Materials	
Impact HAZ-1: Development and land use activities contemplated by the General Plan 2030 would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Page 3.7-9 discloses that the Tassajara Valley contains agricultural and rural residential uses, with little to no reported hazardous materials usage, but that the Eastside Specific Plan process and related environmental review is required to evaluate and address potential sources of hazardous materials and mitigated where necessary.
Impact HAZ-2: Development and land use activities contemplated by the General Plan 2030 would not be exposed to undue risk as a result of prior contamination from past uses.	Page 3.7-10 discloses that the Tassajara Valley contains agricultural and rural residential uses, with little to no reported clean-up sites, but that the Eastside Specific Plan process and related environmental review is required to evaluate and address potential sources of hazardous materials and mitigated where necessary.
Impact HAZ-3: Development and land use activities contemplated by the General Plan 2030 would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Page 3.7-12 discloses that the Tassajara Valley contains agricultural and rural residential uses, with no existing schools, but that the Eastside Specific Plan process and related environmental review is required to evaluate and address compatibility of future school sites.
Impact HAZ-4: Development and land use activities contemplated by the General Plan 2030 would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Page 3.7-12 discloses that the City’s existing Emergency Operations Plan addresses emergency response and evacuation procedures during events such as earthquakes, hazardous materials incidents, floods, national security emergencies, wildfires, and landslides, that Implementing Policy 9.1-I-1 requires the City to maintain and update the Emergency Operations Plan in order to minimize the risk to life and property, and, as such, any potential/future development and land use activities contemplated by the General Plan 2030 would not impair or interfere with emergency response and evacuation. Impacts would be less than significant.
Impact HAZ-5: Development and land use activities contemplated by the General Plan 2030 would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	Exhibit 3.7-1 discloses areas within Tassajara Valley that are exposed to wildfire hazards. Page 3.7-13 discloses that Tassajara Valley is a “very high” wildfire risk area and that it contains agricultural and rural residential uses. Page 3.7-13 discloses that, while no additional development is contemplated in the Tassajara Valley at this time, any potential/future development and land use activities are subject to General Plan 2030 Implementing Policy 4.7-I-3.
Hydrology and Water Quality	
Impact HYD-1: Development and land use activities contemplated by the General Plan 2030 would not violate any water quality standards or waste discharge requirements.	Page 3.8-11 discloses that any potential/future development contemplated by the implementation of the proposed General Plan 2030 may result in construction activities that could have the potential to create polluted runoff. These pollutants could be conveyed offsite potentially affect the water quality within the local

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
	<p>streams and the San Francisco Bay. Generally, construction activities and possibly an increase in impervious surfaces could generate pollutants such as increased silts, ground rubber, oils from automobiles, debris, litter, chemicals, dust, and dissolved solids related to grading, excavating, dredging, building construction, and painting.</p> <p>Page 3.8-11 also states that Implementing Policies 8.4-I-11, 8.4-I-12, and 8.8-I-6 require participation in clean water programs, monitoring waterways to prevent degradation, and the continued implementation of the City of San Ramon Stormwater Management Program, and therefore the impacts would be less than significant.</p>
<p>Impact HYD-2: Development and land use activities contemplated by the General Plan 2030 would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.</p>	<p>Page 3.8-13 explains that the Tassajara Valley is not served by an urban water supplier and that land uses within the area rely on groundwater or surface water impoundments (stock ponds).</p>
<p>Impact HYD-3: Development and land use activities contemplated by the General Plan 2030 would not result in substantial erosion or siltation.</p>	<p>Page 3.8-14 discloses that Tassajara Valley contains undeveloped areas and, thus, any potential/future development activities have the potential to cause erosion and siltation to occur in downstream waterways.</p>
<p>Impact HYD-4: Development and land use activities contemplated by the General Plan 2030 would not result in flooding.</p>	<p>Page 3.8-3 discloses that outside of the city limits (e.g., in Bollinger Canyon and the Tassajara Valley), the 100-year flood hazard area often extends beyond the stream channels, reflecting the unimproved or minimally improved nature of the drainages.</p> <p>Page 3.8-15 states that the proposed Urban Growth Boundary adjustments would encompass a portion of the Tassajara Valley.</p>
<p>Impact HYD-5: Development and land use activities contemplated by the General Plan 2030 would not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems.</p>	<p>Page 3.8-16 discloses that the Tassajara Valley contains undeveloped areas and, thus, any potential/future development activities would require storm drainage infrastructure.</p>
<p>Land Use</p>	
<p>Impact LU-1: Development and land use activities contemplated by the General Plan 2030 would not divide an established community.</p>	<p>Page 3.9-8 discloses that the Tassajara Valley contains agricultural and rural residential uses. The Urban Growth Boundary and Sphere of Influence adjustments are the first steps in a comprehensive land use planning process for this area; they would not divide an established community.</p>
<p>Impact LU-2: Implementation of the San Ramon General Plan would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.</p>	<p>Page 3.9-9 notes that the provisions of Ordinance 197 only apply to areas within the City limits or lands that are proposed to be annexed into the City of San Ramon. As such, Ordinance 197 does not apply to the portion of the Tassajara Valley that is subject to the proposed Urban</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
	<p>Growth Boundary and Sphere of Influence adjustments because these areas would remain unincorporated; however, it will be used to evaluate future development that might occur.</p>
<p>Impact LU-3: The proposed Sphere of Influence adjustment contemplated by the General Plan 2030 is consistent with the factors LAFCo must use is reviewing the proposal.</p>	<p>Table 3.9-1 provides a consistency analysis with the factors set forth in Gov. Code Section 56425 that concern Sphere of Influence adjustments. Page 3.9-9 and 3.9-10 discloses that the proposed General Plan 2030 contemplates the adjustment of the Sphere of Influence to encompass 1,626 acres of the Tassajara Valley. Page 3.9-10 discloses that the City of San Ramon, the County of Contra Costa, and the Town of Danville have had discussions regarding future jurisdictional boundaries in the Tassajara Valley. At the time of this writing, no formal agreement has been entered into between the three agencies. However, such an agreement may be entered into in the near future. Thus, a good faith effort has been made by all affected agencies regarding the provisions of Gov. Code Section 56425 that concern collaboration among agencies.</p>
Noise	
<p>Impact NOI-1: Development and land use activities contemplated by the General Plan 2030 would not expose persons to excessive noise levels.</p>	<p>Page 3.10-23 discloses that implementation of the General Plan 2030 would generate noise during construction activities. Table 3.10-1 discloses the typical noise levels associated with the operation of construction equipment at a distance of 50 feet, and Page 3.10-23 discloses that construction activities would result in a substantial noise increase in such locations on a short-term basis. Page 3.10-23 discloses that implementation of the General Plan 2030 would allow for new development that would generate additional ambient noise levels caused by additional traffic. Page 3.10-33 discloses that existing and future traffic noise levels have the potential to expose persons to excessive noise levels.</p>
<p>Impact NOI-2: Development and land use activities contemplated by the General Plan 2030 would not expose persons to excessive vibration levels.</p>	<p>Page 3.10-34 discloses that implementation of the General Plan 2030 could result in construction activities that result in substantial vibration levels if used in the vicinity of sensitive land uses that may expose persons to excessive vibration levels and cause damage to buildings. Page 3.10-35 discloses that implementation of the General Plan 2030 has the potential for vibration impacts when heavy trucks are operating on private loading areas that are located next to sensitive land uses.</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
Impact NOI-3: Development and land use activities contemplated by the General Plan 2030 would not expose persons to a permanent increase in ambient noise levels.	Page 3.10-36 discloses that implementation of the General Plan 2030 would allow for new development within the City that would generate additional traffic or change traffic patterns that may create a permanent increase in ambient noise levels for existing land uses next to the affected roadways.
Impact NOI-4: Development and land use activities contemplated by the General Plan 2030 would not expose persons to temporary increases in ambient noise levels.	Page 3.10-37 discloses that implementation of the General Plan 2030 could result in construction activities that could expose sensitive land uses adjacent to such activities to a substantial noise increase.
Impact NOI-5: Development and land use activities contemplated by the General Plan 2030 would not expose persons to excessive aviation noise levels.	Page 3.10-38 discloses that helicopter noise may be perceived in various parts of the Planning Area near Camp Parks.
Population and Housing	
Impact POP-1: The proposed General Plan 2030 may induce substantial population growth.	Page 3.11-6 states that the Tassajara Valley Urban Growth Boundary and Sphere of Influence adjustments are the first steps in a comprehensive land use planning process for this area; they would not in themselves induce growth. Implementing Policy 4.7-I-3 requires the preparation of the Eastside Specific Plan to guide any future land use and development activities in this area. As part of this process, buildout potential of this area will be evaluated, including population growth. Furthermore, the Urban Growth Boundary and Sphere of Influence adjustments would not be considered indirect forms of growth inducement, as they consist of simply adjusting political boundaries. Page 3.11-6 explains that existing land use designations and entitlements would not be altered by these adjustments; therefore, no additional growth beyond what is currently allowed by the Contra Costa County General Plan and Zoning Ordinance would be able to occur.
Public Services and Recreation	
Impact PSR-1: Development and land use activities contemplated by the General Plan 2030 would not result in a need for new or expanded fire facilities or adverse impacts on fire protection.	Page 3.12-21 and 3.12-22 states that the Tassajara Valley is currently within the Fire Protection District boundaries; therefore, the proposed Urban Growth Boundary and Sphere of Influence adjustments would not change the status of fire protection. While no development is contemplated in the Tassajara Valley at this time under the General Plan buildout scenario, any future development and land use activities in the Tassajara Valley would be subject to Implementing Policy 4.7-I-3.
Impact PSR-2: Development and land use activities contemplated by the General Plan 2030 would not result in a need for new or expanded police facilities or adverse impacts on police protection.	Page 3.12-23 discloses that the Tassajara Valley is within the unincorporated County and is served by the Sheriff's Department. The proposed Urban Growth Boundary and Sphere of Influence adjustments would not alter the status of police protection for this area. While no development

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
	is contemplated in the Tassajara Valley at this time under the General Plan buildout scenario, any future development and land use activities in the Tassajara Valley would be subject to Implementing Policy 4.7-I-3.
Impact PSR-3: Development and land use activities contemplated by the General Plan 2030 would not result in a need for new or expanded school facilities or adverse impacts on education.	Page 3.12-24 discloses that the Tassajara Valley is currently within the School District boundaries; the proposed Urban Growth Boundary and Sphere of Influence adjustments would not change the status of school services. While no development is contemplated in the Tassajara Valley at this time under the General Plan buildout scenario, any potential/future development and land use activities in the Tassajara Valley would be subject to Implementing Policy 4.7-I-3.
Impact PSR-4: Development and land use activities contemplated by the General Plan 2030 would not result in a need for new or expanded park, trail, or community facilities or have adverse impacts on related services.	Page 3.12-25 discloses that the proposed Tassajara Valley Urban Growth Boundary and Sphere of Influence adjustments would not alter the status of parks, trails, or community facilities available to residents and employees of this area.
Impact PSR-5: Development and land use activities contemplated by the General Plan 2030 would not result in a need for new or expanded library facilities or adverse impacts on related services.	Pages 3.12-26 and 3.12-27 discloses that the proposed Tassajara Valley Urban Growth Boundary and Sphere of Influence adjustments would not alter the status of library services available to residents and employees of this area.
Transportation	
Impact TRANS-1: Development and land use activities contemplated by the General Plan 2030 would not increase traffic volumes or cause transportation facilities to degrade below the City's level of service standards.	Table 3.13-6 discloses the results of the intersection LOS analysis representing the AM and PM peak hours for buildout of the General Plan 2030 cumulatively with regional development to the year 2030.
Impact TRANS-2: Development and land use activities contemplated by the General Plan 2030 would not cause transportation facilities to degrade below the Congestion Management Agency's Transportation Service Objectives for routes of regional significance.	Table 3.13-7 discloses the results of the cumulative conditions freeway performance compared with existing MTSOs.
Impact TRANS-3: Development and land use activities contemplated by the General Plan 2030 would not conflict with plans for or access to public transit, bicycles, or pedestrians.	Page 3.13-62 discloses that the land uses allowed under the General Plan 2030 will create demand for public transportation.
Impact TRANS-4: Development and land use activities contemplated by the General Plan 2030 would not adversely affect response time for emergency service providers.	Page 3.13-62 discloses that land uses allowed under the General Plan 2030 would increase traffic and associated delays at intersections that may impact the response time for emergency service providers.

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
<p>Impact TRANS-5: Development and land use activities contemplated by the General Plan 2030 would not result in non-standard or hazardous designs or land uses that are incompatible with public facilities and adjoining land uses.</p>	<p>Page 3.13-63 discloses that implementation of the General Plan 2030 could allow the development of land uses of the implementation of transportation facility designs that could potentially create hazards to various modes of transportation.</p>
<p>Utility Systems</p>	
<p>Impact US-1: Development and land use activities contemplated by the General Plan 2030 would not result in a need for additional water supplies.</p>	<p>Page 3.14-15 discloses that the Tassajara Valley is not served by an urban water supplier and land uses within the area rely on groundwater or surface water impoundments (stock ponds). The proposed Urban Growth Boundary and Sphere of Influence adjustments will not alter existing groundwater use characteristics in the Tassajara Valley.</p>
<p>Impact US-2: Development and land use activities contemplated by the General Plan 2030 would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities.</p>	<p>Page 3.14-16 discloses that the Tassajara Valley is not served by a wastewater treatment provider and land uses within the area rely on septic or alternative wastewater disposal systems. The proposed Urban Growth Boundary and Sphere of Influence adjustments will not alter existing wastewater disposal characteristics in the Tassajara Valley.</p>
<p>Impact US-3: Development and land use activities contemplated by the General Plan 2030 would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities.</p>	<p>Pages 3.14-17 and 3.14-18 disclose that the Tassajara Valley contains undeveloped areas and, thus, any potential/future development activities would require storm drainage infrastructure.</p>
<p>Impact US-4: Development and land use activities contemplated by the General Plan 2030 would be served by landfills with sufficient permitted capacity and would comply with applicable regulations.</p>	<p>Page 3.14-19 discloses that land uses within the Tassajara Valley currently generate solid waste. The proposed Urban Growth Boundary and Sphere of Influence adjustments will not alter existing solid waste generation characteristics in the Tassajara Valley. Page 3.14-19 discloses that any potential/future development within Tassajara Valley may generate need for additional sold waste and recycling services.</p>
<p>Impact US-5: Development and land use activities contemplated by the General Plan 2030 would not result in the unnecessary, wasteful, or inefficient use of energy.</p>	<p>Page 3.14-20 discloses that land uses within the Tassajara Valley are currently served by PG&E. The proposed Urban Growth Boundary and Sphere of Influence adjustments will not alter existing energy use characteristics in the Tassajara Valley. Page 3.14-20 also discloses that any potential/future development within Tassajara Valley may generate additional energy use.</p>

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
Cumulative Impacts	
Aesthetics, Light, and Glare	Page 4-2 states that any potential/future development and land use activities within both the Planning Area and nearby areas, including Tassajara Valley, have the potential to result in cumulative impacts to scenic vistas, state scenic highway viewsheds, and visual character. Page 4-2 also states that any potential/future development and land use activities within both the Planning Area and nearby areas, including Tassajara Valley, also have the potential to introduce new sources of light and glare.
Agricultural Resources	Page 4-3 states that any potential/future development and land use activities within both the Planning Area and nearby areas, including Tassajara Valley, have the potential to result in the conversion of agricultural land to non-agricultural use, conflict with Williamson Act contracts, and create pressures that cause the premature conversion of agricultural land.
Air Quality/Greenhouse Gas Emissions	Page 4-3 states that any potential/future development and land use activities within the Planning Area and the East Bay region, including Tassajara Valley would result air emissions from construction and operational activities. Growth contemplated by the General Plan 2030 would exceed ABAG population and employment projections for the City of San Ramon; therefore, this represents a significant unavoidable impact associated with air quality planning inconsistency and cumulative criteria pollutant emissions.
Biological Resources	Page 4-3 states that any potential/future development and land use activities within both the Planning Area and nearby areas, including Tassajara Valley, have the potential to result in cumulative impacts to special-status plant and animal species, sensitive natural habitat, federally protected wetlands, and wildlife movement.
Cultural Resources	Page 4-4 states that any potential/future development and land use activities within both the Planning Area and nearby areas, including Tassajara Valley, have the potential to result in impacts to documented and undiscovered cultural resources such as artifacts, fossils, and burial sites.
Geology, Soils, and Seismicity	Page 4-4 states that any potential/future development and land use activities within both the Planning Area and nearby areas, including Tassajara Valley, have the potential to result in impacts to seismic hazards (e.g., fault rupture, ground shaking, liquefaction, landsliding), erosion, unstable soils and geologic units, and expansive soils.

Table 2-1 (cont.): EIR Analysis of Tassajara Valley

Environmental Impact	EIR Analysis Regarding Tassajara Valley
Hazards and Hazardous Materials	Pages 4-4 and 4-5 states that any potential/future development and land use activities within both the Planning Area and nearby areas, including Tassajara Valley, have the potential to result in impacts associated with hazardous materials usage, risk of upset, exposure of schools, emergency evacuation, and wildfires.
Hydrology and Water Quality	Page 4-5 states that any potential/future development and land use activities within both watersheds have the potential to create adverse impacts associated with water quality, groundwater, flooding, and drainage.
Land Use	Page 4-5 states that any potential/future development and land use activities within the Planning Area and neighboring jurisdictions, including Tassajara Valley, have the potential to create adverse impacts associated with division of an established community and inconsistency with adopted land use plans.
Noise	Page 4-6 states that any potential/future development and land use activities within the Planning Area and neighboring jurisdictions have the potential to create adverse impacts associated with noise level increases that expose receptors to unacceptable ambient noise levels.
Population and Housing	Page 4-6 states that any potential/future development and land use activities within the Planning Area and the East Bay region, including Tassajara Valley, would result in population and employment growth.
Public Services and Recreation	Page 4-6 states that development and land use activities within the Planning Area and neighboring jurisdictions, including the Tassajara Valley, have the potential to increase demands for public services including fire protection, emergency medical response, police protection, schools, parks, libraries, and recreational facilities.
Transportation	Page 4-7 states that any potential/future development and land use activities within the Planning Area and neighboring jurisdictions, including the Tassajara Valley, would increase for various modes of transportation.
Utility Systems	Page 4-7 states that any potential/future development and land use activities within the Planning Area and neighboring jurisdictions, including the Tassajara Valley, have the potential to increase demands for utilities including water, wastewater, storm drainage, solid waste, and energy.

In addition to disclosing those potential environmental effects associated with future development under an Eastside Specific Plan that can be reasonably identified at this stage of the planning process, the EIR concludes that, with the exception of the significant and unavoidable impacts identified in the

EIR, those reasonably foreseeable environmental effects will be mitigated through the implementation of the self-mitigating General Plan 2030 Implementing Policies that apply throughout the General Plan area (CEQA Guidelines, Section 15126.4(a)(2)). Accordingly, the EIR provides sufficient information to make a decision on the project, which accounts for environmental consequences based on reasonably available information.

At this stage of the planning process, however, no specific information—such as the type, mix, density, intensity, and location of proposed land uses—exists that would enable a more precise analysis of the potential environmental effects of buildout under any potential Eastside Specific Plan Without a concrete proposal to focus the environmental analysis, The Draft EIR cannot quantify the impacts of Eastside Specific Plan buildout without also engaging in arbitrary speculation. Indeed, CEQA does not permit the EIR to engage in such speculation. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. If the EIR were to assume some range of development under the as-yet undetermined Eastside Specific Plan, as some comments suggest, such assumptions would be entirely arbitrary, would not be supported by substantial evidence, and, thus, would not inform the public or decision makers of the project’s potential environmental effects.

Significance of Project Objectives

Finally, regarding the claim that the text of two project objectives conflict indicate that General Plan 2030 contemplates development in the Tassajara Valley, the full text of each objective is reprinted below:

- Review and adjust the Urban Growth Boundary to include areas that are currently developed or anticipated to develop over the planning horizon.
- Review and adjust the Sphere of Influence to encompass a portion of the Tassajara Valley as a first step of initiating the Eastside Specific Plan Process

CEQA Guidelines Section 15124(b) establishes that project objectives are intended to reflect the “underlying purpose” of the project and are to be used in the development of EIR alternatives, as well as the findings of fact and statement of overriding consideration. As such, the objectives reflect the self-evident, fundamental attributes and characteristics of General Plan 2030. Furthermore, the project objectives are not “project characteristics” (land use activities proposed by the General Plan 2030), nor do they appear anywhere in the text of General Plan 2030 itself. Rather, the project objectives are part of the EIR and fulfill the specific purposes outlined by the CEQA Guidelines.

The text of both objectives reflects the intent of Implementing Policy 4.7-I-3, which is for the Eastside Specific Plan process to guide future development and land use activities in the Tassajara Valley if and when such specific plan is adopted. Neither objective commits or obligates the City of

San Ramon to pursue the development of urban uses in the Tassajara Valley. For these reasons, there is no legal basis for interpreting project objectives to be equivalent to or otherwise interchangeable with “project characteristics.”

Again, as discussed above, the Draft EIR analyses the environmental impacts of development activity on Tassajara Valley to the extent feasible. Any further analysis would be pure speculation unsupported by substantial evidence, as no proposals for development currently exist.