

COUNCILMEMBERS

Dr. Sherry Hu, Mayor
Jean Josey, Vice Mayor
Michael McCorriston, Councilmember
Kashef Qaadri, Councilmember
John Morada, Councilmember



Peter W. Snyder Council Chamber
Dublin Civic Center
100 Civic Plaza
Dublin, CA 94568
www.dublin.ca.gov

Regular Meeting of the DUBLIN CITY COUNCIL

Tuesday, September 1, 2026

**Location: Peter W. Snyder
City Council Chamber
100 Civic Plaza
Dublin, CA 94568**

CLOSED SESSION 6:00 PM
REGULAR MEETING 7:00 PM

This City Council meeting will be broadcast live on Comcast TV channel 28 beginning at 7:00 p.m. This meeting will also be livestreamed at tv28live.org and on the City's website at: <https://dublin.ca.gov/watchmeetings>

Members of the public have the option of giving public comment in person or via two-way telephonic service. Additional information about providing public comment via two-way telephonic service can be found at the end of this agenda.

Two-way telephonic service dial-in and link

Please click the link below to join the event:

https://events.zoom.us/j/AvURG-D9_m6qmp6_En7dl_pZrSI-A_jweD2Df0x2zhH_zq3-ocPp~A3jklTgj3SVpqCIM-Qv39PuqB3DV3HX5M-mn1QwYPEKtg80yjZ-rgkAHSK8iA

Join by Phone:

San Jose: +1 669 444 9171 or +1 669 900 9128

Meeting ID: 83486151432

Passcode: 03172376

CLOSED SESSION

I. CONFERENCE WITH LABOR NEGOTIATORS

Agency designated representatives: Mayor Hu and Vice Mayor Josey
Unrepresented employee: City Manager

REGULAR MEETING

1. CALL TO ORDER AND PLEDGE OF ALLEGIANCE

2. REPORT ON CLOSED SESSION

3. PRESENTATIONS AND PROCLAMATIONS

3.1 Constitution Week Proclamation

The City Council will present the Constitution Week Proclamation.

STAFF RECOMMENDATION:

Present the proclamation.

[Staff Report](#)

[Attachment 1 - Constitution Week Proclamation](#)

3.2 Preview of Splatter 2026

The City Council will receive a presentation previewing Splatter 2026, taking place at Emerald Glen Park on September 12, 2026.

STAFF RECOMMENDATION:

Receive the presentation.

[Staff Report](#)

[Item 3.2 - PowerPoint Presentation](#)

4. PUBLIC COMMENT

At this time, the public is permitted to address the City Council on non-agendized items. Please clearly state your name for the record. COMMENTS SHOULD NOT EXCEED THREE (3) MINUTES. In accordance with State law, no action or discussion may take place on any item not appearing on the posted agenda. The City Council may respond to statements made or questions asked or may request Staff to report back at a future meeting concerning the matter. Any member of the public may contact the City Clerk's Office regarding the proper procedure for placing an item on a future City Council agenda. The exceptions under which the City Council MAY discuss and/or take action on items not appearing on the agenda are contained in Government Code section 54954.2, subdivisions (b)(1)-(3).

5. CONSENT CALENDAR

Consent Calendar items are typically non-controversial in nature and are considered for approval by the City Council with one single action. Members of the audience, Staff or the City Council who would like an item removed from the Consent Calendar for purposes of public input may request the Mayor to remove the item.

5.1 Approval of August 18, 2026 Regular City Council Meeting Minutes

The City Council will consider approving the minutes of the August 18, 2026 Regular City Council Meeting.

STAFF RECOMMENDATION:

Approve the minutes of the August 18, 2026 Regular City Council Meeting.

[Staff Report](#)

[Attachment 1 - August 18, 2026 Regular City Council Meeting Minutes](#)

5.2 2026 Development Agreement Review

The City Council will receive a report on the annual review of active Development Agreements to ensure compliance with the terms and provisions of the Agreements pursuant to the California Government Code Sections 65864-65869.5 and Chapter 8.56 of the Dublin Municipal Code.

STAFF RECOMMENDATION:

Adopt the Resolution Finding that Developers Having Obligations Under Active Development Agreements and Supplemental Agreements as Amended, Have Complied in Good Faith With the Terms and Provisions of the Agreements.

[Staff Report](#)

[Attachment 1 - Resolution Finding that Developers Having Obligations Under Active Development Agreements and Supplemental Agreements as Amended, Have Complied in Good Faith with the Terms and Provisions of the Agreements](#)

6. PUBLIC HEARING – None.

7. UNFINISHED BUSINESS

7.1 Regulation of Firearm Retailers and Indoor Shooting Ranges

The City Council will receive a report on potential land use regulations for firearm retailers and indoor shooting ranges. In January 2026, the City Council adopted an Urgency Interim Ordinance establishing a temporary moratorium on the establishment, expansion, and relocation of firearm related businesses and indoor shooting ranges. The urgency ordinance allows time for the City to complete a comprehensive review of the land use and regulatory frameworks governing such uses. In response, Staff evaluated existing federal and state regulations, Second Amendment case law, and regulations adopted by other jurisdictions. The City Council will receive the report and is requested to provide direction to Staff regarding the future regulation of firearm dealers and indoor shooting ranges.

STAFF RECOMMENDATION:

Receive the report and direct Staff to prepare amendments to the Dublin Municipal Code establishing a 1,000-foot separation between firearm related uses and public and private K–12 schools and evaluate the feasibility of requiring documentation of compliance with federal and state workplace safety and environmental regulations during the building permit review for indoor shooting ranges.

[Staff Report](#)

[Attachment 1 - Existing Federal and State Regulatory Framework](#)

[Attachment 2 - Second Amendment Case Law Relevant to Local Land Use Regulation](#)

[Attachment 3 - Firearm Related Use Regulations By Jurisdiction](#)

[Attachment 4 - Commercial and Industrial Land Use Acreage Comparison](#)

[Attachment 5 - Separation Scenario Maps](#)

[Item 7.1 - PowerPoint Presentation](#)

7.2 Second Review of Draft Code of Ethics and Conduct for Elected and Appointed Officials

At the August 18, 2026 meeting, the City Council reviewed and provided feedback on a draft Code of Ethics and Conduct for Elected and Appointed Officials. The City Council will review the revised Code and provide feedback to be incorporated into the final version.

STAFF RECOMMENDATION:

Review the revised Code of Ethics and Conduct for Elected and Appointed Officials and provide feedback.

[Staff Report](#)

[Attachment 1 - Code of Ethics and Conduct for Elected and Appointed Officials](#)

[Attachment 2 - Code of Ethics and Conduct for Elected and Appointed Officials - redline](#)

[Attachment 3 - August 18, 2026 Staff Report, without attachments](#)

8. NEW BUSINESS

8.1 Designation of Voting Delegates for the 2026 National League of Cities City Summit

The City Council will consider appointing a voting delegate, and up to two alternates, to attend and vote on the City's behalf at the National League of Cities City Summit in November 2026.

STAFF RECOMMENDATION:

Discuss the item and appoint a voting delegate, and up to two alternates, to attend and vote, on the City's behalf at the National League of Cities City Summit in November 2026.

[Staff Report](#)

[Attachment 1 - National League of Cities By-Laws](#)

8.2 Report on the Cost-of-Living Adjustment Methodology for City Employee Compensation

The City Council will receive a report on the City's cost-of-living adjustment (COLA) practice and methodology. The report includes information about the annual escalators provided to City contractors as well as a look at how other Bay Area cities handle compensation increases. This information was requested by the City Council, noting that the 1.7 percent COLA received by employees in 2026 was low, relative to the Consumer Price Index change from late 2025 through spring 2026.

STAFF RECOMMENDATION:

Receive the report.

[Staff Report](#)

[Attachment 1 - City of Dublin Employee Benefit Plan](#)

[Attachment 2 - 10-Year Look: CPI-W and CPI-U](#)

[Item 8.2 - PowerPoint Presentation](#)

9. CITY MANAGER AND CITY COUNCIL REPORTS

Brief information only reports from City Council and/or Staff, including committee reports and reports by City Council related to meetings attended at City expense (AB1234).

10. ADJOURNMENT

Mission

The City of Dublin promotes and supports a high quality of life, ensures a safe, secure, and sustainable environment, fosters new opportunities, and champions a culture of equity, diversity, and inclusion.

Procedure for Public Comment Via Two-Way Telephonic Service

Using either of the following two methods, members of the public can indicate that they wish to make public comment virtually by two-way telephonic service.

The telephonic dial-in (call-in) number and link are published above.

- **Dial into the telephonic option or click on the link on this agenda and join the meeting.** When the Mayor announces the beginning of the item, use the raise-hand feature to indicate a desire to make public comment on that item. Requests must be made before the staff presentation on an agenda item ends, or before the public comment period on non-agendized items is closed. To raise a hand on the telephone, press *9; OR
- **Fill out an online speaker slip.** The speaker slip will be made available here at 10:00 a.m. the morning of the meeting. Speaker slips will be accepted until the staff presentation on an agenda item ends, or until the public comment period on non-agendized items is closed.

When the agenda item upon which the individual would like to comment is addressed, the City Clerk will announce the speaker in the meeting when it is their time to give public comment. In-person public comment will be taken first, followed by virtual speakers with submitted speaker slips, then those with hands raised on the two-way telephonic service. The speaker will be unmuted to give public comment via Zoom. If connected via telephone, press *6 on the phone's dial pad to unmute the line when prompted.

This AGENDA is posted in accordance with Government Code section 54954.2, subdivision (a).

If requested, pursuant to Government Code section 54953.2, this agenda shall be made available in appropriate alternative formats to persons with a disability, as required by Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Section 12132) (ADA), and the federal rules and regulations adopted in implementation thereof. To make a request for disability-related modification or accommodation, please contact the City Clerk's Office at (925) 833-6650 at least 72 hours in advance of the meeting. Upon receiving a request, the City will swiftly resolve requests for reasonable accommodation for individuals with disabilities, consistent with the federal ADA, and resolve any doubt in favor of accessibility.

Agenda materials that become available within 72 hours in advance of the meeting, and after publishing of the agenda, will be available at Civic Center, 100 Civic Plaza, and will be posted on the City's website at www.dublin.ca.gov/ccmeetings.



STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Constitution Week Proclamation
Prepared by: Vanessa Rosales, CMC, Deputy City Clerk

EXECUTIVE SUMMARY:

The City Council will present the Constitution Week proclamation.

STAFF RECOMMENDATION:

Present the proclamation.

FINANCIAL IMPACT:

None.

DESCRIPTION:

Constitution Week commemorates one of America's most important founding documents. It is celebrated annually the week of September 17-23.

The aims of the Constitution Week celebration are to:

- Emphasize citizens' responsibilities to protect and defend the Constitution.
- Inform people that the Constitution is the basis for America's great heritage and the foundation for our way of life.
- Encourage the study of the historical events which led to the framing of the Constitution in September 1787.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

- 1) Constitution Week Proclamation

**A PROCLAMATION OF THE CITY COUNCIL
CITY OF DUBLIN, CALIFORNIA**

**“Constitution Week”
September 17–23, 2026**

WHEREAS, September 17, 2026, marks the 239th anniversary of the signing of the Constitution of the United States of America by delegates of the Constitutional Convention; and

WHEREAS, it is fitting and proper to accord official recognition to this magnificent document and its memorable anniversary, and to the patriotic celebrations which will commemorate the occasion; and

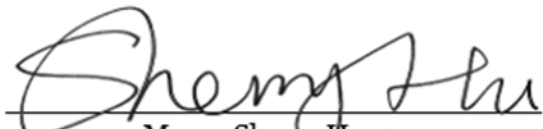
WHEREAS, the National Society of the Daughters of the American Revolution (NSDAR) upholds the goals of Constitution Week, supporting Dublin libraries, schools, and civic organizations in teaching all citizens, especially youth and newly naturalized citizens, about our founding documents; and

WHEREAS, the local José Maria Amador NSDAR chapter runs an annual Constitution Week Poster Contest to raise awareness and inspire Dublin’s citizens; and

WHEREAS, Public Law 915 guarantees the issuing of a proclamation each year by the President of the United States of America designating September 17 through September 23 as Constitution Week.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Dublin does hereby proclaim September 17 through September 23, 2026, as Constitution Week in the City of Dublin, and encourages its residents to reaffirm the ideals that the framers of the Constitution had in 1787 by vigilantly protecting the freedom guaranteed through this guardian of liberties, and remembering that lost rights may never be regained.

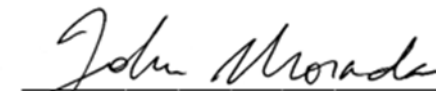
DATED: September 1, 2026


Mayor Sherry Hu


Vice Mayor Jean Josey


Councilmember Michael McCorriston


Councilmember Kashef Qadri


Councilmember John Morada



STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Preview of Splatter 2026
Prepared by: Shelby Perry, Recreation Coordinator

EXECUTIVE SUMMARY:

The City Council will receive a presentation previewing Splatter 2026, taking place at Emerald Glen Park on September 12, 2026.

STAFF RECOMMENDATION:

Receive the presentation.

FINANCIAL IMPACT:

Funding for Splatter is included as part of the City's annual operating budget.

DESCRIPTION:

Dublin's annual end-of-summer event returns on Saturday, September 12, 2026 from 12:00 noon to 8:30 pm at Emerald Glen Park, continuing its celebration of music, food, art, and culture with an emphasis on multicultural performances and expressions. The following is an overview of what attendees can expect to experience.

Entertainment

Splatter will host live performances across three stages, complemented by dynamic roaming acts dispersed throughout the event site. The Amphitheater Stage hosts an assorted lineup of multicultural presentations, while the Side Yard Stage will showcase the community's artistic talents in music and dance. Notable acts include Bollywood-inspired dance performances as well as Kung Fu demonstrations.

During the daytime, the Main Stage will feature *Tyler Gene Band* (country music) and *Woodie and the Longboards* (a Beatles and Beach Boys tribute). As the festival transitions into the

evening, *Good Time Collective* will take over, and attendees can expect an enhanced concert experience with an expanded stage, LED video screens, and increased lighting production. The celebration will conclude with a grand finale that includes professional dancers and special stage effects.

Food, Beverage, and Shopping

Attendees will be able to sample various dishes and shop from an assortment of goods from diverse regions across the globe. In addition, the Rotary Club of Dublin will curate a selection of local craft beers and wines sourced from the Livermore Valley.

The Prisma Lounge – VIP Experience

From 5:00 to 8:30 pm, the Prisma Lounge will provide attendees with the ultimate VIP experience. This velvet-roped outdoor lounge will feature interactive food stations, elevated wine and beer tastings, unique roaming entertainment, picturesque moments, and a front-row seat to the main stage entertainment. Tickets are \$75 when purchased in advance through the City's website and \$95 at the event.

The Arts

Splatter will continue its tradition of celebrating the arts by offering an array of free art activities suitable for all attendees, including interactive art pieces. Also, in collaboration with the Dublin Arts Collective, an art exhibition titled "The High Life" will return to The Wave. This exhibition will feature an assemblage of fine artworks created by talented artists from local high schools.

Special Event App

The City's special events application, "DublinCaEvent", will continue to be utilized for the 2026 Splatter Festival and has been refreshed with updated features and content to enhance the attendee experience. Available for download on both Apple and Android devices, the app serves as a centralized source for event information, including festival maps, sponsor and vendor directories, parking and transportation details, schedules, and entertainment lineups. In addition to improving communication and providing real-time access to event information, the app supports the City's sustainability efforts by reducing the need for printed materials and paper programs.

New Feature: Color Dash

The festival will kick off with the Color Dash, a non-competitive, family-friendly fun run starting at 9:00 am. Participants of all ages and fitness levels will walk, jog, or run a 1.2-mile course consisting of two laps through Emerald Glen Park. Along the route, participants will pass through five color stations featuring vibrant bursts of color, music, and interactive elements. Each registered participant will receive a commemorative Color Dash T-shirt. The experience will conclude with a festive finish-line celebration and photo opportunities. Registration is \$25 per participant and is available on the City's website.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

None.

Splatter 2026 Preview

City Council Meeting – Item 3.2

September 1, 2026



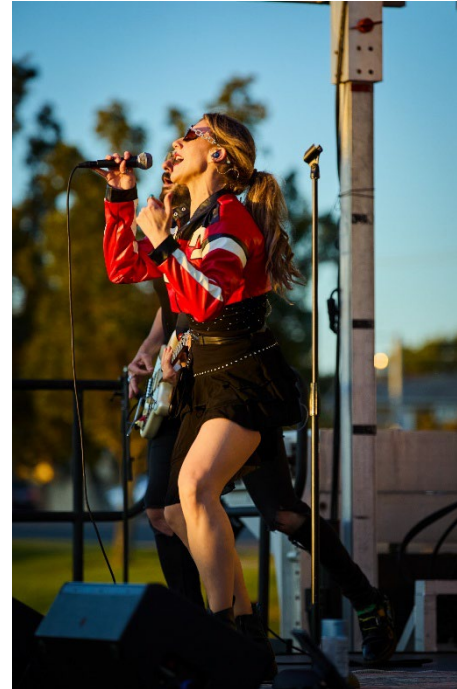
Event Details

- Saturday, September 12, 2026 – Emerald Glen Park
- Color Dash – 9:00 a.m. & 9:30 a.m. Start Times
- Festival – 12:00 p.m. – 8:30 p.m.
- Daytime – Family-Friendly Events & Entertainment
- Late Afternoon/Evening – Prisma Lounge VIP Experience, Headlining Entertainers & Grand Finale



Splatter 2026

- Three Stages of Entertainment
 - Main Stage
 - Headliners & Grand Finale
 - Amphitheater Stage
 - Multicultural Performances
 - Side Yard Stage
 - Local Musicians & Performers
- Prisma Lounge VIP Experience



Splatter Continued

- Over 25 Unique Food Vendors
- Arts & Crafts World Market
- Carnival & Activities
- Interactive Arts & Crafts
- “High Life” – Student Art Gallery, Dublin Arts Collective



Prisma Lounge VIP Experience

- 5:00 p.m. – 8:30 p.m.
- Interactive Food Stations
- Private Dance Floor
- Wine & Beer Tastings
- Roaming Entertainment
- Photo Booth Area
- Front Row Experience for Main Stage



Headlining Entertainment



Night Train



Good Time Collective



Thanks a Splatter!





STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Approval of August 18, 2026 Regular City Council Meeting Minutes
Prepared by: Vanessa Rosales, CMC, Deputy City Clerk

EXECUTIVE SUMMARY:

The City Council will consider approving the minutes of the August 18, 2026 Regular City Council Meeting.

STAFF RECOMMENDATION:

Approve the minutes of the August 18, 2026 Regular City Council Meeting.

FINANCIAL IMPACT:

None.

DESCRIPTION:

The City Council will consider approving the minutes of the August 18, 2026 Regular City Council Meeting.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

- 1) August 18, 2026 Regular City Council Meeting Minutes



MINUTES OF THE CITY COUNCIL OF THE CITY OF DUBLIN

Regular Meeting: August 18, 2026

The following are minutes of the actions taken by the City of Dublin City Council. A full video recording of the meeting with the agenda items indexed and time stamped is available on the City's website at: <https://dublin.ca.gov/watchmeetings>.

CLOSED SESSION 6:00 PM

I. Public Employee Performance Evaluation

Title: City Manager

REGULAR MEETING 7:00 PM

A Regular Meeting of the Dublin City Council was held on **Tuesday, August 18, 2026**, in the Peter W. Snyder Council Chamber, located at 100 Civic Plaza, Dublin, CA 94568. The meeting was called to order at 7:01 PM by Mayor Hu.

1) CALL TO ORDER AND PLEDGE OF ALLEGIANCE

Attendee Name	Status
Dr. Sherry Hu, Mayor	Present
Jean Josey, Vice Mayor	Present
Michael McCorriston, Councilmember	Present
Kashef Qaadri, Councilmember	Present
John Morada, Councilmember	Present

2) REPORT ON CLOSED SESSION

Mayor Hu reported there was no reportable action out of Closed Session.

3) PRESENTATIONS AND PROCLAMATIONS

3.1) Employee Introductions

New City of Dublin employees Luis Martinez, Lieutenant, and Alana Stark, Office Assistant II, with Police Services; and Stephanie Holton, Administrative Technician, with the City Clerk's Office, were introduced.

4) PUBLIC COMMENT

Phillip Liu provided public comment.

Mike Grant provided public comment.

Andrea provided public comment.

Marty London provided public comment.

Sarah Chen provided public comment.

5) CONSENT CALENDAR

- 5.1) Approved the July 21, 2026 Regular City Council Meeting Minutes.
- 5.2) Adopted Resolution No. 78-26 titled, "Confirming City of Dublin Participation in the California Highway Patrol Cannabis Tax Fund Grant Program."
- 5.3) Received the City Treasurer's Informational Report of Investments for the Quarter Ending June 30, 2026.
- 5.4) Adopted Resolution No. 79-26 titled, "Approving a Plan of Finance Including the Issuance of Exempt Facility Bonds by the California Statewide Communities Development Authority for the Purpose of Refinancing the Acquisition, Rehabilitation, Improvement, and Equipping of a Multifamily Rental Housing Project Known as Dublin Ranch Senior Apartments Located at 3115 Finnian Way"; and Resolution No. 80-26 titled, "Approving a Plan of Finance Including the Issuance of Exempt Facility Bonds by the California Statewide Communities Development Authority for the Purpose of Refinancing the Acquisition, Rehabilitation, Improvement, and Equipping of a Multifamily Rental Housing Project Known as Fairway Family Apartments Located at 4161 Keegan Street."
- 5.6) Received the report of payments issued from July 1, 2026 - July 31, 2026 totaling \$26,000,495.66.
- 5.7) Adopted Resolution No. 81-26 titled, "Approving the Agreement for Participation in the Alameda County Operational Area Emergency Management Organization."

On a motion by Councilmember McCorriston, seconded by Councilmember Qaadri, and by unanimous vote, the City Council adopted the Consent Calendar, except for item 5.5.

RESULT:	ADOPTED [UNANIMOUS]
MOVED BY:	Michael McCorriston, Councilmember
SECOND:	Kashef Qaadri, Councilmember
AYES:	Hu, Josey, McCorriston, Qaadri, Morada

- 5.5) *Waived the reading and adopted Ordinance No. 07-26 titled, “Amending Dublin Municipal Code Sections 2.08.020 and 2.08.040 to Change the Salary for Members of the City Council and the Additional Salary for the Mayor After New Terms of Office Start After the November 2026 General Municipal Election.”*

This item was pulled from the Consent Calendar by Councilmember Morada for separate roll-call vote.

On a motion by Vice Mayor Josey, seconded by Councilmember Qaadri, and by 3-2 roll-call vote, the City Council adopted Consent Calendar item 5.5.

RESULT:	ADOPTED [3-2]
MOVED BY:	Jean Josey, Vice Mayor
SECOND:	Kashef Qaadri, Councilmember
AYES:	Josey, McCorriston, Qaadri
NOES:	Hu, Morada

6) **PUBLIC HEARING** – None.

7) **UNFINISHED BUSINESS** – None.

8) **NEW BUSINESS**

8.1) **After-Action Report on 2026 Fireworks Activities**

The City Council received a presentation on the after-action report on the City’s fireworks activities on and around July 4, 2026.

8.2) **Status of the Transfer of Site D-1 from the County to the City for Affordable Housing**

The City Council received a presentation on the status of the transfer of Site D-1 from Alameda County to the City of Dublin for an affordable housing project.

By consensus, the City Council directed Staff to continue to pursue execution of the land transfer agreement and to formally escalate the issue with Alameda County.

8.3) Draft Code of Ethics and Conduct for Elected and Appointed Officials

The City Council received a presentation on the draft Code of Ethics and Conduct for Elected and Appointed Officials.

Mike Grant provided public comment.

By consensus, the City Council directed Staff to amend the draft Code to combine declarations for signature required by City Council policies into one declaration; create a disciplinary escalation process and procedure; rework the language regarding cross attendance to strongly discourage it for City commissions and committees; and research City Council attendance standards to bring back for possible inclusion.

9) CITY MANAGER AND CITY COUNCIL REPORTS

The City Council and Staff provided brief information-only reports, including committee reports and reports related to meetings attended at City expense (AB 1234).

By consensus, the City Council requested Staff to bring back a report on traffic and circulation in Dublin, and a discussion item regarding the cost-of-living adjustment (COLA) provided to Staff in 2026.

10) ADJOURNMENT

Mayor Hu adjourned the meeting at 9:23 PM.

Mayor

ATTEST:

Deputy City Clerk



STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: 2026 Development Agreement Review
*Prepared by: Amy Million, Community Development Director, and
Anastasia Nelson, Administrative Aide*

EXECUTIVE SUMMARY:

The City Council will receive a report on the annual review of active development agreements to ensure compliance with the terms and provisions of the agreements pursuant to the California Government Code, Sections 65864-65869.5 and Chapter 8.56 of the Dublin Municipal Code.

STAFF RECOMMENDATION:

Adopt the **Resolution** Finding that Developers Having Obligations Under Active Development Agreements and Supplemental Agreements as Amended, Have Complied in Good Faith With the Terms and Provisions of the Agreements.

FINANCIAL IMPACT:

The fiscal impacts of these projects were addressed as part of a fiscal analysis performed for each approved project. All financial obligations of the subject developers have been met pursuant to the terms provided in their respective development agreements.

DESCRIPTION:

Background

An annual review of active development agreements is required by California Government Code Sections 65864-65869.5 and Chapter 8.56 of the Dublin Municipal Code. During the review period, occurring in July and August of each year, Staff reviews each active development agreement to ensure compliance with the terms and provisions of the agreement. The burden of demonstrating good faith compliance is on the respective developer and/or property owner. Staff from the Finance, Community Development, Fire Prevention, Parks and

Community Services, and Public Works departments completed a thorough and detailed assessment of the developer's compliance with the requirements contained in the applicable agreements.

Following the review, Staff presents the findings and recommends to the City Council to either: (1) determine that the parties are in compliance and conclude the review; or (2) determine that the parties have not complied in good faith, in which case the City Council must request that the matter of compliance be considered at a noticed public hearing. At said public hearing, the City Council may modify or terminate the development agreement upon making certain findings based on substantial evidence that the developer has not complied in good faith with the agreement.

Analysis

The following active development agreements, identified in Table 1 below, were subject to the 2026 annual review. Based on Staff's review, all required public improvements, payments, and scheduled financial obligations have been satisfied by each of the developers and property owners. Staff concluded that each of the developers/property owners is proceeding in good faith with the terms of their development agreement and is therefore recommending that the report be accepted by the City Council and the annual review be concluded.

Table 1: Active Development Agreements

No.	Development Project	Expiration Date	Compliant
1.	Bex Development (Branaugh Property)	04/20/2033	Yes
2.	Dublin Crossings (Boulevard)	12/20/2033	Yes
3.	Dublin Fallon 580 Project	09/19/2034	Yes
4.	Kaiser Dublin Medical Center	11/04/2041	Yes
5.	SCS Dublin Project (The DC)	01/05/2028	Yes

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

No public notice is required. However, a formal notification of the 2026 Development Agreement Annual Review was sent to the parties of the development agreements. The City Council Agenda was posted.

ATTACHMENTS:

- 1) Resolution Finding that Developers Having Obligations Under Active Development Agreements and Supplemental Agreements as Amended, Have Complied in Good Faith With the Terms and Provisions of the Agreements

RESOLUTION NO. XX – 26**A RESOLUTION OF THE CITY COUNCIL
OF THE CITY OF DUBLIN****FINDING THAT DEVELOPERS HAVING OBLIGATIONS UNDER ACTIVE DEVELOPMENT
AGREEMENTS AND SUPPLEMENTAL AGREEMENTS AS AMENDED, HAVE COMPLIED IN
GOOD FAITH WITH THE TERMS AND PROVISIONS OF THE AGREEMENTS**

WHEREAS, as of July 1, 2026, the following projects have active development agreements with the City of Dublin: Bex Development (Branaugh Property), Dublin Crossings (Boulevard), Dublin Fallon 580 Project, Kaiser Dublin Medical Center, and SCS Dublin Project (The DC); and

WHEREAS, the annual review of active development agreements is required by California Government Code Sections 65864 – 65869.5, and Chapter 8.56 of the Dublin Municipal Code; and

WHEREAS, during the review period, occurring in July and August of each year, Staff reviews the development agreements to ensure compliance with the terms and provisions of the agreements; and

WHEREAS, the burden of demonstrating good faith compliance with the agreements rests with the developers; and

WHEREAS, the appropriate City Departments have reviewed each of the active development agreements, and confirmed that the developers are in compliance with the terms of the agreements; and

WHEREAS, Staff recommends that the City Council determine the developers are in compliance and conclude the review.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Dublin concludes its review of the above-referenced active development agreements and supplemental agreements as amended and determines that the developers having obligations under said agreements have complied in good faith with the terms and provisions of the agreements.

PASSED, APPROVED, AND ADOPTED BY the City Council of the City of Dublin, on this 1st day of September 2026, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Mayor

ATTEST:

City Clerk



STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Regulation of Firearm Retailers and Indoor Shooting Ranges
Prepared by: Jennifer Byous, Planning Manager

EXECUTIVE SUMMARY:

The City Council will receive a report on potential land use regulations for firearm retailers and indoor shooting ranges. In January 2026, the City Council adopted an Urgency Interim Ordinance establishing a temporary moratorium on the establishment, expansion, and relocation of firearm related businesses and indoor shooting ranges. The urgency ordinance allows time for the City to complete a comprehensive review of the land use and regulatory frameworks governing such uses. In response, Staff evaluated existing federal and state regulations, Second Amendment case law, and regulations adopted by other jurisdictions. The City Council will receive the report and is requested to provide direction to Staff regarding the future regulation of firearm dealers and indoor shooting ranges.

STAFF RECOMMENDATION:

Receive the report and direct Staff to prepare amendments to the Dublin Municipal Code establishing a 1,000-foot separation between firearm related uses and public and private K–12 schools and evaluate the feasibility of requiring documentation of compliance with federal and state workplace safety and environmental regulations during the building permit review for indoor shooting ranges.

FINANCIAL IMPACT:

Implementation of any of the recommended changes to the Dublin Municipal Code (DMC) is anticipated to have minimal fiscal impact. Modifications to the DMC and supportive administrative work would require Staff and City Attorney time associated with community outreach, ordinance preparation, Planning Commission review, and City Council consideration. These activities are expected to be completed within existing departmental resources.

DESCRIPTION:

Background

The Dublin Municipal Code (DMC) regulates firearm sales related businesses as retail uses and such uses are permitted in zoning districts where retail uses are allowed. Indoor shooting ranges are regulated as Recreational Facility/Indoor uses. For purposes of this Staff Report, firearm retailers and indoor shooting ranges are collectively referred to as “firearm related uses” unless otherwise specified.

The City received an inquiry regarding a proposed firearm retailer and indoor shooting range adjacent to BASIS Independent School in Downtown Dublin. Although the proposed use is permitted under the existing zoning regulations, the inquiry raised questions regarding land use compatibility and whether additional zoning standards should be considered.

On January 20, 2026, the City Council adopted Urgency Interim Ordinance No. 01-26 establishing a 45-day moratorium on the establishment, expansion, and relocation of firearm related businesses and indoor shooting ranges. On March 3, 2026, the City Council extended the moratorium through January 27, 2027 (Ordinance No. 02-26). The moratorium was adopted to allow the City time to complete a comprehensive review of land use and regulatory frameworks governing such uses, and to protect the public health, safety, and welfare during the review period.

Staff evaluated existing federal and state regulations, Second Amendment case law, regulations adopted by other jurisdictions, and separation standards. The City Council will receive the report and is requested to provide direction regarding the future regulation of firearm dealers and indoor shooting ranges.

Existing Regulatory Framework

Firearm related businesses are regulated through a combination of federal and state laws. These laws establish licensing requirements, regulate firearm sales and transfers, impose background checks and recordkeeping requirements, and establish workplace safety and environmental standards. Local governments retain authority to regulate the location of firearm related uses through zoning and land use regulations.

Firearm retailers. Firearm dealers are subject to federal and state licensing requirements administered by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and the California Department of Justice (DOJ)¹. These agencies regulate dealer licensing, background checks, waiting periods, recordkeeping, secure firearm storage, inspections, and enforcement². Dealers must comply with both federal and state requirements before engaging in firearm sales.

¹ 18 U.S.C. § 923; Cal. Penal Code §§ 26700–26915.

² 18 U.S.C. Chapter 44; California dealer licensing (Penal Code §§ 26700–26915)

Federal and state law also establishes Gun-Free School Zones that generally prohibit the possession of a firearm within 1,000 feet of schools, subject to specified statutory exemptions³. While these laws regulate firearm possession rather than land use, they reflect state and federal policy recognizing schools as sensitive environments. This policy provides context for local governments when evaluating land use compatibility between firearm related businesses and schools.

Indoor shooting ranges. Indoor shooting ranges are subject to workplace safety and environmental regulations administered by federal and state agencies. The Occupational Safety and Health Administration (OSHA) and California Occupational Safety and Health (Cal/OSHA) regulate employee exposure to airborne lead, ventilation, respiratory protection, medical surveillance, and other workplace safety requirements⁴. The California Department of Toxic Substances Control (DTSC) regulates the handling, storage, transportation, and disposal of lead contaminated materials and other hazardous wastes generated by shooting range operations⁵. A summary of these regulatory responsibilities is provided in Attachment 1.

Indoor shooting ranges are also subject to a Building Permit in which the City's applicable building, mechanical, electrical, fire, accessibility, and other life safety requirements are reviewed. Specialized components such as ballistic containment and bullet trap systems, mechanical ventilation and filtration systems may be required to meet federal, state, or local requirements.

Second Amendment

The Second Amendment protects an individual's right to keep and bear arms. In *District of Columbia v. Heller* (2008), the United States Supreme Court recognized an individual's right to possess firearms for lawful purposes, including self-defense. *McDonald v. City of Chicago* (2010) held that the Second Amendment applies to state and local governments, and *New York State Rifle & Pistol Association v. Bruen* (2022) and *Wolford v. Lopez* (2026) establish the current framework for evaluating firearm regulations under the Second Amendment.

Federal courts have also recognized that the Second Amendment protects the ability to lawfully acquire firearms. However, this does not prevent local governments from applying land use regulations to firearm related businesses. Courts consider the practical effect of a regulation, including whether it meaningfully limits the ability to lawfully acquire firearms or the ability to learn to use them, in the case of ranges. The exact constitutional test that would be applied in the event of a challenge is highly uncertain, due to the shifting landscape.

³ Federal Gun-Free School Zones (18 U.S.C. § 922(q)) and California Gun-Free School Zones (Penal Code § 626.9). The restrictions only apply to public property, and, therefore, it is not unlawful to operate a firearms dealer within 1,000 feet of a school.

⁴ OSHA/Cal-OSHA lead standards (29 CFR § 1910.1025; 8 CCR § 5198)

⁵ DTSC hazardous waste authority (Health & Safety Code, Div. 20, Ch. 6.5 / Title 22 CCR)

Local Land Use Authority

The Ninth Circuit addressed the issue of local land use authority in *Teixeira v. County of Alameda* (2017), which involved a zoning ordinance requiring firearm retailers to be separated from certain uses, including schools. The court upheld the ordinance and found that the Second Amendment does not guarantee a firearm retailer the right to operate at a particular location.

Although *Teixeira* was decided before *Bruen*, the Ninth Circuit confirmed in *B & L Productions, Inc. v. Newsom* (2024) that restrictions on where firearms may be sold do not necessarily violate the Second Amendment. The relevant consideration is the practical effect of the regulation on the ability to acquire firearms. More recent Ninth Circuit decisions, including *Nguyen v. Bonta* (2025), further demonstrate that regulations that meaningfully limit firearm acquisition require additional Second Amendment analysis.

These decisions support evaluating the practical effect of proposed land use regulations to ensure there is land zoned for commercial and industrial activities outside of separation areas. A summary of the principal decisions relevant to local land use regulations is provided in Attachment 2.

Local Regulatory Approaches

Staff reviewed regulations adopted by 14 California jurisdictions and the City of Chicago to better understand the range of regulatory approaches used for firearm related businesses. Chicago was included because its regulations have been the subject of significant litigation and provide an additional example of how firearm related businesses have been regulated following more recent legal challenges. A detailed comparison of the jurisdictions reviewed is provided in Attachment 3. Many of the ordinances reviewed were adopted before *Bruen* and subsequent federal court decisions. Staff therefore evaluated these regulatory approaches through the lens of the current legal framework rather than treating those ordinances as models for adoption.

The regulatory approach varies by jurisdiction. Some jurisdictions adopted local firearm dealer licensing programs, discretionary permit requirements such as a Conditional Use Permit (CUP), operational standards, and/or land use regulations such as separation requirements. These jurisdictions use licenses and permits to regulate matters such as security, recordkeeping, employee requirements, and the manner in which firearm sales are conducted. However, these regulations overlap with activities already regulated through federal and state licensing and regulatory programs.

Land use related permits such as a CUP allow for case-by-case review. However, this approach lacks objective zoning standards that establish clear and predictable requirements that allow the City to directly address compatibility issues. The use of separation standards is a common zoning tool used to address compatibility between uses. Requirements for a separation between certain uses deemed relevant for that jurisdiction provide consistent and objective requirements.

Analysis

If the City were to apply additional regulations to the firearm related uses, Staff would recommend a focused land use approach consisting of an objective separation requirement from schools. This approach addresses compatibility issues between land uses while not duplicating existing federal and state regulatory programs for firearm dealer licensing, firearm sales, security, recordkeeping, and other operational requirements and avoids conflicts with established case law.

Separation Standards

Separation standards are a common zoning tool used to address compatibility between uses. According to the Giffords Law Center's statewide survey of local firearm ordinances, 34 California jurisdictions have adopted objective separation requirements for firearm related businesses. Staff reviewed a representative subset of these jurisdictions in greater detail to compare the types of protected uses, separation distances, and measurement methods most relevant to Dublin as shown in Table 1 below.

Table 1. Firearm Separation Requirements

Jurisdiction	Residential Zoning/Uses	Educational & Child-Oriented Uses	Community & Civic Uses	Regulated Commercial Uses¹
Pleasant Hill	150 ft	1,000 ft	500 ft	-
Alameda County	500 ft	500 ft	-	500 ft
Oakland	1,000 ft	Varies	Varies	1,500 ft
San Carlos	1,000 ft	1,000 ft	1,000 ft	1,000 ft
Chicago, IL	-	500 ft – primary and secondary school	500 ft – government owned or leased parks	-

1. Regulated commercial uses vary by jurisdiction and may include other firearm dealers, liquor establishments, adult entertainment businesses, and massage related establishments.

The City currently uses separation standards for the regulation of tobacco retailers, adult businesses, hazardous waste facilities, and cottage food operations. Of these uses, the tobacco retailer standard is most similar to the established federal and state 1,000-foot Gun-Free School Zones around K–12 schools. The City requires tobacco retailers to maintain a 1,000-foot distance between tobacco retailers, a 1,000-foot distance from K–12 schools, and a 500-foot separation to a playground, youth center, city-owned and city-operated recreational facilities, park, or library.

Staff evaluated three separation scenarios: a) applying a 500-foot separation from schools; b) applying a 1,000-foot separation from schools; and c) applying the tobacco retailer separation standards. In the evaluation, Staff considered land use compatibility and whether reasonable opportunities would remain for firearm related uses to locate within the City as shown in Table 2 below. Attachment 4 provides additional information, and Attachment 5 provides maps demonstrating the separation under each of the three separation scenarios.

Table 2. Separation Alternatives

Scenario	Acreage Outside Separation Areas	Percent Outside Separation Areas
500-foot school separation	1,082 acres	95%
1,000-foot school separation	947 acres	83%
Tobacco retailer separation	758 acres	67%

Policy Options and Recommendation

Based on the existing regulatory framework, current Second Amendment case law, the review of other jurisdictions, and the separation analysis, Staff identified the following options for the City Council's consideration:

Option 1: Maintain existing regulations. Continue to regulate firearm related businesses and indoor shooting ranges under the existing zoning framework. This means, for example, that the proposed firearm retailer and indoor shooting range adjacent to BASIS Independent School in Downtown Dublin would be allowed.

Option 2: Establish a 500-foot separation between firearm related uses and public and private K–12 schools. While this option provides 95% availability outside the separation areas for firearm related businesses, Staff believes the separation level would have minimal effect.

Option 3: Mirror the tobacco retailer separation standard. Staff does not recommend this option because it would significantly reduce available commercial and industrial land for firearm related businesses. It is important to preserve reasonable opportunity sites within the City in accordance with the Second Amendment considerations discussed above.

Option 4 (recommended): Establish a 1,000-foot separation between firearm related uses and public and private K–12 schools. Staff recommends this option, which maintains consistency with existing firearm possession laws while also recognizing schools as sensitive environments. Staff also believes this still maintains adequate land zoned for commercial and industrial activities outside of separation areas.

If directed, Staff could also evaluate the feasibility of adding a local requirement for applicants to provide documentation demonstrating compliance with applicable federal and state (i.e., OSHA, Cal/OSHA, and DTSC) workplace safety and environmental regulations for indoor shooting ranges as part of the building permit process.

Next Steps

Based on the City Council's direction, Staff will prepare the appropriate regulations and policies to implement that direction. If amendments to the DMC are proposed, Staff will prepare the amendments for consideration and a recommendation by the Planning Commission and final action by the City Council.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

- 1) Existing Federal and State Regulatory Framework
- 2) Second Amendment Case Law Relevant to Local Land Use Regulation
- 3) Firearm Related Use Regulations by Jurisdiction
- 4) Commercial and Industrial Land Use Acreage Comparison
- 5) Separation Scenario Maps

FEDERAL AND CALIFORNIA REGULATORY FRAMEWORK

Firearm Retailers and Indoor Shooting Ranges

Purpose. This attachment summarizes federal, state, regional, and locally administered regulatory programs applicable to firearm retailers and indoor shooting ranges. The matrix identifies the responsible agency, regulated subject, applicable authority, principal requirements, inspection and enforcement responsibilities, and relevance to the City's land use review. These programs regulate matters including firearm dealer licensing and transactions, occupational safety, lead exposure, hazardous waste, building and fire requirements, and other operational matters. They are distinct from the City's land use authority, which addresses the location and compatibility of firearm-related businesses.

Planning Oriented Regulatory Matrix

Agency / Program	Regulated Subject	Primary Authority	Core Requirements	Inspection / Enforcement	Planning Relevance
ATF - Federal Firearms License	Engaging in the business of importing, manufacturing, or dealing in firearms; dealer records; transfers; inventory losses.	18 U.S.C. §§ 922, 923; 27 C.F.R. Part 478.	Federal Firearms License; identity verification; transaction and acquisition/disposition records; compliance with transfer prohibitions; reporting theft or loss; license renewal.	ATF industry operations investigators conduct compliance inspections and may issue warning letters, warning conferences, suspension/revocation proceedings, or referrals as authorized by law.	A City zoning approval does not authorize firearm sales. Federal licensing is a separate prerequisite. The FFL program does not determine local land use compatibility.
FBI / NICS and California DOJ point-of-contact process	Purchaser eligibility and background checks.	18 U.S.C. § 922(t); 27 C.F.R. § 478.102; Cal. Penal Code §§ 28220 et seq.	Background check before transfer; review of federal and state prohibitions. California dealers submit transactions through the DOJ Dealer Record of Sale system.	FBI and California DOJ administer records checks; prohibited transfers may be denied or delayed; violations may be referred for enforcement.	Background-check administration is not a local zoning function and generally does not require a duplicative City process.
California DOJ - Dealer Licensing and Centralized List	Eligibility to operate as a California firearm dealer.	Cal. Penal Code §§ 26700-26915; DOJ dealer	Valid FFL; applicable local regulatory or business license; seller's permit; DOJ	DOJ may inspect records and dealer operations as authorized by statute	State law expressly anticipates applicable local licensing but does not require a local jurisdiction

Agency / Program	Regulated Subject	Primary Authority	Core Requirements	Inspection / Enforcement	Planning Relevance
		regulations and forms.	Certificate of Eligibility; placement on DOJ Centralized List; employee Certificates of Eligibility for employees handling, selling, or delivering firearms.	and may deny, remove, suspend, or pursue enforcement concerning state eligibility and dealer compliance.	to create a police-permit program. Zoning and any City business-license requirements remain distinct.
California DOJ – Ammunition Vendor Regulation	Retail sale and transfer of ammunition	Cal. Penal Code §§ 16151, 30312, 30342–30365, 30370–30372, 30385–30395.	California generally requires ammunition sales and transfers to be conducted by or processed through a licensed ammunition vendor. A California-licensed firearms dealer is automatically deemed a licensed ammunition vendor, subject to applicable ammunition-sale requirements. State law also contains provisions applicable to ammunition purchased or received at licensed target facilities.	California DOJ administers ammunition-vendor licensing and ammunition purchase authorization requirements and maintains ammunition transaction records as required by state law.	An indoor shooting range that sells ammunition may be subject to California ammunition-vendor requirements. If the range also engages in firearm sales, the separate federal and California firearm-dealer licensing requirements apply. These requirements regulate ammunition and firearm transactions rather than land use compatibility.
California DOJ - Sales, Waiting Period, Records, Storage and Reporting	Dealer Record of Sale, purchaser documentation, waiting period, delivery procedures, safe handling,	Cal. Penal Code §§ 26800-26915, 27540, 28220 and related provisions.	DROS submission; statutory waiting period; delivery only after approval and compliance; purchaser identification and	DOJ audits/inspections and criminal or administrative enforcement may apply.	These requirements regulate transactions and dealer conduct. They do not replace local review of the location and physical compatibility of the use.

Agency / Program	Regulated Subject	Primary Authority	Core Requirements	Inspection / Enforcement	Planning Relevance
	storage, notices, and records.		documentation; dealer storage and security requirements; employee eligibility; records and required notices.		
OSHA - Federal Lead and Workplace Safety	Employee exposure where federal OSHA has jurisdiction; general safety requirements.	29 C.F.R. § 1910.1025; 29 C.F.R. Part 1910; Occupational Safety and Health Act.	Exposure assessment; permissible exposure limit; engineering and work-practice controls; respiratory protection; protective clothing; hygiene; housekeeping; medical surveillance; training; records.	OSHA may inspect workplaces and issue citations and penalties. California operates an approved State Plan, so most private workplaces in California are principally regulated by Cal/OSHA.	Federal standards provide a baseline and may apply in limited federal-jurisdiction settings. They are not land use entitlements.
Cal/OSHA - Lead in General Industry	Employee exposure to lead at indoor ranges and during cleaning or maintenance.	8 C.C.R. §§ 5198 and 5155; Cal. Labor Code; updated lead standard effective January 1, 2025.	10 micrograms per cubic meter 8-hour TWA PEL under §5198; exposure assessment; engineering/work-practice controls; respiratory protection; protective clothing; housekeeping; hygiene facilities and practices; medical surveillance; training; recordkeeping.	Cal/OSHA consultation and enforcement; workplace inspection, citation, abatement, and penalty authority.	Ventilation design and operation may be necessary to control exposure, but compliance is determined through occupational-safety standards and exposure conditions, not by a city-created technical lead standard.
DTSC / California Hazardous Waste Control Law	Discarded recovered bullets, fragments, spent ammunition constituents, lead	Cal. Health & Safety Code, Div. 20, Ch. 6.5 (§§ 25100 et seq.); 22 C.C.R.,	Waste determination; generator identification; accumulation and labeling; storage time	DTSC and the local CUPA inspect and enforce generator and hazardous-waste requirements.	A city may require evidence of agency compliance through ordinary development review, but creating

Agency / Program	Regulated Subject	Primary Authority	Core Requirements	Inspection / Enforcement	Planning Relevance
	dust, filters, cleaning residues, contaminated media, and other wastes.	Div. 4.5; DTSC Shooting Range Maintenance Guidance.	limits; manifests and authorized transport/disposal; employee training and contingency requirements as applicable. Recovered material may be managed differently if legitimately recycled and not discarded.		separate local waste classifications or disposal rules would risk duplication.
CalEPA Unified Program / Alameda County Certified Unified Program Agency (CUPA)	Hazardous-waste generator oversight; hazardous-material inventory and business plans; local implementation of state standards.	Cal. Health & Safety Code Chs. 6.5 and 6.95; 19 C.C.R., Div. 5; 27 C.C.R. electronic reporting requirements; CalEPA Unified Program.	CERS reporting; Hazardous Materials Business Plan when thresholds are met; chemical inventory; site map; emergency response and employee training information; hazardous-waste generator permits/identification as applicable.	Alameda County Department of Environmental Health, as CUPA, administers permits, inspections, and enforcement in its jurisdiction, subject to program boundaries and local arrangements.	Project conditions should direct applicants to the CUPA for applicability determinations rather than establish a parallel city technical program.
U.S. EPA - RCRA / CERCLA / EPCRA	Hazardous-waste requirements and reportable releases of lead or other hazardous substances.	Resource Conservation and Recovery Act, 42 U.S.C. §§ 6901 et seq.; 40 C.F.R. Parts 260-279; CERCLA §103 and 40 C.F.R. §302.6; EPCRA, 42 U.S.C. §§ 11001 et seq.	Federal generator requirements may apply based on waste classification and generator status. Certain releases at or above reportable quantities require notification. EPA states that lead particles below specified size and at	EPA or authorized state agencies may inspect and enforce. California is authorized to administer its hazardous-waste program, which may be more stringent than federal requirements.	EPA requirements are conditional and fact-specific. Whether an indoor shooting range is subject to EPA permitting or other regulatory requirements depends on the specific activities, waste streams, and potential releases associated with the facility.

Agency / Program	Regulated Subject	Primary Authority	Core Requirements	Inspection / Enforcement	Planning Relevance
			reportable quantities may trigger release notification.		
California Fire Code / Local Fire Code Official	Fire and life safety; hazardous materials; fire protection systems; storage and handling; emergency access.	2025 California Fire Code, Title 24, Part 9, including Chapters 9 and 50; locally adopted amendments; Health & Safety Code and Title 19 as applicable.	Building and operational fire permits as applicable; hazardous-material classification and quantity review; HMMP/HMIS when required; storage safeguards; ventilation where code-triggered; automatic sprinklers or extinguishing systems when required; alarm, access, and emergency provisions.	Local fire code official reviews plans, permits construction/operations as authorized, and inspects for code compliance.	Fire-suppression and hazardous-material requirements are governed by generally applicable building and fire codes and project-specific review and inspection. These requirements are addressed through existing regulatory processes rather than through firearm-specific local standards.
BAAQMD - Air District Permitting	New or modified sources of air pollution and associated control devices; toxic-air-contaminant review.	BAAQMD Regulation 2, Rules 1, 2 and 5; applicable particulate and toxic rules; California Health & Safety Code air-district authority.	Authority to Construct and Permit to Operate may be required for a source or control device unless exempt. Permit review addresses emissions, toxic risk, and applicable control requirements.	BAAQMD reviews applications, issues permits, inspects, and enforces Air District rules.	No firearm-range-specific BAAQMD rule was identified. Referral is appropriate for a case-specific determination regarding ventilation exhaust, filtration or other emission sources.
City of Dublin - Land Use, Building and Development Review	Location, zoning classification, site design, building permits, and local	Dublin Municipal Code; California Planning and Zoning Law; locally adopted	Zoning clearance or entitlement; objective separation standard if adopted; building/mechanical/	City departments enforce local approvals and adopted codes.	The City's principal added value is determining where the use may locate and ensuring compliance with generally applicable

Agency / Program	Regulated Subject	Primary Authority	Core Requirements	Inspection / Enforcement	Planning Relevance
	fire/building coordination.	building and fire codes.	electrical permits; site-specific conditions within lawful authority; referral to regulatory agencies.		development standards, not duplicating dealer licensing or occupational/environmental regulation.

Ongoing Inspection and Enforcement. Regulatory oversight continues after a firearms retailer or indoor shooting range begins operation. Depending on the facility and its operations, applicable requirements may be enforced through Cal/OSHA workplace inspections, hazardous waste inspections by DTSC or the local CUPA, fire and life safety inspections, and Air District inspections where applicable. The City would continue to enforce its land use approvals and applicable building and fire code requirements, while other agencies would administer and enforce requirements within their respective areas of responsibility.

Authorities and Primary Sources

1. ATF, Federal Firearms Licenses.
<https://www.atf.gov/firearms/federal-firearms-licenses>
2. ATF, Federal Firearms Licensee Quick Reference and Best Practices Guide.
<https://www.atf.gov/firearms/tools-and-services-firearms-industry/current-licensees/federal-firearms-licensee-quick-reference-and-best-practices-guide>
3. ATF, Firearms Compliance Inspections.
<https://www.atf.gov/firearms/tools-and-services-firearms-industry/current-licensees/compliance-inspections>
4. FBI, National Instant Criminal Background Check System.
<https://www.fbi.gov/how-we-can-help-you/more-fbi-services-and-information/nics>
5. California DOJ, Becoming a Firearm Dealer and/or Ammunition Vendor.
<https://oag.ca.gov/firearms/dealer-vendor>
6. California DOJ, Firearms Dealer Frequently Asked Questions.
<https://oag.ca.gov/firearms/dlrfaqs>
7. California DOJ, Overview of Key California Firearms Laws.
<https://oag.ca.gov/ogvp/overview-firearm-law>
8. California Legislative Information, Penal Code, Part 6 – Control of Deadly Weapons.
<https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PEN&tocTitle=+Penal+Code+-+PEN>
9. California Penal Code § 16151 – Ammunition Vendor.
Defines “ammunition vendor” and provides that a licensed firearms dealer is deemed a licensed ammunition vendor for purposes of California law.
10. California Penal Code § 30312 – Ammunition Sales and Transfers.
Generally requires ammunition sales and transfers to be conducted by or processed through a licensed ammunition vendor and contains an exception for ammunition purchased or received at a licensed target facility when the ammunition remains on the facility premises.
https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?article=2.&chapter=1.&division=10.&lawCode=PEN&part=6.&title=4.
11. California Penal Code §§ 30342–30365 – Ammunition Vendors.
Establishes requirements governing persons and businesses engaged in the sale of ammunition, including ammunition-vendor licensing and transaction requirements.
12. California Penal Code § 30352 – Ammunition Transaction Records and Target-Facility Provision.
Requires ammunition vendors to record and electronically submit specified transaction information and includes provisions applicable to persons purchasing or receiving ammunition at a licensed target facility when the ammunition remains on the premises.
13. California Penal Code §§ 30370–30372 – Ammunition Purchase Authorizations.
Establishes the California Department of Justice ammunition purchase authorization process.
14. California Penal Code §§ 30385–30395 – Ammunition Vendor Licenses.
Establishes California ammunition-vendor licensing requirements.
15. Cal/OSHA, 8 C.C.R. § 5198 – Lead.
<https://www.dir.ca.gov/title8/5198.html>

16. Cal/OSHA, Occupational Lead Exposure Prevention Guidance.
<https://www.dir.ca.gov/dosh/lead/>
17. Cal/OSHA, 8 C.C.R. § 5155 – Airborne Contaminants.
<https://www.dir.ca.gov/title8/5155.html>
18. DTSC, Shooting Range Maintenance Guidance.
<https://dtsc.ca.gov/shooting-range-maintenance-guidance/>
19. CalEPA, Unified Program.
<https://calepa.ca.gov/cupa/>
20. CalEPA, Unified Program Laws and Regulations.
<https://calepa.ca.gov/cupa/lawsregs/>
21. Alameda County Environmental Health, Hazardous Materials / CUPA.
<https://deh.acgov.org/>
22. U.S. EPA, Release Notification for Lead from Ammunition.
<https://www.epa.gov/epcra/release-notification-lead-ammunition>
23. 2025 California Fire Code, Title 24, Part 9, Chapter 50.
<https://codes.iccsafe.org/content/CAFC2025P1/chapter-50-hazardous-materials-general-provisions>
24. BAAQMD, Regulation 2 – Permits.
<https://www.baaqmd.gov/en/rules-and-compliance/rules/reg-2-permits>
25. BAAQMD, Regulation 2, Rule 1 – General Requirements.
<https://www.baaqmd.gov/en/rules-and-compliance/rules/reg-2-rule-1-general-requirements>
26. BAAQMD, Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants.
<https://www.baaqmd.gov/en/rules-and-compliance/rules/reg-2-rule-5-new-source-review-of-toxic-air-contaminants>

SECOND AMENDMENT CASE LAW RELEVANT TO LOCAL LAND USE REGULATION

Decision	Holding (Plain English)	Planning significance	Effect on local zoning authority
United States Supreme Court Decisions			
District of Columbia v. Heller, 554 U.S. 570 (2008)	The Second Amendment protects an individual right to possess a handgun for lawful self-defense. The right is not unlimited. The Court identified longstanding limits, including laws concerning sensitive places and conditions and qualifications on the commercial sale of arms.	Establishes the protected individual right and cautions against treating firearm regulation as ordinary policy balancing.	Does not decide firearm-retailer zoning. Local land use rules remain subject to the Second Amendment when they burden protected conduct.
McDonald v. City of Chicago, 561 U.S. 742 (2010)	The Second Amendment right recognized in Heller applies to state and local governments through the Fourteenth Amendment.	Local ordinances are subject to the federal constitutional standard.	Cities may exercise land use authority, but local enactments must comply with the Second Amendment.
N.Y. State Rifle & Pistol Assn. v. Bruen, 597 U.S. 1 (2022)	When the Second Amendment's text covers the regulated conduct, the government must show that its regulation is consistent with the Nation's historical tradition of firearm regulation. Courts may not uphold a firearm law merely by balancing public benefits against the burden on the right.	Requires legal analysis based on constitutional text and historical tradition rather than policy balancing alone.	Objective land use standards are not automatically valid or invalid. The practical effect of the regulation and the conduct it regulates remain important to the constitutional analysis.
Wolford v. Lopez, 609 U.S. ____ (2026), reversing 116 F.4th 959 (9th Cir. 2024)	The Supreme Court invalidated Hawaii's default rule barring licensed carry on private property open to the public without the owner's express consent. Applying Bruen, the Court concluded that the State had not shown a relevant historical tradition supporting the broad restriction.	Wolford concerns carrying firearms on private property, not firearm sales or business location. It reinforces that modern firearm restrictions must be analyzed under Bruen rather than justified by policy balancing alone.	Does not decide firearm-retailer zoning or school buffers. It is relevant as current Supreme Court guidance on the Bruen framework, but should not be cited as direct authority for or against a land use separation standard.
United States Court of Appeals for the Ninth Circuit Decisions			

Decision	Holding (Plain English)	Planning significance	Effect on local zoning authority
Teixeira v. County of Alameda, 873 F.3d 670 (9th Cir. 2017) (en banc)	Alameda County required firearm retailers to obtain a conditional use permit and maintain a 500-foot separation from specified uses, including schools. The court rejected the Second Amendment claim because the plaintiffs did not plausibly allege that the ordinance meaningfully impeded prospective customers' access to firearms. The court also held that a dealer has no freestanding Second Amendment right to sell firearms at a chosen location.	Directly addresses local zoning of firearm retailers. The practical effect of the ordinance on customers' ability to acquire firearms was central to the court's analysis.	Remains important zoning precedent, but it predates Bruen and should not be treated as establishing a stand-alone "reasonable sites" test or a numerical safe harbor for local buffers.
B & L Productions, Inc. v. Newsom, 104 F.4th 108 (9th Cir. 2024), cert. denied (2025)	The Ninth Circuit held that laws barring firearm sales on state property did not implicate the Second Amendment where they did not meaningfully constrain any individual's ability to keep and bear arms. The court concluded that Teixeira's meaningful-constraint approach is consistent with Bruen.	Provides the key post-Bruen link to Teixeira. A restriction on the place of sale does not necessarily implicate the Second Amendment when lawful acquisition remains practically available elsewhere.	Supports examining the real-world geographic effect of a location rule. It does not establish that any particular buffer distance or amount of remaining land is constitutionally sufficient.
Nguyen v. Bonta, 140 F.4th 1237 (9th Cir. 2025)	The Ninth Circuit held that California's one-firearm-per-30-days law meaningfully constrained firearm acquisition and implicated the Second Amendment. The court then found the law inconsistent with the Nation's historical tradition of firearm regulation.	Illustrates the other side of the meaningful-constraint inquiry: a direct limit on how often an eligible person may acquire firearms can burden protected conduct.	Nguyen is not a land use case and does not independently validate zoning restrictions. It reinforces the importance of evaluating the practical effect of a regulation on lawful acquisition.

Decision	Holding (Plain English)	Planning significance	Effect on local zoning authority
Rhode v. Bonta, 145 F.4th 1180 (9th Cir. 2025)	The Ninth Circuit held that California's ammunition background-check regime meaningfully constrained the right to keep and bear arms. In doing so, the court expressly contrasted that statewide regime with Teixeira and B & L Productions, explaining that a minor constraint on the precise locations within a geographic area where firearms may be acquired does not necessarily meaningfully constrain the right.	Provides recent post-Bruen Ninth Circuit guidance tying Teixeira, B & L Productions, and Nguyen together. It emphasizes practical effect, including the costs, delays, and geographic scope of a regulation.	Useful support for documenting the geographic effect of a proposed separation standard. It does not establish that a particular buffer or percentage of remaining commercial land is constitutional.

FIREARM RELATED USE REGULATIONS BY JURISDICTION

Comparative Jurisdiction Matrix

Jurisdiction	Firearm Sales / Zoning	Separation Standard	Local Permit / Operations	Indoor Shooting Ranges	Current Primary Citation / History	Planning and Post-Bruen Observation
Dublin	No firearm-specific use classification. Retailers are treated as retail uses; indoor ranges are treated as Recreational Facility/Indoor uses.	None currently.	No firearm-specific local police permit identified.	Allowance depends on the zoning district applicable to Recreational Facility/Indoor uses.	DMC §§ 8.08.020 and 8.12.050; Ordinance No. 01-26 (temporary moratorium).	Baseline condition. Proposed ordinance would add objective location standards without creating a new police-permit program.
Pleasanton	Firearm sales require a permit from the Chief of Police and must comply with zoning and business-license requirements.	No firearm-specific school separation identified in Chapter 6.64.	Firearm Sales Permit; secured facility and permit conditions.	No dedicated firearm-range chapter identified; land use classification must be confirmed for a proposed site.	PMC §§ 6.64.030, 6.64.070 and related provisions.	Nearby example of a local permit model. Dublin staff is not recommending a parallel local licensing system.
Livermore	No separate firearm-retailer land use classification identified in the reviewed current development code.	None identified.	No firearm-specific local dealer permit identified in the reviewed current code.	Gun ranges/shooting clubs are addressed under recreation/cultural facility classifications; zoning allowance depends on district and entitlement requirements.	Livermore Development Code Ch. 3-50; Livermore Municipal Code Ch. 9.78 (discharge-related provisions).	Nearby comparator, but not a direct school-separation model.

Jurisdiction	Firearm Sales / Zoning	Separation Standard	Local Permit / Operations	Indoor Shooting Ranges	Current Primary Citation / History	Planning and Post-Bruen Observation
San Ramon	No firearm-specific retailer classification identified in the reviewed current zoning code.	None identified.	No firearm-specific dealer permit identified.	No firearm-specific indoor-range standard identified; generally applicable land use classifications and permits would govern.	San Ramon Zoning Ordinance, Title D; municipal code provisions concerning discharge and weapons.	Not a direct comparator for the proposed zoning standard.
Pleasant Hill	Firearm sales are subject to a police permit and firearm-specific zoning standards.	150 ft from residential uses; 1,000 ft from public/private schools; 500 ft from parks, other firearm sales, massage establishments, and adult entertainment uses, subject to code definitions and exceptions.	Police permit; security, insurance, records, and related operating requirements.	No dedicated indoor-range standard identified in the firearm-sales ordinance.	PHMC Ch. 9.35 and § 18.25.160; Ord. 876 (2013), amended by Ord. 896 (2016).	Direct Bay Area comparator for a 1,000-ft school separation. Predates Bruen and should be used as planning context, not a constitutional safe harbor.
Fremont	Firearm dealers and gunsmiths are restricted retail uses requiring a conditional use permit where allowed.	No firearm-specific school buffer identified in the current cited land use standard.	Chief of Police firearms-dealer permit; security approval, controlled storage, employee requirements, insurance, and compliance provisions.	Indoor ranges may fall within applicable recreation classifications; no dedicated range standard identified in the cited dealer provisions.	FMC Ch. 5.55 and § 18.190.160; code history includes Ord. 2081 (1994), Ord. 5-2008, Ord. 23-2018, Ord. 02-2020, and later use-table amendments.	CUP plus police-permit model. More discretionary and operationally detailed than Dublin's proposed approach.
Alameda County	Firearm sales require a conditional use permit in applicable	500 ft from residentially zoned property, schools, day care, liquor stores, and other	County firearm-dealer license; compliance with federal/state licensing, building,	A CUP is required where an indoor range is allowed under applicable County	Alameda County Code §§ 17.54.130-17.54.141; Teixeira v. County of Alameda, 873 F.3d	Principal Ninth Circuit firearm-retailer zoning precedent. Teixeira predates Bruen; practical access and

Jurisdiction	Firearm Sales / Zoning	Separation Standard	Local Permit / Operations	Indoor Shooting Ranges	Current Primary Citation / History	Planning and Post-Bruen Observation
	unincorporated zoning districts and a County firearm-dealer license.	firearm sales businesses, subject to code measurement and findings.	fire, storage, and security requirements.	classifications; project-specific confirmation is required.	670 (9th Cir. 2017) (en banc).	remaining sites remain important.
Palo Alto	Firearm dealers require a local permit and, under the 2023 zoning amendments, a conditional use permit where permitted.	Firearm-specific zoning standards apply under PAMC § 18.42.210; current definitions, measurements, and exceptions should control.	Permit, investigation, annual renewal, business/security rules, inspection authority, and insurance requirements.	No dedicated indoor-range chapter identified.	PAMC Ch. 4.57 and § 18.42.210; zoning provisions adopted in 2023 after Bruen.	Post-Bruen zoning amendment. Useful current comparator, although the local program includes licensing and operational controls beyond Dublin's recommendation.
Oakland	Firearm dealers require a local permit and planning/zoning compliance.	Distances vary by protected use under Oakland's current planning regulations.	Police permit, security, inventory, records, reporting, and inspection provisions.	No dedicated current range standard confirmed in this review.	OMC Ch. 5.26; Oakland Planning Code provisions applicable to firearms sales activities.	Broad regulatory program. Use only verified current provisions that directly support the City's planning analysis.
San Carlos	Firearm retailers are limited to a designated Firearm Establishment Business Area and require land use and law-enforcement approvals.	1,000 ft from residential zoning, schools, day care, youth/community centers, places of worship, parks, and specified firearm-related or commercial uses.	Law Enforcement Safety Permit; security/surveillance, management plan, annual renewal, inspections, and operating-hour limits.	Expressly regulated. Indoor ranges are limited to designated areas and require land use and safety permits, a range-safety officer, management plan, and operational controls.	SCMC Chs. 5.13 and 5.14; Title 18, including § 18.23.300; Ordinances Nos. 1540 and 1542 (2019).	Most comprehensive Bay Area comparator. Broader than Dublin's proposed zoning-only approach and adopted before Bruen.
San Marcos	Retail firearm sales may occur in conjunction with an approved indoor shooting	500 ft for indoor ranges from child care, K-12 public schools, public parks, residential	Local firearm-dealer license; CUP conditions may address operating issues and law-	Indoor ranges permitted in the Industrial Zone with a CUP and firearm-specific standards.	SMMC Ch. 5.60 and § 20.40.240.	Relevant indoor-range comparator. Uses a discretionary CUP and a 500-ft separation.

Jurisdiction	Firearm Sales / Zoning	Separation Standard	Local Permit / Operations	Indoor Shooting Ranges	Current Primary Citation / History	Planning and Post-Bruen Observation
	range; local licensing provisions apply to concealable-firearm sales.	zones, bars/breweries, and other indoor ranges.	enforcement recommendations.			
Santa Clara	Firearm retailers are treated under generally applicable commercial retail classifications; no firearm-specific use standard identified in the reviewed current zoning code.	None identified.	No firearm-specific local police permit identified.	No firearm-specific indoor-range provision identified.	Santa Clara City Code Title 18 (Zoning).	General-code comparator rather than a model for firearm-specific standards.
Concord	Firearm-related retail uses are subject to applicable retail classifications and may require a use permit where specified.	None identified.	No firearm-specific local police permit identified.	A use permit is required where the applicable indoor recreation/range classification is conditionally permitted.	Concord Development Code, Title 18; applicable land use tables and use-permit provisions.	General discretionary land use model; no verified school buffer.
Danville	Firearm retailers are treated under generally applicable commercial retail classifications.	None identified.	No firearm-specific local permit identified.	No firearm-specific indoor-range regulation identified.	Danville Municipal Code Title 32 (Zoning), applicable commercial use tables.	General-code comparator.
Walnut Creek	Firearm retailers are treated under generally applicable retail classifications.	None identified.	No firearm-specific local permit identified.	No firearm-specific indoor-range regulation identified.	Walnut Creek Municipal Code Title 10 (Planning and Zoning), applicable use tables.	General-code comparator.

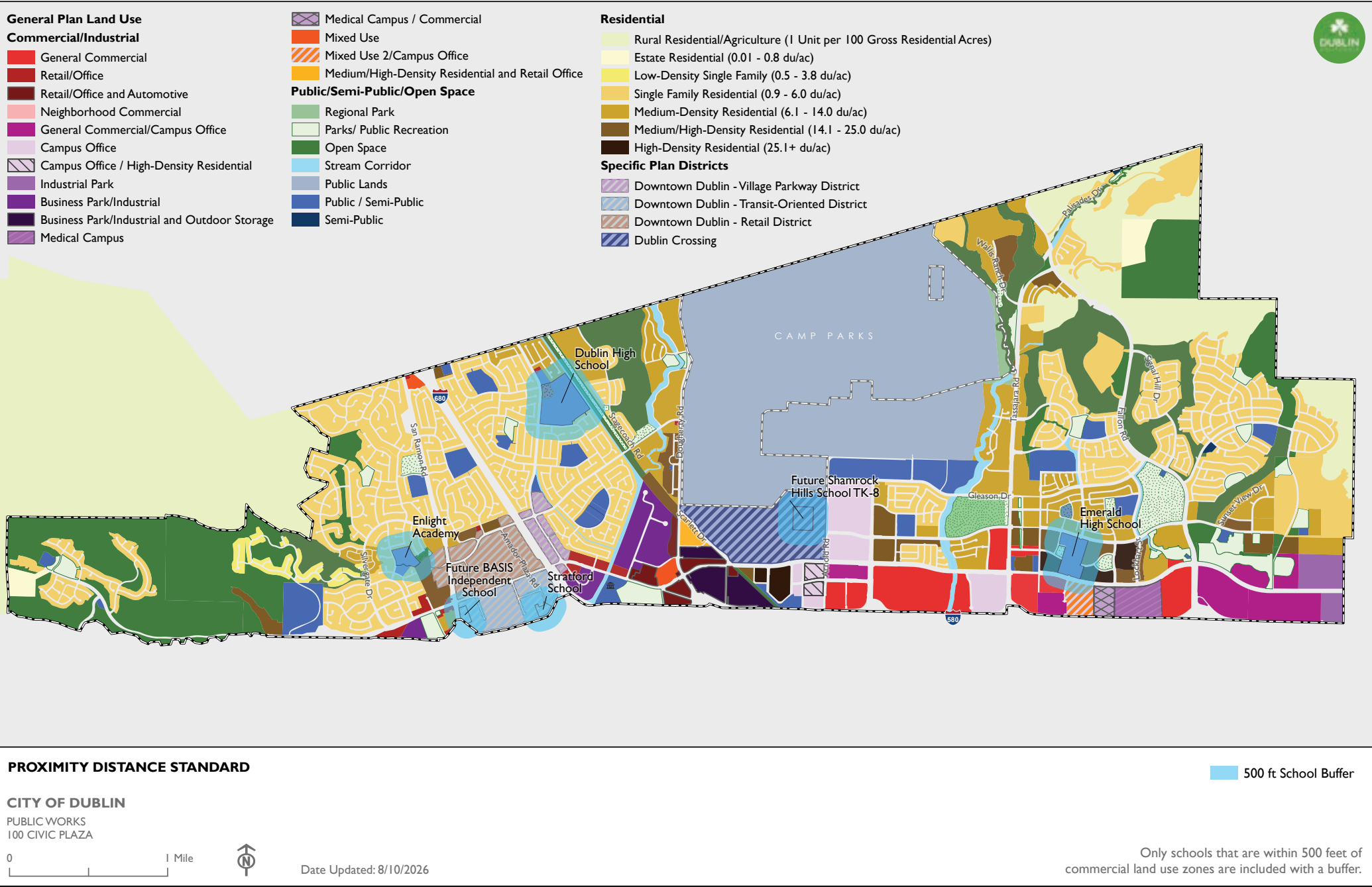
Jurisdiction	Firearm Sales / Zoning	Separation Standard	Local Permit / Operations	Indoor Shooting Ranges	Current Primary Citation / History	Planning and Post-Bruen Observation
Chicago, Illinois	Firearms dealers are a defined use requiring a City firearms-dealer license and compliance with zoning.	500 ft from primary/secondary schools and government-owned or leased parks under current cited provisions.	Firearms-dealer license with eligibility, safety-plan, operating, and renewal requirements.	Shooting range facilities are classified as participant sports/recreation uses and are subject to zoning and licensing provisions.	Chicago Zoning Ordinance §§ 17-17-0106-C and 17-4-0200; Municipal Code Ch. 4-144, including § 4-144-750.	Included because Chicago firearm-business restrictions have generated federal litigation. It is not a California peer and should be treated as supplemental context.

Commercial and Industrial Land Use Acreage Comparison

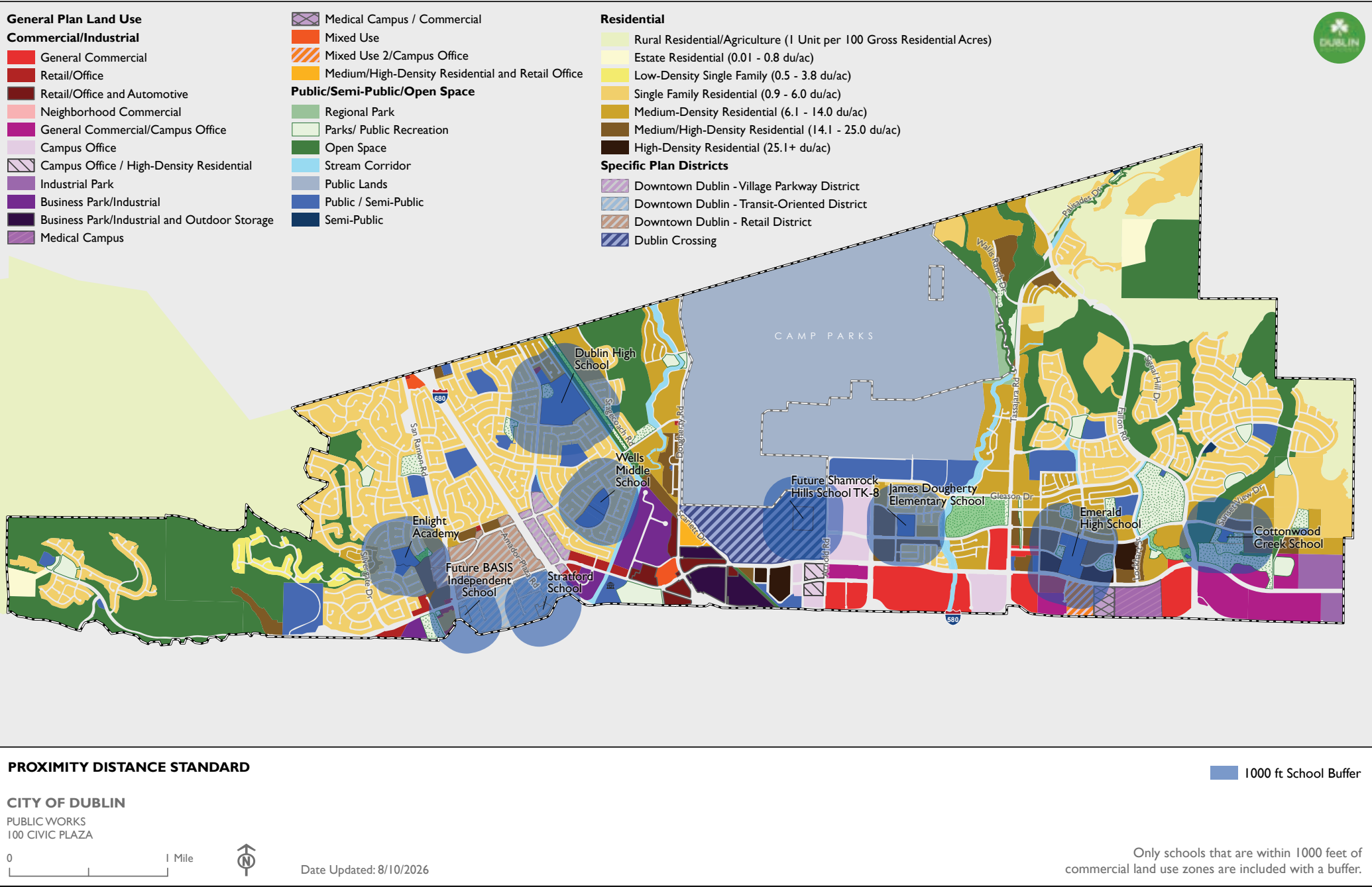
General Plan and Specific Plan Land Use Designations	Existing Acreage	Acreage Available with 500-ft School Separation	Acreage Available with 1,000-ft School Separation	Acreage Available with Tobacco Sensitive-Use Comparison*
Business Park/Industrial	101	101	95	50
Business Park/Industrial and Outdoor Storage	60	60	60	21
Campus Office	127	127	103	97
Campus Office/High-Density Residential	14	14	14	14
Downtown Dublin-Retail District	113	109	88	81
Downtown Dublin -Transit-Oriented District	87	51	10	10
Downtown Dublin – Village Parkway District	31	31	31	20
General Commercial	216	211	203	176
General Commercial/Campus Office	160	160	146	146
Industrial Park	56	56	56	56
Medical Campus	39	39	39	39
Medical Campus/Commercial	16	16	11	11
Mixed-Use	15	15	15	9
Mixed-Use 2/Campus Office	23	17	6	5
Retail/Office	34	31	29	11
Retail/Office and Automotive	43	43	43	10
Total commercial and industrial acreage	1,136	1,082	947	758

**Tobacco sensitive-use comparison applies a 1,000-foot separation from public and private elementary, middle, junior high, and high schools and a 500-foot separation from playgrounds, youth centers, City-owned and operated recreational facilities, parks, and libraries, measured parcel boundary to parcel boundary, consistent with DMC § 8.43.040(B)-(C). The 1,000-foot Retail Tobacco Shop-to-Retail Tobacco Shop spacing requirement in DMC § 8.43.040(D) is not included.*

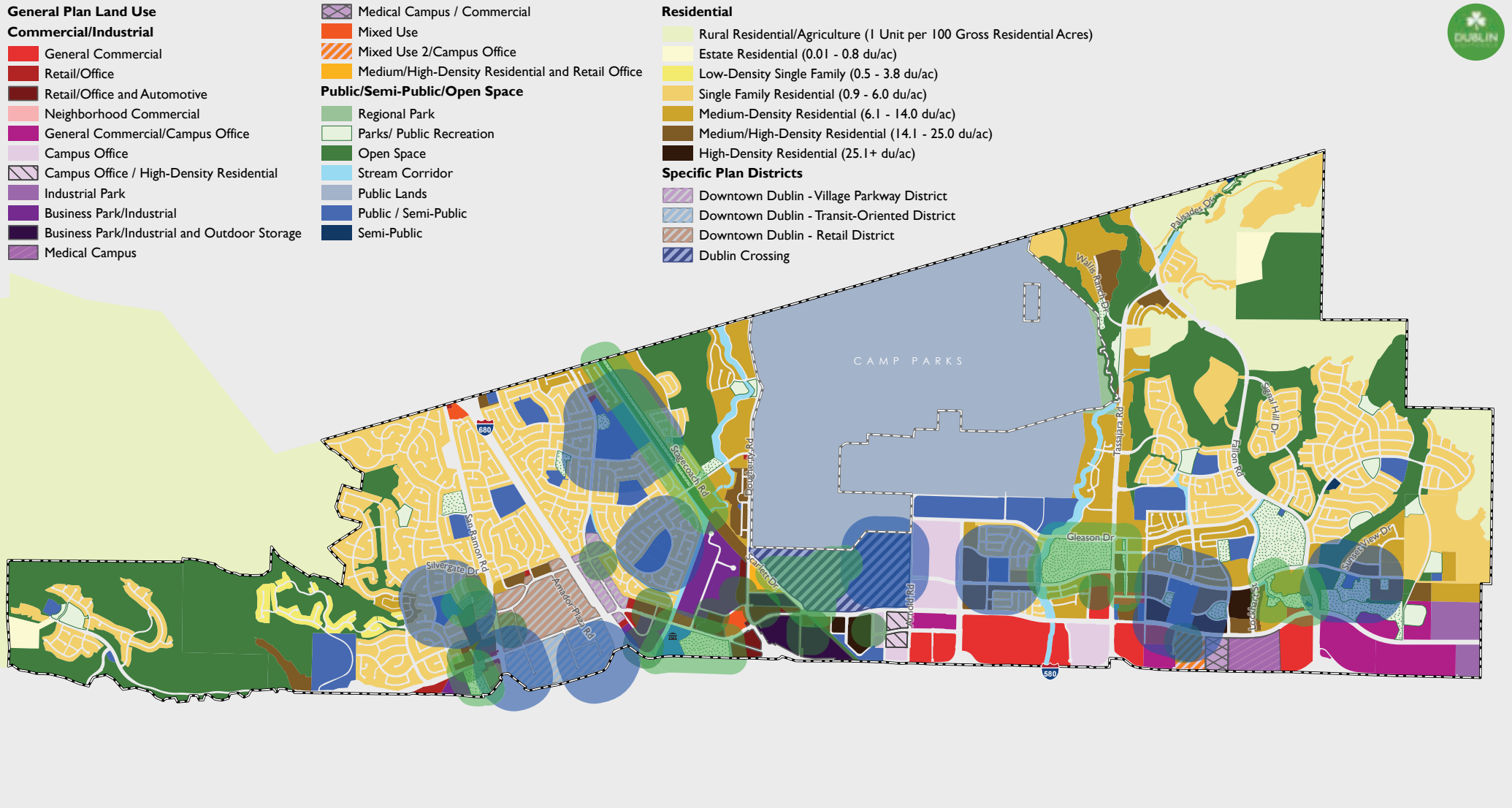
Planning-level totals: 500-foot school separation – 1,082 acres (95%); 1,000-foot school separation – 947 acres (83%); tobacco sensitive-use comparison – 758 acres (66%).



1,000 Foot School Buffer



1,000 Foot School Buffer and 500 Foot Buffer from Other Sensitive Uses



PROXIMITY DISTANCE STANDARD

CITY OF DUBLIN
PUBLIC WORKS
100 CIVIC PLAZA

0 1 Mile

Date Updated: 7/16/2026

1000 ft School Buffer

500 ft Buffer *

Only areas that are within 500 or 1000 feet of commercial land use zones are included with a buffer.

* 500 ft buffer includes parks, City owned facilities, and day care centers.

Regulation of Firearm Retailers and Indoor Shooting Ranges

City Council Meeting
September 1, 2026



Background

- DMC regulates firearm retailers as retail uses, and indoor ranges as Recreational Facility/Indoor uses.
- Received an inquiry for a retailer/range near BASIS Independent School - raised land use compatibility concerns.
- Moratorium adopted through January 27, 2027.
- Reviewed federal/state law, Second Amendment case law, other jurisdictions' rules, and land use alternatives.



Existing Regulatory Framework

- **Firearm Retailers**

- Permitting (ATF and DOJ)
 - Background checks, waiting periods, recordkeeping, secure storage, inspections, enforcement, etc.
- Gun-Free School Zones (1,000 feet of schools)

- **Indoor Shooting Ranges**

- Air quality regulations (OSHA and Cal/OSHA)
- Hazardous materials (DTSC)
- Construction requirements



Second Amendment / Local Land Use Authority

Court decisions guide how local governments may regulate firearm sales and ranges:

- *Teixeira* (2017) — May regulate location if firearm access isn't meaningfully constrained.
- *Bruen* (2022) — Regulations must align with the nation's historical tradition of firearm regulation.
- *B & L Productions* (2024) — Location restrictions OK if firearms remain available elsewhere.
- *Nguyen* (2025) — Meaningful constraints on access require further constitutional review.



Comparator Jurisdictions

- 14 California jurisdictions and Chicago reviewed.
- Most ordinances predate *Bruen* (2022).
- Operational licenses/permits generally overlap with federal and state regulatory activities.
- Separation standards generally address compatibility with schools and other sensitive uses.



Separation Requirements in Other Jurisdictions

Separation requirements are common zoning tool uses to address compatibility between uses.

Jurisdiction	Residential Zoning/Uses	Educational & Child-Oriented Uses	Community & Civic Uses	Regulated Commercial Uses
Pleasant Hill	150 ft	1,000 ft	500 ft	Varies
Alameda County	500 ft	500 ft	—	500 ft
Oakland	1,000 ft	Varies	Varies	1,500 ft
San Carlos	1,000 ft	1,000 ft	1,000 ft	1,000 ft
Chicago, IL	—	500 ft (schools)	500 ft (public parks)	—



Separation Alternatives Evaluated

Staff evaluated three scenarios, measuring how much commercial and industrial land would remain available outside the separation areas.

Scenario	Acreage Outside Separation Areas	Percent Outside Separation Areas
500-foot school separation	1,082 acres	95%
1,000-foot school separation	947 acres	83%
Tobacco retailer separation standard	758 acres	67%



Policy Options

Option 1 — Maintain existing regulations. Firearm-related uses continue under the current zoning framework, and the proposed retailer and range next to BASIS Independent School would be allowed.

Option 2 — 500-foot school separation. Leaves 95% of land available, but Staff believes this separation level would have minimal effect.

Option 3 — Mirror the tobacco-retailer standard. Not recommended; it would significantly reduce available commercial and industrial land (67% remaining).

Option 4 (recommended) — 1,000-foot school separation. Consistent with existing Gun-Free School Zone laws, recognizes schools as sensitive environments, and preserves 83% of commercial and industrial land.



Staff Recommendation

Staff Recommendation

- Receive the report and direct Staff to prepare amendments to the Dublin Municipal Code establishing a 1,000-foot separation between firearm-related uses and public and private K–12 schools and evaluate the feasibility of requiring documentation of compliance with federal and state workplace safety and environmental regulations during building permit review for indoor shooting ranges.





STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Second Review of Draft Code of Ethics and Conduct for Elected and Appointed Officials
Prepared by: Colleen Tribby, City Manager

EXECUTIVE SUMMARY:

At the August 18, 2026 meeting, the City Council reviewed and provided feedback on a draft Code of Ethics and Conduct for Elected and Appointed Officials. The City Council will review the revised Code and provide feedback to be incorporated into the final version.

STAFF RECOMMENDATION:

Review the revised Code of Ethics and Conduct for Elected and Appointed Officials and provide feedback.

FINANCIAL IMPACT:

None.

DESCRIPTION:

At the August 18, 2026 meeting, the City Council reviewed and provided feedback on a draft Code of Ethics and Conduct for Elected and Appointed Officials. The City Council also requested that Staff do the following:

1. Incorporate all relevant elected official policies into the Model of Excellence that requires signature;
2. Evaluate including language in the Code governing councilmember attendance at meetings;
3. Clarify cross-attendance guidelines for officials attending meetings of other bodies; and
4. Provide a procedure for escalating potential code violations.

The updated Code includes the changes requested by the City Council and is provided as Attachment 1 to this report, with Attachment 2 as the redline version. The August 18 Staff report is provided for reference as Attachment 3. The final version of the Code will be brought to the City Council for approval via resolution at the next meeting.

A discussion of Staff's evaluation of potential attendance standards is provided below.

Attendance Standards

Most agencies Staff evaluated rely on state law to govern councilmember attendance at City Council meetings. Government Code Section 36513 applies automatically to all general law cities, and provides that a councilmember absent without permission from all regular City Council meetings for 60 consecutive days (or 70 days, for bodies that meet once monthly) forfeits the office, which is then filled as any other vacancy would be.

Because the state law baseline already applies, most California cities do not restate it in their own ethics or conduct codes. It is absent, for example, from both Alameda's and Sunnyvale's codes, the two documents Dublin's draft is primarily modeled on. Where cities do adopt something supplemental, it is typically not an attempt to change the state-law threshold, but to clarify the process by which a councilmember requests, and the council grants, an excused absence. Section 36513 conditions the vacancy on absence "without permission of the council," but does not define how permission is requested, documented, or granted. Furthermore, Staff did not find any examples of codes of ethics addressing remote attendance.

At this time, Staff has not included Attendance Standards in Dublin's draft Code that are more restrictive than state law. Instead, Staff added a "Commitment to Attendance" to the Guiding Principles section. If the City Council wanted to create a procedure for absence requests and approvals/denials, it would need to also include a list of valid excuses (e.g., personal or family illness, a family emergency or bereavement, jury duty or a legal obligation, military service, unavoidable conflict with official City or intergovernmental business, etc.), and potentially a method for verification. It should be noted that there would be administrative work associated with maintaining such a procedure.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

- 1) Code of Ethics and Conduct for Elected and Appointed Officials
- 2) Code of Ethics and Conduct for Elected and Appointed Officials (redline version)
- 3) August 18, 2026 Staff Report, without attachments

City of Dublin

Code of Ethics and Conduct for Elected and Appointed Officials

DRAFT

September 2026

A. Policy Purpose

The Dublin City Council has adopted this Code of Ethics and Conduct for its members, and for the members of the City's committees and commissions, to ensure the integrity of local government and its effective, fair operation.

B. Ethics

The residents and businesses of Dublin are entitled to a local government that is fair, ethical, and accountable, and that has earned the public's full confidence in its integrity. The effective function of democratic government therefore requires that:

- public officials, both elected and appointed, comply with both the letter and the spirit of the laws and policies affecting the operations of government;
- public officials be independent, impartial, and fair in their judgment and actions;
- public office be used for the public good, not for personal gain; and
- public deliberations and processes be conducted openly, unless legally confidential, in an atmosphere of respect and civility.

1. Guiding Principles

The following principles provide guidance on ethical decision-making for members of the City Council and appointed members of the City's committees and commissions (collectively referred to as "Officials" throughout this document).

- a) **Act in the Public Interest.** Recognizing that stewardship of the public interest must be their primary concern, Officials will work for the common good of the people of Dublin and not for any private or personal interest, and they will assure fair and equal treatment of all persons, claims, and transactions coming before the City Council, committees, and/or commissions.
- b) **Comply with Both the Spirit and the Letter of the Law and City Policy.** Officials shall comply with the laws of the United States, the State of California, and the City of Dublin in the performance of their public duties. These laws include, but are not limited to: the United States and California constitutions; the Ralph M. Brown Act; the Political Reform Act; the Dublin Municipal Code; commission and committee bylaws; the City's Rules of the Conduct of Meetings of the City Council; the City Council Norms; the City's Personal Devices, Personal Accounts, and Messages Policy; and laws pertaining to conflicts of interest, election campaigns, financial disclosures, and open processes of government.
- c) **Conduct of Officials.** The professional and personal conduct of Officials must be above reproach and avoid even the appearance of impropriety. Officials shall refrain from abusive conduct, personal charges, or verbal attacks upon the character or motives of other members of the Council, committees and commissions, City staff, and/or the public.
- d) **Respect for Process.** Officials shall perform their duties in accordance with the processes and rules of order established by the City Council and committees and commissions governing the deliberation of public policy issues, meaningful involvement of the public, and implementation of policy decisions by City staff.
- e) **Conduct of Public Meetings.** Officials shall prepare themselves for public issues, listen courteously and attentively to all public discussion before the body, and focus on the business at hand. They shall refrain from interrupting other speakers, making personal comments not germane to the business of the body, or otherwise interfering with the orderly conduct of meetings.
- f) **Decisions Based on Merit.** Officials shall base their decisions on the merits and substance of the matter at hand, rather than on unrelated considerations.

- g) **Communication and Disclosure of Outside Contacts.** Officials shall publicly disclose substantive information that is relevant to a matter under consideration by the Council, or by a committee or commission, which they may have received from sources outside of the public decision-making process. When serving in a quasi-judicial capacity, Officials shall disclose the nature and substance of any such ex parte communication before the matter is acted upon, so that other parties have an opportunity to respond; disclosure alone does not disqualify a member from participating unless the member cannot remain impartial.
- h) **Conflict of Interest.** In order to assure their independence and impartiality on behalf of the common good, Officials shall not use their official positions to influence government decisions in which they have a material financial interest, or where they have an organizational responsibility or personal relationship which may give the appearance of a conflict of interest. In accordance with the law, Officials shall disclose investments, interests in real property, sources of income, and gifts, and they shall abstain from participating in deliberations and decision-making where conflicts may exist.
- i) **Gifts and Favors.** Officials shall not take any special advantage of services or opportunities for personal gain by virtue of their public office that are not available to the public in general. They shall refrain from accepting any gifts, favors, or promises of future benefits which might compromise their independence of judgment or action or give the appearance of being compromised.
- j) **Confidential Information.** Officials shall respect the confidentiality of information concerning the property, personnel, and/or affairs of the City. They shall neither disclose confidential information without proper legal authorization, nor use such information to advance their personal, financial, and/or other private interests.
- k) **Use of Public Resources.** Officials shall not use public resources not available to the public in general, such as City staff time, equipment, supplies, or facilities, for private gain or personal purposes.
- l) **Representation of Private Interests.** Members of the Council shall not appear on behalf of the private interests of third parties before the Council or any committee, commission, or proceeding of the City, nor shall members of committees and commissions appear before their own bodies or before the Council on behalf of the private interests of third parties on matters related to the areas of service of their bodies.
- m) **Advocacy.** Officials shall represent the official policies or positions of the City Council, committee, or commission to the best of their ability when designated as delegates for this purpose. When presenting their individual opinions and positions, Officials shall explicitly state that they do not represent their body or the City of Dublin, nor shall they allow the inference that they do. Councilmembers and committee and commission members have the right to endorse candidates for all Council seats or other elected offices; it is inappropriate, however, to mention or display endorsements during City Council meetings, committee and commission meetings, or other official City meetings.
- n) **Policy Role of City Councilmembers.** Councilmembers shall respect and adhere to the council-manager structure of City government as established under the Dublin Municipal Code and applicable state law. In this structure, the City Council determines the policies of the City with the advice, information, and analysis provided by the public, committees and commissions, and City staff. Councilmembers shall not interfere with the administrative functions of the City or the professional duties of City staff, nor impair the ability of staff to implement Council policy decisions.
- o) **Independence of Committees and Commissions.** Because of the value of the independent advice of committees and commissions to the public decision-making process, Councilmembers shall refrain from using their position to influence the deliberations or outcomes of committee and commission proceedings.

- p) **Positive Work Environment.** Officials shall support the maintenance of a positive and constructive work environment for City employees and for residents and businesses dealing with the City. Officials shall recognize their special role in dealings with City employees so as to in no way create the perception of inappropriate direction to staff.
- q) **Commitment to Attendance.** Officials recognize that regular attendance at City Council, committee, and commission meetings is essential to fulfilling their duty to represent the Dublin community and to the orderly conduct of the public's business. Officials shall make attendance at scheduled meetings a priority, and where an absence is unavoidable, shall provide timely notice consistent with the City's attendance and excusal procedures.

C. Conduct

This Section of the Code describes the manner in which Officials should treat one another, City staff, constituents, and others they come into contact with in representing the City of Dublin.

1. Conduct with One Another

a) In Public Meetings.

- i. **Practice civility and decorum in discussions and debate.** Difficult questions, tough challenges to a particular point of view, and criticism of ideas and information are legitimate elements of a free democracy in action. This does not allow, however, Officials to make belligerent, personal, impertinent, slanderous, threatening, abusive, or disparaging comments. No shouting or physical actions that could be construed as threatening will be tolerated.
- ii. **Honor the role of the Mayor or Chair in maintaining order.** It is the responsibility of the Mayor or Chair to keep the comments of Officials on track during public meetings. Officials should honor efforts by the Mayor or Chair to focus discussion on current agenda items. Disagreement about the Mayor or Chair's actions should be voiced politely and with reason.
- iii. **Avoid personal comments that could offend other Officials.** If an Official is personally offended by the remarks of another member, the offended Official should note the actual words used and call for a "point of personal privilege" that asks the other Official to justify or apologize for the language used. The chair will maintain control of this discussion.
- iv. **Demonstrate effective problem-solving approaches.** Officials have a public stage to show how individuals with disparate points of view can find common ground and seek a compromise that benefits the community overall. Officials should raise concerns about a specific component and seek amendment before voting against an item as a whole, rather than treating one disagreement as grounds to reject a complex, significant item.

b) Outside of Public Meetings.

- i. **Continue respectful behavior in private.** The same level of respect and consideration of differing points of view that is expected in public discussions should be maintained in private conversations.
- ii. **Be aware of the insecurity of written notes, voicemail messages, email, and texts.** Written notes, voicemail messages, email, texts, and other messages should be treated as potentially public communication, whether or not they are ultimately disclosable under the Public Records Act.

2. Conduct with City Staff

Officials are expected to treat all staff as professionals, engaging in clear, honest communication that respects the abilities, experience, and dignity of each individual staff person.

a) In Public Meetings.

- i. **Keep questions related to the matter at hand.*** Lines of questioning during public meetings should be limited to the item(s) being considered and should not be used to evaluate or substantiate an individual staff person's general knowledge, education, experience, or personal opinion.
- ii. **Treat staff as members of your own team.*** Officials should attempt to communicate questions, corrections, and/or clarifications about reports requiring official action to staff prior to Council, committee, or commission meetings. Allowing staff to prepare for a public meeting helps avoid surprises that can be disruptive to the business of the City.
- iii. **Do not engage in personal attacks of any kind, under any circumstance.*** Officials should be aware, because of the power dynamic of their roles, that their body language and tone of voice, as well as the words they use, can appear intimidating or aggressive to staff members.

b) Outside of Public Meetings.

- i. **Direct all communication to the appropriate City staff.*** All communications (feedback, requests for information, inquiries, etc.) from Councilmembers must be routed directly to the City Manager or designee, or to the City Attorney as necessary. Communications between appointed officials and staff can be directed to the staff assigned to the committee or commission.
- ii. **Do not disrupt City staff from their jobs.*** Officials should not disrupt City staff while they are in meetings, on the phone, or engrossed in performing their job functions.
- iii. **Do not publicly criticize an individual employee.*** Officials should never express concerns about the performance of a City employee in public, to the employee directly, or to the employee's manager. Comments about staff performance should only be made to the City Manager, or the City Attorney as appropriate, through private correspondence or conversation.
- iv. **Do not get involved in certain administrative functions.*** Officials must not attempt to influence City staff on the making of appointments, the awarding of contracts, the selection of consultants, the processing of development applications, or the granting of City licenses and permits.
- v. **Limit requests for staff support.*** Routine secretarial support (e.g., scheduling events for the City Council as a whole, making travel arrangements, creating certificates of recognition, etc.) is provided to all Councilmembers. Requests for additional staff support — even in high-priority or emergency situations — should be made to the City Manager, and/or City Attorney, as appropriate, who are responsible for allocating City resources to maintain a professional, well-run City government.
- vi. **Do not solicit political support from staff.*** Elected and appointed officials should not solicit any type of political support (e.g., financial contributions, display of posters or lawn signs, name on a support list, etc.) from City staff. City staff may, as private residents with constitutional rights, support political candidates, but all such activities must be conducted away from the workplace and after working hours.

3. Conduct with the Public**a) In Public Meetings.**

- i. **Be welcoming to speakers and treat them with care.*** Making the public feel welcome is an important part of the democratic process. No signs of partiality, prejudice, or disrespect should

be evident on the part of individual members toward anyone participating in a public forum. While clarifying questions may be asked, an Official's primary role during public testimony is to listen.

- ii. *Be fair and equitable in allocating public comment time to individual speakers.*** The Mayor or Chair will announce limits on speakers at the start of the public comment process. After the close of public comment, no more public testimony will be accepted unless the chair reopens the public comment period for a limited and specific purpose, and with the consensus of the City Council, committee, or commission.
- iii. *Maintain an open mind.*** Members of the public deserve an opportunity to influence the thinking of elected and appointed officials. Expressing an opinion or passing judgment prior to the close of public comment casts doubt on a member's ability to conduct a fair review of the issue, particularly when officials are serving in a quasi-judicial capacity.
- iv. *Ask for clarification, but avoid debate and argument with the public.*** Questions by Officials to public speakers should seek only to clarify or expand information; it is never appropriate to belligerently challenge or belittle a speaker. Officials' personal opinions or inclinations about upcoming votes should not be revealed until after the public comment period is closed.
- v. *Do not engage in personal attacks of any kind, under any circumstance.*** Officials should be aware that their body language and tone of voice, as well as the words they use, can appear intimidating or aggressive.

b) Outside of Public Meetings.

- i. *Make no promises on behalf of the City Council, committee, commission, or City.*** Officials will frequently be asked to explain a Council, committee, commission action, or to give their opinion about an issue, as they meet and talk with constituents in the community. It is appropriate to give a brief overview of City policy and to refer constituents to City staff for further information. It is inappropriate to overtly or implicitly promise City Council, committee, or commission action, or to promise that City staff will do something specific.
- ii. *Make no personal comments about other Officials.*** It is acceptable to publicly disagree about an issue, but it is unacceptable to make derogatory comments about other Officials, their opinions, and their actions.

4. Conduct with Other Public Agencies

- a) Be clear about representing the governing or advisory body versus personal interests.** When representing the City, a committee, or a commission before another public agency, an Official must support and advocate the official body's position on an issue, not a personal viewpoint. Otherwise, an Official who chooses to comment publicly on a matter must be clear that they are expressing a personal opinion, not an official City, committee, or commission position.

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- b) Correspondence should also be clear about representation.** City letterhead may be used when a Councilmember is representing the City and the City's official position. City letterhead should not be used for non-City business, nor for correspondence representing a dissenting point of view from an official Council position.

5. Conduct Between City Council and Appointed Officials

- a) **Limit attendance at committee or commission meetings.** Councilmembers should be sensitive to how their participation — especially on behalf of an individual, business, or developer — could be viewed as unfairly affecting the process. Individual Councilmembers should not influence commission and committee members and are discouraged from attending commission and committee meetings.
- b) **Limit contact with committee and commission members to questions of clarification.** It is inappropriate for a Councilmember to contact a committee or commission member to lobby on behalf of an individual, business, or developer, and vice versa.
- c) **Remember that committees and commissions serve the community, not individual Councilmembers.** Committee and commission members do not report to individual Councilmembers, nor should Councilmembers feel they have the power or right to threaten committee or commission members with removal because of disagreement over an issue. Appointment and re-appointment to a committee or commission should be based on criteria such as expertise, ability to work with staff and the public, and commitment to fulfilling official duties; a committee or commission appointment should not be used as a political “reward.”
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6. Conduct with the Media

- a) **Be clear about whether you are expressing an official or personal opinion.** In practice, the Mayor is the designated representative of the Council to present and speak on an official City position. However, if an individual Councilmember is contacted by the media, the Councilmember should be clear about whether their comments represent the official City position or a personal viewpoint.
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1. Purpose and General Principle

This Section establishes the process for addressing an alleged violation of this Code by an Official. Officials themselves have the primary responsibility to ensure ethical standards are understood and met. Nothing in this Section limits the City's separate legal obligations, or the separate rights of any person, under state law.

2. Raising a Concern

- a) An Official who believes another Official has violated this Code should, where appropriate and safe to do so, raise the concern directly with that Official first.
- b) A City staff member with a concern about an Official's conduct toward them may report it to the City Manager, or to the City Attorney if the concern involves the City Manager.
- c) The City Manager's own reporting path for a concern involving a Councilmember follows Section 3(d), below.

3. Formal Complaint

- a) If informal resolution does not resolve the concern, or is not appropriate, a formal complaint may be submitted in writing to the City Clerk.
- b) A complaint against a Councilmember must be jointly submitted by at least two members of the City Council, or initiated by the Mayor (or Vice Mayor, if the complaint concerns the Mayor). A complaint against a committee or commission member may be submitted by the Mayor, a Councilmember, the chair of the member's own body, or the City Manager.
- c) A complaint involving the City Manager should be submitted to the Mayor, or the Vice Mayor if the Mayor is involved, or directly to the City Attorney if the concern involves a majority of the Council or internal reporting would not be effective.
- d) The City Clerk shall provide the Official named in the complaint ("the Responding Official") with written notice, including a copy of the complaint, within 10 days.

4. Threshold Review

Before a full investigation begins, the City Council (for a complaint against a Councilmember) or the Mayor (for a complaint against a committee or commission member) shall determine whether the complaint, if true, would constitute a violation of this Code. A complaint that does not meet this threshold shall be dismissed without further proceedings, and the outcome documented by the City Clerk. This review shall occur at a noticed public meeting if it concerns a Councilmember.

5. Investigation

- a) If the threshold is met, the matter shall be investigated by an ad hoc committee of Councilmembers (excluding the Responding Official and any complainant), the City Manager, the City Attorney, or an independent investigator, as appropriate and free of conflicts.
- b) The investigation shall be completed within 90 days and shall result in a written report addressing whether the evidence supports a finding that this Code was violated, and whether a hearing is warranted.

6. Hearing

If a hearing is warranted, it shall be scheduled within 30 days of the investigative report, at a noticed public meeting if the Responding Official is a Councilmember. The Responding Official shall receive reasonable advance access to the evidence and a meaningful opportunity to respond and be heard before any determination is made.

7. Findings and Determination

A finding that this Code was violated must be based on written findings supported by substantial evidence, and requires a majority vote of the members eligible to vote. The Responding Official shall not vote on their own matter.

8. Available Sanctions

Upon a sustained finding, the following sanctions are available, calibrated to the severity and nature of the violation:

- a) For a **Councilmember**: informal counseling; reprimand; formal censure (statement via a resolution); reassignment or loss of committee, subcommittee, or intergovernmental assignments; restriction of City-funded travel; restriction of direct communication with staff. Because a Councilmember is an elected official, removal from office through this Code is not available; removal can occur only through recall by the voters or, where applicable, through the process described in Government Code § 36513 (forfeiture for unexcused absence).
- b) For a **committee or commission member**: counseling, verbal reprimand, or written warning (which may be kept confidential to the extent the law allows); formal censure; suspension; or removal from office, by majority vote of the Council at a noticed public meeting.

9. Non-Retaliation

No Official shall retaliate against any person for raising a good-faith concern or participating in a proceeding under this Section. Retaliation is itself a violation of this Code, evaluated under this same procedure.

10. Public Meeting Requirements

Nothing in this Section alters the City's obligations under the Ralph M. Brown Act. Initial, informal steps under Section D.2 may remain confidential, but any formal Council determination or sanction concerning a Councilmember must occur at a noticed public meeting, consistent with Government Code § 54957(b)(4), which excludes elected officials from the Act's closed-session personnel exception.

11. Records

The City Clerk shall maintain a record of each complaint's disposition, redacted as required by the Public Records Act, sufficient to document that this procedure was followed.

E. Implementation

As an expression of the standards of conduct expected of its members, this Code of Ethics and Conduct is intended to be self-enforcing. It therefore becomes most effective when Officials are thoroughly familiar with it and embrace its provisions. For this reason, this document shall be included in the regular orientation for newly elected Councilmembers and appointed members of committees and commissions.

Members entering office shall sign a statement (Exhibit A) affirming that they have read and understood the City of Dublin Code of Ethics and Conduct as well as other policies related to the position they hold. The City Council can, by consensus, ask to review this Code annually and consider any recommendations for updates.

Exhibit A — Model of Excellence Member Statement

MODEL OF EXCELLENCE Dublin City Council

MEMBER STATEMENT

As a member of the Dublin City Council, I agree to uphold the Code of Ethics and Conduct for Elected and Appointed Officials and to conduct myself according to the following model of excellence. I will:

- Recognize the worth of individual members and appreciate their individual talents, perspectives, and contributions;
- Help create an atmosphere of respect and civility where individual members, City staff, and the public are free to express their ideas and work to their full potential;
- Conduct my personal and public affairs with honesty, integrity, fairness, and respect for others;
- Respect the dignity and privacy of individuals and organizations;
- Keep the common good as my highest purpose and focus on achieving constructive solutions for the public benefit;
- Avoid and discourage conduct which is divisive or harmful to the best interests of Dublin; and
- Treat all people with whom I come in contact in the way I wish to be treated.

I affirm that I have read and understood the City of Dublin Code of Ethics and Conduct for Elected and Appointed Officials.

I also affirm that I have read and understood the City of Dublin's Rules of the Conduct of Meetings of the City Council, City Council Norms, and the Personal Devices, Personal Accounts, and Messages Policy.

Signature

Date

MODEL OF EXCELLENCE Committees and Commissions

MEMBER STATEMENT

As a member of a City of Dublin committee or commission, I agree to uphold the Code of Ethics and Conduct for Elected and Appointed Officials and to conduct myself according to the following model of excellence. I will:

- Recognize the worth of individual members and appreciate their individual talents, perspectives, and contributions;
- Help create an atmosphere of respect and civility where individual members, City staff, and the public are free to express their ideas and work to their full potential;
- Conduct my personal and public affairs with honesty, integrity, fairness, and respect for others;
- Respect the dignity and privacy of individuals and organizations;
- Keep the common good as my highest purpose and focus on achieving constructive solutions for the public benefit;
- Avoid and discourage conduct which is divisive or harmful to the best interests of Dublin; and
- Treat all people with whom I come in contact in the way I wish to be treated.

I affirm that I have read and understood the City of Dublin Code of Ethics and Conduct for Elected and Appointed Officials.

I also affirm that I have read and understood the bylaws for the commission or committee on which I serve.

Signature

Date

City of Dublin

Code of Ethics and Conduct for Elected and Appointed Officials

DRAFT

~~September~~~~August~~ 2026

A. Policy Purpose

The Dublin City Council has adopted this Code of Ethics and Conduct for its members, and for the members of the City's committees and commissions, to ensure the integrity of local government and its effective, fair operation.

B. Ethics

The residents and businesses of Dublin are entitled to a local government that is fair, ethical, and accountable, and that has earned the public's full confidence in its integrity. The effective function of democratic government therefore requires that:

- public officials, both elected and appointed, comply with both the letter and the spirit of the laws and policies affecting the operations of government;
- public officials be independent, impartial, and fair in their judgment and actions;
- public office be used for the public good, not for personal gain; and
- public deliberations and processes be conducted openly, unless legally confidential, in an atmosphere of respect and civility.

1. Guiding Principles

The following principles provide guidance on ethical decision-making for members of the City Council and appointed members of the City's committees and commissions (collectively referred to as "Officials" throughout this document).

- a) **Act in the Public Interest.** Recognizing that stewardship of the public interest must be their primary concern, Officials will work for the common good of the people of Dublin and not for any private or personal interest, and they will assure fair and equal treatment of all persons, claims, and transactions coming before the City Council, committees, and/or commissions.
- b) **Comply with Both the Spirit and the Letter of the Law and City Policy.** Officials shall comply with the laws of the United States, the State of California, and the City of Dublin in the performance of their public duties. These laws include, but are not limited to: the United States and California constitutions; the Ralph M. Brown Act; the Political Reform Act; the Dublin Municipal Code; commission and committee bylaws; the City's Rules of the Conduct of Meetings of the City Council; the City Council Norms; the City's Personal Devices, Personal Accounts, and Messages Policy; and laws pertaining to conflicts of interest, election campaigns, financial disclosures, and open processes of government.
- c) **Conduct of Officials.** The professional and personal conduct of Officials must be above reproach and avoid even the appearance of impropriety. Officials shall refrain from abusive conduct, personal charges, or verbal attacks upon the character or motives of other members of the Council, committees and commissions, City staff, and/or the public.
- d) **Respect for Process.** Officials shall perform their duties in accordance with the processes and rules of order established by the City Council and committees and commissions governing the deliberation of public policy issues, meaningful involvement of the public, and implementation of policy decisions by City staff.
- e) **Conduct of Public Meetings.** Officials shall prepare themselves for public issues, listen courteously and attentively to all public discussion before the body, and focus on the business at hand. They shall refrain from interrupting other speakers, making personal comments not germane to the business of the body, or otherwise interfering with the orderly conduct of meetings.
- f) **Decisions Based on Merit.** Officials shall base their decisions on the merits and substance of the matter at hand, rather than on unrelated considerations.

- g) **Communication and Disclosure of Outside Contacts.** Officials shall publicly disclose substantive information that is relevant to a matter under consideration by the Council, or by a committee or commission, which they may have received from sources outside of the public decision-making process. When serving in a quasi-judicial capacity, Officials shall disclose the nature and substance of any such ex parte communication before the matter is acted upon, so that other parties have an opportunity to respond; disclosure alone does not disqualify a member from participating unless the member cannot remain impartial.
- h) **Conflict of Interest.** In order to assure their independence and impartiality on behalf of the common good, Officials shall not use their official positions to influence government decisions in which they have a material financial interest, or where they have an organizational responsibility or personal relationship which may give the appearance of a conflict of interest. In accordance with the law, Officials shall disclose investments, interests in real property, sources of income, and gifts, and they shall abstain from participating in deliberations and decision-making where conflicts may exist.
- i) **Gifts and Favors.** Officials shall not take any special advantage of services or opportunities for personal gain by virtue of their public office that are not available to the public in general. They shall refrain from accepting any gifts, favors, or promises of future benefits which might compromise their independence of judgment or action or give the appearance of being compromised.
- j) **Confidential Information.** Officials shall respect the confidentiality of information concerning the property, personnel, and/or affairs of the City. They shall neither disclose confidential information without proper legal authorization, nor use such information to advance their personal, financial, and/or other private interests.
- k) **Use of Public Resources.** Officials shall not use public resources not available to the public in general, such as City staff time, equipment, supplies, or facilities, for private gain or personal purposes.
- l) **Representation of Private Interests.** Members of the Council shall not appear on behalf of the private interests of third parties before the Council or any committee, commission, or proceeding of the City, nor shall members of committees and commissions appear before their own bodies or before the Council on behalf of the private interests of third parties on matters related to the areas of service of their bodies.
- m) **Advocacy.** Officials shall represent the official policies or positions of the City Council, committee, or commission to the best of their ability when designated as delegates for this purpose. When presenting their individual opinions and positions, Officials shall explicitly state that they do not represent their body or the City of Dublin, nor shall they allow the inference that they do. Councilmembers and committee and commission members have the right to endorse candidates for all Council seats or other elected offices; it is inappropriate, however, to mention or display endorsements during City Council meetings, committee and commission meetings, or other official City meetings.
- n) **Policy Role of City Councilmembers.** Councilmembers shall respect and adhere to the council-manager structure of City government as established under the Dublin Municipal Code and applicable state law. In this structure, the City Council determines the policies of the City with the advice, information, and analysis provided by the public, committees and commissions, and City staff. Councilmembers shall not interfere with the administrative functions of the City or the professional duties of City staff, nor impair the ability of staff to implement Council policy decisions.
- o) **Independence of Committees and Commissions.** Because of the value of the independent advice of committees and commissions to the public decision-making process, Councilmembers shall refrain from using their position to influence the deliberations or outcomes of committee and commission proceedings.
- p) **Positive Work Environment.** Officials shall support the maintenance of a positive and constructive work environment for City employees and for residents and businesses dealing with the City. Officials shall

recognize their special role in dealings with City employees so as to in no way create the perception of inappropriate direction to staff.

p)q) Commitment to Attendance. Officials recognize that regular attendance at City Council, committee, and commission meetings is essential to fulfilling their duty to represent the Dublin community and to the orderly conduct of the public's business. Officials shall make attendance at scheduled meetings a priority, and where an absence is unavoidable, shall provide timely notice consistent with the City's attendance and excusal procedures.

C. Conduct

This Section of the Code describes the manner in which Officials should treat one another, City staff, constituents, and others they come into contact with in representing the City of Dublin.

1. Conduct with One Another

a) In Public Meetings.

- i. **Practice civility and decorum in discussions and debate.** Difficult questions, tough challenges to a particular point of view, and criticism of ideas and information are legitimate elements of a free democracy in action. This does not allow, however, Officials to make belligerent, personal, impertinent, slanderous, threatening, abusive, or disparaging comments. No shouting or physical actions that could be construed as threatening will be tolerated.
- ii. **Honor the role of the Mayor or Chair in maintaining order.** It is the responsibility of the Mayor or Chair to keep the comments of Officials on track during public meetings. Officials should honor efforts by the Mayor or Chair to focus discussion on current agenda items. Disagreement about the Mayor or Chair's actions should be voiced politely and with reason.
- iii. **Avoid personal comments that could offend other Officials.** If an Official is personally offended by the remarks of another member, the offended Official should note the actual words used and call for a "point of personal privilege" that asks the other Official to justify or apologize for the language used. The chair will maintain control of this discussion.
- iv. **Demonstrate effective problem-solving approaches.** Officials have a public stage to show how individuals with disparate points of view can find common ground and seek a compromise that benefits the community overall. Officials should raise concerns about a specific component and seek amendment before voting against an item as a whole, rather than treating one disagreement as grounds to reject a complex, significant item.

b) Outside of Public Meetings.

- i. **Continue respectful behavior in private.** The same level of respect and consideration of differing points of view that is expected in public discussions should be maintained in private conversations.
- ii. **Be aware of the insecurity of written notes, voicemail messages, email, and texts.** Written notes, voicemail messages, email, texts, and other messages should be treated as potentially public communication, whether or not they are ultimately disclosable under the Public Records Act.

2. Conduct with City Staff

Officials are expected to treat all staff as professionals, engaging in clear, honest communication that respects the abilities, experience, and dignity of each individual staff person.

a) In Public Meetings.

- i. *Keep questions related to the matter at hand.*** Lines of questioning during public meetings should be limited to the item(s) being considered and should not be used to evaluate or substantiate an individual staff person's general knowledge, education, experience, or personal opinion.
- ii. *Treat staff as members of your own team.*** Officials should attempt to communicate questions, corrections, and/or clarifications about reports requiring official action to staff prior to Council, committee, or commission meetings. Allowing staff to prepare for a public meeting helps avoid surprises that can be disruptive to the business of the City.
- iii. *Do not engage in personal attacks of any kind, under any circumstance.*** Officials should be aware, because of the power dynamic of their roles, that their body language and tone of voice, as well as the words they use, can appear intimidating or aggressive to staff members.

b) Outside of Public Meetings.

- i. *Direct all communication to the appropriate City staff.*** All communications (feedback, requests for information, inquiries, etc.) from Councilmembers must be routed directly to the City Manager or designee, or to the City Attorney as necessary. Communications between appointed officials and staff can be directed to the staff assigned to the committee or commission.
- ii. *Do not disrupt City staff from their jobs.*** Officials should not disrupt City staff while they are in meetings, on the phone, or engrossed in performing their job functions.
- iii. *Do not publicly criticize an individual employee.*** Officials should never express concerns about the performance of a City employee in public, to the employee directly, or to the employee's manager. Comments about staff performance should only be made to the City Manager, or the City Attorney as appropriate, through private correspondence or conversation.
- iv. *Do not get involved in certain administrative functions.*** Officials must not attempt to influence City staff on the making of appointments, the awarding of contracts, the selection of consultants, the processing of development applications, or the granting of City licenses and permits.
- v. *Limit requests for staff support.*** Routine secretarial support (e.g., scheduling events for the City Council as a whole, making travel arrangements, creating certificates of recognition, etc.) is provided to all Councilmembers. Requests for additional staff support — even in high-priority or emergency situations — should be made to the City Manager, and/or City Attorney, as appropriate, who are responsible for allocating City resources to maintain a professional, well-run City government.
- vi. *Do not solicit political support from staff.*** Elected and appointed officials should not solicit any type of political support (e.g., financial contributions, display of posters or lawn signs, name on a support list, etc.) from City staff. City staff may, as private residents with constitutional rights, support political candidates, but all such activities must be conducted away from the workplace and after working hours.

3. Conduct with the Public**a) In Public Meetings.**

- i. *Be welcoming to speakers and treat them with care.*** Making the public feel welcome is an important part of the democratic process. No signs of partiality, prejudice, or disrespect should be evident on the part of individual members toward anyone participating in a public forum. While clarifying questions may be asked, an Official's primary role during public testimony is to listen.

- ii. **Be fair and equitable in allocating public comment time to individual speakers.** The Mayor or Chair will announce limits on speakers at the start of the public comment process. After the close of public comment, no more public testimony will be accepted unless the chair reopens the public comment period for a limited and specific purpose, and with the consensus of the City Council, committee, or commission.
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5. Conduct Between City Council and Appointed Officials

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~~However, they~~ should be sensitive to how their participation — especially on behalf of an individual, business, or developer — could be viewed as unfairly affecting the process. ~~Individual Councilmembers should not influence commission and committee members and are discouraged from attending commission and committee meetings. Any public comments by a Councilmember at a committee or commission meeting (or vice versa) should be clearly identified as an individual opinion, not a representation of the feelings of the full body.~~

~~b)a)~~

c)b) Limit contact with committee and commission members to questions of clarification. It is inappropriate for a Councilmember to contact a committee or commission member to lobby on behalf of an individual, business, or developer, and vice versa. ~~It is acceptable for Councilmembers to contact committee or commission members to clarify a position taken by the committee or commission.~~

d)c) Remember that committees and commissions serve the community, not individual Councilmembers.

Committee and commission members do not report to individual Councilmembers, nor should Councilmembers feel they have the power or right to threaten committee or commission members with removal because of disagreement over an issue. Appointment and re-appointment to a committee or commission should be based on criteria such as expertise, ability to work with staff and the public, and commitment to fulfilling official duties; a committee or commission appointment should not be used as a political “reward.”

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- c) A complaint involving the City Manager should be submitted to the Mayor, or the Vice Mayor if the Mayor is involved, or directly to the City Attorney if the concern involves a majority of the Council or internal reporting would not be effective.
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Before a full investigation begins, the City Council (for a complaint against a Councilmember) or the Mayor (for a complaint against a committee or commission member) shall determine whether the complaint, if true, would constitute a violation of this Code. A complaint that does not meet this threshold shall be dismissed without further proceedings, and the outcome documented by the City Clerk. This review shall occur at a noticed public meeting if it concerns a Councilmember.

5. Investigation

- a) If the threshold is met, the matter shall be investigated by an ad hoc committee of Councilmembers (excluding the Responding Official and any complainant), the City Manager, the City Attorney, or an independent investigator, as appropriate and free of conflicts.
- b) The investigation shall be completed within 90 days and shall result in a written report addressing whether the evidence supports a finding that this Code was violated, and whether a hearing is warranted.

6. Hearing

If a hearing is warranted, it shall be scheduled within 30 days of the investigative report, at a noticed public meeting if the Responding Official is a Councilmember. The Responding Official shall receive reasonable advance access to the evidence and a meaningful opportunity to respond and be heard before any determination is made.

7. Findings and Determination

A finding that this Code was violated must be based on written findings supported by substantial evidence, and requires a majority vote of the members eligible to vote. The Responding Official shall not vote on their own matter.

8. Available Sanctions

Upon a sustained finding, the following sanctions are available, calibrated to the severity and nature of the violation:

- a) For a **Councilmember**: informal counseling; reprimand; formal censure (statement via a resolution); reassignment or loss of committee, subcommittee, or intergovernmental assignments; restriction of City-funded travel; restriction of direct communication with staff. Because a Councilmember is an elected official, removal from office through this Code is not available; removal can occur only through recall by the voters or, where applicable, through the process described in Government Code § 36513 (forfeiture for unexcused absence).
- b) For a **committee or commission member**: counseling, verbal reprimand, or written warning (which may be kept confidential to the extent the law allows); formal censure; suspension; or removal from office, by majority vote of the Council at a noticed public meeting.

9. Non-Retaliation

No Official shall retaliate against any person for raising a good-faith concern or participating in a proceeding under this Section. Retaliation is itself a violation of this Code, evaluated under this same procedure.

10. Public Meeting Requirements

Nothing in this Section alters the City's obligations under the Ralph M. Brown Act. Initial, informal steps under Section D.2 may remain confidential, but any formal Council determination or sanction concerning a Councilmember must occur at a noticed public meeting, consistent with Government Code § 54957(b)(4), which excludes elected officials from the Act's closed-session personnel exception.

11. Records

The City Clerk shall maintain a record of each complaint's disposition, redacted as required by the Public Records Act, sufficient to document that this procedure was followed.

1. Reporting Procedures

- a) ~~**Councilmember to Councilmember Concerns.**~~ Officials should point out infractions of this Code to the offending Official directly. If the conduct continues, the matter should be referred privately to the Mayor/Chair. If the Mayor/Chair is the individual whose actions are being challenged, the matter should be referred to the Vice Mayor/Vice Chair. It is the responsibility of the Mayor/Chair (or Vice Mayor/Vice Chair, as applicable) to initiate action if an Official's behavior may warrant sanction.
- b) ~~**Reporting Conduct Concerns Involving City Staff.**~~ A City staff member who believes an Official's conduct toward them violates this Code may report the concern to the City Manager. The City Manager or City Attorney, as applicable, shall determine appropriate next steps, which may include raising the matter with the Mayor/Chair consistent with Section D.1.a above.
- c) ~~**Reporting Conduct Concerns Involving the City Manager.**~~ Because the City Manager serves at the pleasure of the full City Council rather than reporting to any single Councilmember, the City Manager's own reporting path is as follows:

- i.—~~If the concern involves an individual Councilmember other than the Mayor~~, the City Manager shall report the concern privately to the Mayor, consistent with Section D.1.a.
 - ii.—~~If the concern involves the Mayor~~, the City Manager shall report the concern privately to the Vice Mayor.
 - iii.—If the concern involves both the Mayor and the Vice Mayor, involves a majority of the City Council, or if the City Manager reasonably believes internal reporting through the Mayor or Vice Mayor would not be effective or appropriate, the City Manager may instead report the concern directly to the City Attorney. The City Attorney shall independently determine appropriate next steps, which may include engaging independent outside counsel or an independent investigator to review the matter and report findings directly to the full City Council.
 - iv.—~~Regardless of the path used, if any~~, the City Manager may document the concern in writing and request that it be retained by the City Attorney's office.
- d) ~~Non-Retaliation.~~ No Official shall retaliate, or attempt to retaliate, against another Official, the City Manager, or other City staff member for reporting a good-faith concern under this Section. Retaliation against a person for making such a report is itself a violation of this Code and may result in sanction under Section D.2 below, independent of the outcome of the underlying concern.
- e) ~~Public Meeting Requirements.~~ Nothing in this Section is intended to alter the City's obligations under the Ralph M. Brown Act or the Public Records Act. A report made under Section D.1.b or Section D.1.c may be handled confidentially in its initial stages, but any formal action by the City Council to sanction a Councilmember generally must be taken at a noticed public meeting.

2. Sanctions

c) ~~Councilmember Sanctions:~~

- i.—~~Violations of this Code.~~ Depending on the severity and frequency of the conduct at issue, sanctions available to the City Council may include, without limitation: reprimand or formal censure; loss of seniority and/or committee or subcommittee assignments; restriction of official City-funded travel; and restriction of direct communication with certain City staff. A decision to censure requires City Council action at a public meeting.
- ii.—~~Model of Excellence.~~ Officials who do not sign the Model of Excellence Member Statement (Exhibit A) shall be ineligible for intergovernmental assignments or City Council subcommittees.
- iii.—~~Ethics Training for Local Officials.~~ Officials who are out of compliance with state or City-mandated requirements for ethics training—including the training required under Government Code Section 53235 (AB 1234)—shall not represent the City on intergovernmental assignments or City Council subcommittees and may be subject to other sanctions.

d) ~~Appointed Official Sanctions:~~

- i.—~~For lower-level issues,~~ the Mayor may administer counseling, a verbal reprimand, or a written warning to a committee or commission member who fails to comply with City policy. These lower-level sanctions are kept private to the degree allowed by law. Copies of any written reprimand are distributed to the Chair of the respective committee or commission, the City Clerk, the City Attorney, the City Manager, and the full City Council. Written reprimands are not included in public meeting packets, except as required under the Public Records Act.

ii.—~~For more serious conduct~~, the Mayor or a majority of the Council may call for a formal investigation, which the City Manager and/or City Attorney may be asked to conduct or have conducted. Investigation findings are reported to the full City Council as “Information Only” on the agenda of a noticed public meeting, subject to any redactions required to protect privacy interests under the Public Records Act. The Council then determines the next appropriate action at a noticed public hearing. Options other than “take no further action” must go through this public hearing process.

~~The Council may impose sanctions up to and including removal from office, decided by a majority vote of at least a quorum of the Council at a noticed public meeting. Any such disciplinary vote must be preceded by a formal report to the Council with supporting documentation. Nothing in this policy shall limit the City Council’s inherent authority to remove an appointee for any or no reason.~~

E. Implementation

As an expression of the standards of conduct expected of its members, this Code of Ethics and Conduct is intended to be self-enforcing. It therefore becomes most effective when Officials are thoroughly familiar with it and embrace its provisions. For this reason, this document shall be included in the regular orientation for newly elected Councilmembers and appointed members of committees and commissions.

Members entering office shall sign a statement (Exhibit A) affirming that they have read and understood the City of Dublin Code of Ethics and Conduct ~~as well as other policies related to the position they hold.~~ The City Council can, by consensus, ask to review this Code annually and consider any recommendations for updates.

Exhibit A — Model of Excellence Member Statement

MODEL OF EXCELLENCE

Dublin City Council, ~~Committees, and Commissions~~

MEMBER STATEMENT

As a member of the Dublin City Council ~~or of a City of Dublin committee or commission~~, I agree to uphold the Code of Ethics and Conduct for Elected and Appointed Officials and to conduct myself according to the following model of excellence. I will:

- Recognize the worth of individual members and appreciate their individual talents, perspectives, and contributions;
- Help create an atmosphere of respect and civility where individual members, City staff, and the public are free to express their ideas and work to their full potential;
- Conduct my personal and public affairs with honesty, integrity, fairness, and respect for others;
- Respect the dignity and privacy of individuals and organizations;
- Keep the common good as my highest purpose and focus on achieving constructive solutions for the public benefit;
- Avoid and discourage conduct which is divisive or harmful to the best interests of Dublin; and
- Treat all people with whom I come in contact in the way I wish to be treated.

I affirm that I have read and understood the City of Dublin Code of Ethics and Conduct for Elected and Appointed Officials.

I also affirm that I have read and understood the City of Dublin's Rules of the Conduct of Meetings of the City Council, City Council Norms, and the Personal Devices, Personal Accounts, and Messages Policy.

Signature _____

Date _____

MODEL OF EXCELLENCE
Committees and Commissions

MEMBER STATEMENT

As a member of a City of Dublin committee or commission, I agree to uphold the Code of Ethics and Conduct for Elected and Appointed Officials and to conduct myself according to the following model of excellence. I will:

- Recognize the worth of individual members and appreciate their individual talents, perspectives, and contributions;
- Help create an atmosphere of respect and civility where individual members, City staff, and the public are free to express their ideas and work to their full potential;
- Conduct my personal and public affairs with honesty, integrity, fairness, and respect for others;
- Respect the dignity and privacy of individuals and organizations;
- Keep the common good as my highest purpose and focus on achieving constructive solutions for the public benefit;
- Avoid and discourage conduct which is divisive or harmful to the best interests of Dublin; and
- Treat all people with whom I come in contact in the way I wish to be treated.

I affirm that I have read and understood the City of Dublin Code of Ethics and Conduct for Elected and Appointed Officials.

I also affirm that I have read and understood the bylaws for the commission or committee on which I serve.

Signature

Date



STAFF REPORT

CITY COUNCIL

DATE: August 18, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Draft Code of Ethics and Conduct for Elected and Appointed Officials
Prepared by: Colleen Tribby, City Manager

EXECUTIVE SUMMARY:

The City Council will review and provide feedback on a draft Code of Ethics and Conduct for Elected and Appointed Officials (Attachment 1). If so directed by the City Council, Staff will incorporate the Council's feedback and return with a final version for formal adoption by resolution at a future meeting.

STAFF RECOMMENDATION:

Receive the draft Code of Ethics and Conduct, and direct Staff to return with the final version for consideration and adoption at a future meeting.

FINANCIAL IMPACT:

None.

DESCRIPTION:

Background

At the May 5, 2026, meeting, the City Council adopted a resolution approving an update to the City Council Norms. During the discussion, the City Council directed Staff to bring back a code of ethics for consideration.

A code of ethics, also called a code of conduct, is a governance document that describes the standards of behavior a local agency expects of its elected and appointed officials: how they treat one another, staff, and the public; how they handle conflicts of interest, gifts, and confidential information; and how the agency responds if a concern about an official's conduct is raised. It is meant to be a practical, day-to-day reference, separate from the legal requirements already imposed on public officials by state law such as the Political Reform Act

and the Ralph M. Brown Act, or an agency's conflict-of-interest code, all of which continue to apply independently.

The City of Dublin has never adopted a standalone Code of Ethics and Conduct for the City Council or for the City's committees and commissions. Thus far, it has relied on the relatively simple list of City Council Norms to provide a general framework for conducting business in a positive, transparent, and respectful manner. The committees and commissions have only Bylaws and Rules of Procedure.

Draft Code of Ethics and Conduct (Attachment 1)

In preparing the draft Code of Ethics and Conduct for Dublin, Staff researched such policies of a representative sample of California cities, including Alameda, Sunnyvale, San José, Santa Clara, Belmont, Carlsbad, Irvine, Mountain View, Oceanside, Riverside, Santa Cruz, Torrance, Ventura, and West Hollywood, among others. Two consistent findings from that research shaped this draft:

- Most California cities with a code of this kind extend it beyond the City Council to cover members of committees and commissions as well — not the City Council alone. Dublin's draft follows that more common approach.
- Codes vary widely in depth, from short, values-based statements to detailed, procedural documents with a defined enforcement process. Alameda's and Sunnyvale's codes were the most comprehensive examples found, and this draft is modeled primarily on those two, adapted to reflect Dublin's council-manager structure and its own committees and commissions.

Key Provisions

The draft Code of Ethics and Conduct is organized into the following parts:

- Ethics — 16 guiding principles covering the public interest, legal compliance, conflicts of interest, gifts, confidentiality, use of public resources, and the Council's policy role under the council-manager structure.
- Conduct — specific, practical guidance on how Officials should interact with one another, Staff, the public, other agencies, and the media, both during public meetings and outside of them.
- Compliance and Enforcement — a defined, escalating process for addressing conduct concerns, along with sanctions available for more serious or repeated issues.
- Implementation — the Code is intended to be self-enforcing, introduced during orientation for new Councilmembers and committee/commission members, who would sign a "Model of Excellence" statement affirming they have read and understood it.

Next Steps

This item is presented tonight for discussion only. Based on the City Council's feedback, Staff will refine the draft and return with a final version and a resolution for adoption at a future meeting.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

- 1) Draft Code of Ethics and Conduct for Elected and Appointed Officials



STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Designation of Voting Delegates for the 2026 National League of Cities City Summit
Prepared by: Vanessa Rosales, CMC, Deputy City Clerk

EXECUTIVE SUMMARY:

The City Council will consider appointing a voting delegate, and up to two alternates, to attend and vote on the City's behalf at the National League of Cities City Summit in November 2026.

STAFF RECOMMENDATION:

Discuss the item and appoint a voting delegate, and up to two alternates, to attend and vote on the City's behalf at the National League of Cities City Summit in November 2026.

FINANCIAL IMPACT:

Sufficient funds have been allocated in the Fiscal Year 2026-27 Budget for councilmembers' attendance at the November 2026 Conference.

DESCRIPTION:

The National League of Cities (NLC) is an organization through which city officials work together on a national level to further their common interests and the interests of their residents.

The NLC City Summit is scheduled to be held November 19-21, 2026, in Nashville, Tennessee. During this conference, the annual business meeting is held, at which each member city is afforded the opportunity to shape the NLC's federal advocacy agenda for the upcoming year by casting a vote on preferred policy recommendations. In accordance with the NLC By-Laws, Article IV, Section 2 Member Voting (Attachment 1), the City is allowed only one voting delegate and two alternates. For Dublin to participate in this meeting, the City Council needs to appoint a voting delegate, and may appointment up to two alternates, to attend and

vote on the City's behalf at the Summit. Voting delegates must be registered for the conference and participate in person.

Once City Councilmembers have been appointed, notification of the voting delegate and alternate(s) will be forwarded to the NLC.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

- 1) National League of Cities By-Laws



Bylaws of the National League of Cities

Amended on November 19, 2016

ARTICLE I.

NAME, OBJECTS, MEANS, AND DEFINITIONS

Section 1. NAME, OBJECTS, AND MEANS. The name of the organization shall be the National League of Cities (NLC). It shall be a 501 (c) (4) nonprofit organization incorporated under the laws of the State of Illinois. The National League of Cities is dedicated to advancing the public interest, building democracy and community, and improving the quality of life by strengthening the capacity of local governments and advocating for the interests of local communities.

As custodians of democratic values, local government officials work together through the National League of Cities and their state municipal leagues to safeguard the authorities and improve the capabilities of general-purpose local governments to respond to the needs and aspirations of the people.

Local government officials act together through the National League of Cities and their state municipal leagues to express and advocate for their common interests and views as responsible partners in the federal system of governance.

Section 2. DEFINITIONS. As used herein, the words "city," "municipality," "local government," and "general-purpose local governments" shall mean any city, town or township, village, borough, or county that is a corporate entity or functions as such. The term "capacity"

references the means and ability to carry out the responsibilities of general-purpose local governments. The term "state" shall include any state, territory, or possession of the United States.

ARTICLE II.

MEMBERS

Section 1. MEMBER LEAGUES. Any state league or municipality or substantially similar organization (the dues of which are paid by municipalities and consisting of not less than ten active members) is eligible for membership in NLC and may be admitted as a member league upon filing the proper application and receiving the approval of the Board of Directors.

Section 2. MEMBER CITIES. Any city in the United States may, upon payment of the prescribed annual dues, become a member city and, as such, be entitled to all the services and privileges of NLC. It is herein provided that no city which is eligible to, but elects not to, hold membership in its respective state league shall be eligible for membership in NLC.

Section 3. AFFILIATE MEMBER CITIES. If a member state league participates in NLC's Affiliate Member Program, any city in such state, upon fulfillment of the requirements of its state league, may become an Affiliate Member City. An Affiliate Member City shall be entitled to all services and privileges provided by NLC and its member leagues. Elected Municipal officials of eligible affiliate cities shall be entitled to attend and participate in all organizational meetings of NLC, subject to rules and procedures set forth by the Board of Directors.

Section 4. STATE LEAGUE CITY. Any city, upon fulfillment of the requirements of its member state leagues, shall be eligible to become an NLC State League City. An NLC State League City shall be entitled to all the general services furnished to municipalities through the member state leagues. Such state league cities will not have the voting privileges of member cities and member state leagues.

ARTICLE III.

OFFICERS AND BOARD OF DIRECTORS

Section 1. LEAGUE OFFICERS. The officers of the National League of Cities shall be: a President, a First Vice President, a Second Vice President, an Immediate Past President, and an Executive Director. The Executive Director shall be appointed by the Board of Directors and shall hold office at the pleasure of that Board. The Executive Director shall be Secretary and Treasurer of NLC. The President, the First Vice President, and the Second Vice President, all of whom are elected at the annual meeting, shall hold office for one year, or until their successors are qualified. The term of office of all newly-elected and designated officers shall commence immediately upon adjournment of the annual meeting.

Section 2. BOARD OF DIRECTORS. The affairs of the National League of Cities shall be governed by a Board of Directors consisting of: the President, the First Vice President, the Second Vice President, the Chief Executive Officers from eight (8) member leagues, and forty (40) additional at-large members, all selected in the manner provided in Article III, Section 6 and Article IV. In addition, all Past Presidents still in elective office in a member city, and the Chair of each NLC standing Federal Advocacy Committee shall serve on the Board of Directors. The Board of Directors shall conduct the affairs of NLC when representatives of the membership are not assembled, including by a majority vote of Board of Directors members, determination or modification of national municipal policies, or adoption of resolutions on national legislation affecting cities. The Board of Directors may refer to the membership through the mail or electronically on any matter which is not otherwise provided for in these bylaws, the voting thereon to be as provided in Article IV, Section 5.

Section 3. TERMS. At-large members of the Board of Directors (referred to here as “Director”) shall serve a term of two (2) years from the date of their election. Directors shall take office immediately following the close of the annual meeting at which they are elected. No Director shall serve more than two (2) two-year terms. Fulfilling an incomplete term is not considered part of the term limit. Director terms shall be staggered so that approximately half the number of Directors will end their term in any given year.

Section 4: POWERS AND DUTIES OF OFFICERS. The powers and duties of the Officers of the National League of Cities shall be indicated by the general definition of the title of their offices. The President shall establish and appoint such committees as may be necessary, provided that standing Board committees shall be established by a majority vote of the Board of Directors and their membership appointed by the President. The Executive Director shall transact the financial business of NLC and keep a complete record of all transactions and, with such assistants and staff personnel as necessary, shall perform such other duties as NLC or the Board of Directors shall direct and shall receive such compensation as the Board of Directors may prescribe.

Section 5. EXECUTIVE COMMITTEE. There shall be an Executive Committee composed of the following members of the Board: the President, the First Vice President, the Second Vice President, the two (2) most immediate Past Presidents still in elective office in a member city, two (2) Chief Executive Officers of member leagues recommended by the President and approved by the Board, and up to three (3) members of the Board recommended by the President and approved by the Board. NLC's Executive Director shall also serve on the Committee in an *ex officio* capacity. The Executive Committee may exercise the powers of the Board between meetings of the Board unless otherwise specified by the Board. A majority of the members of the Executive Committee shall comprise a quorum. The Executive Committee shall meet at the call of the President or of a majority of its members. All official actions taken by the Executive Committee shall be reported to the Board at its next meeting or as otherwise specified by the Board.

Section 6. QUALIFICATIONS. Each elected officer of the National League of Cities shall be, at the time of their election, an elected official of a member city. Each Board member shall be, at the time of their election, an elected official of a member city or a chief executive officer, or equivalent officer of a member league.

Section 7. ELECTIONS. The elected officers and other members of the Board of the National League of Cities shall be elected in the manner provided for in Article IV. Nominations for all officers and Board members, except Past Presidents still in elective office in a member city and the Chairs of each standing federal advocacy committee, shall be made by a nominating

committee of not less than six (6) nor more than fourteen (14) members from member leagues and member cities and the most Immediate Past President, all of whom shall be appointed by the President. Nominations shall take into consideration the diversity of the membership. The Immediate Past President shall serve as Chair of the Nominating Committee. The Nominating Committee shall make its report in writing at least four hours before the scheduled election.

Section 8. VACANCIES. A vacancy shall occur in any office of the National League of Cities in the event that the person holding the office resigns or ceases to possess the essential qualifications for election to office as provided in Article III, Section 6. A vacancy in the office of President shall be filled by the succession of the First Vice President to that office. A vacancy in the office of the First Vice President shall be filled by the succession of the Second Vice President to that office. A vacancy in the office of the Second Vice President or other elected member of the Board of Directors shall continue until a new qualified person is elected under Article III, Section 7, unless it is filled for the unexpired term by a person selected by a majority vote of the remaining members of the Board of Directors. A vacancy which occurs for a person serving as a member of the Board of Directors as a Past President, a Federal Advocacy Committee Chair, or a Chief Executive Officer of a member league because that person ceases to possess the essential qualifications provided in Article III, Section 6 shall continue until a new, qualified Past President, Chair or Chief Executive Officer assumes such position on the Board of Directors.

Section 9. ADVISORY COUNCIL. The Board of Directors shall establish an Advisory Council, which shall consist of previous members of the Board of Directors who remain in elected office. The duties, responsibilities, and leadership of the Advisory Council shall be determined by the Board of Directors.

ARTICLE IV.

MEETINGS, VOTING, AND NATIONAL POLICIES

Section 1. MEMBERSHIP MEETINGS. An annual meeting of the membership shall take place during the organization's fall conference. At the annual meeting, the memberships shall

elect directors and officers, receive reports on activities of the association, and adopt national municipal policies for the coming year. The President may also call a special meeting of the membership. The time, place, and program of the annual meeting shall be determined by a motion of the Board of Directors. Notices of meetings for members shall be delivered to the mailing address or electronic address designated by the members not less than thirty (30) nor more than sixty (60) days before such meetings, provided that any notices required by this section may be waived before such meetings.

Section 2. MEMBER VOTING. In all meetings requiring the official decision of the National League of Cities, each member league shall be entitled to twenty votes. Each member city shall be entitled to one to twenty votes based upon population as follows:

Under 50,000	1 vote
50,000- 99,999	2 votes
100,000- 199,999	4 votes
200,000 - 299,999	6 votes
300,000- 399,999	8 votes
400,000 - 499,999	10 votes
500,000-599,999	12 votes
600,000 - 699,999	14 votes
700,000 - 799,999	16 votes
800,000- 899,999	18 votes
900,000 and above	20 votes

Member cities, but not member leagues, shall be required to cast unanimous votes.

It shall be the duty of the President in advance of or at the beginning of any such meeting to appoint a credentials committee of three persons, at least one of whom shall be a representative of a member city. As soon as practicable after the naming of the credentials committee, each member league shall designate one or more voting delegates not to exceed the number of votes to

which it is entitled, and may designate alternate voting delegates not to exceed the number of its voting delegates. Each member city shall designate one voting delegate and may designate one alternate voting delegate. It shall be the duty of the credentials committee to settle any dispute concerning the voting rights of members and their voting delegates and alternate voting delegates, the number of votes each is entitled to cast, and the total number of votes of all the members of NLC.

All voting shall be by voice vote unless a weighted vote is demanded by ten percent or more of the certified votes present at the meeting. When the weighted vote is taken, voting shall be limited to the duly certified voting delegates, or their alternates, each casting the total number of votes to which the voter is entitled by the certified voting roll. A majority vote of the certified votes present at the meeting shall be required for the election of any officer or member of the Board of Directors, or for passage of any matter of business brought before the business meeting. There shall be no voting by proxy.

Section 3. MEMBER QUORUM. A quorum at the annual business meeting or special meeting shall consist of majority of the votes certified to the meeting.

Section 4. MEMBER RESOLUTIONS ON POLICIES. Resolutions on national legislation affecting cities shall be submitted to the voting delegates in writing by the Board of Directors, by a resolution committee appointed therefore, or by special petition, provided that such petition is presented to the annual convention by ten (10) voting delegates with the consent of a majority vote. A two-thirds vote shall be necessary to adopt all resolutions.

Section 5. BALLOTS BY MAIL OR ELECTRONICALLY. Except as otherwise expressly provided by these bylaws, a matter of business may be submitted to a vote of the membership through the mail or electronically. If submitted through the mail, a response from a member league shall bear the signature of the President and the countersignature of the Chief Executive Officer of such member leagues, and the response from a member city shall bear the signature of the Mayor. If submitted electronically, the response must come from the electronic address designated by the member. Weighted voting shall be in effect in all balloting through the mail or electronically.

Section 6. BOARD MEETINGS. Notices of meetings of the Board of Directors shall be delivered through the mail to the mailing address or electronically to the email address designated by the members of the Board of Directors not less than five (5) nor more than forty (40) days before such meetings, unless otherwise required by law, provided that any notices required by this section may be waived before such meetings. A majority of the directors present at a meeting shall constitute a quorum, provided that a quorum consists of no less than one-third of the directors then in office. An act of the majority of the directors present at a meeting at which a quorum is present shall be considered an act of the Board of Directors, unless otherwise required by the articles of incorporation or these bylaws.

ARTICLE V.

FINANCIAL MATTERS

Section 1. DUES AND CHARGES. The annual membership dues of the National League of Cities, and the schedule of fees or systems of charges for all other services of NLC, shall be established by a resolution of the Board of Directors. Within such resolution, general limits may be set by NLC in annual meetings. Annual membership dues and annual service charges shall be due the first day of the membership year for which they are assessed.

Section 2. FISCAL YEAR. The fiscal year of the National League of Cities shall be from October 1 to September 30, inclusive of those dates.

Section 3. ANNUAL BUDGET. The revenues and expenditures of the National League of Cities shall be planned and approved through an annual budget, and financial obligations shall be incurred based on that budget. The annual budget shall be prepared by the Executive Director under the direction of the Board of Directors. The budget shall be approved by the Board of Directors.

Section 4. ANNUAL AUDIT. An annual audit shall be made of the financial affairs of the National League of Cities by a certified public accountant designated or approved by the Board of Directors.

ARTICLE VI.

AMENDMENTS

These bylaws may be repealed or amended at the annual meeting of the membership, or through the mail or electronically. In the case of an annual meeting, a two-thirds majority of the certified votes cast at the meeting shall be necessary to pass such an amendment. In the case that an amendment is submitted through the mail or electronically, a two-thirds majority of the votes cast shall be necessary to pass such an amendment. Amendments may be proposed either by initiatory petitions signed by members present at the meeting or by resolution of the Board of Directors, provided notice of such proposed amendments to be voted on at the annual meeting shall be delivered to all members not less than fifteen days prior to that annual meeting.

In the case that an amendment is submitted through the mail or electronically, not less than forty days shall elapse before the votes are canvassed by two members of the Board of Directors. Such amendments, when adopted through the mail or electronically, shall become effective ten days after the votes are canvassed and written notice of adoption is delivered to the membership.

ARTICLE VII.

PARLIAMENTARY PROCEDURE

Except as provided in these bylaws, and such official rules and procedures for the conduct of business meetings as may be adopted by the Board of Directors, the procedures defined in *Robert's Rules of Order* (revised edition) shall prevail in matters of parliamentary procedure.



STAFF REPORT

CITY COUNCIL

DATE: September 1, 2026

TO: Honorable Mayor and City Councilmembers

FROM: Colleen Tribby, City Manager

SUBJECT: Report on the Cost-of-Living Adjustment Methodology for City Employee Compensation
Prepared by: Sarah Monnastes, Human Resources Director/Risk Manager

EXECUTIVE SUMMARY:

The City Council will receive a report on the City's cost-of-living adjustment (COLA) practice and methodology. The report includes information about the annual escalators provided to City contractors as well as a look at how other Bay Area cities handle compensation increases. This information was requested by the City Council, noting that the 1.7 percent COLA received by employees in 2026 was low relative to the Consumer Price Index change from late 2025 through spring 2026.

STAFF RECOMMENDATION:

Receive the report.

FINANCIAL IMPACT:

There is no action contemplated in this report; it is informational only. The 1.7 percent cost-of-living adjustment (COLA) given to City employees effective July 1, 2026 equates to a total of \$337,375 in salary and benefit costs.

DESCRIPTION:

During Item 9 of the August 18, 2026 meeting, the City Council requested that Staff bring back an informational item on the most recent annual cost-of-living adjustment (COLA) received by City employees, in light of it being low relative to the Consumer Price Index change from late 2025 through spring 2026.

This report provides contextual information about Dublin's Employee Process that governs COLAs, describes the City's COLA methodology, and for reference, discusses annual

escalators provided in the City's agreements with external parties, and looks at how other Bay Area agencies handle compensation increases.

Dublin's Employee Process

Every three to five years, the City Manager engages with permanent City employees to review the City's compensation and benefits program and establish a framework for salary and benefits for the coming years. This practice, known as the Employee Process, provides employees an opportunity to share feedback on the City's current offerings and identify areas for potential change or enhancement.

As part of this process, the City also evaluates its compensation structure and market competitiveness, including through comprehensive salary survey data. Employee feedback, market data, fiscal considerations, and organizational needs are considered together in developing recommendations for the City's future compensation and benefits program. Any changes agreed to during the Employee Process and approved by the City Council are reflected in the Employee Benefit Plan, which is the document that describes all benefits received by employees.

The next Employee Process will begin this fall for adjustments effective July 1, 2027 for a period of up to five years.

COLA Methodology

Tying COLA to CPI-W

Dublin's Employee Process has always included a discussion on annual COLAs or "market rate adjustments" to align compensation with current external economic conditions or industry standards. Prior to 2012, the City's COLAs were based on an annual survey of classifications; while Staff was unable to determine exactly why this practice changed, it is suspected that as the City grew, the annual classification survey became too labor-intensive to sustain.

Since 2012, the City has tied COLAs to the Consumer Price Index (CPI), specifically the CPI-W (All Urban Wage Earners and Clerical Workers) for the San Francisco-Oakland-San Jose region (renamed San Francisco-Oakland-Hayward in 2018). The CPI-W is the older of the two main indexes published by the Bureau of Labor Statistics (BLS), dating back to 1913. It reflects the purchasing patterns of a specific slice of the population: households where more than half of income comes from clerical or hourly wage work, which is roughly 28 percent of the country.

In 1978, BLS added a broader index, the CPI-U (All Urban Consumers), covering closer to 90 percent of the population, including retirees, self-employed people, and professionals. Despite CPI-U being more widely cited, Dublin has always used CPI-W to set its COLAs. For reference, a 10-year look at CPI-W and CPI-U is included as Attachment 2.

Floor/Ceiling and Measurement Month

Dublin's Employee Benefit Plan has also historically provided minimum and maximum limits for its COLAs that are determined through the Employee Process. The current limits are a floor of 1 percent and a ceiling of 3.5 percent, effective July 1, 2023 to June 30, 2027.

Furthermore, the Employee Benefit Plan specifies that the COLA will be based on the CPI-W change from February to February each year. Staff could not determine why that month was selected but suspects it was a decision based on the timing of the annual budget preparation. The San Francisco-Oakland-Hayward metro area CPI is published every other month, in February, April, June, August, October, and December. An April or later reading may not have left enough time, in the past, to build the number into the next fiscal year's budget.

2026 COLA

In line with the February 2026 CPI-W, Dublin employees received a 1.7 percent COLA effective July 1, 2026. This was an unusually low adjustment compared to prior years, and it is particularly notable that the CPI changes immediately before and after February came in significantly higher: 3.1 percent in December, 3.3 percent in April, and 3.4 percent in June. This suggests February landed on an outlier data point rather than reflecting a genuine, sustained drop in inflation. In Fiscal Year 2026-27, the COLA equated to \$337,375 in salary and benefit costs (one percentage point equates to \$184,115).

Annual Contract Escalators

During the Item 9 request for this report, the City's contracts were mentioned in the context of annual escalators as compared to the employee COLA. Dublin engages in many multi-year agreements, almost all of which have a built-in annual escalator. In the last two years, the majority of these escalators have been tied to CPI, to a maximum of 3 percent. The CPI month used varies: it could be December, or it could be the month closest to the beginning of the contract term. Upon expiration, multi-year contracts are re-bid and new rates are set.

There are some exceptions to this: for example, in a time-and-materials agreement, hourly rates for certain in-demand positions (e.g., high-level engineering positions) are dictated by the market for the work. At times, those rates within the City's contracts have increased much more than CPI.

Practices of Other Agencies

To provide additional context, Staff looked at how the City's compensation survey comparator agencies handle general wage increases for employees outside of police and fire: Brentwood, Hayward, Livermore, Milpitas, Newark, Pleasanton, San Leandro, San Ramon, Tracy, Union City, Walnut Creek, and Alameda. All of them use a flat, negotiated percentage rather than a CPI formula. Alameda is the outlier, using a Base Revenue Index (BRI) rather than a cost-of-living measure. This method ties compensation increases to the City's own revenue growth rather than to any price index. For reference, Table 1 provides the most recent COLAs received by the City's comparator agencies.

Table 1. Comparator Agency Increases for 2026

Agency	Effective Date	Increase
Alameda ¹	July 1, 2026	TBD
Brentwood	July 1, 2026	3.0%
Hayward	July 1, 2026	3.0%
Livermore	October 5, 2026	3.0%
Milpitas ²	July 1, 2026	3.0%
Newark	July 1, 2026	3.5%
Pleasanton	April 11, 2026	3.0%
San Leandro	July 1, 2026	3.0%
San Ramon	July 1, 2026	3.0%
Tracy	June 28, 2026	4.0%
Union City	January 1, 2026	3.0%
Walnut Creek	June 21, 2026	5.0%

Finally, Staff looked at a few other Bay Area agencies outside the City's formal comparator survey: Berkeley, San Mateo, Sonoma County, Fremont, South San Francisco, Concord, Santa Rosa, and Contra Costa County. None currently use CPI to adjust general employee pay. In summary, a CPI-indexed COLA is the exception, not the rule, and it is becoming even more of an exception as agencies that previously used it have moved away.

STRATEGIC PLAN INITIATIVE:

None.

NOTICING REQUIREMENTS/PUBLIC OUTREACH:

The City Council Agenda was posted.

ATTACHMENTS:

- 1) City of Dublin Employee Benefit Plan
- 2) 10-Year Look: CPI-W and CPI-U

¹ Final adjustments to be decided no later than 9/30/2026 and applied retroactively.

² Currently in negotiations, 3% is the COLA placeholder for the FY 26-27 budget.

City of Dublin



Employee Benefit Plan

Established – July 1, 2023



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Section 1 – Eligible Employees:

All benefits shall apply to full-time employees of the City of Dublin, unless otherwise stated. The benefits outlined in this plan shall not be provided to temporary (part- or full-time), provisional or contract employees, or to individuals who provide services to the City pursuant to contract unless the contract explicitly provides for such benefits.

Section 2 – Market Rate Adjustments and Consumer Price Index (CPI) Adjustments:

Effective July 1, 2023, salary ranges (top and bottom) shall be adjusted based on the change in Consumer Price Index (CPI) from February 2022 through February 2023 using the San Francisco-Oakland-San Jose region (Urban Wage Earners and Clerical Workers) as published by the Bureau of Labor Statistics. The maximum adjustment shall be no greater than three and one-half percent (3.5%), the minimum adjustment will be one percent (1%). Employee salaries will also be adjusted July 1, 2023, based on the CPI results.

Additionally, a total compensation salary survey of benchmark classifications was conducted. Any classification that was deemed to be under market was brought up to the 65th percentile of the City's comparator cities. Individual employees will not be adjusted, unless their current salary falls below the minimum of an adjusted range.

In recognition of historically high CPI values the last two years, employees will receive a one-time \$1,500 stipend the first check paid out in January 2024.

Effective July 1, 2024, salary ranges for most classifications (top and bottom) shall be adjusted based on the change in Consumer Price Index (CPI) from February 2023 through February 2024 using the San Francisco-Oakland-San Jose region (Urban Wage Earners and Clerical Workers) as published by the Bureau of Labor Statistics. For those classifications that were over market in July of 2023, a total compensation survey will be conducted in April of 2024. The maximum adjustment shall be no greater than three and one-half percent (3.5%), the minimum adjustment will be one percent (1%). Employee salaries will also be adjusted July 1, 2024, based on the CPI results, but in no event shall any adjustment provided for in this section result in an employee earning a salary in excess of the top of the range for their classification.

Effective July 1, 2025, salary ranges for most classifications (top and bottom) shall be adjusted based on the change in Consumer Price Index (CPI) from February 2024 through February 2025 using the San Francisco-Oakland-San Jose region (Urban Wage Earners and Clerical Workers) as published by the Bureau of Labor Statistics. For those classifications that continued to be over market in April of 2024, a total compensation survey will be conducted in April of 2025. The maximum adjustment shall be no greater than three and one-half percent (3.5%), the minimum adjustment will be one percent (1%). Employee salaries will also be adjusted July 1, 2025, based on the CPI results, but in no event shall any adjustment provided for in this section result in an employee earning a salary in excess of the top of the range for their classification.

Effective July 1, 2026, salary ranges for most classifications (top and bottom) shall be adjusted based on the change in Consumer Price Index (CPI) from February 2025 through February 2026 using the San Francisco-Oakland-San Jose region (Urban Wage Earners and Clerical Workers) as published by the

Bureau of Labor Statistics. For those classifications that continued to be over market in April of 2025, a total compensation survey will be conducted in April of 2026. The maximum adjustment shall be no greater than three and one-half percent (3.5%), the minimum adjustment will be one percent (1%). Employee salaries will also be adjusted July 1, 2026, based on the CPI results, but in no event shall any adjustment provided for in this section result in an employee earning a salary in excess of the top of the range for their classification.

Section 3 – Merit-Based Salary Adjustments:

- a) Annual adjustments in salary (based on the anniversary of the employee's date of hire or if applicable, the anniversary date of the most recent promotion) shall be based upon employee performance as determined by the performance evaluation. It is the duty of the supervisor and Department Head to give a fair and unbiased evaluation based on job performance of the employee.
- b) For the period of July 1, 2023, through June 30, 2027, employees will be eligible for an annual merit increase of up to 2.5%, based on their performance as outlined in their annual review, with an additional .5% at the discretion of the Department Director with agreement from the City Manager, for a maximum of 3%.
- c) In no event shall any salary adjustment result in an employee earning a salary in excess of the top of the range of their classification.

Section 4 – Performance Pay Adjustments:

If applicable, performance pay adjustment increases will be consistent with increases outlined in Section 3. Eligibility criteria is outlined in the City's Personnel Rules.

Section 5 – Medical Insurance:

All City employees who are members of the California Public Employees Retirement System (CalPERS) shall be eligible to select from plans administered by the Public Employees Medical and Hospital Care Act (PEMHCA).

- a. The City currently contracts with the California Public Employees' Retirement System (CalPERS) for the purpose of providing medical insurance benefits for active employees and their eligible dependents, eligible retired employees, and eligible survivors of retired employees. The eligibility of a dependent to participate in this program shall be in accordance with the terms of the Public Employees' Medical and Hospital Care Act (PEMHCA). The Eligibility of retired employees and survivors of retired employees to participate in this program shall be in accordance with those provisions of the PEMHCA providing for participation by CalPERS annuitants.
- b. Effective January 1, 2016, the City's employer contribution towards medical insurance benefits for each eligible employee shall be the minimum contribution amount required by Government

Section 22892. Contributions provided under this Section are required only to the extent mandated by PEMHCA.

- c. In the event CalPERS requires a minimum employer payment in excess of the amount recited above, the City shall pay such additional amounts as approved by the City Council. Because CalPERS may change carriers and plans, the City shall not be required to provide a specific insurance coverage and shall only be required to provide those benefits as described in the Benefit Plan so long as the city contracts for benefits with CalPERS for medical insurance benefits. The City shall provide each eligible annuitant, as defined by the PEMHCA, with an employer contribution towards medical insurance benefits that is equal to any contribution provided to active employees under the Benefit Plan and in accordance with Government Code Section 22892.

Section 6 – Flexible Benefit Program:

The City shall make available a flexible benefit program (tax deferred employee contribution) that can be applied to specific expenses, e.g., health premiums, and medical, dental, and vision expenses not covered by the insurance plan. The City's plan is subject to the requirement and availability of Internal Revenue Code Section 125, allowing employees to use pre-tax compensation for PEMHCA medical premiums, eligible dependent care expenses, eligible uninsured medical expenses, or a combination thereof. All costs associated with the enrollment and administration of an eligible employee's account shall be paid by the City.

- a. The City shall not treat contributions made to the program as compensation subject to income tax withholding unless the Internal Revenue Service and/or the Franchise Tax Board indicates that such contributions are taxable income subject to withholding. Each employee shall be solely and personally responsible for any federal, state, or local tax liability of the employee that may arise out of the implementation of this Section or any penalty that may be imposed, therefore.
- b. Contributions to the flexible benefit program shall be used only for payment of those benefits that are available through the City's program. Any amount remaining after the Employee has designated the portion of his or her flexible benefit (125 plan) contribution amount for the purposes described in this Section shall be deemed forfeited.
- c. Each eligible employee shall file an election in writing during the month of open enrollment for medical insurance each year designating how the contributions in his or her flexible benefits account are to be spent during the ensuing year. Thereafter, no changes to designations shall be allowed until the enrollment of the following year, except for change for changes due to an eligible qualifying event.
- d. Each employee shall be responsible for providing immediate written notice to the Director of Human Resources of designee of any changes to the number of his or her dependents which would affect the amount of the City's payment into the program.

- e. Beginning with the January 1, 2023, premium, eligible employees shall receive up to \$2,030 per month toward the premium cost for CalPERS health insurance based on the employee's annual plan election less the amount of any contribution provided by the City directly to CalPERS under government Code Section 22892.
- f. Beginning with the January 1, 2024, premium, eligible employees shall receive a monthly allowance up to the amounts listed below. Eligibility is based on the employee's plan selection and participation level (e.g., employee only coverage, employee plus 1 dependent or employee plus two or more), less the amount of any contribution paid under Section 2 above.

Employee only = \$1,260/month

Employee and 1 dependent = \$2,255/month

Employee and 2 or more dependents = \$2,525/month

- g. For CalPERS plan years 2025, 2026, and 2027, the City will increase the monthly contribution outlined in Section 7(f) by half of the percent increase in Kaiser premiums at each level, except if the newly calculated amount exceeds the actual rate of Kaiser for the given year. If this situation occurs, the City contribution from the prior year will carry over.
- h. The City shall continue to provide a flexible benefit program as provided in this Section unless amended or repealed by the City Council.

Section 7 – Alternative Benefit:

Effective July 1, 2015, subject to proof of other health coverage and completion of CalPERS Health Form HBD12 indicating same, eligible City employees who are members of the California Public Employees Retirement System (CalPERS) and (1) elect to opt-out of receiving City contributions under Government Code Section 22892; as described in Section 2b; (2) are not enrolled in a City-sponsored health insurance plan as the dependent of another City employee; and (3) provide proof of medical insurance coverage from a plan other than a City-sponsored plan shall receive an alternative benefit in the form of a cash payment.

- a. Effective July 1, 2015, the amount of alternative benefit is \$350 per month and benefit must be elected each year during open enrollment or upon a qualifying event.
- b. Effective January 1, 2024, the amount of alternative benefit provided to an employee is based on the level of insurance coverage that the employee could have received if the employee had enrolled in a City-sponsored health insurance plan, as follows:

Employee only = \$250/month

Employee and 1 dependent = \$450/month

Employee and 2 or more dependents = \$625/month

- c. For the purpose of this Section, the term "dependent" shall mean a dependent eligible for coverage under a CalPERS medical plan.

- d. Any cash payment provided under this Section shall be paid and reported to the Internal Revenue Service (IRS) and the California Franchise Tax Board as compensation subject to income tax withholding and is considered a non-reportable CalPERS payment/benefit. Each eligible employee shall be solely and personally responsible for any tax liability that may arise out of receipt of the alternative benefits provided under this Section.

Section 8 – Dental Insurance:

The City will contribute on behalf of each employee schedule to regularly work at least 30 hours per week, a maximum of the “full-family premium” per month to a dental insurance plan selected by the City. The City will contribute on behalf of each regular employee scheduled to work between 20 to 29 hours per week, a maximum of the “employee only” premium per month to a dental insurance plan selected by the City.

Effective January 1, 2024, in lieu of enrolling in a City-sponsored dental plan, employees may elect to opt-out of dental for themselves and eligible dependent(s). The amount of alternative benefit provided to an employee is based on the level of insurance coverage that the employee could have received if the employee had enrolled in a City-sponsored dental plan, as follows:

Employee only = \$25/month

Employee and 1 dependent = \$50/month

Employee and 2 or more dependents = \$75/month

For the purpose of this Section, the term “dependent” shall mean a dependent eligible for coverage under the City-sponsored dental plan.

Any cash payment provided under this Section shall be paid and reported to the Internal Revenue Service (IRS) and the California Franchise Tax Board as compensation subject to income tax withholding and is considered a non-reportable CalPERS payment/benefit. Each eligible employee shall be solely and personally responsible for any tax liability that may arise out of receipt of the alternative benefits provided under this Section.

Section 9 – Vision Insurance:

The City will contribute on behalf of each employee schedule to regularly work at least 20 hours per week, a maximum of the “employee only premium” per month to a vision insurance plan selected by the City.

Section 10 – Trust Fund/Health Reimbursement Arrangement (HRA):

- a. Plan Limits: Beginning on calendar year January 1, 2021, full-time, regular employees will have a \$1,000 limit for eligible reimbursements. Employees regularly scheduled to work between 20 and 30 hours per week shall have a pro-rated share based on hours regularly scheduled.
- b. Plan Year: The "Plan Year" shall cover reimbursements for eligible expenses incurred between January 1 and December 31 of the calendar year.

- c. Third Party Administrator (TPA)/Eligible Claims: Employees eligible for this benefit may request reimbursement through the third-party administrator selected by the City.
- d. Administrative Rules: The reimbursement of any expenses pursuant to this section shall be contingent upon the fulfillment of requirements pursuant to the provision(s) of the Internal Revenue Code and the City's selected third-party administrator.

Section 11 – Disability Insurance:

The City will contribute on behalf of each regular employee scheduled to regularly work at least 20 hours per week, the total premium cost of a Long-Term Disability Plan selected by the City. In addition, the City Manager shall be authorized to implement a short-term disability program, which would allow regular employees scheduled to work at least 20 hours per week, to purchase short-term disability insurance through payroll deductions, if such a plan is available.

Section 12 – Life Insurance:

The City will contribute on behalf of each full-time employee scheduled to regularly work at least 40 hours per week, the total premium cost of a \$50,000 Term Life Insurance Policy selected by the City. In addition, the City Manager shall be authorized to implement a supplemental life insurance program, which would allow full-time employees to purchase additional term life insurance through payroll deductions, if such a plan is available.

Section 13 – Retirement:

For employees who are “Classic” members (as determined by CalPERS), the City will provide the California Public Employees Retirement System 2.7% at age 55 (Section 21354.5 of the California Public Employees' Retirement System plan) retirement plan with the one-year final compensation (Section 20042 of the California Public Employees' Retirement System plan) benefit option. The City Council shall have the authority to further amend the plan to include benefit options offered by the Public Employees Retirement System. Effective July 1, 2011, classic members shall pay 8% of the employees' contribution rate.

Effective January 1, 2013, the City shall comply with the California Public Employees' Pension Reform Act of 2013 (PEPRA). Eligible employees who join the City's CalPERS retirement system on or after January 1, 2013, and are considered “PEPRA” members (as defined by CalPERS) and shall have a retirement formula of 2% @ 62; 3-Year final compensation average and shall contribute their portion toward a new CalPERS retirement tier as defined by law.

Effective July 11, 2015, and pursuant the adoption of City Ordinance 1-2015 (June 2, 2015), employees shall share in the City's CalPERS costs by contributing a percentage of the employee's compensation reportable to CalPERS (i.e., “compensation earnable”) towards the City's employer contribution, in accordance with Government Code section 20516(f). Employees who are Classic CalPERS members will contribute 7%, and PEPRA CalPERS members will contribute 3.05%.

The City shall apply the provisions of Internal Revenue Code (IRC) 414(h) (2) to all eligible payroll deductions for employee CalPERS contributions so long as such provisions remain available to the City.

Section 14 – Retiree Health Reimbursement Arrangement (HRA):

The City shall make available a Retiree HRA account to eligible employees who were hired before January 1, 2016, and who retire from the City of Dublin while meeting the eligibility requirements for CalPERS retiree health insurance as provide under PEMHCA laws.

- a. Beginning on January 1, 2016, the City's Retiree HRA Plan Year shall begin January 1 and end December 31 of each calendar year.
- b. Beginning with January 1, 2023, CalPERS premium year, eligible CalPERS annuitants under the City of Dublin's CalPERS health contract shall receive reimbursement up to \$2,030 per month toward the cost of CalPERS health insurance premiums. Reimbursement is provided in the form of cash to the eligible CalPERS annuitant on a monthly basis based on the CalPERS annuitant's annual election less the amount of any contribution provided by the City directly to CalPERS under Government Code Section 22892. In no event, shall the City's total reimbursement exceed the amount described in this section.
- c. Beginning with January 1, 2024, CalPERS premium year, an annual adjustment, equal to the difference in the CalPERS Kaiser Family rate, not to exceed \$100 per month, shall be provided.
- d. Employees hired by the City on or after January 1, 2016, are not eligible for the Retiree HRA as defined in this section. The City's maximum contribution toward CalPERS retiree health coverage shall be the PEMCHA minimum contribution as determined by CalPERS under Government Code Section 22892.

Section 15 – Deferred Compensation Plan:

Participation in a variety of deferred compensation plans is offered. Participation in the City's deferred compensation plan shall be voluntary, but for employees who choose to participate, effective January 1, 2024, the City will match an employee's contribution to the 457 deferred compensation plan up to a maximum of \$50/month.

Section 16 – Holidays:

The following days shall be deemed holidays in accordance with the Personnel System Rules:

- | | |
|-------------------------------|---------------------------|
| a) New Year's Day | January 1 |
| b) Martin Luther King Jr. Day | Third Monday in January |
| c) Washington's Birthday | Third Monday in February |
| d) Memorial Day | Last Monday in May |
| e) Independence Day | July 4 |
| f) Labor Day | First Monday in September |
| g) Veteran's Day | November 11 |

h) Thanksgiving Day	Fourth Thursday in November
i) Day following Thanksgiving	Day following above
j) Day preceding Christmas	December 24
k) Christmas Day	December 25
l) Day preceding New Year's Day	December 31

In addition to the designated holidays listed above, effective January 1, 2021, employees shall be provided two (2) floating holiday per calendar year. Effective January 1, 2024, in recognition of time off for employees to celebrate their cultural or religious holidays, the City will provide two (2) additional floating holidays, for a total of four (4).

Civic Service Leave will no longer be provided.

Floating holidays are subject to the following restrictions:

- 1) Must be used during the calendar year and cannot be carried over; and
- 2) Requires advance approval of the Department Head and the City Manager.

All holidays will be credited at eight (8) hours each for full-time employees. Part-time employees will receive a pro-rated number of hours.

Section 17 – Education Reimbursement:

Full-time and regular part-time employees shall be eligible to participate in an education reimbursement program. The City shall only reimburse the employee for courses undertaken which are job-related or are part of a job-related course of study and/or degree program. The employee must obtain prior authorization from the City Manager and reimbursement will only be provided upon submittal of proof of satisfactory completion of the courses undertaken with a passing grade when applicable. The City will reimburse an amount equal to 75% of the employee's tuition and/or fees, (including books). For full-time employees, the amount reimbursed shall not exceed \$2,000 per Fiscal Year beginning July 1, 2020; for employees scheduled to work between 20-39 hours per week, the amount shall be pro-rated based on regularly scheduled hours. The payment of any reimbursements shall be contingent upon the fulfillment of reporting requirements established by the City Manager.

Section 18 – Wellness Reimbursement Program:

Beginning July 1, 2020, the City shall provide a wellness reimbursement program of \$25.00 per month to all regular full-time and part-time employees. Eligible wellness expenses may include activities that promote health, wellbeing and physical movement and/or exercise. Employees shall be reimbursed biennially in December and June of each fiscal year.

Section 19 – Employee Service Awards:

Beginning July 1, 2020, regular full-time and part-time employees may opt in for a cash service award in the year in which they complete 10, 15, 20, and 25 years of service; cash award amounts are as follows: 10 years \$500.00, 15 years \$600.00, 20 years \$800.00, 25 years \$1,000.

Section 20 – Employee Commute Alternative Program/Transit Commuter Program:

The City established an Employee Commute Alternative Program to help ease traffic congestion, improve air quality in the Bay Area and work to achieve less stressful commutes. The City supports this program by encouraging City employees to register with the 511 Regional Rideshare Program through www.511.org and by participating in the Alameda County Congestion Management Agency - Guaranteed Ride Home program. The City shall provide a \$5.00 per day commute alternative cash incentive to all eligible employees pursuant to providing proper commute verification information. In addition, the City offers a pre-taxed Transit Commuter Program administered through third-party administrator (WageWorks) for the cost of public transit. Both Commuter programs comply with SB 1128, which requires employers with 50 or more to offer at least one commuter benefit option to employees.

Section 21 – Car Allowance and Mileage Reimbursement:

The following positions shall be eligible to receive the designated monthly allowance. The receipt of the car allowance pursuant to this section shall be full compensation for all operating costs excluding tolls, parking fees and out of area travel.

a. Management Positions Receiving Monthly Allowance

<u>Eligible Positions</u>	<u>Monthly Allowance</u>
Assistant City Manager	\$190
Assistant Director of Community Development	\$190
Assistant Finance Director	\$190
Assistant Parks and Community Services Director	\$190
Assistant Public Works Director/City Engineer	\$190
Capital Improvement Program Manager	\$190
Chief Building Official	\$190
Chief Information Security Officer	\$190
Communications Manager	\$190
Community Development Director	\$190
Deputy City Manager	\$190
Economic Development Director	\$190
Finance Director	\$190
Human Resources Director	\$190
Parks & Community Services Director	\$190
Parks & Community Services Manager	\$190
Planning Manager	\$190
Principal Engineer	\$190
Public Works Director/Assistant City Engineer	\$190
Public Works Manager	\$190
Public Works Transportation & Operations Manager	\$190

b. Miscellaneous Employees Receiving Car Allowance

The following position shall be eligible to receive the designated monthly car allowance.

Eligible Position
Senior Civil Engineer

Monthly Allowance
\$190

- c. Operating Costs
Employees whose services and compensation are provided for under separate agreement who receive a car allowance shall be eligible to receive 40 percent (rounded up to the nearest cent) of the amount recognized by the Internal Revenue Service for the use of a private vehicle as an operating cost.
- d. Mileage Reimbursement
For employees not receiving a car allowance, when traveling on City business, the City will reimburse the amount recognized by the Internal Revenue Service for the use of a private vehicle.
- e. Out of Area Travel Reimbursement
When traveling out of the area on City business, the City will reimburse the amount recognized by the Internal Revenue Service for the use of a private vehicle, or air transportation costs, whichever is less.
- f. Administrative Requirements
The payment of any mileage reimbursements or car allowance shall be contingent upon the fulfillment of requirements established by the City's accounting procedures and other rules and policies.

Section 21 – Resident Registration Fees:

Effective July 1, 2015, non-resident employees shall be granted Dublin resident fees and rates for City Parks and Community Services classes, trips and facility rentals; priority registration does not apply.

Section 22 – Effective Date:

The provisions of this Benefit Plan shall be administered in accordance with the regulations, policies and procedures issued by the City Manager or designee which shall include, but not limited to, the method and frequency of reimbursement to eligible employees for the benefit program(s) selected and appropriate procedures for the verification of payment made pursuant to the Benefit Plan.

This Benefit Plan shall be effective July 1, 2023, and shall supersede Resolution No. 115-10 and 61-20, all amendment to, and any previous resolutions adopted by the City Council which are in conflict.

10-Year Comparison: CPI-W and CPI-U

CPI-W – San Francisco-Oakland-Hayward

Year	Feb	Apr	Jun	Aug	Oct	Dec	Annual	HALF1	HALF2
2016	2.9	2.6	2.5	2.4	3.1	3.0	2.7	2.6	2.8
2017	3.3	3.7	3.3	2.9	2.7	3.1	3.1	3.4	2.9
2018	3.8	3.4	4.0	4.3	4.4	4.4	3.9	3.6	4.3
2019	3.3	3.7	3.0	2.5	3.0	2.2	3.1	3.5	2.7
2020	2.5	0.7	1.3	1.6	0.9	2.2	1.5	1.6	1.4
2021	1.8	4.1	4.3	4.9	5.2	5.5	4.1	3.1	5.1
2022	6.5	6.5	7.6	6.0	6.4	4.6	6.3	6.7	6.0
2023	4.9	3.6	2.3	3.3	2.5	2.8	3.3	3.8	2.8
2024	2.9	4.0	3.0	2.4	2.3	2.1	2.8	3.2	2.3
2025	2.7	1.6	1.9	2.7	(X)	3.1	2.3	2.0	2.6
2026	1.7	3.3	3.4					2.8	

(X): Data unavailable due to the 2025 lapse in appropriations

CPI-U – San Francisco-Oakland-Hayward

Year	Feb	Apr	Jun	Aug	Oct	Dec	Annual	HALF1	HALF2
2016	3.0	2.7	2.7	3.1	3.6	3.5	3.0	2.8	3.2
2017	3.4	3.8	3.5	3.0	2.7	2.9	3.2	3.6	2.9
2018	3.6	3.2	3.9	4.3	4.4	4.5	3.9	3.4	4.3
2019	3.5	4.0	3.2	2.7	3.0	2.5	3.3	3.7	2.9
2020	2.9	1.1	1.6	1.6	1.1	2.0	1.7	2.0	1.4
2021	1.6	3.8	3.2	3.7	3.8	4.2	3.2	2.5	3.9
2022	5.2	5.0	6.8	5.7	6.0	4.9	5.6	5.4	5.8
2023	5.3	4.2	2.9	3.4	2.8	2.6	3.7	4.4	2.9
2024	2.4	3.8	3.2	2.7	2.4	2.4	2.8	3.0	2.5
2025	2.7	1.3	1.5	2.5	(X)	3.0	2.2	1.9	2.5
2026	2.5	3.8	3.8					3.2	

(X): Data unavailable due to the 2025 lapse in appropriations

Cost-of-Living Adjustment Methodology

For City Employee Compensation



Executive Summary

Council requested information on the 2026 employee cost-of-living (COLA) adjustments received by City employees.



Report reviews:

Dublin's Employee
Process

COLA Formula

Contract
Escalators

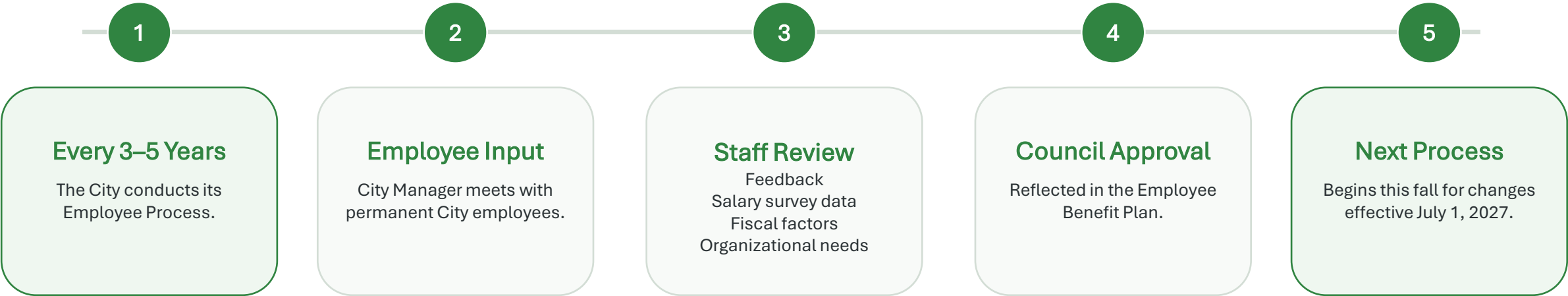
Comparator
Agencies



Dublin’s Employee Process

The Employee Benefit Plan governs employee benefits, including COLAs.
The upcoming process may establish adjustments for a period of up to five years.

Employee feedback + market data + fiscal considerations + organizational needs



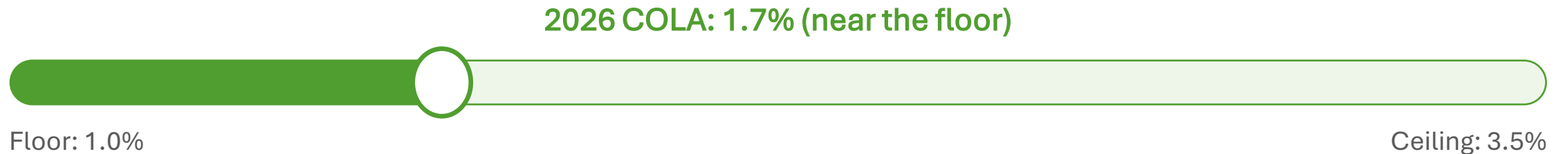
COLA Methodology

CPI-W

Index used since 2012 (SF-Oakland-Hayward)

Feb → Feb

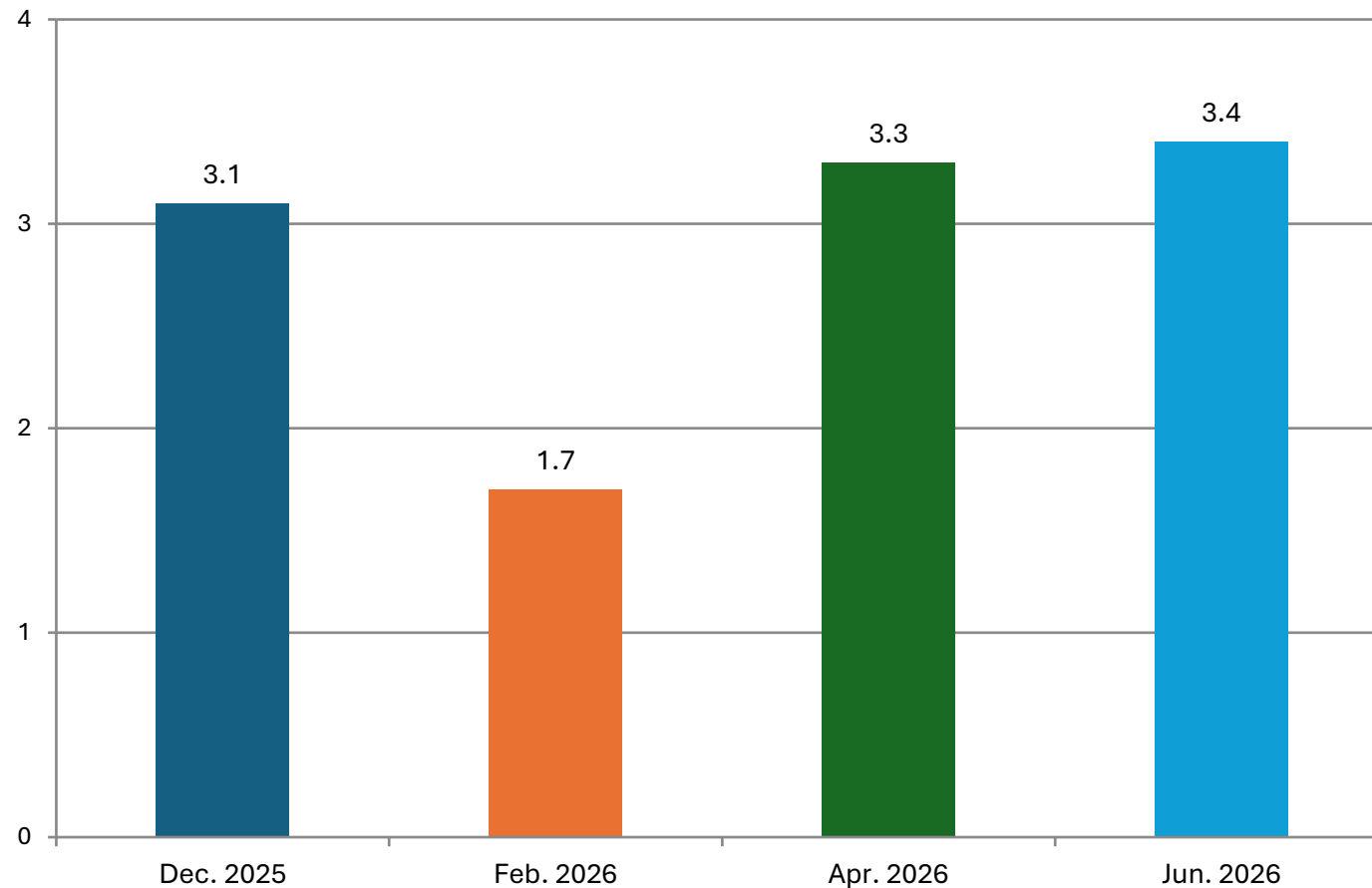
Measurement window each year



Dublin has always used CPI-W (~28% of population), but CPI-U (broader, ~90% of population) is the official measure for the region.



2026: February Was an Outlier



Key takeaway

The 1.7% February reading did not reflect the higher CPI-W readings immediately surrounding it.

One percentage point of COLA = approximately \$184,115 in salary and salary-related benefits.



Comparison: Annual Contract Escalators



Many of the City's multi-year contracts include a built-in annual escalator, most tied to CPI, with a max of 3%.



The CPI month used varies by contract, often December or the month closest to the contract's start date.



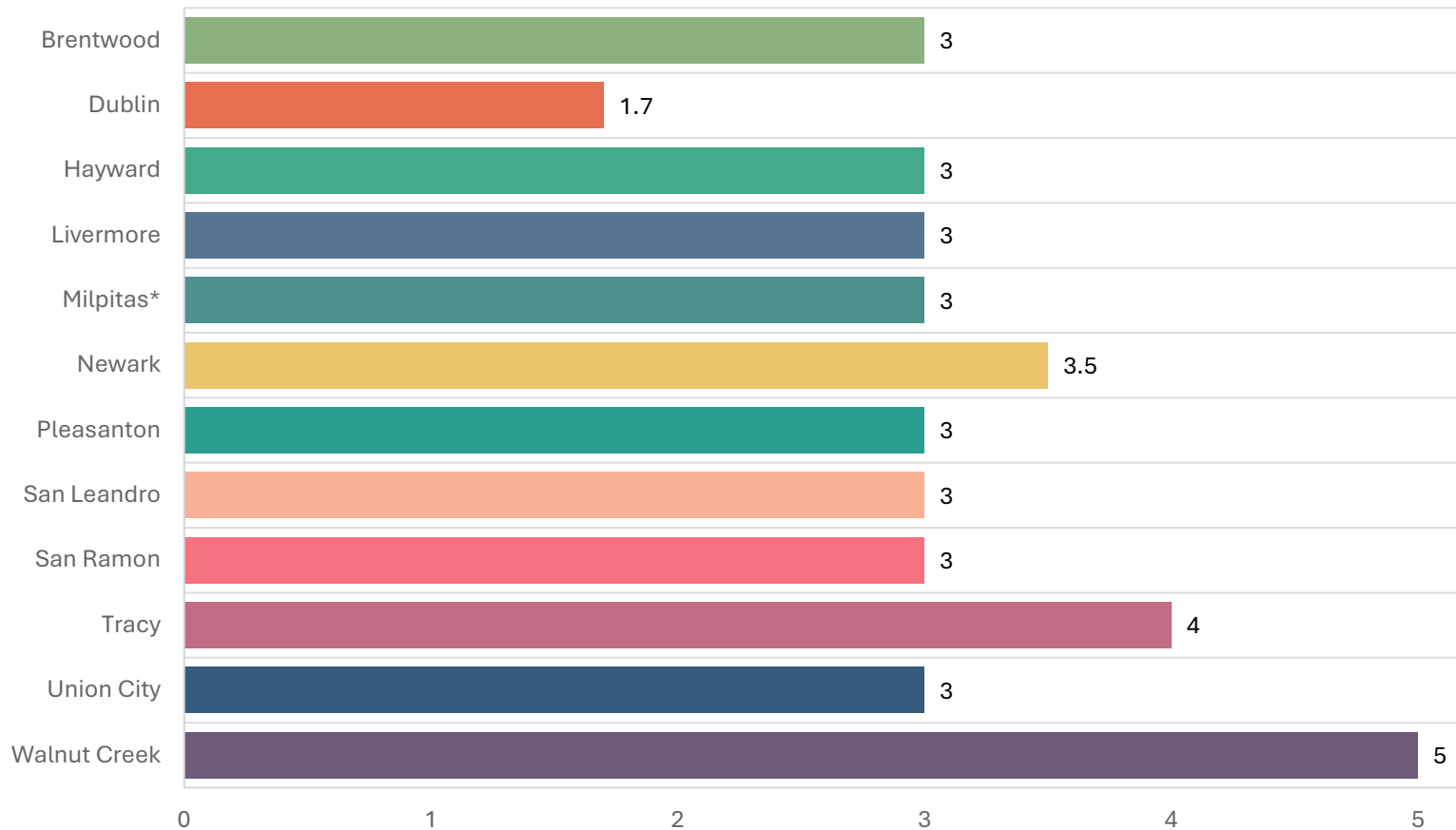
Multi-year contracts are re-bid and new rates are set upon expiration.



Exception: time-and-materials agreements for in-demand positions (e.g., high-level engineering) are priced to market and can rise faster than CPI.



Comparator Agency Increases for 2026



* Milpitas: 3% budget placeholder while in negotiations.

What stands out

All formal comparators use a flat negotiated percentage rather than a CPI formula.

Alameda is the exception, using a Base Revenue Index; its 2026 adjustment was still TBD when the report was prepared.

All listed 2026 increases are 3.0% or higher.



Questions?

