880 Doolittle Drive Industrial Project

Draft Environmental Impact Report

PLN22-0039

prepared by

City of San Leandro
835 East 14th Street
San Leandro, California 94577
Contact: Cindy Lemaire, AICP, CNU-A, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

June 2024

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Table of Contents

Executive Summary ES-1
Project Synopsis ES-1
Project Objectives ES-3
Alternatives ES-3
Areas of Known Controversy ES-5
Issues to be Resolved ES-5
Issues Not Studied in Detail in the EIR ES-5
Summary of Impacts and Mitigation Measures ES-6

1 Introduction 1-1
1.1 Environmental Impact Report Background 1-1
1.2 Purpose and Legal Authority 1-1
1.3 Scope and Content 1-8
1.4 Issues Not Studied in Detail in the EIR 1-8
1.5 Environmental Review Process 1-11

2 Project Description 2-1
2.1 Project Applicant 2-1
2.2 Lead Agency Contact Person 2-1
2.3 Project Location 2-1
2.4 Existing Site Characteristics 2-4
2.4.1 Site History and Existing Conditions 2-4
2.4.2 General Plan Designation 2-4
2.4.3 Zoning 2-4
2.4.4 Surrounding Land Uses 2-8
2.5 Project Description 2-8
2.5.1 Property Consolidation and Demolition 2-8
2.5.2 Industrial Development 2-8
2.5.3 Circulation/Access and Parking 2-9
2.5.4 Landscaping 2-13
2.5.5 Utilities 2-13
2.5.6 Construction and Grading 2-14
2.6 Project Objectives 2-17
2.7 Lead, Responsible, and Trustee Agencies 2-17
2.8 Required Approvals 2-18

3 Environmental Setting 3-1
3.1 Regional Setting 3-1
3.2 Project Site Setting 3-1
3.3 Cumulative Development 3-2

4 Environmental Impact Analysis 4-1
4.1 Greenhouse Gas Emissions 4.1-1
4.1.1 Setting 4.1-1
4.1.2 Regulatory Setting 4.1-3
4.1.3 Impacts Analysis 4.1-6
4.1.4 Cumulative Impacts 4.1-13

4.2 Hazards and Hazardous Materials 4.2-1
4.2.1 Setting 4.2-1
4.2.2 Regulatory Setting 4.2-6
4.2.3 Impacts Analysis 4.2-11
4.2.4 Cumulative Impacts 4.2-19
4.3 Noise and Vibration 4.3-1
4.3.1 Setting 4.3-1
4.3.2 Regulatory Setting 4.3-4
4.3.3 Impacts Analysis 4.3-7
4.3.4 Cumulative Impacts 4.3-20
4.4 Transportation 4.4-1
4.4.1 Setting 4.4-1
4.4.2 Regulatory Setting 4.4-3
4.4.3 Impacts Analysis 4.4-5
4.4.4 Cumulative Impacts 4.4-7

5 Other CEQA Required Discussions 5-1
5.1 Growth Inducement 5-1
5.1.1 Population Growth 5-1
5.1.2 Economic Growth 5-1
5.1.3 Removal of Obstacles to Growth 5-2
5.2 Irreversible Environmental Effects 5-2
5.3 Significant and Unavoidable Impacts 5-3

6 Alternatives 6-1
6.1 Potentially Significant Impacts 6-1
6.2 Alternative 1: No Project Alternative 6-2
6.2.1 Impact Analysis 6-2
6.3 Alternative 2: No Natural Gas Alternative 6-5
6.3.1 Impact Analysis 6-5
6.4 Alternative 3: Airport Parking Land Use Alternative 6-9
6.4.1 Impact Analysis 6-9
6.5 Alternatives Considered but Eliminated 6-13
6.6 Environmentally Superior Alternative 6-14

7 References 7-1
7.1 Bibliography 7-1
7.2 List of Preparers 7-4

Tables

Table ES 1- Summary of Potentially Significant Environmental Impacts, Mitigation Measures, and Residual Impacts ES-7

Table 1-1 NOP Comments Summary 1-2

Table 1-2 Issues Not Studied in the EIR 1-9

Table 3-1 Cumulative Projects List 3-3

Table 4.1-1 San Leandro Annual GHG Emissions, Metric Tons 4.1-2

Table 4.1-2 Project Consistency Analysis with the BAAQMD 2017 Clean Air Plan 4.1-10

Table 4.1-3 Project Consistency with the San Leandro Climate Action Plan 4.1-11
Table 4.3-1 Groundborne Vibration Architectural Damage Thresholds 4.3-11
Table 4.3-2 Estimated Noise Levels by Project Construction Phase 4.3-12
Table 4.3-3 Estimated Construction Vibration Levels (in/sec PPV) 4.3-19
Table 6-1 Impact Comparison of Alternatives 6-15

Figures

Figure 1-1 Environmental Review Process 1-13
Figure 2-1 Regional Location 2-2
Figure 2-2 Project Site Location 2-3
Figure 2-3 Existing Site Conditions: Representative Photographs 2-5
Figure 2-4 Conceptual Site Plan 2-10
Figure 2-5 Conceptual Building Elevations 2-11
Figure 2-6 Conceptual Rendering of Project 2-12
Figure 2-7 Preliminary Utility Plan 2-15
Figure 2-8 Conceptual Grading Plan 2-16
Figure 4.2-1 On-Site Groundwater Well Network 4.2-3
Figure 4.2-2 Soil Management Areas 4.2-5
Figure 4.3-1 City of San Leandro Land Use Compatibility Noise Guidelines 4.3-8
Figure 4.3-2 Estimated Rooftop HVAC Noise Levels near Project Site 4.3-14
Figure 4.3-3 Estimated Truck Operations and HVAC Noise Levels near Project Site: North Side of Building 4.3-15
Figure 4.3-4 Estimated Truck Operations and HVAC Noise Levels near Project Site: East Side of Building 4.3-16
Figure 4.3-5 Estimated Truck Operations and HVAC Noise Levels near Project Site: South Side of Building 4.3-17

Appendices

Appendix A Initial Study
Appendix B Notice of Preparation (NOP) and NOP Comment Letters
Appendix C Transportation Impact Analysis
Appendix D Revised Soil and Groundwater Management Plan
Appendix E Evaluation of Site Sound Emissions
Appendix F Noise Letter Report

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed 880 Doolittle Drive Industrial Project (proposed project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

Project Applicant

Prologis
510-656-1900

Lead Agency Contact Person

Cindy Lemaire, AICP, CNU-A, Senior Planner
City of San Leandro
835 East 14th Street
San Leandro, California 94577
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Project Description

This EIR has been prepared to examine the potential environmental effects of the 880 Doolittle Drive Industrial Project. The following is a summary of the full project description, which can be found in Section 2.0, *Project Description*.

The project site is located at 880 Doolittle Drive, which is on the east side of Doolittle Drive just east of adjacent properties with frontage on Doolittle Drive, approximately 0.2 mile north of its intersection with Davis Street, in San Leandro. The project site measures approximately 14.14 acres and consists of two Assessor's parcels: APN 77A-0741-004-02 and 77A-0741-005-00. Existing access to the project site is from a driveway on Doolittle Drive. Access to the site is also provided from a driveway at the southern terminus of Hester Street, which is a public street north of the project site.

The regional location of the site is shown in Figure 2-1, and the vicinity of the site and its boundaries are shown in Figure 2-2.

Project Characteristics

The proposed project consists of consolidating the two parcels comprising the project site into a single parcel, demolishing existing vacant structures, and developing a new industrial shell building on the site. The proposed project also includes a new surface parking lot, internal circulation roadways, new utility connections, and landscaping. Site preparation activities would commence with demolition of the two existing vacant structures on site, as well as all associated surface parking, landscaping, and internal circulation and driveways on the site. Existing utility connections would be completely removed or abandoned in place in accordance with local and state regulations, in coordination with utility providers. After approximately 6 months following demolition of existing structures, the proposed project would include construction of a new warehouse with supporting

office space. The proposed warehouse is approximately 244,573 square feet, comprised of a 229,573 square-foot of warehouse and 15,000 square feet of associated office space. Approximately 10,000 square feet of office space would be provided on the ground floor alongside the warehouse use. The remaining 5,000 square feet of office space would be on a mezzanine level of the warehouse. The footprint of the warehouse and office use would be 239,753 square feet. The proposed floor area ratio (FAR) is 0.40 and the maximum building height would be 50 feet with an interior clear height of 40 feet. Sixty-four loading docks are proposed, 27 on the north side and 37 on the south side of the building. In addition to dock doors, traditional doors for egress and ingress to the building would be provided for each of the two office spaces within the proposed warehouse. Traditional doors would be provided on the north side of the building and south side of the building, next to dock doors. A conceptual site plan is provided as Figure 2-4.

The exterior of the proposed warehouse would be constructed of a mix of materials, including concrete panels, corrugated and noncorrugated metal panels, wood finish/trim, and glazing. Glazing refers to the glass installed in the building such as windows. Glazing would be a mix of insulated glass installed over concrete and other materials, and glass installed over openings to serve as traditional windows.

The building would be constructed for a speculative tenant or tenants; the project is intended for occupancy by uses consistent with the site's General Industrial designation, as well as those uses permitted under the site's Industrial General zoning classification. The proposed shell building would be designed to accommodate a future industrial tenant who may perform interior improvements to accommodate their specific needs.

Parking and Site Access

Access to the project site would be from the driveway on Doolittle Drive in the southwest area of the site, and from the end of Hester Street in the northern area of the site. Although these are both existing driveways, the proposed project would include reconstruction of the driveways to meet City standards and current ADA requirements. This would involve repairs as needed of the driveway from Doolittle Drive. New curb cut would be provided at the cul-de-sac on Hester Street, which would also include reconstructing (i.e., replacement of) portions of the sidewalk along the project site frontage on Hester Street. Additionally, a new, second, driveway to the site would be constructed at the end of Hester Street, providing a total of three driveways.

A total of 204 parking spaces would be provided on-site for passenger vehicles, which would be located primarily in a new surface parking lot on the west side of the proposed building. The other main surface parking area would be on the north side of the warehouse. This parking area would consist of 59 spaces sized for tractor trailers. A total of 24 bicycle parking spaces would be provided in the vicinity of the office main entrance, including 12 short-term spaces and 12 long-term spaces.

Utilities

The proposed industrial building would require utility and drainage improvements including new sanitary sewer, storm drain, and domestic water lines. These new utilities would connect to existing utilities within the right-of-way of Doolittle Drive. Bioretention areas would be constructed on-site to collect and treat stormwater runoff prior to discharge into the City's storm drain system. Electricity at the project site would be provided by Pacific Gas & Electric, which provides services to the project area. The proposed project would also include natural gas energy, also provided by Pacific Gas & Electric.

Construction and Grading

The timing of project construction would be determined by market forces and other considerations, such as weather or availability of workforce. However, for purposes of this analysis it is anticipated that construction would begin in 2024 with demolition of existing vacant structures and related infrastructure, such as utilities and surface parking. Site grading would occur following demolition of the existing development on the project site, which totals approximately 212,000 square feet of structures. Elevations on the project site following grading would vary between approximately 10 feet and 17 feet above mean sea level. Preliminary grading design shows a balanced site. Project construction would commence following grading. Construction would include excavation and trenching to install buried utility connections, such as new water, sanitary sewer, and storm drain laterals. The foundation of the warehouse would be poured followed by framing and construction of the walls, interior spaces, and exterior. Paving of surface parking areas, driveways, and internal access roads would also occur during project construction, as well as construction of new sidewalk on site frontage along Hester Street. Construction staging would occur on-site. A variety of typical construction equipment would be used, such as backhoes, dump trucks, excavators, pavers, and dozers. A crawler crane with a boom height of up to approximately 161 feet would also be required. During construction, up to five existing trees just off the project site at the terminus of Hester Street would be removed.

Project Objectives

The underlying purpose of the proposed project is to provide a modern industrial warehouse with ancillary office using sustainable and environmentally superior practices within the existing industrialized portion of the City. The proposed project would accommodate the need for additional large warehouse uses in the City and in Alameda County, while enhancing the economic vitality of the City.

The City and the applicant have the following objectives for the project:

- Increase the economic base of the City's industrial corridor by maximizing the productive use of the City’s industrial land, which is currently underutilized;
- Create a modern warehouse that contributes to the aesthetics of the surrounding area through the redevelopment of an obsolete and underutilized property;
- Create a new, efficient and updated warehouse that is attractive to future tenants, by incorporating the state's green building design and building health and safety standards;
- Maintain and protect the City’s inventory of larger-scale industrial sites with easy access to freeways, rails, airports, and seaports; and
- Support and retain existing industrial uses and employment in the City of San Leandro’s industrial sector.

Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives (stated in Section 2, *Project Description*, of this EIR) but would avoid or substantially lessen the significant adverse impacts.

Included in this analysis are three alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that would reduce the project-related potentially significant environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: No Natural Gas
- Alternative 3: Airport Parking Land Use

Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.2 through 6.4.

Alternative 1 (No Project). The No Project Alternative assumes that the two existing industrial masonry buildings would remain on the project site. These buildings are currently vacant. The City has no applications on file for occupancy of the buildings; therefore, this analysis assumes the buildings would remain vacant under this alternative. The project applicant or another person or organization could submit an application for occupancy of one or both buildings in the future. Granting an occupancy permit for a business or activity allowed by-right within the existing Industrial General zoning district of the site would be a ministerial permit, and CEQA may not be applicable.

The No Project Alternative would not fulfill any of the project objectives.

Alternative 2 (No Natural Gas). Under the No Natural Gas Alternative, the proposed industrial building would be constructed on the project site, nearly consistent with the proposed project. Alternative 2 assumes that the industrial building and associated surface parking lot would be approximately the same size and design as the proposed project, which would require the same demolition and construction activities as the proposed project. Once construction is complete, Alternative 2 assumes the same on-site operations would occur as with the proposed project, with the exception of natural gas consumption. Under this alternative, natural gas connections would not be provided on the project site. Therefore, potential future occupants and uses in the new industrial building would not consume natural gas, as natural gas would be unavailable on the project site. Alternative 2 would instead require on-site building operations to rely entirely on electricity for energy.

The No Natural Gas Alternative would fulfill most project objectives but not all objectives. For example, this alternative would develop an industrial building with easy access to freeways and airports, while also supporting industrial employment opportunities within the city's industrial sector. Alternative 2 would also contribute to the aesthetics of the surrounding area because the vacant and aging existing buildings on-site would be demolished and replaced with a new building. However, Alternative 2 may not fulfill the objective of creating a warehouse that is attractive to future tenants to the same extent as the proposed project. While it is reasonable to assume a new warehouse proximate to freeways, rail, and the Oakland International Airport would be attractive to many tenants, the elimination of natural gas utility may deter some tenants from leasing or purchasing the warehouse, as natural gas could be critical to their business or operations. For example, businesses that manufacture products such as paper, glass, and steel typically use natural gas.

Alternative 3 (Airport Parking Land Use). Under the Airport Parking Land Use Alternative, the proposed industrial building would be constructed on the project site, nearly consistent with the proposed project. Alternative 3 assumes that the industrial building and associated surface parking lot would be approximately the same size and design as the proposed project, which would require the same demolition and construction activities as the proposed project. Once construction is complete, Alternative 3 assumes the proposed building would not operate as a warehouse. Instead, the building would operate as covered vehicle parking serving the Oakland International Airport. The new surface parking areas would also be for airport parking. Because the building would not operate as a warehouse, more surface parking would be provided on-site compared to the proposed project because larger parking spaces and areas for tractor trailer maneuvers would be eliminated from the project design. Alternative 3 assumes that the new building would not include natural gas connections, as there would not be demand to heat internal spaces used solely for vehicle parking and storage that could not generally be met with electric heat.

The Airport Parking Land Use Alternative would fulfill the project objective to create a modern warehouse structure that contributes to the aesthetics of the surrounding area through the redevelopment of an obsolete and underutilized property, although the building would not operate as a warehouse. Alternative 3 would not fulfill the other objectives of the project, which are generally centered on creating industrial employment and industrial productivity, which would not be accomplished from airport parking.

Refer to Section 6.0, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR are summarized in Section 1, *Introduction*. Comments pertained to a range of issues, but most notably air quality, airport hazards, greenhouse gas emissions, hazardous materials and soil and groundwater contamination, noise, transportation, and tribal cultural resources.

Issues to be Resolved

The proposed project would require site plan review and grading and building permits, as well as a tree removal permit, use permit, and height exception. In addition, given the proximity of the Oakland Internation Airport to the project site, a No Hazard Determination for the warehouse was issued from the Federal Aviation Administration pursuant to Federal Aviation Regulations Part 77. Further, several mitigation measures discussed in Section 4.2, Hazards and Hazardous Materials, of this EIR would require either approval or oversight from the California Department of Toxic Substances Control (DTSC). Issues to be resolved also include the choice among alternatives and whether or how to mitigate potentially significant effects of the project.

Issues Not Studied in Detail in the EIR

Section 1.4, *Issues Not Studied in Detail in the EIR*, summarizes issues from the environmental checklist that were addressed in the Initial Study (Appendix A). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur to the following issue areas: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources,

Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Impacts to Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, and Transportation were found to be potentially significant and are addressed in this EIR.

Summary of Impacts and Mitigation Measures

Table ES-1 includes a brief description of the environmental issues relative to the proposed project, the identified environmental impacts, proposed mitigation measures, and residual impacts. Impacts are categorized by significance. Per Section 15123(b) of the State CEQA Guidelines, Table ES-1 addresses only those impacts determined to be potentially significant in either the Initial Study (Appendix A) or the EIR, or both. Significant and unavoidable adverse impacts require a statement of overriding considerations to be issued per Section 15093 of the State CEQA Guidelines if the project is approved. Significant but mitigable impacts are adverse impacts that can be feasibly mitigated to less than significant levels and which require findings to be made under Section 15091 of the State CEQA Guidelines. Less than significant impacts would not exceed significance thresholds and therefore would not require mitigation.

The Initial Study found that the proposed project would have significant but mitigable impacts on air quality, biological resources, cultural resources, and tribal cultural resources. The Initial Study addresses these issues and provides mitigation measures, which are summarized in Table ES-1 below. These issues, as well as those issues found to have less than significant impacts in the Initial Study, are not analyzed further in this EIR. Discussion of these impacts may be found in the Initial Study (Appendix A). Issues that were found to have potentially significant impacts in the Initial Study and therefore required additional analysis in the EIR include greenhouse gas emissions, hazards and hazardous materials, noise, and transportation. Table ES-1 summarizes the impacts related to these issues as well as applicable mitigation measures to reduce impacts, as identified in this EIR.

Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Potentially Significant Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Air Quality		
Construction of the proposed project would generate wind-blown dust that could contribute particulate matter into the local atmosphere. With implementation of Mitigation Measure AQ-1, this impact would be less than significant.	**AQ-1 BAAQMD Best Management Practices for Construction-Related Fugitive Dust Emissions.** The project applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by BAAQMD to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 8. Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel. 9. Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.	Less than significant.
Biological Resources		
The proposed project would involve construction work near street trees just off the project site near the driveway that connects to Hester Street which may affect protected nesting birds in existing trees. Impacts to nesting birds would be reduced to less than significant with implementation of Mitigation Measure BIO-1.	**BIO-1 Nesting Bird Avoidance and Minimization Measures.** The following avoidance and minimization measures shall be implemented during project construction activities: ▪ Initial site disturbance shall occur outside the general avian nesting season (February 1 through September 15), if feasible. ▪ If initial site disturbance occurs in a work area within the general avian nesting season indicated above, a qualified biologist shall conduct a pre-construction	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
	nesting bird survey no more than 14 days prior to initial disturbances in the work area. The survey shall include the entire area of disturbance area plus a 50-foot buffer (relevant to non-raptor species) and 300-foot buffer (relevant to raptors) around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer should be a minimum of 50 feet for non-raptor bird species and at least 300 feet for raptor species. Larger buffers may be required and/or smaller buffers may be established depending upon the species, status of the nest, and construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. ▪ If construction activities in a given work area cease for more than 14 days, additional surveys shall be conducted for the work area. If active nests are located, the aforementioned buffer zone measures shall be implemented.	
Cultural Resources		
Unanticipated archaeological deposits could be encountered and damaged during ground-disturbing activities required for project construction. Impacts to archeological resources would be reduced to less than significant with implementation of Mitigation Measure CR-1.	**CR-1 Unanticipated Discovery of Cultural Resources.** In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
	repository of the CHRIS, per CCR Guidelines Section 15126.4(b)(3)(C).	
Greenhouse Gas Emissions		
Impact GHG-1. The proposed project would include new natural gas connections, which would have the potential to contribute to the long-term generation of GHG emissions affecting the environment. This impact would be significant and unavoidable.	No feasible mitigation measures are available.	Significant and unavoidable.
Impact GHG-1. The proposed project would include new natural gas connections, which would have the potential to contribute to the long-term generation of GHG emissions affecting the environment. This impact would be significant and unavoidable.	No feasible mitigation measures are available.	Significant and unavoidable.
The cumulative GHG impacts of the proposed project would be significant.	No feasible mitigation measures are available.	Significant and unavoidable.
Hazards and Hazardous Materials		
Impact HAZ-1. The project has the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment due to potential hazardous materials that may be present in the existing on-site structures and soils and groundwater. In addition, because of existing soil and groundwater contamination, the site is on a list compiled pursuant to Government Code Section 65962.5. This impact would be potentially significant but mitigable.	**HAZ-1 Project Demolition Activities.** In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site building(s) to determine the presence of asbestos-containing materials (ACMs) and/or lead-based paint. Documentation of the survey shall be provided to the City of San Leandro prior to commencement of demolition activities. During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Title 8, California Code of Regulations (CCR), Section 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of lead being disposed. All potentially friable asbestos containing materials (ACMs) shall be removed in accordance with National Emission Standards for Air Pollution (NESHAP) guidelines prior to demolition or renovation activities that may disturb ACMs. All demolition activities shall be undertaken in accordance with Cal/OSHA standards contained in Title 8, CCR, Section 1529, to protect workers from asbestos exposure. A registered asbestos abatement contractor shall be retained to remove and dispose of ACMs identified in the asbestos survey performed for the site in accordance with the standards stated above in this mitigation measure. Materials containing more than one-percent asbestos are also subject to Bay Area Air Quality Management District regulations. Removal of materials containing more than	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
	one-percent asbestos shall be completed in accordance with Bay Area Air Quality Management District requirements and notifications. Based on Cal/OSHA rules and regulations, the following conditions shall be implemented to limit impacts to construction workers: ▪ Prior to commencement of demolition activities, a building survey, including sampling and testing, shall be completed to identify and quantify building materials containing lead-based paint. ▪ During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR, Section 1532.1, including employee training, employee air monitoring and dust control. ▪ Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of waste being disposed. **HAZ-2 Implementation of the Revised Soil and Groundwater Management Plan and DTSC Regulatory Oversight.** The project shall implement the appropriate handling procedures and worker health and safety measures during excavating or dewatering activities as described in the site-specific Revised Soil and Groundwater Management Plan developed by RMD Environmental Solutions for the project in June 2021 (included as Appendix D to this EIR). Measures included in the Revised Soil and Groundwater Management Plan to control potential hazardous contamination and exposure include, but are not limited to the following: ▪ Construction contractors shall implement dust control mitigation measures during construction activities at the project site to minimize the generation of dust. Examples of dust control measures that shall be implemented include routinely applying water or non-toxic soil stabilizers to exposed soils while performing grading and excavation activities; sweeping (with wet power sweepers) paved access roads, parking areas, and staging areas; covering or otherwise stabilizing soil stockpiles at the end of each workday; And suspending construction activities that cause visible dust plumes and odors to extend beyond project site boundaries. Some additional dust control mitigation measures listed in the Soil and Groundwater Management Plan include limiting construction vehicle and equipment speeds to 15 miles per hours when operated on exposed soils and removing visible loose soils from vehicles before leaving the project site. ▪ To prevent or minimize construction equipment from tracking polluted spoils off the site onto roadways, trucks used to transport soil will be	

Impact	Mitigation Measure (s)	Residual Impact
	loaded in a manner to minimize soil spillage and fugitive dust. Examples of ways to load trucks to minimize spillage and dust include loading the truck bed to less than full capacity and covering the bed of truck after it has been loaded. ▪ Construction equipment shall be cleaned prior to movement out of active work zones in impacted areas. The equipment wheels/tires shall be cleaned by means of shovels and stiff-bristled brooms or brushes until they are fully cleaned. Upon completion of cleaning, debris shall be placed in the appropriate transportation vessel and the plastic sheeting shall be disposed. If washing water is required, decontamination wash water shall be profiled and transported to an appropriate disposal or recycling facility. Equipment exiting the project site shall be inspected and logged for compliance with the site decontamination requirements. ▪ A construction Health and Safety Plan shall be prepared by the project applicant or its general contractor for the proposed project in accordance with Federal and State Occupational Safety and Health Administration (OSHA) standards for hazardous waste operations (29 Code of Federal Regulations [CFR] 1910.1208 and 8 California Code of Regulations [CCR] 5192, respectively). Subcontractors shall either adopt the General Contractor's Health and Safety Plan or prepare their own Health and Safety Plan satisfying the same regulatory requirements. The General Contractor shall be responsible for verifying that onsite construction workers and visitors have read and adhere to the procedures established in the Health and Safety Plan. A copy of the Health and Safety Plan shall be kept onsite during redevelopment activities. In the event that unanticipated conditions occur at the site, the General Contractor shall be responsible for modifying the Health and Safety Plan accordingly. ▪ Field screening of soil shall be conducted continuously during ground disturbing activities using a calibrated handheld photoionization detector or other organic vapor meter. Field screening using a photoionization detector shall be conducted by properly trained General Contractor and/or Environmental Consultant personnel. Based on the field screening, excavated soil shall be separated into stockpiles in three categories: 1) Background Soil: No visual and odor indicators, and photoionization detector measurements that are consistent with background levels. Photoionization detector readings of up to 5 parts per million by volume (ppmv) shall be considered background levels. These soils can be characterized for onsite reuse, if applicable; 2) Interim Soil: No visual and odor indicators, and photoionization detector measurements between 5 ppmv and 50 ppmv. These soils can be characterized	

Impact	Mitigation Measure (s)	Residual Impact
	for onsite reuse, if applicable; and 3) Contaminated Soil: Staining and odor indicators present, and/or photoionization detector measurements of more than 50 ppmv. These soils shall be further evaluated and are likely to be characterized for offsite disposal. ▪ If soil exhibiting evidence of contamination (e.g., visual and odor indicators, and photoionization detector measurements of more than 50 ppmv), is encountered during ground disturbing activities, the project applicant and/or General Contractor shall cease ground disturbing activities in the area and delineate the area with barricades or fencing, stakes and plastic sheeting as appropriate, and signage to notify onsite workers and visitors of access restrictions. The General Contractor shall notify the Property Owner and Environmental Consultant. Upon notification, the Environmental Consultant shall implement and/or provide oversight. ▪ Stormwater pollution controls shall be implemented by the project applicant and/or General Contractor to minimize sediment runoff in stormwater. Best Management Practices including grading the site and installing stormwater control measures such as temporary earth berms or erecting silt fences around the perimeter of exposed soil at the site, shall be implemented to prevent erosion and sediment runoff from the site. Straw bale barriers or sediment traps shall be required to protect any existing catch basins or drainage channels. ▪ During project construction activities, soil and/or groundwater sampling, removal and management of discovered underground structures (e.g., storage tanks), chemical analysis and proper disposal of contaminated materials, and soil import activities shall be documented in a daily field log by the project applicant and/or General Contractor and/or Environmental Consultant. At the completion of the construction activities, a Construction Completion Report shall be prepared by the Environmental Consultant for submittal to DTSC that summarizes the soil and groundwater handling activities. The DTSC shall continue to be utilized for agency oversight of assessment and remediation of the project site through completion of construction activities. In addition to implementing the Revised Soil and Groundwater Management Plan, prior to commencement of construction and grading activities at the project site, the project applicant shall implement and/or complete the following tasks, and other tasks if requested by DTSC, regarding the open Site Cleanup Program Case: ▪ Implement the November 19, 2020 Redevelopment-Related Groundwater Monitoring Well Network Modification Work Plan, as approved by DTSC on May 26, 2021	

Impact	Mitigation Measure (s)	Residual Impact
	▪ Implement the October 5, 2021 Revised Vapor Intrusion Mitigation System Implementation Work Plan, as approved by DTSC on December 1, 2021 ▪ Implement the October 21, 2021 Revised Community Air Monitoring Plan (CAMP), as approved by DTSC on December 1, 2021 ▪ Prepare a Five Year Remedial Action Review Report for the years 2019-2023 as specified in a DTSC letter dated May 3, 2022 ▪ Implement the August 30, 2022 Soil Vapor Probe Destruction Workplan, as approved by DTSC on September 29, 2022 Upon submittal or completion of the information above, and in accordance with the 2012 Land Use Covenant, DTSC may require actions such as: development of subsurface investigation workplans; completion of soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. Subsurface soil, soil vapor, and groundwater investigations, if required, shall be conducted in accordance with a sampling plan that shall be reviewed and approved by the DTSC. The DTSC approval documents shall be submitted to and reviewed by the City prior to issuing grading permits. **HAZ-3 Construction Dewatering Requirements.** Construction dewatering effluent, if produced, shall be pumped into holding tanks or United Nations (UN)-rated 55-gallon drums with appropriate labeling and secondary containment. If dewatering effluent would be discharged to an existing storm drain or drains, a National Pollutant Discharge Elimination System (NPDES) permit shall be obtained from the Regional Water Quality Control Board. If dewatering effluent would be discharged to the San Leandro Water Pollution Control Plant, an industrial pre-treatment permit shall be obtained from the San Leandro Environmental Services Section. Chemical analysis shall be performed in accordance with the receiving facility's requirements prior to discharge. If concentrations exceed the limits established for the discharge point, the dewatering effluent shall either be (1) transferred into a vacuum truck or properly labeled UN-rated 55-gallon drums and transported offsite for disposal at an appropriately licensed disposal facility; or (2) treated and discharged following sampling and analysis to confirm compliance with permit requirements. **HAZ-4 Groundwater Monitoring Well Protection.** A November 19, 2020 Redevelopment-Related Groundwater Monitoring Well Network Modification Work Plan (RMD Environmental Solutions 2020c), which was approved in 2021 DTSC letter, was prepared to reduce the potential for damaged or lost wells during development of the project site. Based on available	

Impact	Mitigation Measure (s)	Residual Impact
	development plans at that time, the monitoring wells were designated for either: 1. Protection in areas where minimal grade changes are anticipated. These monitoring wells shall be marked with paint and/or installation of delineators/snow fencing/bollards. The project applicant and/or General Contractor shall protect these groundwater monitoring wells and maintain access to the wells for routine monitoring to the extent practicable; or 2. Destruction in areas within the building footprint and areas with substantial grade changes. The DTSC shall be notified of changes to these designations based on modifications to the development plans and/or input from the project applicant and/or General Contractor with rationale for wells that do not warrant replacement. Prior to removal or installation of any wells, permits shall be acquired from the Alameda County Public Works Agency. **HAZ-5 Engineered Vapor Barrier Requirement.** An engineered vapor barrier shall be employed to further protect against possible vapor intrusion of chemicals of potential concern into the proposed building. The vapor barrier shall be designed to meet the needs of the building. Vapor barriers are generally constructed using membranes constructed with high-density polyethylene or other polyolefin-based resins. The vapor barrier shall be resistant to volatile organic compounds. The vapor barrier shall meet the American Society for Testing and Materials guideline for a vapor barrier and have a permeance rating of 0.1 perms or less. The thickness and strength of the vapor barrier shall be based on the needs for the building, but the architect and contractor shall use a material strong enough to easily withstand the building construction and other building considerations. The selected vapor barrier shall be approved by the DTSC or Regional Water Quality Control Board prior to installation. Written approval from either the DTSC or Regional Water Quality Control Board shall be provided to the City of San Leandro before building permits are issued. **HAZ-6 Bioretention Design Coordination.** The project applicant shall consult with the City of San Leandro on location and/or design of the on-site bioretention basins to ensure protection of the groundwater basin, which may include, but is not limited to, locating the basins outside of the restricted areas or use of a liner in the detention basin. The final design and location of the on-site bioretention basins shall demonstrate that groundwater would be protected from contamination. If bioretention basins are proposed in the restricted areas, DTSC and/or the San Francisco Bay RWQCB shall also approve the design of the bioretention basins.	
Noise and Vibration		
Impact NOI-1. Construction and operation of the proposed project would generate noise, increasing	**NOI-1 On-Site Noise Barrier.** The applicant shall install a permanent noise barrier along the property boundary that is oriented in a northwest-southeast direction and	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
ambient noise levels near the project site. Construction noise would be temporary and below thresholds of significance. Traffic noise during operation would also be below significance thresholds; however, on-site operational noise would exceed thresholds established for the nearest sensitive receptor. Impacts would be potentially significant but mitigable.	separates the project site from APN 77A-742-3-2. The noise barrier shall be a solid fence or wall design and no less than 8 feet tall. The noise barrier shall be no less that 140 feet in length, beginning at the southernmost end of this property boundary.	
Impact NOI-2. Operation of the project would not generate substantial groundborne vibration, but project construction would generate groundborne vibration. Construction vibration levels would exceed thresholds of structural damage at nearby existing buildings. Impacts would be potential significant but mitigable.	**NOI-2 Static Roller Requirement.** The project applicant and/or its construction contractors shall use of a static roller in lieu of a vibratory roller for paving activities within 15 feet of the existing off-site buildings to the north and west of the project site. City staff shall verify that this requirement is incorporated into construction plans prior to issuance of a building permit and verified in the field.	Less than significant.
Impact NOI-3. The project would result in employment opportunities within areas that occur inside of noise contours of the Oakland International Airport. However, the project site would be within the 60 dBA noise contour, and 60 dBA is not an excessive noise level. Therefore, people working in the project site would not be exposed to excessive airport noise, and impacts would be less than significant.	No mitigation measures are required.	Less than significant.
Transportation		
Impact TRA-1. The project would generate VMT that is more than 15 percent below the average VMT per employee in the project area Therefore, the proposed project would not conflict with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.	No mitigation measures are required.	Less than significant.
Impact TRA-2. The project would introduce tractor trailers entering into roadway traffic via driveways. However, sufficient sight distance exists to prevent tractor trailers existing the project site from creating hazards related to dangerous intersections. Impacts would be less than significant.	No mitigation measures are required.	Less than significant.
Tribal Cultural Resources		
Unanticipated tribal cultural resources could be encountered and	**TCR-1 Unanticipated Discovery of Tribal Cultural Resources.** In the event that cultural resources of Native	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
damaged during ground-disturbing activities required for project construction. Impacts to tribal cultural resources would be reduced to less than significant with implementation of Mitigation Measure TCR-1.	American origin are identified during project construction, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City, in consultation with local Native American tribes, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. The plan shall include measures to ensure the find is treated in a manner that respectfully retains, to the degree feasible, the qualities that render the resource of significance to the local Native American group(s). Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.	

1 Introduction

This document is an Environmental Impact Report (EIR) for a proposed industrial development located at 880 Doolittle Drive, San Leandro, California. The proposed 880 Doolittle Drive Industrial Project (hereafter referred to as the "proposed project" or "project") would be constructed on a site currently developed with vacant warehouses and surface parking.

This section discusses (1) the project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) issue areas found not to be significant by the Initial Study; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA). The proposed project is described in detail in Section 2, *Project Description*. The Initial Study is provided as Appendix A to this EIR.

1.1 Environmental Impact Report Background

The City of San Leandro distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on November 22, 2023 and ending on December 22, 2023. The City received letters from eight public agencies in response to the NOP during the public review period. The NOP is presented in Appendix B of this EIR, along with the responses received. Table 1-1 on the following page summarizes the content of the letters and where the issues raised are discussed in the EIR.

1.2 Purpose and Legal Authority

The proposed project requires the discretionary approval of the City of San Leandro; therefore, the project is subject to the environmental review requirements of the California Environmental Quality Act (CEQA). In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

> "will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This EIR has been prepared as a project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A Project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines*:

> "This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation."

This EIR is to serve as an informational document for the public and City of San Leandro decision makers. The process will include a public hearing before the City Council of San Leandro to consider certification of a Final EIR and approval of the proposed project.

Table 1-1 NOP Comments Summary

Commenter	Comment/Request Summary	Where the Topic is Discussed in the EIR
Alameda County, Community Development Agency, Planning Department	The Airport Land Use Commission has no comments on the scope of the environmental analysis in the EIR. However, regarding the Oakland Airport Land Use Compatibility Plan: The project site is located primarily in the Outer Approach Zone (Zone 4), where warehouses and distribution facilities are a compatible use. This assumes that there will be at most 100 employees per acre and that at least 20 percent of the parcel will be vacant land (this includes parking areas). Commercial and industrial uses are compatible with the 60 dB CNEL contour, in which 880 Doolittle is located. With the stated height of 50 feet, the new warehouse should be under the Part 77 surface maximum for the area. The site is located in the plan's avigation easement zone.	Potential noise impacts of the project are evaluated in Section 4.3, *Noise*. Section 9, *Hazards and Hazardous Materials*, of the Initial Study, which is provided as Appendix to this EIR, discusses Part 77 surface maximum and proposed building height.
Bay Area Air Quality Management District	It is recommended that the project incorporate all feasible measures to reduce air quality and greenhouse gas impacts, including the installation of on-site solar arrays, procurement of 100 percent renewable energy, electrification of all operations to the extent feasible including 'make-ready' electrification infrastructure, and consideration of truck route management to reduce community impacts.	The potential air quality impacts of the project, including potential health risk impacts from air pollution, are evaluated in the Initial Study for the project. The Initial Study is provided as Appendix A to this EIR. Additionally, the Initial Study contains a detailed health risk assessment prepared for the project. The potential impacts of the project related to greenhouse gas emissions are evaluated in Section 4.1, *Greenhouse Gas Emissions*, of this EIR.
Bay Area Air Quality Management District	The project should incorporate construction mitigation measures, especially for demolition and site preparation that may elevate fugitive dust.	The potential air quality impacts of the project, including potential health risk impacts from air pollution, are evaluated in the Initial Study for the project. The Initial Study is provided as Appendix A to this EIR. Best management practices for controlling fugitive dust during project construction have been incorporated as mitigation.
Bay Area Air Quality Management District	Certain aspects of the project may require a permit from the Bay Air Quality Management District (for example, backup diesel generators and asbestos demolition). Please ensure the Bay Air Quality Management District is adequately recognized as a permitting agency in future environmental documents.	The project applicant will be responsible for obtaining applicable permits for the project.

Commenter	Comment/Request Summary	Where the Topic is Discussed in the EIR
California Department of Justice	Diesel trucks visiting warehouses emit nitrogen oxide (NOx)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.	The potential air quality impacts of the project, including potential health risk impacts from air pollution, are evaluated in the Initial Study for the project. The Initial Study is provided as Appendix A to this EIR. Additionally, the Initial Study contains a detailed health risk assessment prepared for the project.
California Department of Justice	Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.	Potential noise impacts of the project are evaluated in Section 4.3, *Noise*.
California Department of Justice	The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists.	Traffic jams are a type of traffic delay. Traffic delay at key intersection near the project site is discussed in the Initial Study. The Initial Study is provided as Appendix A to this EIR. Potential conflicts of the project with pedestrian and bicycle modes of transportation are evaluated in the Initial Study. Potential transportation hazards such as unsafe intersections or incompatible vehicle types are evaluated in Section 4.4, *Transportation*, of this EIR.
California Department of Justice	Warehouses may also have other environmental impacts.	The potential environmental impacts of the project are evaluated in this EIR and in the Initial Study, which is provided as Appendix A to this EIR.
California Department of Justice	In preparing the EIR, the Department of Justice encourages the City to consult its publication titled *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*.	The City reviewed the publication referenced in this comment and relevant components have been incorporated into the preparation of this EIR. For example, the publication recommends preparation of a noise impact analysis. As described in EIR Section 4.3, *Noise*, a noise impact analysis has been prepared for the project.

Commenter	Comment/Request Summary	Where the Topic is Discussed in the EIR
California Department of Justice	Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.	The potential air quality impacts of the project are evaluated in the Initial Study. The Initial Study is provided as Appendix A to this EIR.
California Department of Toxic Substances Control	Surveys should be conducted for lead-based paint and products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk prior to demolition of buildings and structures. Removal, demolition, and disposal of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies.	Potential impacts of the project associated with hazardous materials, including chemicals mentioned in this comment, are evaluated in Section 4.2, *Hazards and Hazardous Materials*.
California Department of Toxic Substances Control	Imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material meets screening levels for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use.	The proposed project does not include importing fill material.
California Department of Toxic Substances Control	Prior to new buildings being constructed on site, a Remedial Action Plan amendment will be required to evaluate the soil vapor impacts and vapor intrusion risk. While a vapor mitigation system has been discussed for the site, the system cannot be installed before the completion of the Remedial Action Plan amendment.	The potential impacts related to soil vapor intrusion are evaluated in Section 4.2, *Hazards and Hazardous Materials*. Section 4.2, *Hazards and Hazardous Materials,* also identifies mitigation measures for impacts related to soil vapor intrusion.
California Department of Transportation – Aeronautics Program	The project site is primarily in Safety Zone 4 (Outer Approach/Departure Zone), with a portion in Zone 6 (Traffic Pattern Zone) of the Oakland International Airport and therefore must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) formed by the ALUC pursuant to the PUC, Section 21674. Warehouse and office space square footage per person should be further reviewed to adhere to consistency with the ALUCP and Table 3-2 of the ALUCP. Section 3.3.2.7. should also be reviewed to ensure compatibility with development criteria.	This comment does not directly pertain to environmental impacts evaluated under CEQA. However, the City recognizes the importance of adhering to the Airport Land Use Compatibility Plan. The Alameda County Community Development Agency, Planning Department (ALUC) also provided a written comment in response to the NOP. In that letter the ALUC indicates that warehouses are a compatible use within Safety Zone 4 assuming certain restrictions on the number of employees on-site.

Commenter	Comment/Request Summary	Where the Topic is Discussed in the EIR
California Department of Transportation – Aeronautics Program	The project site is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, compatibility restrictions should be reviewed per the ALUCPs Table 3-2 and Section 3.3.2.8(e).	Potential impacts of the project associated with hazardous materials are evaluated in Section 4.2, *Hazards and Hazardous Materials*.
California Department of Transportation – Aeronautics Program	The proposed project may also be subject to 14 CFR Part 77 Conical Surface standards and CNEL Contours noise compatibility in applicable areas.	The Alameda County, Community Development Agency, Planning Department (ALUC) also provided a written comment in response to the NOP. In that letter the ALUC indicates that the proposed height of the warehouse should be under the Part 77 surface maximum for the area. The ALUC also indicated that commercial and industrial uses are compatible with the 60 dB CNEL contour, in which 880 Doolittle is located.
California Department of Transportation – Aeronautics Program	Caltrans advises the City of San Leandro to submit its plans to the ALUC to determine if the plans or projects are consistent or not with the ALUCP according to the State Aeronautics Act's statutory procedure.	This comment does not directly pertain to environmental impacts evaluated under CEQA. However, the project plans will be submitted to the ALUC for review.
California Department of Transportation	Please consider the following freight issues when drafting the DEIR: the number of parking spaces should be based on peak operating time of the activity generator; site entrance and exit points should accommodate the design of vehicle movements; the DEIR should identify pedestrian and bicycle conflict points to and from the proposed facility as well as bus stops that may conflict with truck parking zones; and the project should consider the number of legal truck parking spots available in the area and the potential areas that may be utilized as unauthorized parking.	Parking requirements are not a CEQA topic or issue area. However, the project will be evaluated by the City for conformance to the San Leandro Municipal Code, including the provision of adequate parking. Potential conflicts of the project with transit, pedestrian, and bicycle modes of transportation are evaluated in the Initial Study. The Initial Study is provided as Appendix A to this EIR. Potential transportation hazards such as unsafe intersections or incompatible vehicle types are evaluated in Section 4.4, *Transportation*, of this EIR.
California Department of Transportation	Potential impacts to the state right-of-way from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits. Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan to reduce construction traffic impacts to the State Transportation Network.	Impacts to state right-of-way are not environmental impacts pursuant to CEQA. Regardless, the proposed project does not include temporary access points from or within state right-of-way. The project applicant must obtain all required permits and comply with regulatory requirements. Construction and operational noise impacts are evaluated in Section 4.3, *Noise*, of this EIR.

Commenter	Comment/Request Summary	Where the Topic is Discussed in the EIR
California Department of Transportation	As the Lead Agency, the City of San Leandro is responsible for all project mitigation, including any needed improvements to the State Transportation Network. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.	Mitigation measures required for the project are identified in the Initial Study (see Appendix A) and throughout this EIR. The Executive Summary of this EIR also lists all required mitigation measures for the project. The identified mitigation measures do not require improvements or modifications to the State Transportation Network. As part of the CEQA process, the City will prepare a Mitigation Monitoring and Reporting Program (MMRP). The MMRP will identify the timing and monitoring frequency of mitigation measures, as well as the agency or organization responsible for ensuring the measure is implemented and monitored accordingly.
East Bay Municipal Utility District	When the development plans are finalized, the project sponsor should contact EBMUD's New Business Office and request a water service estimate to determine costs and conditions for providing water service to the project. Engineering and installation of water services require substantial lead time, which should be provided for in the project sponsor's development schedule.	The project applicant would request water service for the project site once the development plans are finalized and would consider the lead time in their project development schedule.
East Bay Municipal Utility District	The District's Standard Site Assessment Report indicates the potential for contaminated soils or groundwater to be within the project's boundaries. The project sponsor should be aware that East Bay Municipal Utility District will not install pipeline or services in contaminated soil or groundwater, nor in areas where groundwater contaminant concentrations exceed specified limits. The project sponsor must submit copies to East Bay Municipal Utility District of all known information regarding soil and groundwater quality within or adjacent to the project boundary and a legally sufficient, complete, and specific written remediation plan establishing the methodology, planning and design of all necessary systems for the removal, treatment, and disposal of contaminated soil and groundwater.	Potential impacts of the project associated with hazardous materials, including contaminated soil and groundwater, are evaluated in Section 4.2, *Hazards and Hazardous Materials*.

Commenter	Comment/Request Summary	Where the Topic is Discussed in the EIR
East Bay Municipal Utility District	The East Bay Municipal Utility District will not design piping or services until soil and groundwater quality data and remediation plans have been received and reviewed and will not start underground work until remediation has been carried out and documentation of the effectiveness of the remediation has been received and reviewed. If no soil or groundwater quality data exists, or the information supplied by the project sponsor is insufficient, East Bay Municipal Utility District may require the project sponsor to perform sampling and analysis to characterize the soil and groundwater that may be encountered during excavation, or East Bay Municipal Utility District may perform such sampling and analysis at the project sponsor's expense. If evidence of contamination is discovered during East Bay Municipal Utility District work on the project site, work may be suspended until such contamination is adequately characterized and remediated to East Bay Municipal Utility District standards.	Potential impacts of the project associated with hazardous materials, including contaminated soil and groundwater, are evaluated in Section 4.2, *Hazards and Hazardous Materials*.
East Bay Municipal Utility District	East Bay Municipal Utility District requests that the City include in its conditions of approval a requirement that the project sponsor comply with Assembly Bill 325, "Model Water Efficient Landscape Ordinance," (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495). The project sponsor should be aware that Section 31 of East Bay Municipal Utility District's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense.	This comment cites regulatory requirements. The proposed project must comply with regulatory requirements regardless of CEQA analysis and mitigation measures.
Native American Heritage Commission	The Native American Heritage Commission recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.	No California Native American Tribes have submitted requests to the City of San Leandro for consultation on CEQA projects pursuant to Public Resources Code Section 21080.3.1. The proposed project does not involve an amendment to the City's General Plan; therefore, consultation pursuant to SB 18 is not required. Potential project impacts related to tribal cultural resources are evaluated in the Initial Study, which is provided as Appendix A to the EIR. The Initial Study also provides mitigation measures to reduce potential impacts to tribal cultural resources. These mitigation measures also appear in the Executive Summary of this EIR.

1.3 Scope and Content

This EIR addresses impacts identified by the Initial Study to be potentially significant. The following issues were found to include potentially significant impacts and have been studied in the EIR:

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Transportation

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the EIR (Section 5) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on a range of reasonable alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and two alternative development scenarios for the project site.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *CEQA Guidelines* state:

> An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Issues Not Studied in Detail in the EIR

Table 1-2 lists the environmental resource areas that were addressed in the Initial Study (Appendix A). A full analysis of each resource area listed in Table 1-2 can be found in Appendix A. As indicated in the Initial Study, there is no substantial evidence that the proposed project may have a significant impact on the environment in any of these issue areas, either with or without mitigation, depending on the specific impact.

Table 1-2 Issues Not Studied in the EIR

▪ Aesthetics	▪ Agriculture and Forestry Resources
▪ Air Quality	▪ Biological Resources
▪ Cultural Resources	▪ Energy
▪ Geology and Soils	▪ Hydrology and Water Quality
▪ Hydrology and Water Quality	▪ Land Use and Planning
▪ Mineral Resources	▪ Population and Housing
▪ Public Services	▪ Recreation
▪ Tribal Cultural Resources	▪ Utilities and Service Systems
▪ Wildfire	

Impacts included in the Initial Study that would be less than significant with implementation of mitigation include:

- **Air Quality:** Construction of the proposed project would generate wind-blown dust that could contribute particulate matter into the local atmosphere. With implementation of Mitigation Measure AQ-1, this impact would be less than significant.

  AQ-1 BAAQMD Best Management Practices for Construction-Related Fugitive Dust Emissions

  The project applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by BAAQMD to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures:

  1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
  2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
  3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
  4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
  5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
  6. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
  7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
  8. Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.
  9. Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

- **Biological Resources:** The proposed project would involve construction work near street trees just off the project site near the driveway that connects to Hester Street which may affect protected nesting birds in existing trees. Impacts to nesting birds would be reduced to less than significant with implementation of Mitigation Measure BIO-1.

  BIO-1 Nesting Bird Avoidance and Minimization Measures

  The following avoidance and minimization measures shall be implemented during project construction activities:

  - Initial site disturbance shall occur outside the general avian nesting season (February 1 through September 15), if feasible.
  - If initial site disturbance occurs in a work area within the general avian nesting season indicated above, a qualified biologist shall conduct a pre-construction nesting bird survey no more than 14 days prior to initial disturbances in the work area. The survey shall include the entire area of disturbance area plus a 50-foot buffer (relevant to non-raptor species) and 300-foot buffer (relevant to raptors) around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer should be a minimum of 50 feet for non-raptor bird species and at least 300 feet for raptor species. Larger buffers may be required and/or smaller buffers may be established depending upon the species, status of the nest, and construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer.
  - If construction activities in a given work area cease for more than 14 days, additional surveys shall be conducted for the work area. If active nests are located, the aforementioned buffer zone measures shall be implemented.

- **Cultural Resources:** Unanticipated archaeological deposits could be encountered and damaged during ground-disturbing activities required for project construction. Impacts to archeological resources would be reduced to less than significant with implementation of Mitigation Measure CR-1.

  CR-1 Unanticipated Discovery of Cultural Resources

  In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as

appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the CHRIS, per CCR Guidelines Section 15126.4(b)(3)(C).

- **Tribal Cultural Resources:** Unanticipated tribal cultural resources could be encountered and damaged during ground-disturbing activities required for project construction. Impacts to tribal cultural resources would be reduced to less than significant with implementation of Mitigation Measure TCR-1.

  TCR-1 Unanticipated Discovery of Tribal Cultural Resources

  In the event that cultural resources of Native American origin are identified during project construction, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City, in consultation with local Native American tribes, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. The plan shall include measures to ensure the find is treated in a manner that respectfully retains, to the degree feasible, the qualities that render the resource of significance to the local Native American group(s). Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.

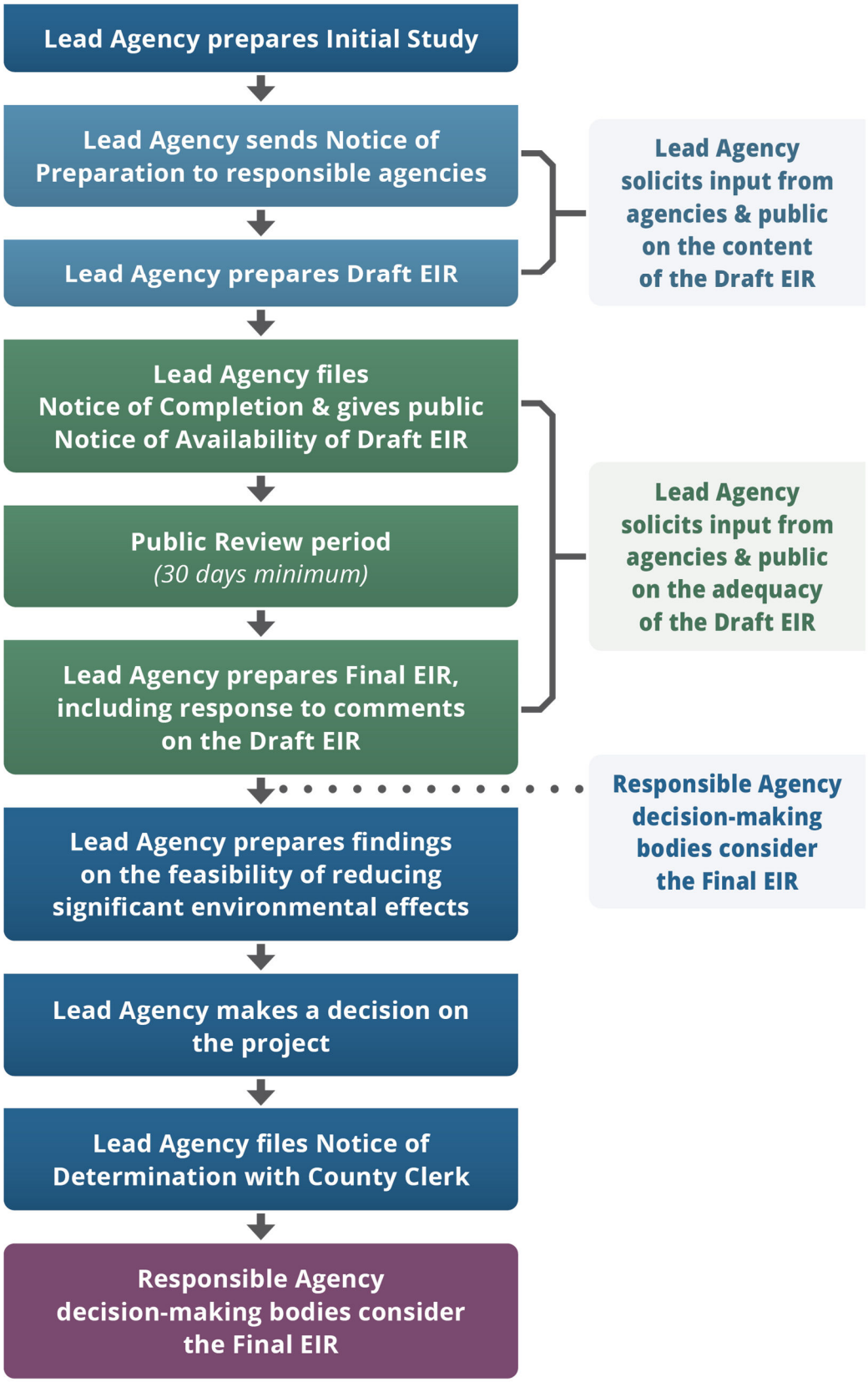
1.5 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Initial Study**. After deciding that an EIR is required, the lead agency (City of San Leandro) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Sections 21080.4 and 21092.2). Aside from temporary exceptions in place prior to September 30, 2021, due to the COVID-19 pandemic, the NOP must be posted at the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts (*CEQA Guidelines* Section 15082(a)(2).
2. **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.

3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must post the NOC in the County Clerk's office for at least 30 days and send a copy of the NOC to anyone requesting it (Public Resources Code Sections 21092, 21092.3, and *CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21153). The minimum public review period for a Draft EIR is 30 days (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include a) the Draft EIR; b) copies of comments received during public review; c) a list of persons and entities commenting on the Draft EIR; and d) the Lead Agency's responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project; and d) the Final EIR reflects the lead agency's independent judgment and analysis (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence in the record, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the significant impact; b) changes to the project are within another agency's responsibility and jurisdiction and such changes have or should be adopted by the other agency; or c) specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision (*CEQA Guidelines* Section 15091).
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (*CEQA Guidelines* Sections 15091 and 15097).
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



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2 Project Description

This section describes all components and characteristics of the proposed project, including the project applicant, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval, and serves as a basis for the analysis that follows in subsequent chapters of this Draft Environmental Impact Report (EIR). This section also provides an overview of existing conditions on and around the project site, including current jurisdictional designations; however, existing conditions are described in greater detail in the Environmental Setting portion of each environmental analysis section in Chapter 3, Environmental Setting.

2.1 Project Applicant

Prologis
Claudia Tarpin, Director, Development
(510)-656-1900

2.2 Lead Agency Contact Person

Cindy Lemaire, AICP, CNU-A, Senior Planner
City of San Leandro
835 East 14th Street
San Leandro, California 94577
(510) 577-3348

2.3 Project Location

The project site is located at 880 Doolittle Drive, which is on the east side of Doolittle Drive just east of adjacent properties with frontage on Doolittle Drive, approximately 0.2 mile north of its intersection with Davis Street, in San Leandro. The project site measures approximately 14.14 acres and consists of two Assessor's parcels: APN 77A-0741-004-02 and 77A-0741-005-00. Existing access to the project site is from a driveway on Doolittle Drive. Access to the site is also provided from a driveway at the southern terminus of Hester Street, which is a public street north of the project site. Figure 2-1 shows the site location in a regional context. Figure 2-2 shows an aerial view of the location of the site relative to the surrounding area. The aerial photograph shown in Figure 2-2 is outdated in that is shows vehicles on-site indicating an occupied building. The buildings on site are currently vacant with no active operations.

The project site is also in the planning area of the Airport Land Use Compatibility Plan for the Oakland International Airport (Alameda County Community Development Department 2010).

Figure 2-1 Regional Location

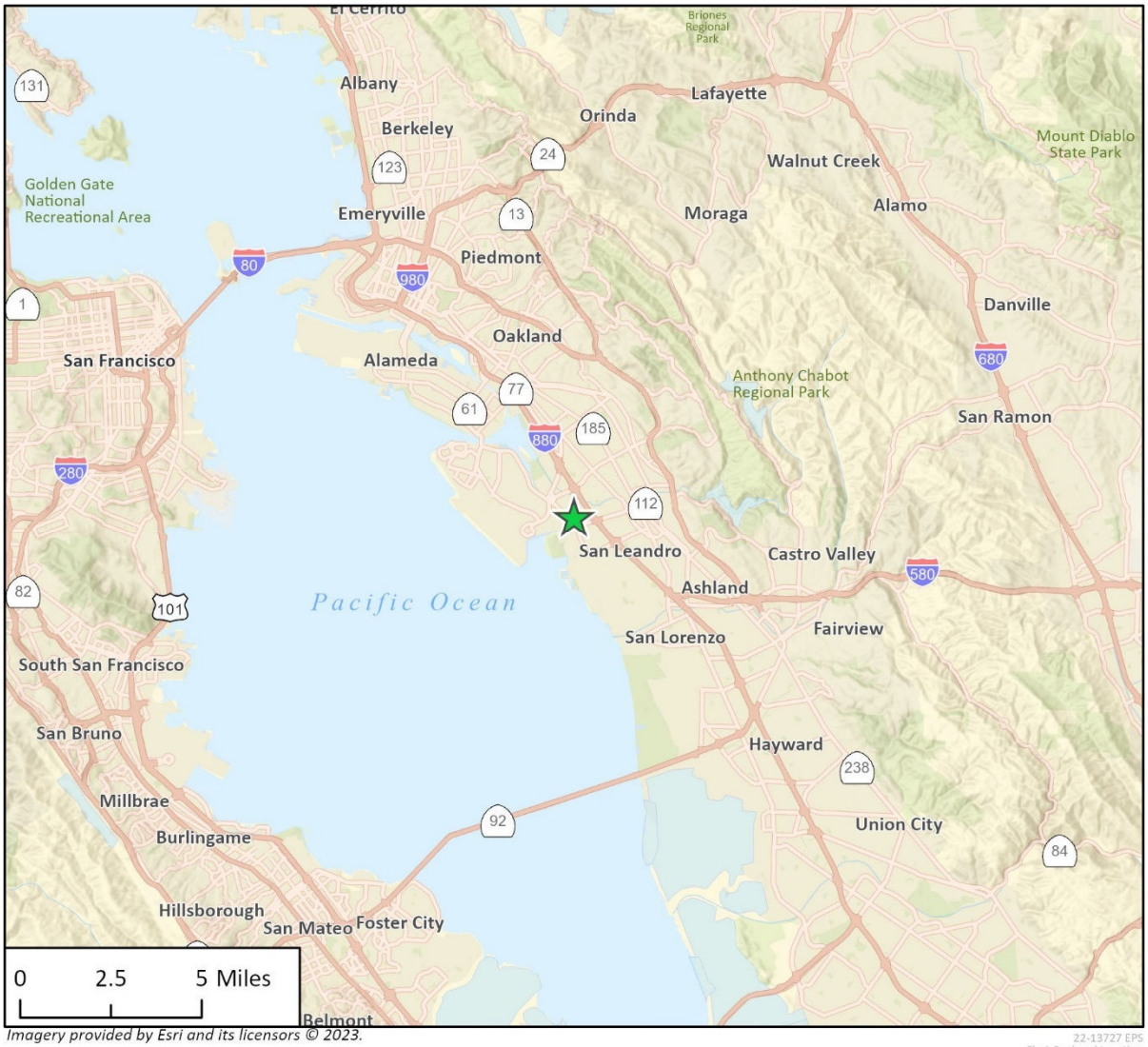


Figure 2-2 Project Site Location

Imagery provided by Microsoft Bing and its licensors © 2023.

22-13727 EPS
Fig 2 Project Location

2.4 Existing Site Characteristics

2.4.1 Site History and Existing Conditions

The project site is entirely developed. Existing on-site development consists of an approximately 207,000 square-foot industrial masonry building, an approximately 4,700 square-foot industrial masonry building, and paved surface parking lots, including a large surface parking lot covering approximately the northern half of the site. These existing buildings are vacant, and the unoccupied condition is the circumstance used for the environmental baseline in this document. Unpaved portions of the site are limited to small islands of landscaping, such as a strip of landscaping around the cul-de-sac at the end of Hester Street and landscaping along the easternmost project site boundary. Existing landscaping is a mix of non-native and weedy ground cover consisting of ruderal grass. There are inactive railroad tracks adjacent to the south and west of the site, and there is an active railroad corridor approximately 400 feet east of the project site.

In addition to the on-site warehouses, the project site has also been used as vehicle parking for people departing from the Oakland International Airport. However, operation of airport parking on the site ended during the COVID-19 pandemic and never resumed. The project site is currently vacant with no active operations.

Representative photographs of existing site conditions are shown on Figure 2-3.

2.4.2 General Plan Designation

The project site is designated as General Industrial (IG) in the San Leandro 2035 General Plan (City of San Leandro 2016). According to the Land Use Element of the 2035 General Plan, areas designated as General Industrial may contain a wide range of manufacturing, transportation, food and beverage processing, technology, warehousing, vehicle storage, office-flex, and distribution uses. A limited range of commercial uses are also permitted in these areas.

2.4.3 Zoning

The site is zoned as an Industrial General (IG) District. According to the San Leandro Zoning Code, areas zoned as Industrial General Districts are allowed to contain the following uses: accessory uses, other than entertainment events, when in conjunction with a permitted use; adult-oriented business; emergency and non-emergency ambulance services; artists' studios; automobile parts sales; building materials and services; business services; business and trade schools; catering services; communications facilities; emergency health care; equipment sales; retail financial institutions; general and limited food processing; government offices; health and fitness centers; home improvement and interior decoration; custom, general, limited, and research and development industry; laboratories; maintenance and repair services; marine sales and services; medical supply stores; nurseries; offices, business and professional; parcel processing and shipping centers; pre-existing residential uses; big box retail sales; telecommunications, architecturally-integrated antennas and/or co-locations on existing tower structures; minor utilities; new vehicle/heavy equipment dealers; and storage and wholesale/retail distribution warehouse that utilizes the existing building that would not be expanded 10,000 square feet or more.

Figure 2-3 Existing Site Conditions: Representative Photographs

Existing driveway connection between Doolittle Drive and the project site. The view in this photograph is northeast, toward the project site with Doolittle Drive behind the camera.

Typical existing development on the project site, incuding existing vacant structures, fencing, ashpalt parking and driving surfaces, and signage. The view in this photograph is east toward where the driveway from Doolittle Drive crosses into the project site.

Figure 2-3 Existing Site Conditions: Representative Photographs (Continued)

Typical existing development on the project site, incuding existing vacant structures, ashpalt parking and driving surfaces, and ruderal vegetation. The view in this photograph is southwest facing existing buildings with the camera positioned in the northern area of ths site.

Typical existing development on the project site, incuding existing vacant structures, overhead utilities, ashpalt parking and driving surfaces, and tractor trailers. The view in this photograph is south facing existing buildings with the camera positioned in the northern area of ths site.

Figure 2-3 Existing Site Conditions: Representative Photographs (Continued)

Typical existing developmen ton the project site, incuding an existing vacant structure, fencing, ashpalt parking and driving surfaces, as well as off-site railroad tracks along the southern site boundary. The view in this photograph is east.

The terminus of Hester Street and the existing driveway connection between Hester Street and the project site. Existing development on the project site is visible in the background. The view in this photograph is southeast toward the project site.

2.4.4 Surrounding Land Uses

The project is located on an infill site that is largely surrounded by industrial and commercial uses. Land adjacent to the northern boundary of the project site is developed with a mix of commercial and industrial land uses, including but not limited to, tool vendors, screen printing shops, machine shops, and sign shops. Carden Street separates the project site from land uses to the east, which are comprised of trucking businesses, a landscape company, metal supplier, and other commercial/industrial businesses.

The site is approximately 2.5 miles east of the San Francisco Bay, 5.8 miles northwest of San Lorenzo Creek, and 2.5 miles west of San Leandro Creek. The San Francisco Bay shoreline is approximately 3,000 feet southwest of the project site. The freight and corporate aircraft runways at Oakland International Airport are approximately 4,050 feet northwest of the project site.

2.5 Project Description

The proposed project consists of consolidating the two parcels comprising the project site into a single parcel, demolishing existing vacant structures, and developing a new industrial shell building on the site. There is no specific known land use and/or tenant proposed at this time, and the shell building would be designed to accommodate a future industrial tenant who may perform interior improvements to accommodate their specific needs. The proposed project also includes a new surface parking lot, internal circulation roadways, new utility connections, and landscaping, including landscaped areas that would serve as stormwater management. The major components of the proposed project are described in subsections below.

2.5.1 Property Consolidation and Demolition

The project site comprises two separate parcels, identified as APNs 77A-0741-004-02 and 77A-0741-005-00. The proposed project includes merging these two parcels into a single parcel. The new parcel would measure approximately 14.14 acres.

Site preparation activities would commence with demolition of the two existing vacant structures on site, as well as all associated surface parking, landscaping, and internal circulation and driveways on the site. Existing utility connections would be completely removed or abandoned in place in accordance with local and state regulations, in coordination with utility providers. Demolition materials, such as solid waste from the existing structures and asphalt pavement, would be disposed of at permitted or licensed facilities in accordance with local and state regulations. Demolition would last approximately 2 months.

2.5.2 Industrial Development

After approximately 6 months following demolition of existing structures, the proposed project would include construction of a new warehouse with supporting office space. The proposed building is approximately 244,573 square feet, comprised of a 229,573 square-foot of warehouse and 15,000 square feet of associated office space. Approximately 10,000 square feet of office space would be provided on the ground floor alongside the warehouse use. The remaining 5,000 square feet of office space would be on a mezzanine level of the warehouse. The footprint of the warehouse and office use would be 239,753 square feet. The proposed warehouse would be positioned within the project site to comply with the City's minimum frontage setback requirement of 10 feet. The proposed floor area ratio (FAR) is 0.40 and the maximum building height would be 50 feet with an

interior clear height of 40 feet. Figure 2-4, which is a conceptual site plan, shows the location of the proposed warehouse on the project site.

As shown on Figure 2-4, sixty-four loading docks are proposed, 27 on the north side and 37 on the south side of the building. In addition to dock doors, traditional doors for egress and ingress to the building would be provided for each of the two office spaces within the proposed warehouse. Traditional doors would be provided on the north side of the building and south side of the building, next to dock doors.

The exterior of the proposed warehouse would be constructed of a mix of materials, including concrete panels, corrugated and noncorrugated metal panels, wood finish/trim, and glazing. Glazing refers to the glass installed in the building such as windows. Glazing would be a mix of insulated glass installed over concrete and other materials, and glass installed over openings to serve as traditional windows. Generally, given the proposed warehouse use, exterior windows would be limited to the office use areas of the buildings. Figure 2-5 shows conceptual elevations of the proposed building, including identifying the various exterior finishes and glazing that would be used. Conceptual renderings of the project are shown on Figure 2-6.

At the time of publishing of this EIR, a tenant has not been identified for the proposed building. However, operational hours and activities would be typical of a warehouse land use. The building would be constructed for a speculative tenant or tenants; the project is intended for occupancy by uses consistent with the site's General Industrial General Plan land use designation, as well as those uses permitted under the site's Industrial General zoning classification. Based on employee generation rates published by the U.S. Green Building Council (2023), the proposed project would employ approximately 152 full-time employees.[1]

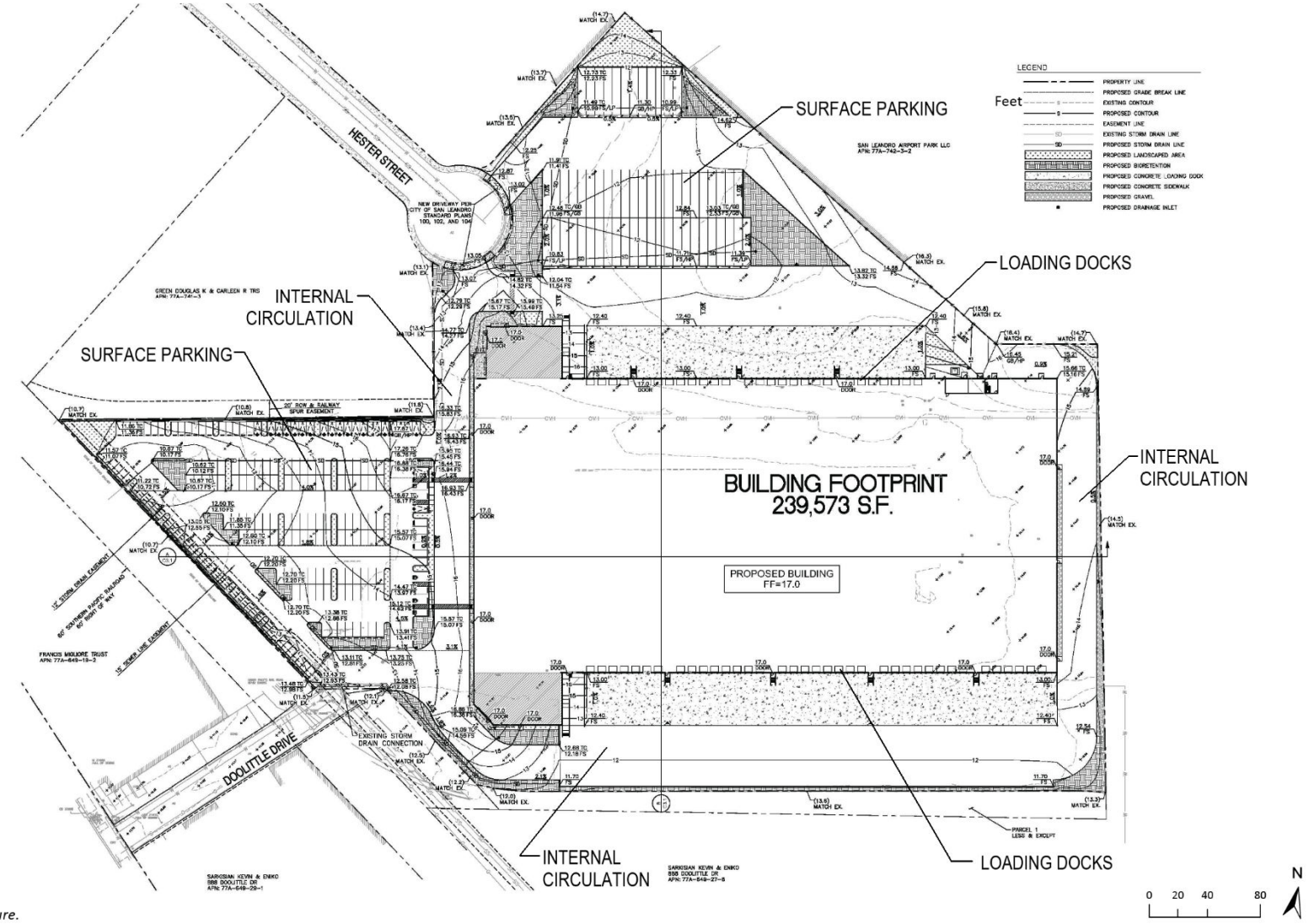
2.5.3 Circulation/Access and Parking

Access to the project site would be from the driveway on Doolittle Drive in the southwest area of the site, and from the end of Hester Street in the northern area of the site, as shown on Figure 2-4. Although these are both existing driveways, the proposed project would include reconstruction of the driveways to meet City standards and current ADA requirements. This would involve repairs as needed of the driveway from Doolittle Drive. New curb cut would be provided at the cul-de-sac on Hester Street, which would also include reconstructing (i.e., replacement of) portions of the sidewalk along the project site frontage on Hester Street. Additionally, a new, second, driveway to the site would be constructed at the end of Hester Street, providing a total of three driveways.

The proposed driveways would lead to internal access and circulation roads that encircle the proposed warehouse as well as surface parking areas that would be provided on the west and north sides of the warehouse. The internal circulation roads are designed to comply with standards for passenger vehicles, tractor-trailers, and emergency equipment like fire engines and ambulances. The internal circulation road would be wide enough to allow tractor trailers to maneuver in reverse into loading docks on the north and south side of the warehouse, as shown on Figure 2-4.

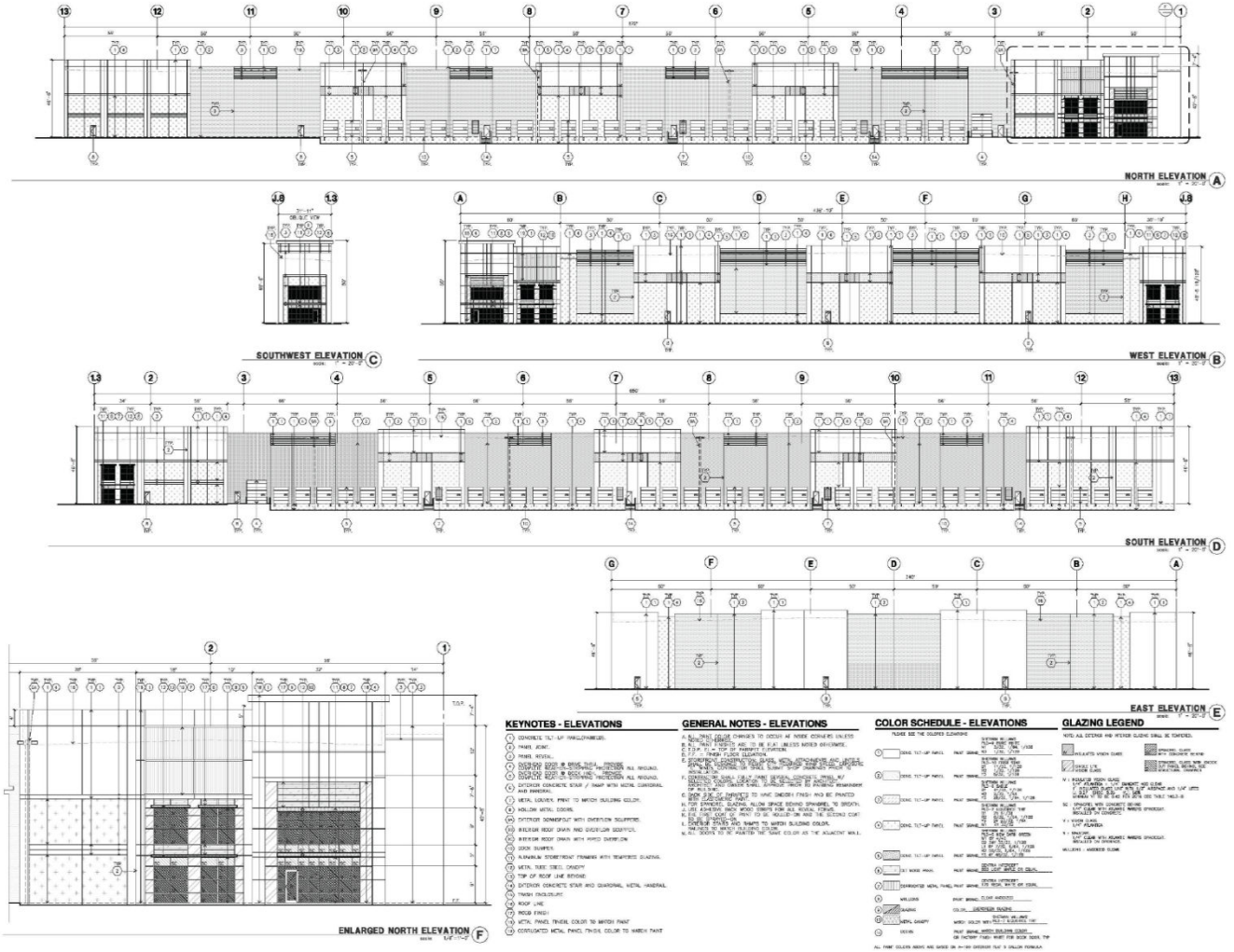
[1] (229,573 square foot warehouse distribution use/2,500 square foot per employee) + (15,000 square foot office use/250 square foot per employee) = 152 employees (US Green Building Council 2023). Numbers may not add up due to rounding.

Figure 2-4 Conceptual Site Plan



Source: HPA Architecture.

Figure 2-5 Conceptual Building Elevations



Source: HPA Architecture.

Figure 2-6 Conceptual Rendering of Project

The proposed project would include two main surface parking areas. The lot on the west side of the building would consist primarily of parking spaces for passenger vehicles. A total of 204 parking spaces would be provided for passenger vehicles, consisting of the following:

- 116 standard parking spaces (9 feet by 18.5 feet)
- 57 spaces for compact cars (8 feet by 16 feet)
- 3 standard accessible spaces
- 3 standard accessible van space
- 4 clean air spaces
- 21 electric vehicle spaces

The other main surface parking area would be on the north side of the warehouse, as shown on Figure 2-4. This parking area would consist of 59 spaces sized for tractor trailers. Tractor trailer parking spaces would be 10 feet by 53 feet each.

In addition to vehicle parking, the proposed project would also provide on-site bicycle parking. A total of 24 bicycle parking spaces would be provided in the vicinity of the office main entrance, including 12 short-term spaces and 12 long-term spaces.

2.5.4 Landscaping

Approximately 41,592 square feet of landscaping would be provided throughout the site including along the perimeter of the site to provide screening and a buffer between adjoining properties and land uses as well as in parking islands. No landscaping is proposed on the east side of the warehouse, which faces Carden Street and other commercial and industrial land uses. Instead, the project would include rock mulch at the eastern project site boundary. Where landscaping is installed, it would consist mostly of shrubs, providing either visual accents or screening, depending on planting density. Landscaping would also include new trees. New trees would be planted amongst shrubs along much of the site boundary, but also in landscaped parking islands within the surface parking area designed for passenger vehicles. Trees would also be planted around the proposed driveways on Hester Street, near the surface parking area designed for trailers. Trees would be a mix of conifers and deciduous species. Landscaping shrubs and trees would consist of species native to California. The proposed project would comply with water efficient landscape and would include the planting of species that would be appropriate for the local climate and contribute to conserving outdoor water use.

The project would also include bioswale areas to treat stormwater runoff. The bioswales would be planted with a mix of native grasses, low shrubs, and sod. These bioswale areas are described in more detail below in the Utilities section of this project description.

2.5.5 Utilities

Potable water service for the project would be provided by the East Bay Municipal Utility District (EBMUD), the City of San Leandro potable water service provider. A new water connection would be constructed on site and connect to an existing water main that is beneath the surface of the existing driveway at Doolittle Drive. Generally, the new water connection would be located beneath the new surface parking area on the west side of the proposed warehouse, as shown on Figure 2-7. A new fire hydrant pipeline would also connect to the existing water main in the project area in accordance with City code and requirements.

Sanitary sewer service for the project would be provided by the City's Sewer Department. Similar to the water line, a new sanitary sewer line would connect the proposed warehouse and an existing sanitary sewer main through the driveway on Doolittle Drive, as shown on Figure 2-7.

Stormwater runoff would be treated on site to meet the current Alameda County C.3 stormwater regulations before being discharged to the existing storm drain system. On-site treatment would occur with a series of bioswales, as shown on Figure 2-7. The bioswales are designed to capture and slow/pool runoff from impervious surfaces, functioning as bioretention areas. The bioswales would include approximately 18 inches of biotreatment soils and an underlying approximately 12 inches of permeable gravels. The bioswales will be vegetated with a native bioretention grass. Runoff collects and infiltrates the biotreatment soil, reducing the volume of runoff discharged into the storm drain system. Slowing the velocity of runoff by directing it into bioswales also allows solids to settle out before the runoff is discharged into the storm drain system. After entering on-site bioswales, treated runoff that infiltrates the soil would enter storm drain inlets installed in each bioswale. As shown on Figure 2-7, the inlets would connect to a storm drain pipeline installed beneath new surface parking areas and connect to an existing storm drain through the Doolittle Drive driveway.

Electricity and natural gas service at the project site would be provided by Pacific Gas & Electric, which provides services to the project area.

2.5.6 Construction and Grading

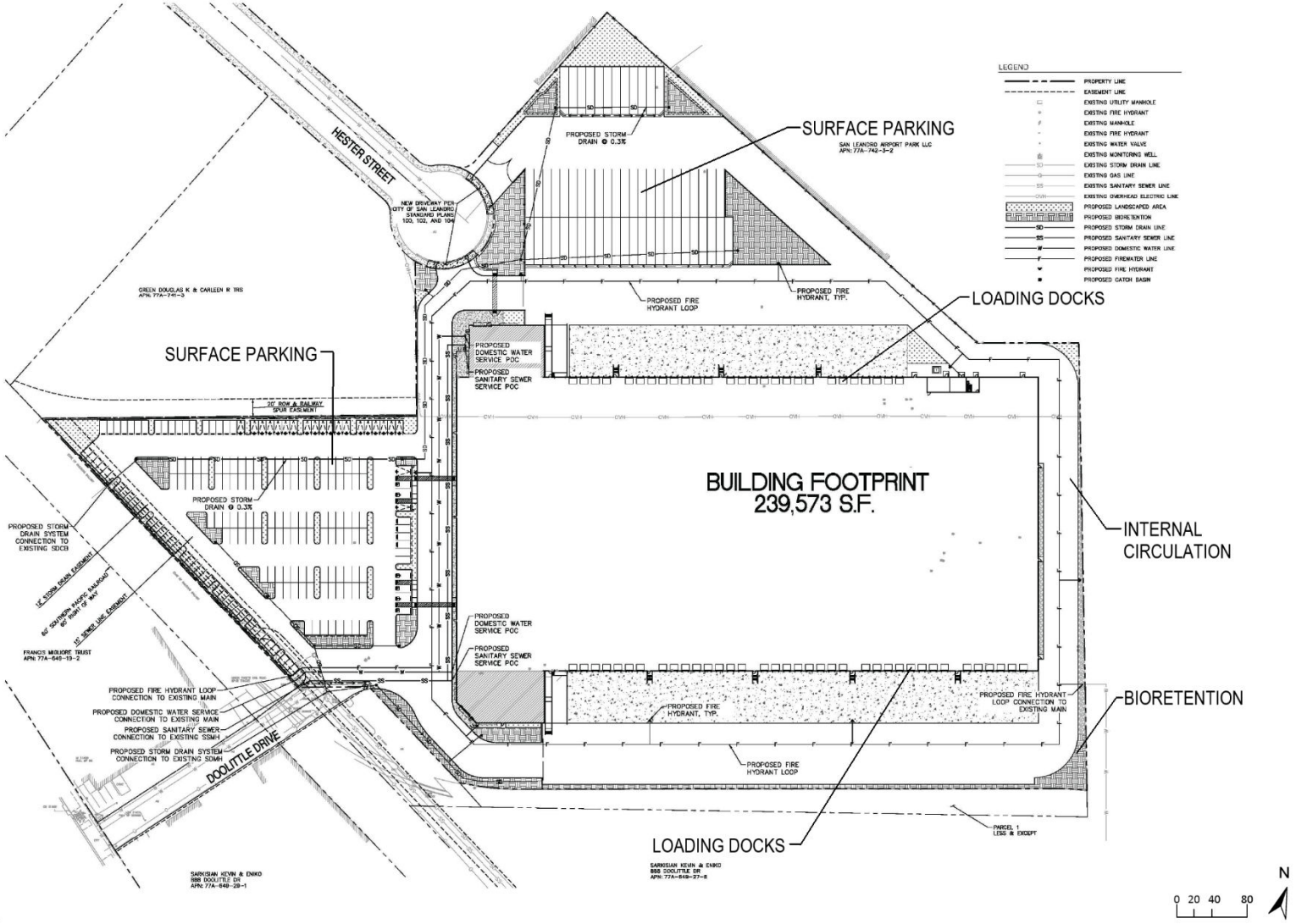
The timing of project construction would be determined by market forces and other considerations, such as weather or availability of workforce. However, for purposes of this analysis it is anticipated that construction would begin in 2024 with demolition of existing vacant structures and related infrastructure, such as utilities and surface parking.

Site grading would occur following demolition of the existing development on the project site, which totals approximately 212,000 square feet of structures. The site is relatively level, which minimizes the amount of grading included in the proposed project. Generally, grading would be designed to slope in a west-southwest direction across the site, which would allow stormwater runoff to flow into bioswale areas and then continue into the City's storm drain system using gravity rather than mechanical forces. Elevations on the project site following grading would vary between approximately 10 feet and 17 feet above mean sea level. Preliminary grading design shows a balanced site The conceptual grading plan for the proposed project is shown on Figure 2-8.

Project construction would commence following grading. Construction would include excavation and trenching to install buried utility connections, such as new water, sanitary sewer, and storm drain laterals. The foundation of the warehouse would be poured followed by framing and construction of the walls, interior spaces, and exterior. Paving of surface parking areas, driveways, and internal access roads would also occur during project construction, as well as construction of new sidewalk on site frontage along Hester Street. Additionally, repaving of a small off-site area between the existing off-site railroad tracks and the project site would be conducted. Following construction, new landscaping would be planted or installed. Assuming construction of the project is continuous, construction would occur over approximately 18 months, with 6 of those months being a period of inactivity following demolition that is associated with construction contracting.

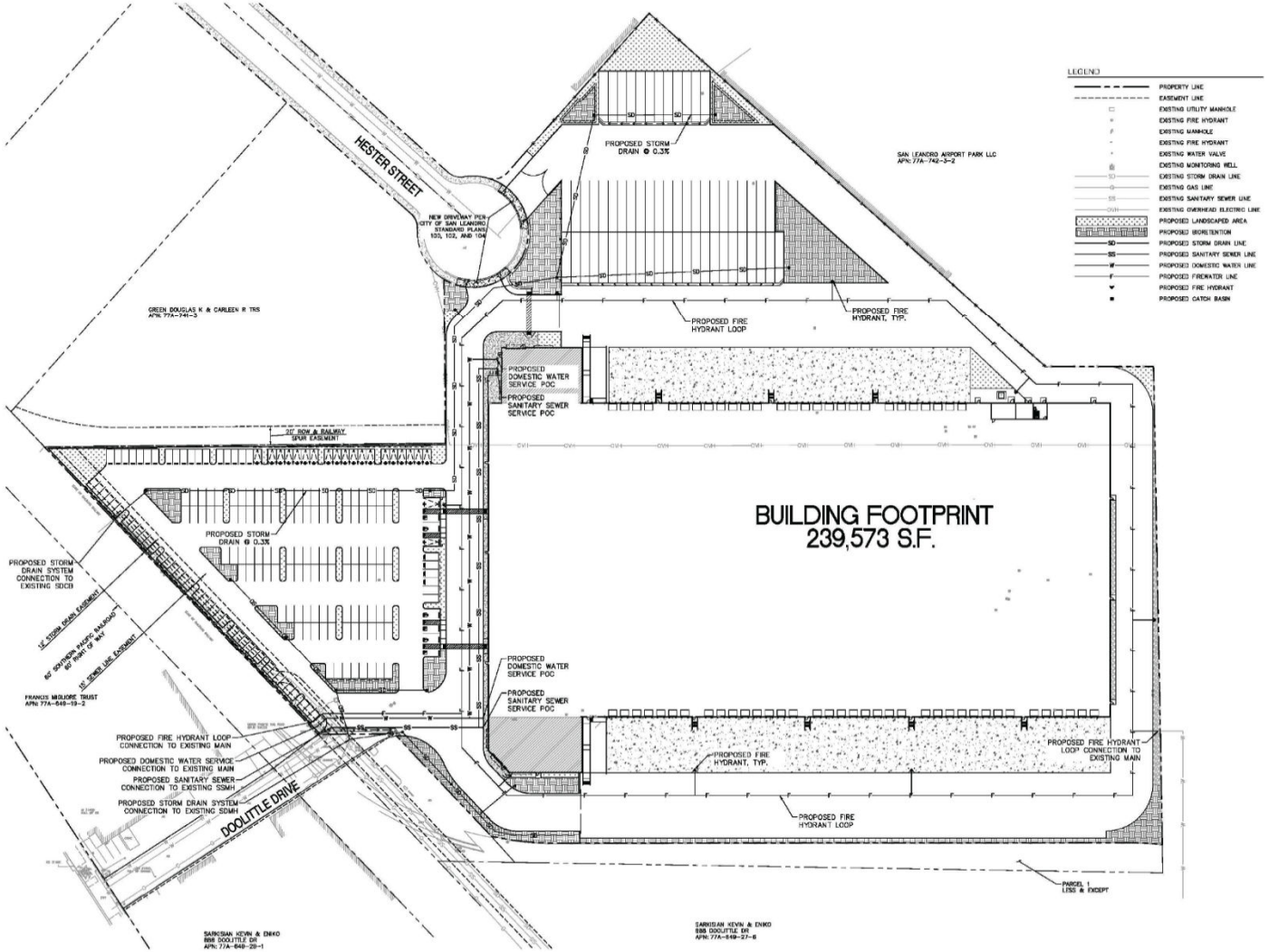
Construction staging would occur on-site. A variety of typical construction equipment would be used, such as backhoes, dump trucks, excavators, pavers, and dozers. A crawler crane with a boom height of up to approximately 161 feet would also be required. During construction, up to five existing trees just off the project site at the terminus of Hester Street would be removed.

Figure 2-7 Preliminary Utility Plan



Source: HPA Architecture.

Figure 2-8 Conceptual Grading Plan



Source: HPA Architecture.

2.6 Project Objectives

CEQA Guidelines Section 15124(b) requires an EIR to include a statement of objectives sought by the project. The objectives assist the City, as the lead agency, in developing a reasonable range of alternatives to be evaluated in the EIR. The project objectives also aid decision-makers in preparing findings or, if necessary, a statement of overriding considerations. The statement of objectives also includes the underlying purpose of the Project and the Project benefits.

The underlying purpose of the proposed project is to provide a modern industrial warehouse with ancillary office using sustainable and environmentally superior practices within the existing industrialized portion of the City. The proposed project would accommodate the need for additional large warehouse uses in the City and in Alameda County, while enhancing the economic vitality of the City.

The City and the applicant have the following objectives for the project:

- Increase the economic base of the City's industrial corridor by maximizing the productive use of the City's industrial land, which is currently underutilized;
- Create a modern warehouse that contributes to the aesthetics of the surrounding area through the redevelopment of an obsolete and underutilized property;
- Create a new, efficient and updated warehouse that is attractive to future tenants, by incorporating the state's green building design and building health and safety standards;
- Maintain and protect the City's inventory of larger-scale industrial sites with easy access to freeways, rails, airports, and seaports; and
- Support and retain existing industrial uses and employment in the City of San Leandro's industrial sector.

2.7 Lead, Responsible, and Trustee Agencies

The CEQA Guidelines define lead, responsible, and trustee agencies. The City of San Leandro is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. The project site is approximately 4,050 feet away from the nearest runways at Oakland International Airport. Due to this proximity, pursuant to Federal Aviation Regulations Part 77, a No Hazard Determination for the warehouse was issued from the Federal Aviation Administration pursuant to Federal Aviation Regulations Part 77, because the proposed warehouse would have a maximum height of 50 feet, exceeding the 43 feet maximum permitted at this distance from the airport runway. The applicant submitted the project to the FAA, who determined that a building height of 50 feet does not present a hazard to air navigation. An additional No Hazard Determination may also be needed for the use of project construction equipment exceeding 43 feet in height.

Several mitigation measures discussed in Section 4.2, *Hazards and Hazardous Materials*, of this EIR require either approval or oversight from the California Department of Toxic Substances Control (DTSC). For this reason, DTSC is identified as a responsible agency.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

2.8 Required Approvals

The following permits and approvals are required from the City of San Leandro prior to the construction of the proposed project:

- Use Permit
- Site Plan Review
- Height Exception
- Building Permit
- Grading Permit
- Tree Removal Permit

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is in the City of San Leandro, which is part of the greater San Francisco Bay Area in northern California. The San Francisco Bay Area is an urbanized region composed of numerous cities and counties that have a combined population of approximately 7.5 million people and encompass almost 7,000 square miles (California Department of Finance 2023). The climate varies within the San Francisco Bay Area, but the region is generally known to have a coastal Mediterranean climate with cool, wet winters and mild to hot, dry summers. Although air quality in the area has steadily improved in recent years, several counties in the San Francisco Bay Area Region remain nonattainment areas for ozone (urban smog).

San Leandro is located along the eastern side of the bay and is approximately 17 miles inland of Pacific Ocean coastline. Incorporated in 1872, San Leandro was primarily an agricultural city until World War II, when the city experienced rapid population growth. The city's population doubled between 1940 and 1950 and doubled again between 1950 and 1960. San Leandro shifted to manufacturing and commercial sectors, and by the late 1960s, the city was almost completely built out. Infill development has continued to expand San Leandro's commercial and residential growth (City of San Leandro 2020). The city borders the San Francisco Bay to the west and extends approximately 4 miles inland. To the north of the city are the cities of Alameda and Oakland, and to the south are the cities of Hayward and Fremont. Major roadways in the city include San Leandro Boulevard, Marina Boulevard, and Washington Avenue. Freeways that pass through the City include Interstate 880 (I-880), Interstate 580 (I-580), and State Route 185 (SR 185). I-880 is approximately 0.3 mile east of the project site, and I-580 is approximately 2.7 miles east. Figure 2-1 in Section 2, *Project Description*, shows the location of the project site in the region.

3.2 Project Site Setting

As shown in Figure 2-2 in Section 2, *Project Description,* the project site is bordered by industrial and commercial development to the north, including but not limited to, tool vendors, screen printing shops, machine shops, and sign shops. Carden Street separates the project site from land uses to the east, which are comprised of trucking businesses, a landscape company, metal supplier, and other commercial/industrial businesses. Industrial and commercial development also occurs to the south of the project site, as well as to the west. The freight and corporate aircraft runways at Oakland International Airport are approximately 4,050 feet northwest of the project site. There are inactive railroad tracks adjacent to the south and west of the site, and there is an active railroad corridor approximately 400 feet east of the project site. The San Francisco Bay shoreline is approximately 3,000 feet southwest of the project site. The site is approximately 2.5 miles east of the San Francisco Bay, 5.8 miles northwest of San Lorenzo Creek, and 2.5 miles west of San Leandro Creek.

The project site is nearly flat and currently occupied by two vacant industrial masonry buildings and has a General Plan land use designation of General Industrial. The site is zoned Industrial General District, as defined by the City's Zoning Ordinance. Uses permitted in the Industrial General designation include a wide range of manufacturing, transportation, food and beverage processing, technology, warehousing, vehicle storage, office-flex, and distribution uses. A limited range of commercial uses are also permitted in areas designated Industrial General.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, the California Environmental Quality Act (CEQA) requires Environmental Impact Reports (EIRs) to consider potential cumulative impacts of the proposed project. The CEQA Guidelines define "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts (CEQA Guidelines Sections 15065 and 15355). Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby past, pending, and planned projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects. Consistent with CEQA Guidelines Section 15130, the discussion in this EIR focuses on the identification of any significant cumulative impacts and, where present, the extent to which the proposed project would constitute a considerable contribution to the cumulative impact.

CEQA requires cumulative impact analysis in EIRs to consider either a list of past, planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Past projects include those land uses that have been previously developed and comprise the existing environment. Pending projects include those projects recently approved or under construction. Planned projects are those that are reasonably foreseeable, such as those for which an application is on file and in process with a local planning department. Past, currently planned and pending projects in San Leandro are listed in Table 3-1. In particular, the projects are either located in proximity or along the same major arterial and collector roads as the project site and construction schedules may overlap. These projects are considered in the cumulative analyses in Section 4.0, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project No.	Project Location[1]	Land Use
1	1345 Doolittle Drive	Industrial- 264,000 square-foot industrial spec. building
2	1091 Doolittle Drive	Light Industrial – expansion of a heavy processing facility
3	100 & 200 Halcyon Drive	Commercial
4	2806 Marina Boulevard	Apartments – 3-story building with 6 units
5	1815 Williams Street	Commercial – 2-story multi-tenant industrial building
6	1411 Bancroft Avenue	Medical – reuse of a 3,457 square-foot building providing 15 medical beds
7	601 Aladdin Avenue	Light Industrial – waste/bulky item hauling
8	14341 Bancroft Avenue	Apartments – 20 units
9	1700 Doolittle Drive	Industrial – 79,840 square-foot industrial spec. building
10	14143 Washington Avenue	Industrial – 52,269 square-foot warehouse
11	Monarch Bay Shoreline	Mixed-Use
12	2599 Fairway Drive	Residential – 144 single-family dwellings and 62 townhomes
13	1800 Williams Street	Industrial – 9,306 square-foot building
14	13489 East 14th Street	Residential – 9 townhouses
15	1199 East 14th Street	Apartments – 180-unit multi-family building
16	1965 Marina Boulevard	Commercial – small-scale fast-food
17	1919 Williams Street	Industrial – demolition of an existing warehouse and construction of a new warehouse
18	15101 Washington Avenue	Apartments – 72-unit multi-family building

[1] Cumulative project details were obtained from the City of San Leandro in 2024

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the project for the specific issue areas that were identified through the scoping process as having the potential to cause significant effects on the environment. A "significant effect on the environment" as defined by the *CEQA Guidelines* Section 15382:

> means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

This document is an EIR in that it evaluates potential impacts on a limited number of environmental issue areas that the lead agency determined to be significant (*CEQA Guidelines* Sections 15006(d), 15063(c)(3)). After preparation of the Initial Study Checklist (see Appendix A), the City of San Leandro determined that the EIR would focus on the potentially significant impacts of the proposed project on the following environmental topics or resources:

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Transportation

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the regulatory framework, and the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City and other agencies, widely recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation measures are incorporated into or by the project. "Mitigation Measures" are measures that would be required of the project to avoid a significant adverse impact; to minimize a significant adverse impact; to rectify a significant adverse impact by restoration; to reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or to compensate for the impact by replacing or providing substitute resources or environment. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under *CEQA Guidelines* Section 15091 and a Statement of Overriding Considerations to be issued if the project is approved per *CEQA Guidelines* Section 15093.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under *CEQA Guidelines* Section 15091.

- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3.0, *Environmental Setting*.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed project, including mitigation measures identified in the Initial Study (Appendix A).

4.1 Greenhouse Gas Emissions

This section of the EIR analyzes greenhouse gas (GHG) emissions associated with the proposed project and potential impacts related to climate change. This section describes regional GHG emission sources and inventories, the regulatory framework applicable to GHG emissions, and evaluates potential project impacts related to GHG emissions as a result of project construction and operation.

4.1.1 Setting

a. Overview of Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere and helps regulate the temperature of the planet. Most of the radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions.

GHG emissions occur both naturally and from human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2022).[1]

b. Greenhouse Gas Emissions Inventories

Based upon the California Air Resources Board (CARB) California Greenhouse Gas Inventory for 2000-2021, California produced 381.3 million metric tons (MMT) of CO2e in 2021 (CARB 2023). Transportation is the major source of GHG in California, contributing 39 percent of the state's total GHG emissions. Industrial operations are the second largest source, contributing 22 percent of the state's GHG emissions. Specifically, emissions from the electricity sector continue to decline due to growing zero-GHG energy generation sources, dominated by solar (CARB 2023).

The City of San Leandro conducted a citywide GHG emissions inventory while preparing its current Climate Action Plan, which was approved in July 2021 (City of San Leandro 2021). Emissions

[1] The Intergovernmental Panel on Climate Change's (2022) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

inventories were prepared for 2005, 2010, 2015, and 2017. Table 4.1-1 shows the change in GHG emissions from 2005 to 2017, and the activity data by subsector for the four inventory years.

Table 4.1-1 San Leandro Annual GHG Emissions, Metric Tons

Sector	2005 CO_2e	2010 CO_2e	2015 CO_2e	2017 CO_2e
Transportation	363,550	372,220	353,130	344,290
Non-residential energy	182,950	146,600	96,490	88,620
Residential energy	101,760	100,650	83,830	73,320
Waste	46,910	40,080	38,880	34,860
Off-road	23,190	22,860	30,940	26,970
BART	2,920	3,030	3,720	3,710
Water and wastewater	-	2,410	2,470	1,820
Total	**720,990**	**687,860**	**609,460**	**573,580**

Source: City of San Leandro 2021 Climate Action Plan (2021)

In 2017, transportation remained the largest source of GHG emissions, accounting for approximately 60 percent of the city's total. Nonresidential energy was the second-largest source of GHG emissions, equaling approximately 15 percent of the community total, followed by residential energy at 13 percent (City of San Leandro 2021).

c. Potential Effects of Climate Change

Potential impacts of climate change in California may include sea level rise, loss of water supply and snowpack, more and larger forest fires, damage to agriculture, public health impacts, and habitat destruction (Office of the Attorney General [OAG] 2018). These potential impacts are also anticipated and have been observed in the Bay Area.

The most relevant effects of climate change to the project site are those that could result in potential damage to the structure or its occupants, including severe storms or water shortages during drought conditions.

Climate change makes open space areas and the built environment at the edge of natural areas more vulnerable to fires by increasing temperatures and making forests and brush drier. Potential increases in the severity and frequency of drought would exacerbate the risk of wildfire. The fire season in California has begun to start earlier, last longer, and be more intense than in the last several decades. Wildfire occurrence statewide could increase several fold by the end of the century, increasing fire suppression and emergency response costs and damage to property (OAG 2018).

The project site is not adjacent to wildland fuels, such as forest, chaparral, or annual grasslands. The project site is developed and surrounded by urban and built-up lands and does not contain wildland fuels, such as forest or grassland. However, the smoke from wildland fires in other areas of the Bay Area, as well as other areas of the State could impact the health of potential occupants of the proposed building.

4.1.2 Regulatory Setting

a. Federal Regulations

The federal government has taken regulatory steps toward addressing climate change. Generally, California policy and regulations and regulations implemented at the regional and local levels are as or more comprehensive and stringent than federal actions; therefore, this section focuses on state, regional, and local regulatory actions whose implementation would lessen the contribution of the proposed project to GHG emissions and associated climate change.

b. State Regulations

Assembly Bill 32

Assembly Bill 32, the California Global Warming Solutions Act (Health and Safety Code Section 38500 et seq.),established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for substantial sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emissions reductions would be achieved from significant GHG sources.

Effective January 1, 2017, SB 32 amended the California Global Warming Solutions Act. SB 32, and accompanying Executive Order B-30-15, requires CARB to ensure that statewide GHG emissions are reduced 40 percent below the 1990 level by 2030.

On November 30, 2017, CARB released its 2017 Climate Change Scoping Plan (2017 Scoping Plan), which lays out the framework for achieving the 2030 reductions as established in SB 32 (and other regulations). The 2017 Scoping Plan identifies the GHG reductions needed by emissions sector to achieve a Statewide emissions level that is 40 percent below 1990 levels before 2030. Many of the programs require Statewide action, promulgated through regulation, and are outside the ability of substate jurisdictions to implement on their own accord. This is important to recognize in terms of GHG emissions efficiency and attaining GHG targets. The ability to attain targets will rely not only on transportation strategies (e.g., the SCS) but also on land use strategies implemented by local cities and counties (e.g., qualified GHG reduction plans) and controls and actions tied to economy-wide changes promulgated by the State.

California Renewables Portfolio Standard

In 2015, the Legislature enacted Senate Bill 350, which embodies a policy encouraging a substantial increase in the use of electric vehicles and increased the Renewable Portfolio Standard to require 50 percent of electricity generated to be from renewables by 2030.

On September 10, 2018, former Governor Brown signed into law SB 100 and Executive Order B55-18. SB 100 raises California's Renewable Portfolio Standard requirement to 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. Executive Order B-55-18 establishes a carbon neutrality goal for California by 2045; and sets a goal to maintain net negative emissions thereafter.

Assembly Bill 1493, Pavley Clean Car Standards

In July 2002, the Legislature enacted AB 1493 (Pavley Bill), which requires the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty trucks beginning with model year 2009. In September 2009, CARB adopted amendments to the Pavley standards to reduce GHG emissions from new motor vehicles through the 2016 model year. These regulations created what are commonly known as the "Pavley II standards."

Advanced Clean Cars

In January 2012, CARB adopted an Advanced Clean Cars program aimed at reducing both smog-causing pollutants and GHG emissions for vehicles model years 2017-2025. The regulations focus on substantially increasing the number of plug-in hybrid cars and zero-emission vehicles in the vehicle fleet and on making fuels such as electricity and hydrogen readily available for these vehicle technologies. It is expected that the Advanced Clean Car regulations will reduce GHG emissions from California passenger vehicles by about 34 percent below 2016 levels by 2025, all while improving fuel efficiency and reducing motorists' costs.

Senate Bill 375, Sustainable Communities Strategy

Senate Bill 375, signed in August 2008, requires sustainable community strategies to be included in regional transportation plans to reduce emissions of GHGs. The San Francisco Bay Metropolitan Transportation Commission and the Association of Bay Area Governments jointly approve and prepare Plan Bay Area, which includes the San Francisco Bay region's Sustainable Communities Strategy and Regional Transportation Plan. The most current version is Plan Bay Area 2050. Plan Bay Area 2050 includes a target to reduce GHG emissions by 10 percent per capita by 2020 and by 19 percent per capita by 2035.

California Energy Code

The California Energy Code (California Code of Regulations, Title 24, Part 6), which is incorporated into the California Building Standards Code, was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Code is updated every three years by the California Energy Commission to allow consideration and possible incorporation of new energy efficiency technologies and construction methods. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

California Green Buildings Standards Code

The purpose of the California Green Building Standards, which became effective on January 1, 2011, is to improve building design and construction to reduce negative environmental impacts through sustainable construction practices. The 2019 California Green Building Standards instituted mandatory and voluntary environmental performance standards for all ground-up new construction of commercial, low-rise residential uses, and state-owned buildings, as well as schools and hospitals. Jurisdictions could opt to adopt Tier 1 or Tier 2 standards, which are stricter than the mandatory standards, that would apply to new construction. The most current version, the 2022 California Green Building Standards, requires that most new homes and buildings statewide will either need to

be equipped with at least one highly efficient heat pump for either space heating or water heating, or face higher energy efficiency requirements. The 2022 California Green Building Standards also provides more standards for electric vehicles and infrastructure.

c. Local Regulations

Bay Area Air Quality Management District 2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) adopted its 2017 Clean Air Plan to define a vision for achieving ambitious GHG reduction targets for 2030 and 2050, and to provide a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets (BAAQMD 2017). There are 85 control measures designed to decrease emissions of air pollutants and GHGs in the Clean Air Plan. The control measures that address GHG emissions and that are applicable to the project include TR1: Clean Air Teleworking Initiative; TR 2: Trip Reduction Programs; TR19: Medium and Heavy-Duty Trucks; TR 22: Construction, Freight, and Farming Equipment; BL1: Green Buildings; BL2: Decarbonize Buildings; BL4: Urban Heat Island Mitigation; and SL1: Short-Lived Climate Pollutants.

Bay Area Air Quality Management District CEQA Guidelines

On April 20, 2022, the BAAQMD Board of Directors adopted *CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans*. The purpose of the BAAQMD CEQA Guidelines is to assist lead agencies in evaluating air quality and climate impacts from proposed land use projects and plans in the San Francisco Bay Area Air Basin. The Guidelines include nonbinding recommendations for how a lead agency can evaluate, measure, and mitigate air quality and climate impacts generated from land use construction and operational activities. The Guidelines do not replace the State CEQA Statute and Guidelines; rather, they are designed to provide BAAQMD-recommended procedures for evaluating potential air quality and climate impacts during the environmental review process that are consistent with CEQA requirements.

City of San Leandro 2035 General Plan

The City of San Leandro's 2035 General Plan, adopted in September 2016, lists several GHG-reduction goals, policies, and actions as part of the Transportation Element and Open Space, Parks, and Conservation Element that support the goal of reducing GHG emissions. The following goals and policies are applicable to the proposed project (City of San Leandro 2016):

> **Policy T-5.2 Evaluating Development Impacts:** Use vehicle miles traveled (VMT) as the primary metric for evaluating the transportation impacts of new development proposals. Traffic impact studies may also consider the total number of trips generated and the resulting impact on traffic volumes and congestion (e.g., "Level of Service"), but VMT shall provide the primary basis for determining appropriate mitigation measures.

Goal OSC-7: Promote recycling, water conservation, green building, and other programs which reduce greenhouse gas emissions and create a more sustainable environment.

> **Policy OSC-7.8 Green Building:** Promote green building in new construction and remodels.

Goal OSC-8: Promote the efficient use of energy and the increased use of renewable energy by San Leandro residents and businesses.

Policy OSC-8.1 Conservation and Energy Efficiency: Strongly advocate for increased energy conservation by San Leandro residents and businesses, and ensure that the City itself is a conservation role model.

Policy OSC-8.2 Planning and Building Practices: Encourage construction, landscaping, and site planning practices that minimize heating and cooling costs and ensure that energy is efficiently used. Local building codes and other City regulations and procedures should meet or exceed state and federal standards for energy conservation and efficiency, and support the City's greenhouse gas reduction goals.

City of San Leandro Municipal Code

Section 3.24.400 of the SLMC requires commercial business organic waste generators and multi-family dwelling units to participate in organic waste collection services. These uses must subscribe to collection services for compost containers, recycling containers, and landfill containers.

Section 7.5.600 of the SLMC requires compliance with Tier 1 of the California Green Building Code, Title 24, Part 11, which details requirements for energy conservation and green design. Section 7.5.700 of the SLMC requires compliance with the California Energy Code, Title 24, Part 6, which details requirements for the use of energy-efficient design and technologies as well as provisions for incorporating renewable energy resources into building design.

San Leandro 2021 Climate Action Plan

The 2021 Climate Action Plan is San Leandro's comprehensive strategy to reduce GHG emissions and to adapt to changing climate conditions (City of San Leandro 2021). The Climate Action Plan allows City of San Leandro (City) decision-makers, staff, and the community to understand the sources and magnitude of local GHG emissions and the impacts of climate change on the community, reduce GHG emissions, prioritize steps to achieve GHG emission-reduction targets, and increase resilience. The 2021 Climate Action Plan also presents a work plan and monitoring program for the City to track progress toward reducing GHG emissions and achieving targets. The 2021 Climate Action Plan meets the criteria under State CEQA Guidelines Section 15183.5(b), which is often referred to as "Qualified Climate Action Plan."

4.1.3 Impact Analysis

a. Methodology and Thresholds of Significance

According to *CEQA Guidelines* Appendix G, impacts related to GHG emissions are considered significant if implementation of the proposed project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The 2022 BAAQMD *CEQA Guidelines* document contains two approaches for determining significance of GHGs (BAAQMD 2022). The two approaches are as follows:

1. Projects must include, at a minimum, the following project design elements:

   Buildings

   - The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
   - The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

   Transportation

   - Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
     - Residential projects: 15 percent below the existing VMT per capita
     - Office projects: 15 percent below the existing VMT per employee
     - Retail projects: no net increase in existing VMT
   - Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

2. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

   According to the BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans, a qualified GHG reduction strategy must:

   - Quantify GHG emissions, both existing and projected over a specified period, resulting from activities in a defined geographic area
   - Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable
   - Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated in the geographic area
   - Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
   - Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels
   - Be adopted in a public process following environmental review

While the City's Climate Action Plan meets the requirements specified in criterion 2, the City has determined this analysis will evaluate the project in terms of consistency with the project design elements listed under criterion 1 above. Methodology for determining consistency is based on applicant-provided data, such as site plans, proposed utility plans, and a Transportation Impact Analysis (see Appendix C).

Threshold 1:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

IMPACT GHG-1 THE PROPOSED PROJECT WOULD INCLUDE NEW NATURAL GAS CONNECTIONS, WHICH WOULD HAVE THE POTENTIAL TO CONTRIBUTE TO THE LONG-TERM GENERATION OF GHG EMISSIONS AFFECTING THE ENVIRONMENT. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Project Construction

Project construction would generate GHG emissions from the combustion of fuels used to power construction equipment, such as gasoline and diesel fuel. Construction workers would also use personal vehicles to commute to the project site, resulting in additional GHG emissions. The generation of GHG emissions from project construction activities would be temporary for the duration of construction, which would be approximately 18 months with some periods of inactivity. Project construction would not conflict with the BAAQMD criterion 1 approach, above, because construction would not involve buildings or permanent substantial increases in VMT or wasteful or excessive energy consumption. Accordingly, construction of the project would not generate GHG emissions that result in significant impacts on the environment.

Project Operation

As noted in Section 2.5.5, *Utilities*, the proposed project would include new natural gas connections to the proposed building. According to the Bay Area Air Quality Management District, projects that include natural gas appliances or natural gas plumbing should be found to make a significant climate impact because it will hinder California's efforts to address climate change (Bay Area Air Quality Management District 2022). Although the project would not result in wasteful or inefficient energy use (see Initial Study, Appendix A), because the proposed project would include new natural gas connections (i.e., plumbing), impacts would be significant.

The proposed project would satisfy other parameters of BAAQMD Criterion 1. For example, according to the Transportation Impact Analysis prepared for the project (see Appendix C), VMT generated by the project would be at least 15 percent below the average VMT per employee in the region. Specifically, the project would generate 15.34 VMT per employee in 2020 and 16.08 VMT per employee in 2040. The VMT per employee in the region in 2020, accounting for a 15 percent reduction, would be 16.3, and in 2040 would be 16.2. The project VMT of 15.34 and 16.08 is below the regional average for 2020 and 2040, respectively. The CalGreen Code requires at least 10 percent of the total parking spaces for a new project to be electric-vehicle ready parking spaces. With the proposed 204 parking spaces, at least 21 electric-vehicle ready parking spaces must be provided to meet CalGeen requirements. A total of 21 electric-vehicle ready parking spaces are proposed, which therefore meets the CalGreen Code requirement. Accordingly, because the project VMT per capita would be at least 15 percent below regional VMT per capita and sufficient electric-vehicle ready parking spaces would be provided, the proposed project would satisfy the transportation component of BAAQMD criterion 1.

Because the project would result in a potentially significant GHG emissions impact associated with new natural gas plumbing, implementation of mitigation is required.

Mitigation Measures

The City is unable to implement mitigation to reduce this significant impact based on a recent court case titled California Restaurant Association v. City of Berkeley. Briefly, in this case, the California Restaurant Association sued Berkeley in the U.S. District Court for the Northern District of California, arguing among other things that the federal Energy Policy and Conservation Act (EPCA) preempted the City's ordinance banning natural gas in new buildings. The District Court dismissed the California Restaurant Association's challenge. However, the Ninth Circuit reversed the District Court, holding that EPCA expressly preempts state and local regulations concerning the energy use of many natural gas appliances. The Ninth Circuit concluded that EPCA preempted Berkeley's ban of natural gas, because it prohibited the onsite installation of natural gas infrastructure necessary to support natural gas appliances covered under the EPCA. Accordingly, based on the decision of the Ninth Circuit in California Restaurant Association v. City of Berkeley, the City of San Leandro cannot require the project applicant to eliminate natural gas from the proposed project. No other mitigation is available to eliminate the use of natural gas in the proposed project. See Section 6, *Alternatives*, which includes project alternatives that do not include natural gas connections.

Significance After Mitigation

Because there is no feasible mitigation to reduce potentially significant impacts resulting from GHG emissions of the project, impacts would remain significant and unavoidable.

Threshold 2:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

IMPACT GHG-2 THE PROPOSED PROJECT WOULD CONFLICT WITH AN APPLICABLE POLICY OR POLICIES ADOPTED FOR THE PURPOSES OF REDUCING THE EMISSIONS OF GREENHOUSE GASES. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The BAAQMD 2017 Clean Air Plan contains numerous control measures designed to decrease emissions of air pollutants and GHGs in the San Francisco Bay. Some of the control measures are not applicable to the proposed project and are not evaluated further in this document. For example, Control Measure TR-17 encourages increased use of cleaner burning jet fuel in commercial jets arriving and departing the Bay Area, and the proposed project does not include commercial jet operations. Control measures that are applicable to the proposed project and also address GHG emissions include: TR1: Clean Air Teleworking Initiative; TR 2: Trip Reduction Programs; TR19: Medium and Heavy-Duty Trucks; TR 22: Construction, Freight, and Farming Equipment; BL1: Green Buildings; BL2: Decarbonize Buildings; BL4: Urban Heat Island Mitigation; and SL1: Short-Lived Climate Pollutants. Project consistency with these control measures is evaluated in Table 4.1-2, below. As shown therein, the proposed project would be consistent with most control measures of the BAAQMD 2017 Clean Air Plan. The proposed project would be inconsistent with control measure TR-1, pertaining to telecommuting policies. However, as discussed in Section 4.4, Transportation, of this EIR, the proposed project would generate VMT that is at least 15 percent below average VMT per employee in the area. Therefore, inconsistency with control measure TR-1 would not result in significant environmental impacts. As shown in Table 4.1-2, the proposed project would also be inconsistent with control measure SL-1, which pertains to reducing methane emissions from landfills. As described in Section 19, Utilities and Service Systems, of the Initial Study (Appendix A), project generated waste per day would be less than 0.02 percent of Altamont Landfill's allowable waste limit and project generated waste annually would be less than 0.0007 percent of Altamont

Landfill's remaining capacity. The project would be required to comply with City and State plans and policies to reduce solid waste generation, including a requirement to divert at least 50 percent of solid waste and recyclables as required by Assembly Bill 939. Therefore, inconsistency with control measure SL-1 would not result in significant environmental impacts.

Table 4.1-2 Project Consistency Analysis with the BAAQMD 2017 Clean Air Plan

2017 Clean Air Plan Control Measure	Project Consistency Analysis
TR-1: Develop teleworking best practices for employers and develop additional strategies to promote telecommuting. Promote teleworking on Spare the Air Days.	**Inconsistent.** A tenant for the proposed building has not been identified at this time; therefore, it is unknown if the future tenant(s) would promote telecommuting for their employees.
TR-2: Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.	**Consistent.** A tenant for the proposed building has not been identified at this time; therefore, it is unknown how many employees may work at the site. However, the Commuter Benefits Program is a BAAQMD rule (Rule 14-1). Accordingly, if the future tenant is an employer with 50 or more employees, that employer must comply with Rule 14-1.
BL-1: Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for onsite renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	**Consistent.** The proposed project would be constructed compliant to the version of CALGreen in effect when construction permits are issued. Because the project would be constructed to a newer version of CALGreen than onsite existing buildings, the proposed project would increase the efficiency of potential future operations on the project site.
SL-1: Reduce methane from landfills and farming activities through various control measures listed under waste and agriculture sectors. Develop a rule to reduce methane emissions from natural gas pipelines and processing operations and amend regulations to reduce emissions of methane and other organic gases from equipment leaks at oil refineries. Enforce applicable regulations on the servicing of existing air conditioning units in motor vehicles, support the adoption of more stringent regulations by CARB and/or U.S. EPA, and encourage better HFC disposal practices.	**Inconsistent.** The proposed project does not include new landfill facilities and would not involve farming activities. The proposed project would include new natural gas plumbing, which because it would be new, would not be corroded and less susceptible to leaks compared to older, existing natural gas infrastructure at the project site. However, the project would not separate waste, such as having a compost for organic waste.

Source: BAAQMD 2017 Clean Air Plan (2017)

The City of San Leandro updated and approved its Climate Action Plan in July 2021, which outlines strategies for reducing GHG emissions through various activities, including but not limited to water conservation, energy conservation, land use design and orientation, transportation-oriented development, and renewable energy source use. Table 4.1-3 below compares the project's consistency with the City's Climate Action Plan.

Table 4.1-3 Project Consistency with the San Leandro Climate Action Plan

San Leandro Climate Action Plan Measure	Project Consistency
Building Efficiency (BE)	
BE-1: Electrified retrofits. Incentivize significant building retrofits with fewer or no natural gas appliances to reduce pollution and increase cost savings.	**Inconsistent.** The proposed project would include the development of a new light industrial warehouse and would not retrofit existing buildings. The proposed project would include a new natural gas connection. Although the existing on-site buildings have natural gas connections, the proposed project would not result in fewer or no natural gas connections or appliances.
BE-2: Electrified new construction. Commit to developing a reach code limiting natural gas use in new construction, or as directed by the State or regional agencies.	**Inconsistent.** The City of San Leandro has adopted a reach code encouraging limiting natural gas use in new construction. However, the proposed project would include natural gas infrastructure.
Renewable Energy (RE)	
RE-4: Increase renewable energy generation and energy storage capacity at nonresidential properties.Encourage the use of non-fossil fuel backup generation systems as much as possible.	**Consistent.** The proposed project would be required to comply with San Leandro Municipal Code Chapter 7-5, Article 6 Green Building Code, which would require all new development to be consistent with Title 24, including the provision for solar-ready rooftop infrastructure.
Reducing Auto Dependency (AD)	
AD-1: Traffic calming. Continue to provide the Neighborhood Traffic Calming Program and related efforts to reduce travel speeds and cut through traffic in residential areas.	**Consistent.** The proposed project would not include a roadway that could be used to cut through residential neighborhoods and would facilitate travel to the proposed project driveways.
AD-4: Evaluate parking standards. Evaluate parking standards and continue to support shared parking and other efforts to ensure the availability of necessary parking while reducing vehicle miles traveled.	**Consistent.** The proposed project would provide parking consistent with development standards contained in the San Leandro Municipal Code.
Active and Alternative Transportation (AT)	
AT-1: Transportation Demand Management (TDM). Require local employers above a certain number of employees to develop programs that promote ride sharing, flextime, telecommuting, and other means to reduce commute trips and congestion, and target 10 percent mode shift.	**Consistent.** Although the number of employees that would be employed by the proposed project is unknown at the time of preparation of this report, the proposed project would comply with any City TDM programs should they apply.
AT-2: Bicycle infrastructure. Expand San Leandro's bicycle network and supportive bicycle infrastructure, including funding buildout of the City's bicycle network as identified in the current Bicycle and Pedestrian Master Plan, to meet commute trip, non-commute trip, and recreational needs.	**Consistent.** The proposed project would not inhibit the expansion of the City's bicycle network, because it would be consistent with existing Building Codes and would not prevent the installation of bicycle lanes or infrastructure adjacent to the project site. Additionally, the project would include 12 bicycle parking spaces.
Transportation Electrification and Low-Carbon Fuels (TE)	
TE-1: Electric vehicle adoption. Conduct education and outreach to inform members of the public about the availability of EVs, and the economic incentives available to encourage EV adoption. **TE-2:** Increase the availability of publicly accessible EV charging stations at multi-family residential buildings, retail centers, offices, and public facilities.	**Consistent.** The proposed project includes the development of a new warehouse that would be subject to Title 24 requirements mandating EV charging infrastructure. The proposed project would include 21 EV charging spaces.

San Leandro Climate Action Plan Measure	Project Consistency
Waste Management (WM)	
WM-1: Increased curbside recycling. Increase participation in curbside recycling programs, including efforts to reduce material contamination and improvements to waste educational programs.	**Consistent.** The proposed project would be required to comply with the City's construction debris and waste recycling ordinance. The proposed project would be provided waste removal services by Oro Loma Sanitary District,which provides recycling services for residential uses.
WM-2: Curbside composting. Expand participation in composting programs, including partnerships with community organizations such as StopWaste and a mandatory curbside composting program for all businesses.	**Consistent.** The Oro Loma Sanitary District would provide Green Waste bins for the proposed project's waste disposal and the proposed project would participate in mandatory composting practices for businesses.
Waste Reduction and Reuse (WR)	
WR-1: Waste minimization. Explore emerging opportunities for waste minimization, including maker spaces, material reuse, and tool-lending libraries.	**Inconsistent.** The project has not considered maker spaces, material reuse, or tool-lending libraries.
WR-2: Construction and Demolition waste. Explore opportunities to exceed State requirements for construction and demolition materials by encouraging deconstruction and material reuse.	**Consistent.** The construction contractor would be required to comply with San Leandro Municipal Code Section 3-7 related to constructionwaste and debris recycling. San Leandro Municipal Code Section 3-7 exceeds State requirements by requiring the project applicant to submit a Debris Recycling Statement to the City.
Water Efficiency (WE)	
WE-4: New Greywater Installations. Continue to require water conservation and green infrastructure strategies as a condition of approval for major developments.	**Consistent.** As described in Section 2, *Project Description*, The proposed project would comply with water efficient landscape and would include the planting of species that would be appropriate for the local climate and contribute to conserving outdoor water use.
Community Consumption (CC)	
CC-4: Carbon Sequestration. Promote increasing soil carbon and planting high carbon sequestering, climate appropriate species in landscaping projects.	**Consistent.** The proposed project would increase the amount of landscaping on the site compared to current conditions, which would contribute to carbon sequestration on- site.

Source: City of San Leandro 2021

As shown above in Table 4.1-3, the proposed project would be generally consistent with the City's Climate Action Plan. However, the proposed project would be inconsistent with policy WR-1 pertaining to waste reuse and policies BE-1 and BE-2 of the Climate Action Plan, which pertain to replacing natural gas with electricity. Inconsistency with policy WR-1 would not result in physical environmental impacts because the policy encourages maker spaces, and tool-lending libraries for example. The absence of these features from the project do not result in physical environmental effects. The proposed project would be inconsistent with policies BE-1 and BE-2 because the proposed project would include new natural gas connections. Accordingly, the proposed project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Impacts would be potentially significant, and mitigation is required.

Mitigation Measures

The City is unable to implement mitigation to reduce this significant impact based on a recent court case titled California Restaurant Association v. City of Berkeley. Briefly, in this case, the California Restaurant Association sued Berkeley in the U.S. District Court for the Northern District of California,

arguing among other things that the federal Energy Policy and Conservation Act (EPCA) preempted the City's ordinance banning natural gas in new buildings. The District Court dismissed the California Restaurant Association's challenge. However, the Ninth Circuit reversed the District Court, holding that EPCA expressly preempts state and local regulations concerning the energy use of many natural gas appliances. The Ninth Circuit concluded that EPCA preempted Berkeley's ban of natural gas, because it prohibited the onsite installation of natural gas infrastructure necessary to support natural gas appliances covered under the EPCA. Accordingly, based on the decision of the Ninth Circuit in California Restaurant Association v. City of Berkeley, the City of San Leandro cannot require the project applicant to eliminate natural gas from the proposed project. No other mitigation is available to eliminate the use of natural gas in the proposed project. See Section 6, *Alternatives*, which includes project alternatives that do not include natural gas connections.

Significance After Mitigation

Because there is no feasible mitigation to reduce potentially significant impacts resulting from GHG emissions of the project, impacts would remain significant and unavoidable.

4.1.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). While greenhouse gas emissions are a global occurrence and climate change affects the entire planet, it is impractical to extend the geographic scope for this cumulative impacts analysis to the entire planet. Additionally, the geographic scope for this analysis need only to include the San Franscisco Bay Area due to the abundance or GHG emission sources, including residential, commercial, industrial, and mobile sources. Combined, the GHG emissions from these sources have resulted in a significant cumulative impact related to climate change. The proposed project would result in additional GHG emissions, especially due to the combustion of natural gas that is included in the natural project. The other reasonably foreseeable future projects listed in Table 3.1 of this EIR would also generate GHG emissions. Accordingly, the cumulative GHG impacts of the proposed project would be significant. As described in Section 4.1.3, there are no feasible mitigation measures to reduce the significant GHG impacts of the proposed project. the project's contribution to significant cumulative GHG impacts would be cumulatively considerable.

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4.2 Hazards and Hazardous Materials

This section of the EIR addresses the potential environmental impacts of the proposed project that are related to hazards and hazardous materials. Simply defined, a hazardous waste is a waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment (U.S. Environmental Protection Agency 2023). This section is based largely on a Revised Soil and Groundwater Management Plan that RMD Environmental Solutions, Inc. prepared for the project site in 2021. The California Department of Toxic Substances Control (DTSC) approved the Revised Soil and Groundwater Management Plan in a letter dated August 3, 2021. The Soil and Groundwater Management Plan and the DTSC approval letter are provided as Appendix D to this EIR.

4.2.1 Setting

a. Past and Current Land Uses

As described in EIR Section 2.3, *Project Location*, the project site consists of two Assessor's parcels: APN 77A-0741-004-02 and 77A-0741-005-00. Kaiser Aerotech manufactured aerospace and/or aircraft equipment on APN 77A-0741-004-02 from approximately 1955 to 1996, when these operations ceased, and the manufacturing equipment was dismantled (RMD Environmental Solutions 2021). Kaiser Aerotech used the APN 77A-0741-005-00 for employee parking, light manufacturing, and storage between 1963 and 1976. Between 1976 and 2002, most of the APN 77A-0741-005-00 was leased to other businesses including a cargo container repair and storage company and a light manufacturing company (RMD Environmental Solutions 2021; Appendix D).

From the early 2000s to May 2020, Expresso Airport Parking operated at the Site to provide off-site airport parking and the former manufacturing buildings were repurposed as indoor parking (RMD Environmental Solutions 2021). Currently the buildings remain on site.

b. Hydrogeologic Zones

Hydrogeological zones refer to the subsurface areas of rock and soil containing distinct characteristics that influence groundwater flow and storage. As it relates to prior site operations and associated use of hazardous materials, the site's hydrogeologic zones determine how these materials may contribute to groundwater contamination. According to the Soil and Groundwater Management Plan for the project site (RMD Environmental Solutions 2021), the project site subsurface consists of the following hydrogeologic zones:

- **Vadose zone:** Ground surface to the top of the water table at approximately 5 feet below ground surface;
- **A-zone:** Approximately 5-15 feet below ground surface; thin, discontinuous sand lenses;
- **B-zone:** Approximately 15-35 feet below ground surface; thicker sand channels enveloped by fine-grained soil;
- **Fine-grained soil:** Approximately 35-45 feet below ground surface; interpreted aquitard; and
- **C-zone:** Below approximately 45 feet below ground surface; thicker, more laterally continuous sand intervals.

In general, horizontal hydraulic gradients are toward the west in each of the three water-bearing zones. Groundwater is typically observed at approximately 5 to 7 feet below ground surface in the A-zone. Groundwater elevations in A-zone observed in existing on-site wells are typically similar to those in adjacent B-zone wells and are below those in adjacent C-zone wells (RMD Environmental Solutions 2021). On-site groundwater monitoring well locations are shown on Figure 4.2-1.

c. Hazardous Constituents of Potential Concern

The project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, otherwise known as the "Cortese List" (DTSC 2023; State Water Resources Control Board 2023). The project site is considered a hazardous site due to subsurface contamination with chlorinated volatile organic compounds associated with the Kaiser Aerotech operation that formerly operated on-site. Specifically, according to the Soil and Groundwater Management Plan prepared for the project site (RMD Environmental Solutions 2021; Appendix D), the primary contaminants of potential concern at the site are trichloroethene and its associated degradation products, cis-1,2-dichloroethene, trans-1,2- dichloroethene, and vinyl chloride. Trichloroethene is considered the primary indicator contaminant of potential concern based on the past Kaiser Aerotech operations. Trichloroethene and its degradation products are distributed throughout the soil and groundwater occurring throughout the A and B hydrogeologic zones, which extend approximately 5 to 35 feet below ground surface. Tetrachloroethene is largely limited to this same zone but slightly less deep into the B hydrogeologic zone and is considered to be the result of an offsite source associated with the railroad at the western boundary of the site (RMD Environmental Solutions 2021; Appendix D).

d. Phase I Environmental Site Assessment Document

Langan Engineering and Environmental Services, Inc. prepared a Phase I Environmental Site Assessment for the project site in December 2019. The findings of the 2019 Phase I Environmental Site Assessment include a summary of the site contamination identified by DTSC (see *Section c. Hazardous Constituents of Potential Concern*, above). Additionally, the Phase I Environmental Site Assessment identifies elevated concentrations of lead associated with deteriorating paint at the project site. Further, the Phase I Environmental Site Assessment identifies the presence of asbestos containing materials at the site, generally associated with the existing vacant buildings. There are also approximately 51 electrical transformers present at the site that contain polychlorinated biphenyls.

e. Remediation Actions

Environmental response activities, including remedial actions, have been implemented at the project site to address chlorinated volatile organic compounds observed in the site subsurface. As described in the Final Remedial Action Plan (The Source Group, Inc. 2008a) and Remedial Design and Implementation Plan (The Source Group, Inc. 2008b), the remediation of trichloroethene at the site was addressed using primarily bioremediation techniques. Areas containing concentrations of 1,000 micrograms per liter (µg/L) or greater were treated using enhanced reductive de-chlorination through injection of an electron-donor substrate, which is a process that modifies the groundwater conditions to enhance degradation of contaminates to their non-contaminated end products. Routine groundwater monitoring results are used to continue to evaluate site conditions and remedial progress (RMD Environmental Solutions 2021; Appendix D).

Figure 4.2-1 On-Site Groundwater Well Network

Source: RMD Environmental Solutions 2021

Groundwater monitoring data indicate that remediation efforts successfully reduced trichloroethene concentrations in the onsite wells to near or below its maximum contaminant level (MCL) (5.0 µg/L) in most of the treatment areas. The MCL is the maximum level of contaminant allowed in water which is delivered to a user of a public water system. In several areas, the return toward ambient conditions and more limited enhanced reductive de-chlorination have not resulted in trichloroethene concentration rebound above 100 µg/L indicating the effectiveness of remediation efforts. In the A-zone and B-zone monitored natural attenuation wells, the generally stable-to-decreasing concentrations of trichloroethene and its degradation products (e.g., cis-1,2-dichloroethene, vinyl chloride) observed during routine groundwater monitoring are consistent with ongoing natural attenuation in lower concentration areas. The need for further electron-donor substrate injections and continued natural attenuation continue to be evaluated through routine groundwater monitoring (RMD Environmental Solutions 2021; Appendix D).

f. Sub-Slab Vapor, Indoor Air, and Soil Vapor

In April 2020, 12 sub-slab vapor points were installed on-site and sampled and three ambient air samples, 13 indoor air samples, and one duplicate indoor air sample were also collected at the project site. Later, in October 2020, eight soil vapor probes were installed and sampled at approximate depths of 4.75 to 5 feet below ground surface. In January 2021, three soil vapor probes were installed and sampled at an approximate depth of 4.25 feet below ground surface (RMD Environmental Solutions 2021).

In the 2020 and 2021 vapor samples, trichloroethene, tetrachloroethene, cis-1,2- dichloroethene, vinyl chloride, benzene, and ethylbenzene were detected at concentrations exceeding the commercial/industrial screening levels in either sub-slab vapor or soil vapor sample samples, or both (using a conservative U.S. Environmental Protection Agency soil vapor to indoor air attenuation factor of 0.03).

In general, indoor air concentrations were consistent with background, ambient concentrations and benzene was the only volatile organic compound detected at concentrations exceeding the commercial/industrial screening levels. At the time of sampling, existing on-site buildings were used for off-airport parking. As such, vehicles were operating within and outside the building. Vehicular exhaust likely contributed to the benzene concentrations detected in both indoor and ambient air samples (RMD Environmental Solutions 2021; Appendix D).

g. Land Use Covenant

In conjunction with environmental response activities, a Land Use Covenant (LUC) was filed with Alameda County in 2012 to ensure that the site is not used for the following land uses: residences, hospitals for humans, public or private school for persons under 21 years of age, and day care center for children. The Land Use Covenant requires DTSC approval of planned future use of groundwater at the project site and a Soil Management Plan prior to planned disturbance of subsurface soil in two limited areas of the site. These soil management areas are shown on Figure 4.2-2 as “Approximate Extent of TCE Concentration Above 910 ug/m”. Operation and maintenance activities and annual Land Use Covenant inspections are routinely conducted to evaluate groundwater conditions and remedial progress at the site (RMD Environmental Solutions 2021). The Land Use Covenant is included as an attachment to the Soil and Groundwater Management Plan, which is provided as Appendix D to this EIR.

Figure 4.2-2 Soil Managment Areas

Source: RMD Environmental Solutions 2021

4.2.2 Regulatory Setting

a. Federal Regulations

Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976

These acts established a program administered by the U.S. Environmental Protection Agency for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. The Resource Conservation and Recovery Act was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation and Liability Act, amended by the Superfund Amendments and Reauthorization Act (1986)

This law was enacted in 1980 and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, the Comprehensive Environmental Response, Compensation and Liability Act established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Comprehensive Environmental Response, Compensation and Liability Act also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

Lead-Based Paint Regulations

Regulations for lead-based paint are contained in the Lead-Based Paint Elimination Final Rule, 24 CFR 33, governed by the U.S. Housing and Urban Development, which requires sellers and lessors to disclose known lead-based paint and lead-based paint hazards to perspective purchasers and lessees. Additionally, all lead-based paint abatement activities must be in compliance with California Occupational Safety and Health Administration (Cal/OSHA) and Federal OSHA and with the State of California Department of Health Services requirements. Only lead-based paint -trained and -certified abatement personnel are allowed to perform abatement activities. All lead-based paint removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

Regulations to manage and control exposure to lead-based paint are also described in CFR Title 29, Section 1926.62 and California Code of Regulations Title 8 Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers exposed to lead-based materials. Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work

practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 sf of lead-based paint is disturbed.

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency is the agency primarily responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials. Applicable Federal regulations pertaining to hazardous materials are contained in the CFR Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws:

1. Resource Conservation and Recovery Act of 1976) (42 USC 6901 et seq.); Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (also called the Superfund Act) (42 USC 9601 et seq.)
2. Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et. Seq.)
3. Superfund Amendments and Reauthorization Act of 1986 (Public Law 99 499)

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. The U.S. Environmental Protection Agency provides oversight and supervision for Federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

Asbestos Regulations

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the U.S. Environmental Protection Agency in the 1970s. Asbestos-containing materials (ACMs) were commonly used for insulation of heating ducts as well as ceiling and floor tiles. Undisturbed ACMs contained within building materials present no significant health risk because there is no exposure pathway. However, once these tiny fibers are disturbed, they can become airborne and become a respiratory hazard. The fibers are very small and cannot be seen with the naked eye. Once they are inhaled, they can become lodged into the lungs, and may cause cancer, lung disease or other pulmonary complications.

The U.S. Environmental Protection Agency regulations under Title 40 CFR Part 61 regulate the removal and handling of ACMs. The federal Occupational Safety and Health Administration also has a survey requirement under Title 29 CFR that is implemented by Cal/OSHA under Title 8 California Code Regulations. These regulations require facilities to take all necessary precautions to protect employees and the public from exposure to asbestos.

b. State Regulations

Department of Toxic Substances Control

As a department of the California EPA, the Department of Toxic Substances Control (DTSC) is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the Resource Conservation and Recovery Act and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law to regulate hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than the Resource Conservation and Recovery Act, until the U.S. Environmental Protection Agency approves the California program, both state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the State Water Resources Control Board, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

Hazardous Waste Control Act

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 26. The State program is similar to, but more stringent than, the Federal program under the Resource Conservation and Recovery Act. The regulations list materials that may be hazardous, and establish criteria for their identification, packaging, and disposal. Environmental health standards for management of hazardous waste are contained in California Code of Regulations (CCR) Title 22, Division 4.5. As required by California Government Code Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List for the State called the Cortese List.

California Department of Pesticide Regulation, Department of Food and Agriculture, and the Department of Public Health

The California Department of Pesticide Regulations (DPR), a division of California Environmental Protection Agency, in coordination with the California Department of Food and Agriculture, a division of Measurement Standards and the California Department of Public Health have the primary responsibility to regulate pesticide use, vector control, food, and drinking water safety. CCR Title 3 requires the coordinated response between the County Agricultural Commissioner and the Sonoma County Department of Health Services to address the use of pesticides used in vector control for animal and human health on a local level. DPR registers pesticides; the County tracks pesticide use. Title 22 is used also to regulate both small and large California Department of Public Health water systems.

California Fire Building Code

The 2016 Fire and Building Code (2016) establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

c. Local Regulations

Alameda County Local Hazard Mitigation Plan

The Alameda County Local Hazard Mitigation Plan assesses hazards, risks, and capabilities for hazard mitigation, and then provides a blueprint for a mitigation strategy. The hazard and risk assessment focuses on dam failure inundation, drought, earthquake, flood, landslide, liquefaction, tsunami, and wildfire. The Alameda County 2016 Local Hazard Mitigation Plan was adopted by the County Board of Supervisors in January 2016, and was approved by the Federal Emergency Management Agency in October 2016.

Alameda County Water Department

The Alameda County Water District manages the Niles Cone Groundwater Basin, which underlies the project site, through comprehensive programs that protect and improve water supplies for groundwater users. The project site is also located within the Alameda County Water District's jurisdictional boundary. The Alameda County Water District is identified within the Sustainable Groundwater Management Act as the exclusive local agency within its statutory boundaries to comply with the Sustainable Groundwater Management Act. The Alameda County Water District is also the Groundwater Sustainability Agency for the Niles Cone Groundwater Basin and has an approved Alternative to a Groundwater Sustainability Plan.

Alameda County Department of Environmental Health

The mission of the Alameda County Department of Environmental Health is to protect the health, safety and well-being of the public through the promotion of environmental quality. The department's Hazardous Materials Division contains the Clean Water Program, Waste Tire Program, and the Certified Unified Program Agency for much of Alameda County, but not the City of San Leandro. As discussed in the next paragraph, the City of San Leandro Environmental Services Section is designated as the City's Certified Unified Program Agency.

San Leandro Environmental Services Section

The City of San Leandro Environmental Services Section is designated as the City's Certified Unified Program Agency, which is overseen by the California Environmental Protection Agency and coordinates the regulation of hazardous materials and hazardous wastes in the City. The Certified Unified Program Agency ensures the consistent application of statewide standards during administrative, permitting, inspection, and enforcement activities associated with hazardous materials and hazardous wastes. If a business operated at the project site would use and store

hazardous materials and generate hazardous wastes, the Certified Unified Program Agency would require the electronic submittal of chemical and facility information, a Hazardous Materials Business Plan, and hazardous waste generator permits to the California Environmental Reporting System online database. If operations at the project site would include the treatment, storage, and/or disposal of hazardous waste, the City Environmental Services Section would regulate these activities under a tiered permitting system.

The Certified Unified Program Agency, through the Hazardous Materials Office, regulates USTs containing hazardous materials, including installation, operation and maintenance, temporary closure, and removal and disposal of USTs. Additionally, the Certified Unified Program Agency holds the responsibility and authority to implement the Aboveground Petroleum Storage Act, which regulates aboveground petroleum storage tanks through administrative requirements, permitting, inspections, and enforcement. Any aboveground or underground storage tanks present at the project site would be managed by the City Environmental Services Section.

The Hazardous Materials Office administers the California Accidental Release Prevention Program, which aims to reduce the likelihood and impact of accidental releases of regulated toxic and flammable substances through administrative and operational procedures, and facility inspections. If the facility located on the project site would be regulated under the California Accidental Release Prevention Program, the facility would file a written Risk Management Plan with the City Environmental Services Section.

City of San Leandro General Plan

The Environmental Hazards Element of the City of San Leandro General Plan includes the following goals and policies that aim to reduce potential damage from hazardous materials:

Goal EH-5: Protect local residents and workers from the risks associated with hazardous materials.

> **Policy EH-5.1: Regulatory Compliance.** Work with the appropriate county, regional, state, and federal agencies to develop and implement programs for hazardous waste reduction, hazardous material facility siting, hazardous waste handling and disposal, public education, and regulatory compliance.
>
> **Policy EH-5.2: Clean-Up of Contaminated Sites.** Ensure that the necessary steps are taken to clean up residual hazardous wastes on any contaminated sites proposed for redevelopment or reuse. Require soil evaluations as needed to ensure that risks are assessed and appropriate remediation is provided.
>
> **Policy EH-5.3: Design of Storage and Handling Areas.** Require that all hazardous material storage and handling areas are designed to minimize the possibility of environmental contamination and adverse off-site impacts. Enforce and implement relevant state and federal codes regarding spill containment facilities around storage tanks.
>
> **Policy EH-5.7: Hazardous Building Materials.** Ensure the safe and proper handling of hazardous building materials, such as friable asbestos and lead based paint. If such materials are disturbed during building renovation or demolition, they should be handled and disposed of in a manner that protects human health and the environment.

4.2.3 Impact Analysis

a. Methodology and Thresholds of Significance

According to *CEQA Guidelines* Appendix G, impacts related to hazards and hazardous materials are considered significant if implementation of the proposed project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area;
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

CEQA checklist items 1, 3, and 5 through 7 were found to be less than significant in the Initial Study (Appendix A). Therefore, these topics will not be discussed further in this section.

Threshold 2:	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
Threshold 4:	Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-1 THE PROJECT HAS THE POTENTIAL TO CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT DUE TO POTENTIAL HAZARDOUS MATERIALS THAT MAY BE PRESENT IN THE EXISTING ON-SITE STRUCTURES AND SOILS AND GROUNDWATER. IN ADDITION, BECAUSE OF EXISTING SOIL AND GROUNDWATER CONTAMINATION, THE SITE IS ON A LIST COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5. THIS IMPACT WOULD BE POTENTIALLY SIGNIFICANT BUT MITIGABLE.

Project Construction

Project construction would require the transport of construction equipment and fuels to the project site. This equipment and fuel, such as diesel fuel and gasoline, would be stored on-site for the duration of construction. If these fuels and other hazardous equipment fluids, such as motor oil, were to leak or be spilled they could create substantial hazards to the public or the environment.

For example, if a diesel fuel spill were to occur during project construction, the fuel could become runoff and discharge to surface waters, which would be a substantial hazard to the environment. Construction of the project would require ground disturbance over an area exceeding 1 acre. Therefore, the project applicant must develop and implement a Stormwater Pollution Prevention Plan (SWPPP), pursuant to state regulations. The SWPPP must include containment and clean-up measures to implement in the event of a leak or spill of construction fluids, such as equipment diesel fuel. Mandatory implementation of the SWPPP would reduce potential impacts associated with release of substantial hazards from construction equipment and fluids to less than significant.

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the U.S. Environmental Protection Agency in the 1970s. Asbestos-containing materials (ACMs) were commonly used for insulation of heating ducts as well as ceiling and floor tiles. Undisturbed ACMs contained within building materials present no significant health risk because there is no exposure pathway. However, once these tiny fibers are disturbed, they can become airborne and become a respiratory hazard. The proposed project would involve the demolition of existing vacant structures on the project site. Project demolition activities would have potential to expose construction workers to asbestos containing materials due to the age of the existing structures. Additionally, construction workers could also be exposed to lead-based paint during demolition of existing structures. Lead is hazardous to human health.

Lead-based paint and other lead-containing materials associated with the proposed project would be required to be handled in compliance with Cal/OSHA regulations regarding lead-based paints and materials. The California Code of Regulations, Section 1532.1, requires testing, monitoring, containment, and disposal of lead-based paints and materials, such that exposure levels do not exceed Cal/OSHA standards. Compliance with applicable Cal/OSHA regulations would ensure impacts related to lead-based paint would be less than significant.

Friable ACMs are regulated as a hazardous air pollutant under the Clean Air Act, and the Bay Area Air Quality Management District regulates ACM in Regulation 11, Rule 2, which governs the proper handling and disposal of ACM for demolition activities. As a worker safety hazard, ACMs are also regulated under the authority of Cal/OSHA. In structures slated for demolition, ACMs would be abated in accordance with state and federal regulations prior to the start of demolition activities and in compliance with all applicable existing rules and regulations. However, if construction workers are unaware of the potential presence of ACMs, regulations may not be properly implemented, leaving workers vulnerable to exposure to ACMs, as well as lead. Likewise, people working or living nearby could also be exposed to ACMs in dust from construction. This would be a significant impact because it could affect health. Implementation of Mitigation Measure HAZ-1 is required. Mitigation Measure HAZ-1 requires visual inspection/pre-demolition surveys to confirm the presence of ACMs and lead-based paint.

In association with existing on-site contamination, a Land Use Covenant was filed with Alameda County in 2012 to ensure that the site is not used for the following land uses: residences, hospitals for humans, public or private school for persons under 21 years of age, and day care center for children. The Land Use Covenant requires DTSC approval of planned future use of groundwater at the project site and a Soil Management Plan prior to planned disturbance of subsurface soil in two limited areas of the site. To address this, RMD Environmental Solutions prepared a Soil and Groundwater Management Plan for the site (RMD Environmental Solutions 2021; Appendix D).

The Soil and Groundwater Management Plan identifies two areas within the project site where residual contamination levels are of concern. These areas are referred to as the “land use restriction

areas" and are shown above as a small circular area on Figure 4.2-2. Soil and groundwater within the restricted areas could contain detectable concentrations of trichloroethene, a human-made chemical that is hazardous to human health. These compounds are referred to as chemicals of potential concern. According to the Land Use Covenant, elevated concentrations of the trichloroethene in soil could be encountered during construction activities at depths of less than 6 feet below ground surface within the land use restriction areas (Appendix D). Therefore, project construction activities involving excavation, such as construction of the proposed building foundation or buried utility connections, could disturb contaminated soils or groundwater and expose construction workers to trichloroethene. Because contaminated soils generally exist on-site at depths greater than 6 feet below ground surface outside of the mapped land use restriction areas, other shallow ground disturbance elsewhere on the project site during project construction would have less potential to disturb contaminated soils and expose construction workers to contamination. Nonetheless, the potential for construction workers to be exposed to contaminated soil or groundwater during project construction would be a potentially significant. Implementation of Mitigation Measure HAZ-2 is required, which requires implementation of the Revised Soil and Groundwater Management Plan during construction.

Likewise, project construction would generate dust. If soils from the contamination areas are stockpiled on site and become airborne dust, either from wind erosion or construction equipment, off-site receptors could be exposed, as well as project construction workers. Reuse of contaminated soils as fill material on site is prohibited, but if mistakenly used it could also expose workers to contamination, as well as future employees of the proposed building. Similarly, dewatering could be required if groundwater is encountered. Improper discharge of groundwater removed during dewatering would be a substantial hazard to the environment. Impacts would be potentially significant, and implementation of Mitigation Measure HAZ-2 and Mitigation Measure HAZ-3 is required. Mitigation Measure HAZ-3 requires containment of dewatering effluent and obtaining a discharge permit is released from containment.

Project construction would require the demolition of some or all existing groundwater monitoring wells that were previously installed as part of the remediation actions on-site. According to the Land Use Covenant for the project site, these wells should be maintained and monitored as an ongoing remediation activity. With the potential demolition of wells during project construction, there would be no way to monitor if prior remediation activities have continued to be effective. Contamination levels could increase without knowledge of such increases, resulting in the migration of contaminants through the groundwater aquifer(s). This would be a potentially substantial hazard to the environment. Impacts would be potentially significant, and implementation of Mitigation Measure HAZ-4 is required. Mitigation Measure HAZ-4 requires protection of the groundwater well network.

Project Operation

As described above in Section 4.2.1, *Setting*, the Land Use Covenant for the project site prohibits the following land uses: residences, hospitals for humans, public or private school for persons under 21 years of age, and day care center for children. The proposed project would not be developed or used for these land uses, consistent with the Land Use Covenant restrictions. Future industrial tenants could potentially use and store hazardous materials at the project site, depending on the specific tenant or tenants. The use and storage of hazardous materials would be subject to federal and state regulations. Depending on the quantity of hazardous materials stored or used on-site, additional permits and oversight would be required, such as permits from the City. Regulatory

requirements would ensure that hazardous materials are properly handled, stored, and disposed of in such a way as not present environmental and health hazards.

During project operation, vapors from contaminated soil and groundwater underlying the site could potentially infiltrate the proposed building, including spaces within the building where employees would be routinely present. The accumulation of vapors in the breathing zone inside the building could present a potential hazard to human health. Therefore, the potential for soil vapor intrusion during operation would be a potentially significant impact. Implementation of Mitigation Measure HAZ-5 is required. Mitigation Measure HAZ-5 requires an engineered vapor barrier to be employed to further protect against possible vapor intrusion of chemicals of potential concern into the proposed building.

Stormwater runoff would be treated on site in bioretention areas to meet the current Alameda County C.3 stormwater regulations. The bioretention areas would slow runoff and aid infiltration in order to reduce the amount of runoff discharge to the City's storm drain system. However, if improperly designed, the bioretention areas could result in contaminants leaching from soil into groundwater or result in migration of the existing contamination plume within groundwater. At least one of the proposed bioretention swales would be located partially within a land use restriction area where trichloroethene concentrations exceed MCLs. Migration or leaching of contamination would be a potentially significant environmental impact, and implementation of Mitigation Measure HAZ-6 is required. Mitigation Measure HAZ-6 requires bioretention areas to be designed and constructed in such a way as to protect groundwater aquifers from contamination.

Mitigation Measures

HAZ-1 Project Demolition Activities

In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site building(s) to determine the presence of asbestos-containing materials (ACMs) and/or lead-based paint. Documentation of the survey shall be provided to the City of San Leandro prior to commencement of demolition activities.

During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Title 8, California Code of Regulations (CCR), Section 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of lead being disposed.

All potentially friable asbestos containing materials (ACMs) shall be removed in accordance with National Emission Standards for Air Pollution (NESHAP) guidelines prior to demolition or renovation activities that may disturb ACMs. All demolition activities shall be undertaken in accordance with Cal/OSHA standards contained in Title 8, CCR, Section 1529, to protect workers from asbestos exposure.

A registered asbestos abatement contractor shall be retained to remove and dispose of ACMs identified in the asbestos survey performed for the site in accordance with the standards stated above in this mitigation measure. Materials containing more than one-percent asbestos are also subject to Bay Area Air Quality Management District regulations. Removal of materials containing more than one-percent asbestos shall be completed in accordance with Bay Area Air Quality Management District requirements and notifications.

Based on Cal/OSHA rules and regulations, the following conditions shall be implemented to limit impacts to construction workers:

- Prior to commencement of demolition activities, a building survey, including sampling and testing, shall be completed to identify and quantify building materials containing lead-based paint.
- During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR, Section 1532.1, including employee training, employee air monitoring and dust control.
- Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of waste being disposed.

HAZ-2 Implementation of the Revised Soil and Groundwater Management Plan and DTSC Regulatory Oversight

The project shall implement the appropriate handling procedures and worker health and safety measures during excavating or dewatering activities as described in the site-specific Revised Soil and Groundwater Management Plan developed by RMD Environmental Solutions for the project in June 2021 (included as Appendix D to this EIR). Measures included in the Revised Soil and Groundwater Management Plan to control potential hazardous contamination and exposure include, but are not limited to the following:

- Construction contractors shall implement dust control mitigation measures during construction activities at the project site to minimize the generation of dust. Examples of dust control measures that shall be implemented include routinely applying water or non-toxic soil stabilizers to exposed soils while performing grading and excavation activities; sweeping (with wet power sweepers) paved access roads, parking areas, and staging areas; covering or otherwise stabilizing soil stockpiles at the end of each workday; And suspending construction activities that cause visible dust plumes and odors to extend beyond project site boundaries. Some additional dust control mitigation measures listed in the Soil and Groundwater Management Plan include limiting construction vehicle and equipment speeds to 15 miles per hours when operated on exposed soils and removing visible loose soils from vehicles before leaving the project site.
- To prevent or minimize construction equipment from tracking polluted spoils off the site onto roadways, trucks used to transport soil will be loaded in a manner to minimize soil spillage and fugitive dust. Examples of ways to load trucks to minimize spillage and dust include loading the truck bed to less than full capacity and covering the bed of truck after it has been loaded.
- Construction equipment shall be cleaned prior to movement out of active work zones in impacted areas. The equipment wheels/tires shall be cleaned by means of shovels and stiff-bristled brooms or brushes until they are fully cleaned. Upon completion of cleaning, debris shall be placed in the appropriate transportation vessel and the plastic sheeting shall be disposed. If washing water is required, decontamination wash water shall be profiled and transported to an appropriate disposal or recycling facility. Equipment exiting the project site shall be inspected and logged for compliance with the site decontamination requirements.
- A construction Health and Safety Plan shall be prepared by the project applicant or its general contractor for the proposed project in accordance with Federal and State Occupational Safety and Health Administration (OSHA) standards for hazardous waste operations (29 Code of Federal Regulations [CFR] 1910.1208 and 8 California Code of Regulations [CCR] 5192,

respectively). Subcontractors shall either adopt the General Contractor's Health and Safety Plan or prepare their own Health and Safety Plan satisfying the same regulatory requirements. The General Contractor shall be responsible for verifying that onsite construction workers and visitors have read and adhere to the procedures established in the Health and Safety Plan. A copy of the Health and Safety Plan shall be kept onsite during redevelopment activities. In the event that unanticipated conditions occur at the site, the General Contractor shall be responsible for modifying the Health and Safety Plan accordingly.

- Field screening of soil shall be conducted continuously during ground disturbing activities using a calibrated handheld photoionization detector or other organic vapor meter. Field screening using a photoionization detector shall be conducted by properly trained General Contractor and/or Environmental Consultant personnel. Based on the field screening, excavated soil shall be separated into stockpiles in three categories: 1) Background Soil: No visual and odor indicators, and photoionization detector measurements that are consistent with background levels. Photoionization detector readings of up to 5 parts per million by volume (ppmv) shall be considered background levels. These soils can be characterized for onsite reuse, if applicable; 2) Interim Soil: No visual and odor indicators, and photoionization detector measurements between 5 ppmv and 50 ppmv. These soils can be characterized for onsite reuse, if applicable; and 3) Contaminated Soil: Staining and odor indicators present, and/or photoionization detector measurements of more than 50 ppmv. These soils shall be further evaluated and are likely to be characterized for offsite disposal.
- If soil exhibiting evidence of contamination (e.g., visual and odor indicators, and photoionization detector measurements of more than 50 ppmv), is encountered during ground disturbing activities, the project applicant and/or General Contractor shall cease ground disturbing activities in the area and delineate the area with barricades or fencing, stakes and plastic sheeting as appropriate, and signage to notify onsite workers and visitors of access restrictions. The General Contractor shall notify the Property Owner and Environmental Consultant. Upon notification, the Environmental Consultant shall implement and/or provide oversight.
- Stormwater pollution controls shall be implemented by the project applicant and/or General Contractor to minimize sediment runoff in stormwater. Best Management Practices including grading the site and installing stormwater control measures such as temporary earth berms or erecting silt fences around the perimeter of exposed soil at the site, shall be implemented to prevent erosion and sediment runoff from the site. Straw bale barriers or sediment traps shall be required to protect any existing catch basins or drainage channels.
- During project construction activities, soil and/or groundwater sampling, removal and management of discovered underground structures (e.g., storage tanks), chemical analysis and proper disposal of contaminated materials, and soil import activities shall be documented in a daily field log by the project applicant and/or General Contractor and/or Environmental Consultant. At the completion of the construction activities, a Construction Completion Report shall be prepared by the Environmental Consultant for submittal to DTSC that summarizes the soil and groundwater handling activities.

The DTSC shall continue to be utilized for agency oversight of assessment and remediation of the project site through completion of construction activities. In addition to implementing the Revised Soil and Groundwater Management Plan, prior to commencement of construction and grading activities at the project site, the project applicant shall implement and/or complete the following tasks, and other tasks if requested by DTSC, regarding the open Site Cleanup Program Case:

- Implement the November 19, 2020 Redevelopment-Related Groundwater Monitoring Well Network Modification Work Plan, as approved by DTSC on May 26, 2021
- Implement the October 5, 2021 Revised Vapor Intrusion Mitigation System Implementation Work Plan, as approved by DTSC on December 1, 2021
- Implement the October 21, 2021 Revised Community Air Monitoring Plan (CAMP), as approved by DTSC on December 1, 2021
- Prepare a Five Year Remedial Action Review Report for the years 2019-2023 as specified in a DTSC letter dated May 3, 2022
- Implement the August 30, 2022 Soil Vapor Probe Destruction Workplan, as approved by DTSC on September 29, 2022

Upon submittal or completion of the information above, and in accordance with the 2012 Land Use Covenant, DTSC may require actions such as: development of subsurface investigation workplans; completion of soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents.

Subsurface soil, soil vapor, and groundwater investigations, if required, shall be conducted in accordance with a sampling plan that shall be reviewed and approved by the DTSC.

The DTSC approval documents shall be submitted to and reviewed by the City prior to issuing grading permits.[1]

HAZ-3 Construction Dewatering Requirements

Construction dewatering effluent, if produced, shall be pumped into holding tanks or United Nations (UN)-rated 55-gallon drums with appropriate labeling and secondary containment. If dewatering effluent would be discharged to an existing storm drain or drains, a National Pollutant Discharge Elimination System (NPDES) permit shall be obtained from the Regional Water Quality Control Board. If dewatering effluent would be discharged to the San Leandro Water Pollution Control Plant, an industrial pre-treatment permit shall be obtained from the San Leandro Environmental Services Section.

Chemical analysis shall be performed in accordance with the receiving facility's requirements prior to discharge. If concentrations exceed the limits established for the discharge point, the dewatering effluent shall either be (1) transferred into a vacuum truck or properly labeled UN-rated 55-gallon drums and transported offsite for disposal at an appropriately licensed disposal facility; or (2) treated and discharged following sampling and analysis to confirm compliance with permit requirements.

HAZ-4 Groundwater Monitoring Well Protection

A November 19, 2020 Redevelopment-Related Groundwater Monitoring Well Network Modification Work Plan (RMD Environmental Solutions 2020c), which was approved in 2021 DTSC letter, was prepared to reduce the potential for damaged or lost wells during development of the project site. Based on available development plans at that time, the monitoring wells were designated for either:

[1] The DTSC may determine that the San Francisco Bay RWQCB or the City of San Leandro may be best suited to perform the cleanup oversight agency duties for the assessment and/or remediation of the project. Should the cleanup oversight agency be transferred from the DTSC to the San Francisco Bay RWQCB or the CUPA, this and other mitigation measures shall still apply.

1. Protection in areas where minimal grade changes are anticipated. These monitoring wells shall be marked with paint and/or installation of delineators/snow fencing/bollards. The project applicant and/or General Contractor shall protect these groundwater monitoring wells and maintain access to the wells for routine monitoring to the extent practicable; or
2. Destruction in areas within the building footprint and areas with substantial grade changes.

The DTSC shall be notified of changes to these designations based on modifications to the development plans and/or input from the project applicant and/or General Contractor with rationale for wells that do not warrant replacement. Prior to removal or installation of any wells, permits shall be acquired from the Alameda County Public Works Agency.

HAZ-5 Engineered Vapor Barrier Requirement

An engineered vapor barrier shall be employed to further protect against possible vapor intrusion of chemicals of potential concern into the proposed building. The vapor barrier shall be designed to meet the needs of the building. Vapor barriers are generally constructed using membranes constructed with high-density polyethylene or other polyolefin-based resins. The vapor barrier shall be resistant to volatile organic compounds. The vapor barrier shall meet the American Society for Testing and Materials guideline for a vapor barrier and have a permeance rating of 0.1 perms or less. The thickness and strength of the vapor barrier shall be based on the needs for the building, but the architect and contractor shall use a material strong enough to easily withstand the building construction and other building considerations. The selected vapor barrier shall be approved by the DTSC or Regional Water Quality Control Board prior to installation. Written approval from either the DTSC or Regional Water Quality Control Board shall be provided to the City of San Leandro before building permits are issued.

HAZ-6 Bioretention Design Coordination

The project applicant shall consult with the City of San Leandro on location and/or design of the on-site bioretention basins to ensure protection of the groundwater basin, which may include, but is not limited to, locating the basins outside of the restricted areas or use of a liner in the detention basin. The final design and location of the on-site bioretention basins shall demonstrate that groundwater would be protected from contamination. If bioretention basins are proposed in the restricted areas, DTSC and/or the San Francisco Bay RWQCB shall also approve the design of the bioretention basins.

Significance After Mitigation

Mitigation Measure HAZ-1 would reduce impacts by requiring testing to indicate whether lead-based paint or asbestos is present in the structures slated for demolition. If lead or asbestos is detected, these materials would be abated in accordance with state, federal, and local regulations to ensure they would not be released to the environment or impair human health. Therefore, the impact related to ACMs and lead would be less than significant with mitigation implemented.

With incorporation of Mitigation Measure HAZ-2, the provisions of the approved Soil and Groundwater Management Plan for the site would reduce potential hazardous materials impacts associated with the past on-site contamination during project construction. Additionally, implementation of Mitigation Measure HAZ-3 would protect the health of construction workers and the environment during construction dewatering activities. Impacts related to release and exposure

of hazardous materials during construction would be reduced to less than significant levels with implementation of these mitigation measures.

With incorporation of Mitigation Measure HAZ-4, the existing groundwater monitoring well network would be maintained or modified only with written approval of the DTSC. This would ensure that soil and groundwater contamination does not become more severe over the operational life of the project. Likewise, implementation of Mitigation Measure HAZ-5 would require installation of a vapor barrier approved by the DTSC or Regional Water Quality Control Board to protect the health of operational workers and occupants. Impacts related to release and exposure of hazardous materials during operation would be reduced to less than significant levels with implementation of these mitigation measures.

Mitigation Measures HAZ-6 would require coordination with local agencies to ensure that groundwater quality is protected and reduce the environmental impact associated with the existing contamination that may be affected by the bioretention basins.

Overall, with implementation of Mitigation Measure HAZ-1 through HAZ-6, impacts would be reduced to less than significant levels.

4.2.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative hazardous materials impacts is limited to projects within San Leandro that are west of Interstate 880. This geographic scope is appropriate for hazardous materials because risks associated with hazards and hazardous materials occur largely in a site-specific and localized context as adverse impacts from a hazardous materials release or spill diminish in magnitude with distance. Cumulative development in the vicinity of the project site is identified in Table 3-1. Continued urban development has the potential to increase exposure to hazards. However, overall, hazards and hazardous materials impacts associated with individual developments are site specific in nature and must be addressed on a case-by-case basis. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Since hazards and hazardous materials are required to be examined as part of the permit application and environmental review process, it is anticipated that potential impacts associated with individual projects will be adequately addressed and mitigated prior to permit approval. Compliance with regulatory requirements would avoid potential hazard impacts associated with cumulative development. With adherence to existing policies and other local, regional, state, and federal regulations, no significant cumulative human or environmental health impacts are anticipated.

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4.3 Noise and Vibration

This section analyzes the project's potential noise and vibration impacts. The analysis contains a description of the existing noise setting, a discussion of both the temporary noise impacts related to construction activity and long-term impacts associated with project operations, and mitigation to reduce impacts, as applicable. Vibration impacts are analyzed related to construction activity only since project operation would not generate substantial vibration. Operational vibration is typically associated with projects involving heavy rail, blasting, pile driving, etc. These types of operational activities would not be facilitated by the project as designed.

The analysis presented in this section is based on the following technical studies, which are included as appendices to this EIR:

- Evaluation of Site Sound Emissions: Ostergaard Acoustical Associates 2024 (Appendix E)
- Noise Letter Report: Rincon Consultants 2024 (Appendix F)

The Evaluation of Site Sound Emissions was provided by the project applicant. Accordingly, Rincon Consultants conducted a peer review of the study at the request of the City of San Leandro to ensure its methodology and results and conclusions were appropriate and accurate.

4.3.1 Setting

a. Overview of Sound Measurement

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz and less sensitive to frequencies around and below 100 Hertz. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dBA; reducing the energy in half would result in a 3 dBA decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice or half the sound energy, respectively); a change of 5 dBA is readily perceptible (eight times the sound energy); and an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g.,

point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units) (Occupational Safety and Health Administration [OSHA] 2023; Caltrans 2013). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result from the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and human-made features such as buildings and walls, can substantially alter noise levels.

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of a project's noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. Typically, L_{eq} is summed over a one-hour period. L_{max} is the highest sound pressure level within the sampling period, and L_{min} is the lowest sound pressure level within the measuring period (Crocker 2007).

Noise occurring at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours; it is also measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by L_{dn} and CNEL usually differ by about 1 dBA. The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of traffic during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60-plus CNEL range. Normal conversational levels are in the 60 to 65 dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration 2018).

b. Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hertz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body starts from a low frequency of less than 1 Hertz and goes to a high of about 200 Hertz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration

spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hertz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern associated with vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared vibration velocity. The PPV and root mean squared velocity are normally described in inches per second (in/sec) PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

c. Existing Noise Setting

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The San Leandro General Plan Environmental Hazards Element identifies noise-sensitive land uses as residential land uses, schools, and open space and recreation areas (City of San Leandro 2016a). The nearest sensitive receiver is a residential subdivision located approximately 510 feet northeast of the project site boundary.

The residential subdivision approximately 510 feet northeast of the project site boundary is also the nearest vibration sensitive receiver for human annoyance. The nearest structure to the project site where vibration could occur is approximately 10 feet north and south of the site boundary.

Ambient Noise Setting

The dominant sources of noise in the project site vicinity is vehicular traffic on Doolittle Drive, train operations on nearby railroad tracks, and aircraft noise from the Oakland International Airport.

The easternmost portion of the project site is within the 60 DBA CNEL contour of the Oakland International Airport (Alameda County Community Development Department 2010). According to the San Leandro General Plan Environmental Hazards Element, the eastern most of area of the project site is within the 60 dBA CNEL contour of Doolittle Drive (City of San Leandro 2016a). The easternmost area of the project site experiences noise levels of approximately 60 to 65 dBA CNEL because of traffic noise on Doolittle Drive and aircraft noise at Oakland International Airport.

The central and western areas of the project site are not within noise contours of the Oakland International Airport (Alameda County Community Development Department 2010). The central and western areas of the project site are also not near through roadways. Therefore, it is reasonable to assume noise levels in these areas of the project site are generally below or near 60 dBA CNEL.

However, there is an active railroad corridor approximately 400 feet east of the project site. When trains pass by the site, there would be a temporary increase in ambient noise levels in the project site. According to the Federal Transit Administration, diesel locomotives traveling at speeds of 50 miles per hour generate noise levels of approximately 92 dBA when measured approximately 50 feet from the railroad track (Federal Transit Administration 2018). Based on an attenuation rate of 3 dBA per doubling of distance from the source, trains using the tracks east of the project site would generate noise levels of approximately 83 dBA at the eastern project site boundary. In the central areas of the project site (approximately 800 feet from the tracks), train noise would be approximately 80 dBA. Additionally, although the project site is not in the noise contours of the Oakland International Airport, freight aircraft do arrive and depart the airport using routes that pass over or near the project site (Alameda County Community Development Department 2010). Similar to intermittent train operations, these freight aircraft operations would cause a temporary increase in ambient noise levels in the project site.

The nearest sensitive receptors to the project site, which are the residences to the northeast, are within the 60 dBA CNEL contour of Interstate 880 (City of San Leandro 2016a). However, Interstate 880 is east of these sensitive receptors; Interstate 880 does not separate the project from these sensitive receptors. However, there are multiple other residential buildings between these receptors and Interstate 880 that would cause freeway traffic noise level to attenuate before reaching these sensitive receptors, and this attenuation is not accounted for in the noise contour mapping of the General Plan. Accordingly, ambient noise levels at the nearest sensitive receptors to the project site are likely slightly below 60 dBA.

4.3.2 Regulatory Setting

a. State Regulations

California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. California law requires each county and city to adopt a General Plan that includes a Noise Element prepared based on guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. CEQA requires known environmental effects of a project be analyzed, including environmental noise impacts, including airport noise.

California Building Code

California Code of Regulations (CCR) Title 24, Building Standards Administrative Code, Part 2 and the California Building Code codify the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to an acceptable level of 45 dBA CNEL.

The 2022 State of California's Green Building Standards Code contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from

exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within the noise contour of an airport, freeway, or railroad.

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions have the responsibility to set specific noise standards based on local conditions. See the discussion below, under the "City of San Leandro General Plan," for the compatibility guidelines adopted by the City.

b. Local Regulations

City of San Leandro General Plan

The San Leandro 2035 General Plan was adopted by the City of San Leandro on in September 2016. Noise and vibration are addressed in the Environmental Hazards Element, which is Chapter 7 of the General Plan. The Environmental Hazards Element provides goals, objectives, policies, and actions to help protect citizens of San Leandro from excessive and incompatible noise and vibration.

General Plan goals and policies applicable to the proposed project are included below:

Goal EH-7: Ensure that noise associated with the day-to-day activities of San Leandro residents and businesses does not impede the peace and quiet of the community.

> **Policy EH-7.1: Noise Compatibility Table.** Ensure that potential noise impacts are considered when new development is proposed. Projects that could significantly increase noise levels should incorporate mitigation measures to reduce such impacts. Apply the standards shown in Chart 7-2 when evaluating applications for future development. Chart 7-2 specifies the maximum noise levels that are normally acceptable, conditionally acceptable, and normally unacceptable for new development.
>
> **Policy EH-7.3: Residential Exterior Noise Standard.** Strive to maintain an exterior noise level of no more than 60 dB Ldn in residential areas. Recognizing that some San Leandro neighborhoods already exceed this noise level, encourage a variety of noise abatement measures that benefit these areas.
>
> **Policy EH-7.4: Degradation of Ambient Noise Levels.** If a neighborhood is well within acceptable noise standards, do not automatically allow noise levels to degrade to the maximum tolerable levels shown in Chart 7-2. A project's noise impacts should be evaluated based on the potential for adverse community response, as well as its conformance to the adopted standards. For CEQA purposes, an increase of 3 dB Ldn should generally be considered a significant adverse impact.
>
> **Policy EH-7.5: Noise-Sensitive Uses.** Discourage noise-sensitive uses such as hospitals, schools, and rest homes from locating in areas with very high noise levels unless sufficient noise mitigation and buffering can be provided. Conversely, discourage new uses likely to produce

high levels of noise from locating in areas where noise-sensitive uses would be adversely impacted.

Policy EH-7.9: Vibration Impacts. Limit the potential for vibration impacts from construction and ongoing operations to disturb sensitive uses such as housing and schools.

Goal EH-8: Reduce the effects of surface transportation noise, including vehicular noise and noise associated with railroad and BART traffic.

Policy EH-8.3: Site Planning and Building Design. Require new development or redevelopment near freeways, arterials, BART, and major bus routes to incorporate site planning and architectural design measures that reduce the exposure of future building occupants to traffic noise.

Chart 7-2 in Environmental Hazards Element provides noise compatibility guidelines for land uses based on State of California guidelines. The guidelines identify those areas where various uses are acceptable, conditionally acceptable, normally unacceptable, or clearly unacceptable based on ambient noise levels. Chart 7-2 of the General Plan is provided as Figure 4.3-1.

San Leandro Municipal Code

Chapter 4-1 of the San Leandro Municipal Code provides restrictions and regulations for noise within San Leandro. The noise-related code does not contain numerical noise level limits and is aimed more at prohibiting "disturbing, excessive and offensive noises" so as to abate public nuisances relative to noise. The following section forms the framework for these nuisance-related restrictions.

Section 4-1-110 of the San Leandro Municipal Code establishes a general prohibition of noise which causes discomfort or annoyance to reasonable persons of normal sensitivity. The factors which should be considered in determining whether a violation of this section exists include but are not limited to the sound level of the objectionable and ambient noise, the proximity of the noise to residential property, and the duration of the noise.

Section 4-1-115 of the San Leandro Municipal Code prohibits certain acts related to noise, such as construction-related noise near residential uses outside of the hours of 7 a.m. and 7 p.m. on weekdays and 8 a.m. and 7 p.m. on weekends. Noise within public parks and noise that conflicts with residential uses is also prohibited.

Section 4-1-505 of the San Leandro Municipal Code restricts the hours of operation of vehicles with sound amplifying equipment to 10:00 a.m. through 7:00 p.m. Pursuant to Section 4-1-505, the volume of amplified sound shall be controlled so that it will not be audible for a distance in excess of 200 feet from the vehicle and so that said volume is not unreasonably loud, raucous, jarring, disturbing, or a nuisance to persons within the area of audibility.

Neither the City of San Leandro nor the County of Alameda has specific and/or quantitative regulatory standards for construction or operational vibration sources. San Leandro Zoning Code Part IV, Article 16, Division 3, Provision 4-1670B, Vibration, requires that no use, activity, or process produce vibrations that are perceptible without instruments by a reasonable person at the property lines of a site. This performance standard applies to all land use classifications in all zoning districts.

4.3.3 Impact Analysis

a. Methodology

The analysis of noise impacts considers the effects of both temporary construction-related noise and long-term noise associated with operation of the project. The potential for short-term construction and long-term operational noise impacts was assessed at noise-sensitive receptors closest to the project site (i.e., the residences approximately 510 feet northeast of the project site).

Construction Noise

Construction noise levels in the project vicinity would fluctuate depending on the particular type, number, and duration of usage for the various pieces of equipment. The effects of construction noise depend largely on the types of construction activities occurring on a given day, noise levels generated by those activities, distances to noise-sensitive receptors, and the existing ambient noise environment in the vicinity of the receptors. Construction generally occurs in several discrete stages, with each stage varying the equipment mix and equipment usage rates. These construction stages alter the characteristics of the noise environment generated on the project site and in the surrounding community for the duration of the construction stage. Construction stages for development of this project were assumed to include demolition, site preparation, grading, building construction, paving and painting (architectural coating).

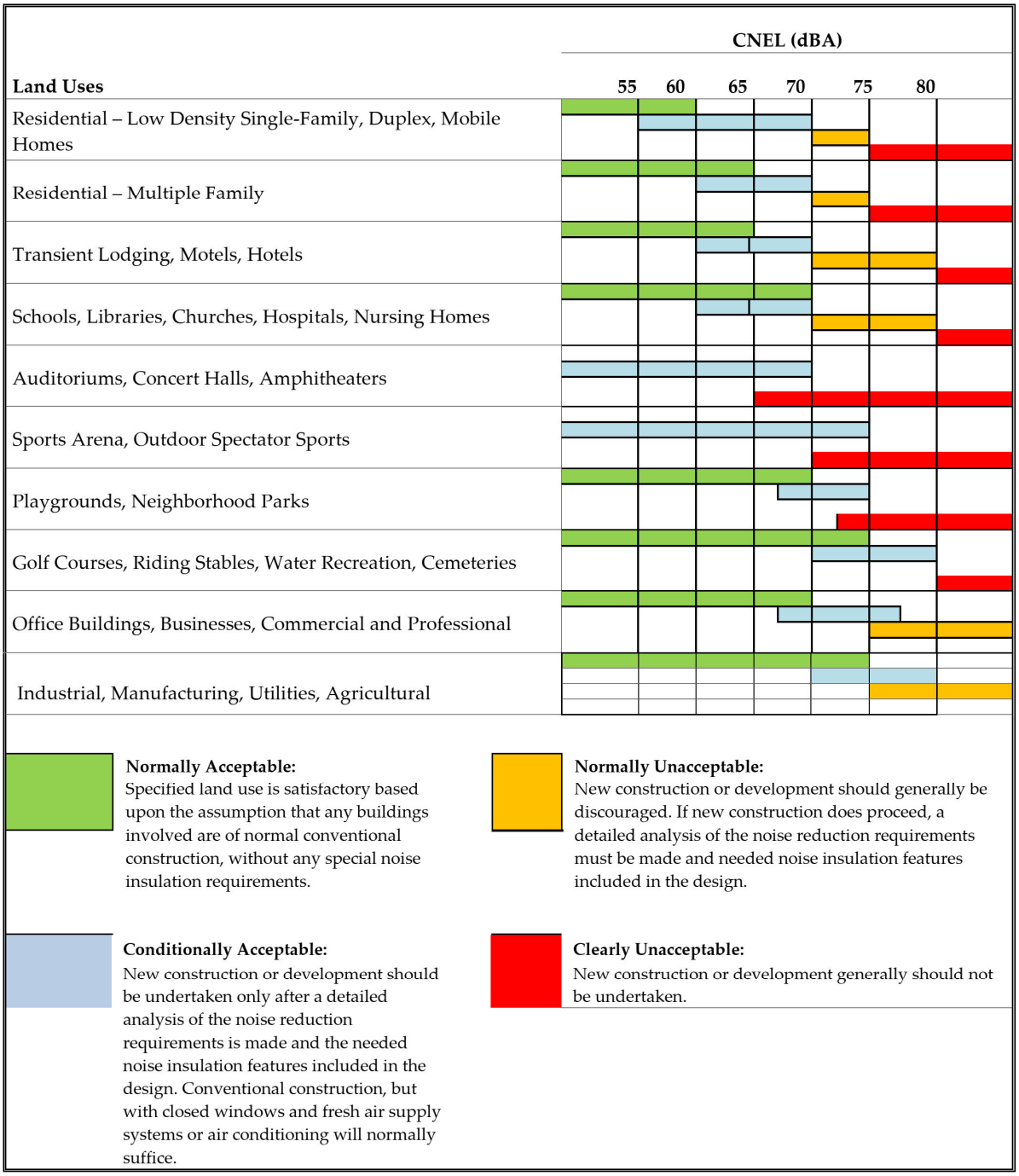
For purposes of construction noise assessment, construction equipment can be considered to operate in two modes, stationary and mobile. As a general rule, stationary equipment operates in one location for one or more days at a time, with either a fixed-power operation, such as, pumps, generators, and compressors, or a variable noise operation, such as pile drivers, rock drills, and pavement breakers. Mobile equipment moves around the construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (Federal Transit Administration 2018). Noise impacts from stationary equipment are assessed from the center of the equipment, while noise impacts for mobile construction equipment are assessed from the center of the equipment activity area (i.e., construction site).

Although specific construction requirements for build-out of the proposed project are currently unknown, it is anticipated that typical construction sources such as backhoes, compressors, bulldozers, excavators, loaders and other related equipment would be utilized during project construction, based on input from the project applicant. Based on the reference noise levels, usage rates, fleet mixes and operational characteristics discussed above, overall hourly average noise levels attributable to project construction activities were calculated for the project. Construction noise levels were predicted using reference noise emission data and operational parameters contained in the FHWA Roadway Construction Noise Model, Version 1.1 (Reherman, et. al. 2006), and the Federal Transit Administration guidance manual (Federal Transit Administration 2018).

Vibration

Construction activities on the project site may result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Groundborne vibration attenuates rapidly, even over short distances. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in Federal Transit Administration and Caltrans guidance.

Figure 4.3-1 City of San Leandro Land Use Compatibility Noise Guidelines



Source: City of San Leandro 2016

Construction vibration levels were calculated at the sensitive receptor nearest to the project site, residences to the northeast, to determine whether project construction would generate vibration levels that would cause human annoyance at the receptors or physical damage to nearby structures. Vibration levels were estimated for construction equipment expected to be used during project construction and were based on the vibration source levels for construction equipment from the Federal Transit Administration Transit Noise and Vibration Assessment (2018). Construction vibration levels were then calculated at distances of approximately 510 feet (the distance between the location of on-site vibratory equipment and the residential receptors) and at 30 feet (the distance between the location of on-site vibratory equipment, considering site constraints, and the nearest structures).

Operational Noise

Mechanical equipment associated with the operation of warehouse uses generally consists of heating, ventilation, and air-conditioning (HVAC) equipment. Mechanical equipment is often mounted on rooftops, partially enclosed at grade adjacent to buildings, or located within mechanical equipment rooms. Noise levels generated by the HVAC and other mechanical equipment vary substantially depending on unit size, efficiency, location, type of rotating or reciprocating components, and orientation of openings. For the analysis in the EIR, it was assumed up to 14 rooftop HVAC units would operate on-site. The rationale for this assumption is described in Appendix E. Each HVAC unit was assumed to be at a height of approximately 4 feet above the rooftop of the proposed building. Acoustical modelling software, specifically CadnaA, was used to model the noise associated with HVAC operation.

Additionally, CadnaA was used to model noise that would result from truck operations on the project site, given the project is a warehouse that includes docks for trucks. Trucks were modelled at various on-site locations, including along the eastern site boundary, closest to the nearest sensitive receptors. The noise reference value used to model trucks was 79 dBA at 50 feet away. As described in Appendix E, this sound level was determined by looking at a wide variety of truck activity, such as truck movement, air brakes, back-up alarms, and coupling/decoupling, and distilling it to a single conservative maximum level and spectrum. The height of a truck source for all truck activity was modelled at a conservative height of 8 feet above grade. The full range of model inputs and assumptions used for on-site truck noise is described in Appendix E.

Long-term operation of the proposed project would generate an increase in traffic volumes on the local roadway network in the project vicinity. Consequently, noise levels from this vehicular and truck traffic along affected roadway segments would have the potential to increase. To assess the effect of project-generated traffic increases, traffic noise levels were modeled for roadway segments in the project vicinity based on the FHWA Highway Traffic Noise Model prediction methodologies (Reherman, et. al. 2006).

Traffic volumes and the distribution of those volumes were obtained from the forecasted traffic volumes in the City's General Plan EIR. Average daily trip volumes resulting from the project were calculated by summing all traffic movements for both the a.m. and p.m peak hours, existing on or turning on to a particular roadway segment during the peak-hour and multiplying the total peak-hour volume by a "k-factor" of 5. Peak hours consist of 7:00 to 9:00 a.m and 4:00 to 6:00 p.m. Average vehicle speeds on local area roadways were assumed to be consistent with posted speed limits and remain as such with or without implementation of the proposed project.

b. Thresholds of Significance

According to *CEQA Guidelines* Appendix G, impacts related to noise and vibration are considered significant if implementation of the proposed project would:

1. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2. Result in generation of excessive groundborne vibration or groundborne noise levels; or
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

Construction Noise

The City of San Leandro has not adopted specific quantitative standards or limits related to construction noise. However, Section 4-1-115 of the San Leandro Municipal Code prohibits certain acts related to noise, such as construction-related noise near residential uses outside of the hours of 7 a.m. and 7 p.m. on weekdays and 8 a.m. and 7 p.m. on weekends. Noise within public parks and noise that conflicts with residential uses is also prohibited. Policy EH-7.4 of the General Plan states that an increase of 3 dB Ldn at residential land uses is a significant adverse impact for purposes of CEQA. Therefore, construction noise would be considered significant if it occurs outside of the hours specified in the San Leandro Municipal Code and would also increase noise levels by 3 dBA or greater at the nearest residence to the project site.

In addition to the San Leandro Municipal Code and the City's General Plan policies, the Federal Transit Administration has developed guidance for determining if construction of a project would expose various land uses to significant noise levels or if a project would result in a substantial temporary increase in noise levels. Based on Federal Transit Administration guidance, a significant impact would occur if project-generated construction noise exceeds the 8-hour 80 dBA Leq noise limit at residences (Federal Transit Administration 2018).

On-Site Operation Noise

As described in Appendix E, on-site HVAC noise would be considered significant if it exceeds 50 dBA. Noise from on-site truck operations would be considered if it exceeds 55 dBA. As described in Appendix E, these thresholds are based on maintaining existing noise levels at the residences northeast of the project site. By maintaining existing noise levels at the residences northeast of the project site, this threshold would also be consistent with Policy EH-7.4 of the General Plan, which states that an increase of 3 dB Ldn at residential land uses is a significant adverse impact for purposes of CEQA.

Traffic Noise

Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible to most people. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance are used to assess traffic noise impacts at the nearest sensitive receptors:

- Greater than 1.5 dBA increase for ambient noise environments of 65 dBA CNEL and higher;

- Greater that 3 dBA increase for ambient noise environments of 60–64 CNEL; and
- Greater than 5 dBA increase for ambient noise environments of less than 60 dBA CNEL.

Vibration

The City of San Leandro has not adopted a significance quantitative threshold to assess vibration impacts during construction and operation. However, San Leandro Zoning Code Part IV, Article 16, Division 3, Provision 4-1670B, Vibration, requires that no use, activity, or process produce vibrations that are perceptible without instruments by a reasonable person at the property lines of a site. Caltrans recommends a 0.2 in/sec PPV as the threshold of human annoyance for vibration (Caltrans 2020). Accordingly, vibration would be considered significant if it results in vibration levels of 0.2 in/sec or greater at the project site boundary.

In addition to human annoyance threshold, this analysis also considers the damage that groundborne vibration could do to existing structures in the project area. Based on information contained in the 2018 FTA *Transit Noise and Vibration Impact Assessment Manual*, groundborne vibration levels that could induce potential architectural damage to buildings are identified in Table 4.3-1. Based on FTA recommendations, limiting vibration levels to below 0.5 in/sec peak particle velocity (PPV) at reinforced concrete, steel, or timber with no plaster (which would apply to the industrial structures nearest the project site) would prevent architectural damage. If vibration levels exceed 0.5 in/sec PPV at the nearest structures, impacts would be considered potentially significant.

Table 4.3-1 Groundborne Vibration Architectural Damage Thresholds

Building Category	PPV (in/sec)
Reinforced concrete, steel, or timber (no plaster)	0.5
Engineered concrete and masonry (no plaster)	0.3
Non-engineered timber and masonry buildings	0.2
Buildings extremely susceptible to vibration damage	0.12

Source: FTA 2018
PPV = peak particle velocity
in/sec = inches per second

Threshold 1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

IMPACT NOI-1 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD GENERATE NOISE, INCREASING AMBIENT NOISE LEVELS NEAR THE PROJECT SITE. CONSTRUCTION NOISE WOULD BE TEMPORARY AND BELOW THRESHOLDS OF SIGNIFICANCE. TRAFFIC NOISE DURING OPERATION WOULD ALSO BE BELOW SIGNIFICANCE THRESHOLDS; HOWEVER, ON-SITE OPERATIONAL NOISE WOULD EXCEED THRESHOLDS ESTABLISHED FOR THE NEAREST SENSITIVE RECEPTOR. IMPACTS WOULD BE POTENTIALLY SIGNIFICANT BUT MITIGABLE.

Project Construction

Project construction would consist of several different stages, including demolition, site preparation, grading, building construction, and paving. These construction activities or stages can generate

noise levels ranging from 72 dBA to 84 dBA at distances of approximately 50 feet away from the construction site (Reherman, et. al. 2006). These noise levels would attenuate before reaching the nearest sensitive receptor, approximately 510 feet northeast of the project site. As described in the analysis methodology above, project construction noise was modeled at this nearest sensitive receptor. Results of the modeling are shown in Table 4.3-2, below.

Table 4.3-2 Estimated Noise Levels by Project Construction Phase

Construction Phase	Reference Noise Level at 50 Feet (DBA Leq)	Noise Level at Nearest Sensitive Receptor (DBA Leq)
Demolition	82	62
Site Preparation	83	63
Grading	84	64
Building Construction	78	58
Paving	78	58

Source: Federal Highway Administration Roadway Construction Noise Model (see Appendix F)

As shown in Table 4.3-2, construction noise levels would be loudest during the grading stage. Noise levels during this stage would be approximately 64 DBA Leq at the nearest sensitive receptor. The estimated noise level of 64 DBA Leq is well below the Federal Transit Administration construction noise standard, which is 80 DBA Leq. In addition to being well below the Federal Transit Administration standard, project construction activities must also comply with Section 4-1-115 of the San Leandro Municipal Code, prohibiting construction activities outside of the hours of 7 a.m. and 7 p.m. on weekdays and 8 a.m. and 7 p.m. on weekends. This would prevent construction noise from reaching the nearest residence at night when most people are at home and sleeping and most sensitive to noise. Accordingly, because construction noise levels would be below thresholds of significance (i.e., 80 dBA Leq) and occur when most people are awake or away at work, school, or other daytime activities out of the residence, project construction noise impacts would be less than significant.

On-Site Project Operations

Routine or typical operations at the project site would generate noise. Examples of operational noise include rooftop HVAC equipment, trucks maneuvering or otherwise operating on-site, employees talking or shouting, garage doors rolling up or closing, among many other activities. Generally, the highest noise levels would result from HVAC equipment and trucks operating on-site, as these things generate higher noise levels than employees having a discussion outside of the proposed building, for example.

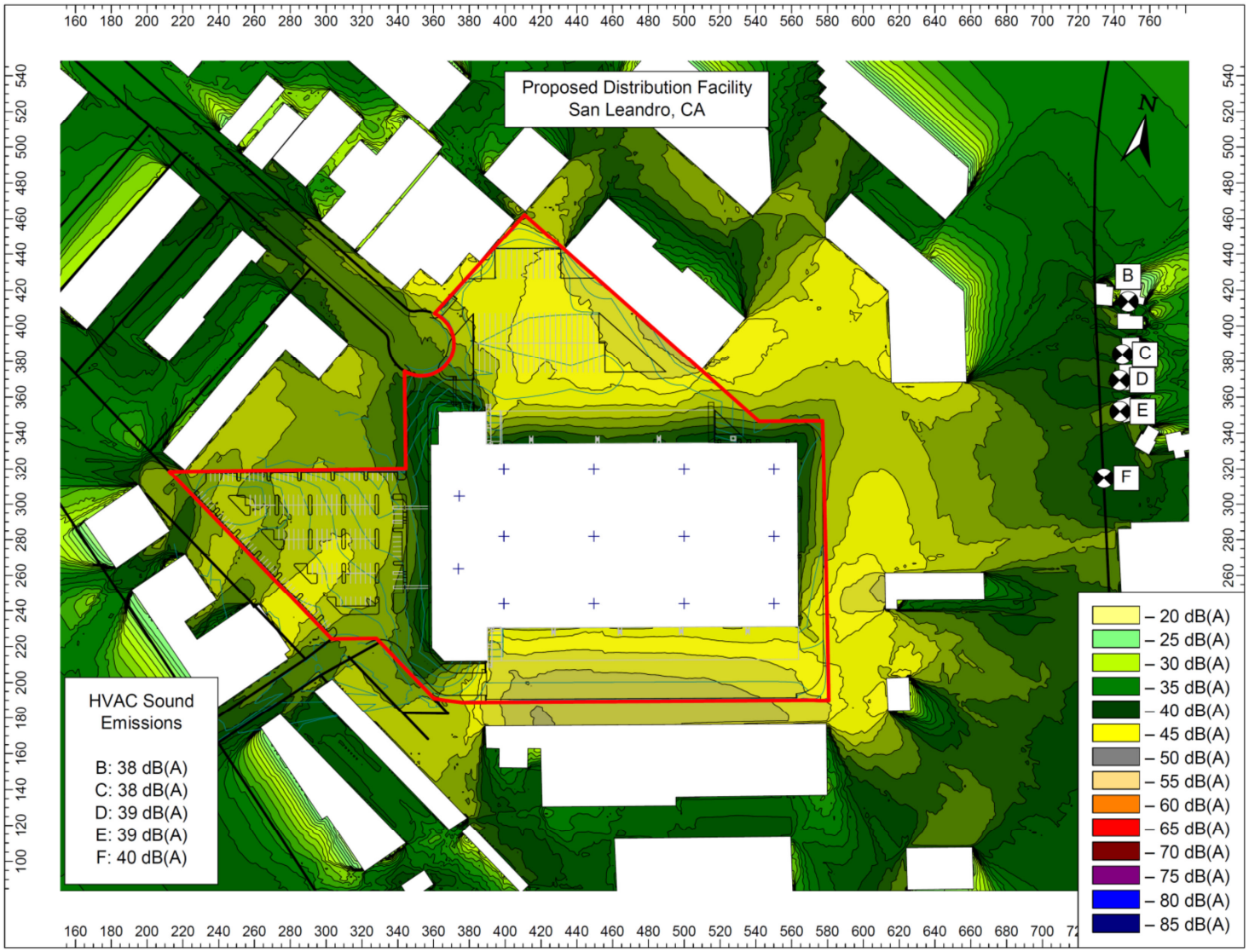
Rooftop HVAC equipment produces noise that is nominally steady in nature, and hence will not vary substantially over time. According to the noise study prepared for project operations (Appendix E), rooftop HVAC noise levels would be up to approximately 50 dBA on the project site. However, as shown in Figure 4.3-2, below, these noise levels would quickly attenuate to below 40 dBA outside of the project site. Because project HVAC noise levels would attenuate to 40 dBA or less proximate to the project site, HVAC noise levels would attenuate even more at distances of approximately 510 feet from the project site, which is where the nearest sensitive receptor is located. Therefore, rooftop HVAC noise from project operations would attenuate below ambient noise levels at the nearest sensitive receptor, resulting in no discernible change in noise level at the receptor.

On-site truck activity would routinely generate engine noises, as well as noise associated with air brakes, back-up alarms, and coupling/decoupling of trailers. When distilled down to a single maximum noise level, truck noise in typical dock and trailer parking areas can routinely produce maximum sound levels of approximately 79 dBA at distances of approximately 50 feet away. In the rare event that two trucks operate in the same spot and time, noise levels would increase by approximately 3 dBA (Ostergaard Acoustical Associates 2024; Appendix E).

Trucks would operate at various locations on the project site, which would affect the distance between the truck activity and nearest sensitive receptor, as well as the number and types of intervening structures between the trucks and receptor. The on-site location where trucks would have the potential to result in the highest noise levels at the nearest sensitive receptor is along the northern side of the proposed building at proposed loading docks. When trucks operate in this area of the project site, noise levels at the nearest sensitive receptor would be approximately 56 dBA. The estimated 56 dBA noise level at the nearest sensitive receptor includes on-site truck activity noise combined with rooftop HVAC noise. Truck activities on other areas of the site would generate noise levels below 56 dBA at the nearest sensitive receptor (Ostergaard Acoustical Associates 2024; Appendix E). Figure 4.3-3, Figure 4.3-4, and Figure 4.3-5 show noise levels associated with truck activity at different areas of the project site.

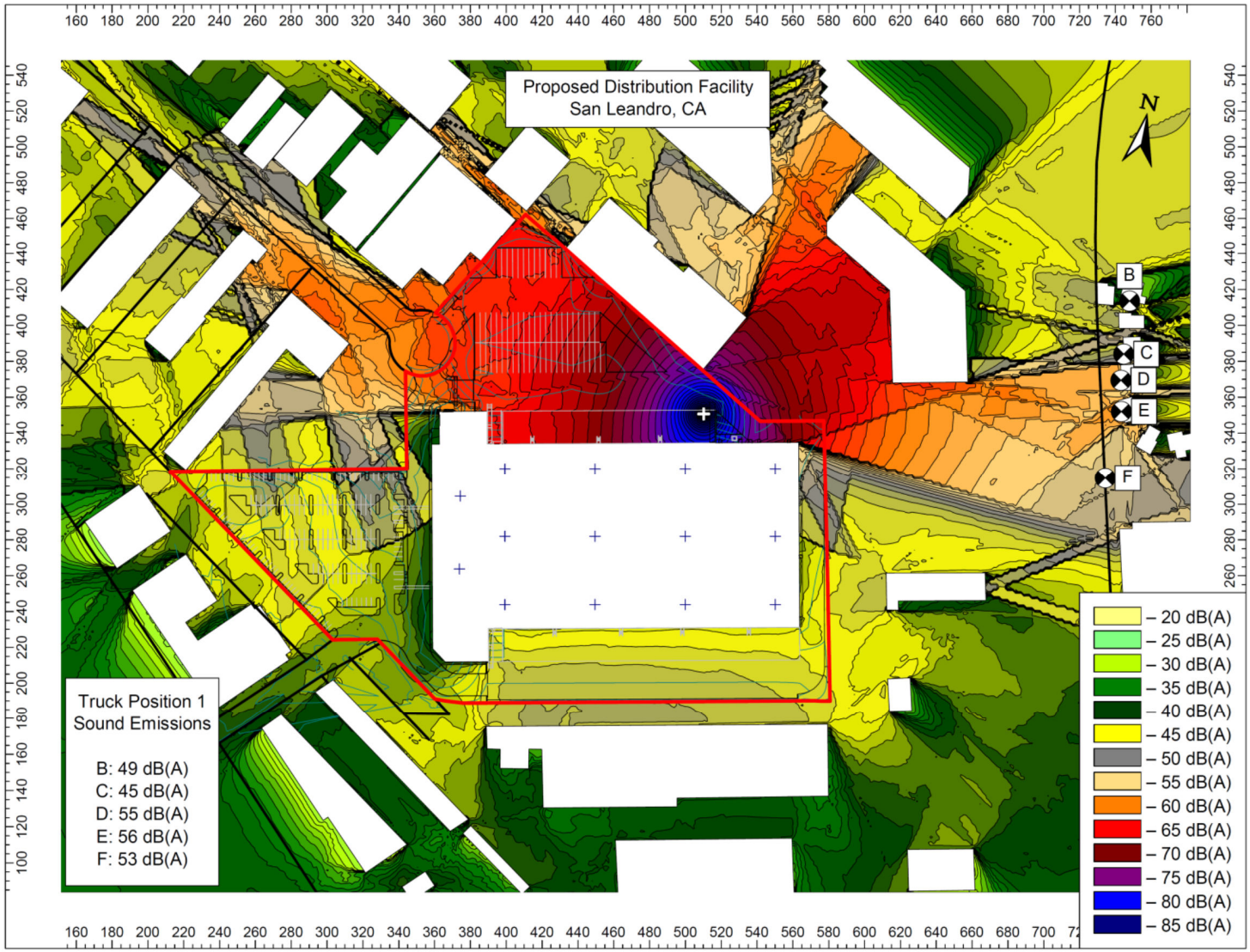
Noise levels of 56 dBA at the nearest residence would exceed the significance threshold of 55 dBA. Because on-site operational noise would exceed the threshold of 55 dBA, impacts would be potentially significant, and mitigation is required.

Figure 4.3-2 Estimated Rooftop HVAC Noise Levels near Project Site



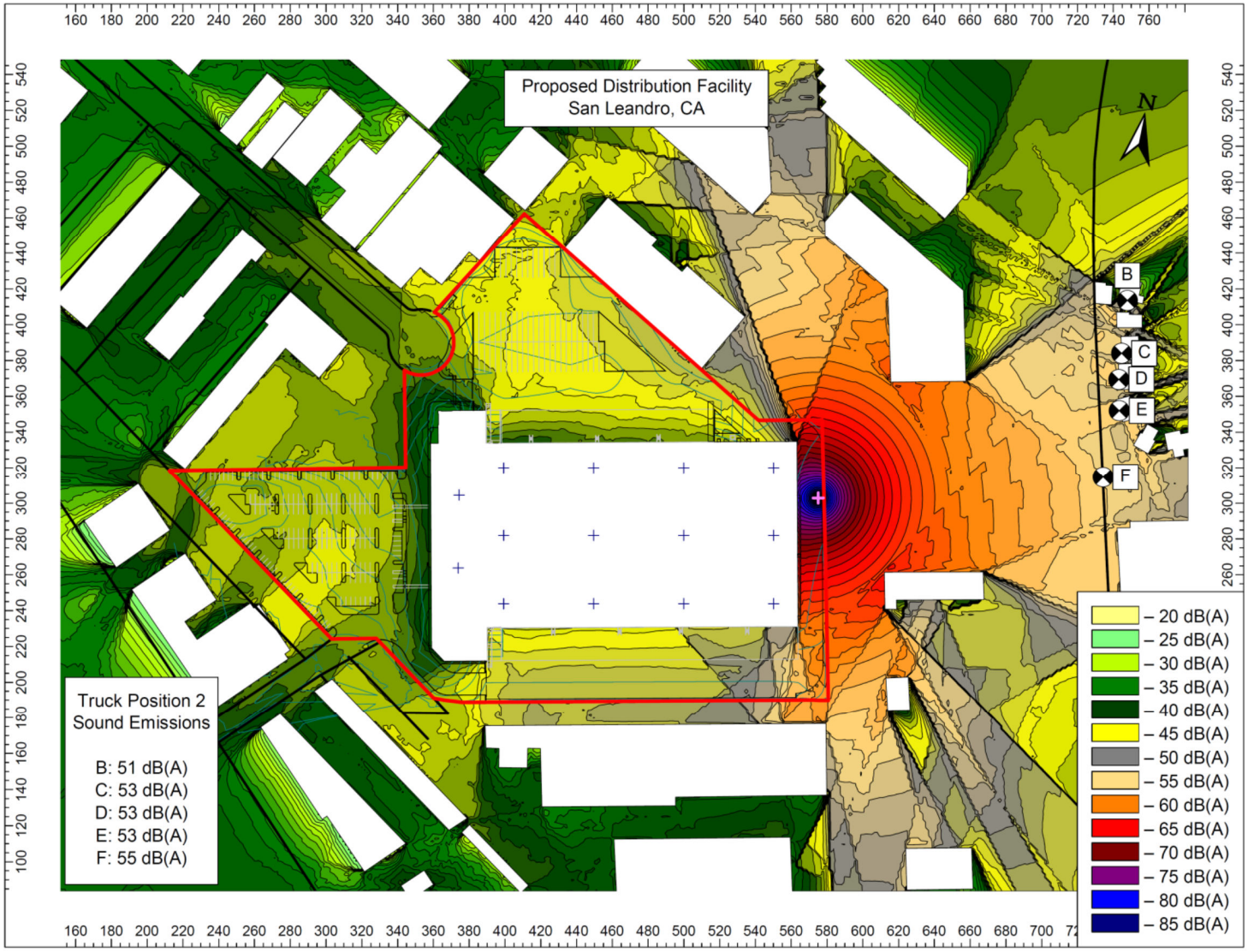
Source: Evaluation of Site Sound Emissions: Ostergaard Acoustical Associates 2024 (Appendix E)

Figure 4.3-3 Estimated Truck Operations and HVAC Noise Levels near Project Site: North Side of Building



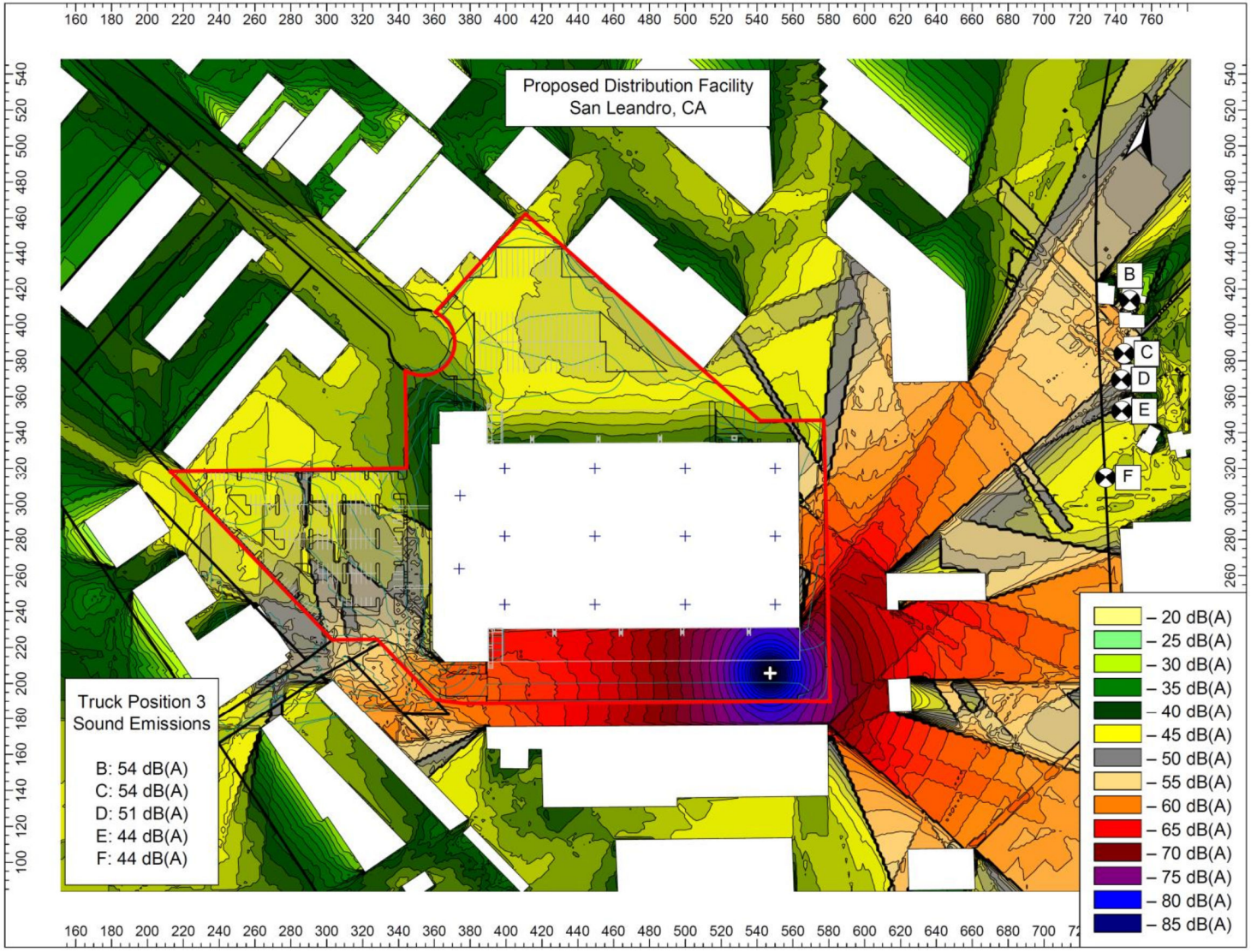
Source: Evaluation of Site Sound Emissions: Ostergaard Acoustical Associates 2024 (Appendix E)

Figure 4.3-4 Estimated Truck Operations and HVAC Noise Levels near Project Site: East Side of Building



Source: Evaluation of Site Sound Emissions: Ostergaard Acoustical Associates 2024 (Appendix E)

Figure 4.3-5 Estimated Truck Operations and HVAC Noise Levels near Project Site: South Side of Building



Source: Evaluation of Site Sound Emissions: Ostergaard Acoustical Associates 2024 (Appendix E)

Traffic Noise

Based on the Transportation Impact Analysis prepared for the proposed project by Kimley-Horn and Associates in 2024 (see Appendix C), the proposed project would generate up to 1,543 additional daily vehicle trips on project area roads. These additional trips would increase traffic noise on roadways. Specifically, the existing average daily trips on Doolittle Drive, between Adams Avenue to Davis Street, is 29,400 trips. The addition of 1,543 daily vehicle trips would result in an increase in traffic noise that would be approximately 0.2 dBA CNEL. As stated in the City of San Leandro General Plan Update Draft EIR (City of San Leandro 2016b), the existing ambient noise level for Doolittle Drive, between Adams Avenue to Davis Street, is 71.8 dBA at 50 feet. The estimated 0.2 dBA CNEL increase resulting from project trips on this street would be below 1.5 dBA, which is the significance threshold for roadways with ambient noise levels of 65 dBA CNEL or higher (Appendix F). Accordingly, traffic noise would result in less than significant noise impacts.

Mitigation Measures

NOI-1 On-Site Noise Barrier

The applicant shall install a permanent noise barrier along the property boundary that is oriented in a northwest-southeast direction and separates the project site from APN 77A-742-3-2. The noise barrier shall be a solid fence or wall design and no less than 8 feet tall. The noise barrier shall be no less that 140 feet in length, beginning at the southernmost end of this property boundary.

Significance After Mitigation

CadnaA was used to model noise that would result from truck operations on the project site with implementation of Mitigation Measure NOI-1 requiring installation of an 8-foot-tall solid sound fence along 140 feet of the northeastern property boundary. With a sound fence in this location, on-site noise levels at the nearest sensitive receptor would be reduced to 50 dBA. Noise levels of 50 dBA would be below the threshold of 55 dBA. Accordingly, with implementation of Mitigation Measure NOI-1, impacts would be less than significant.

Threshold 2:	Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

IMPACT NOI-2 OPERATION OF THE PROJECT WOULD NOT GENERATE SUBSTANTIAL GROUNDBORNE VIBRATION, BUT PROJECT CONSTRUCTION WOULD GENERATE GROUNDBORNE VIBRATION. CONSTRUCTION VIBRATION LEVELS WOULD EXCEED THRESHOLDS OF STRUCTURAL DAMAGE AT NEARBY EXISTING BUILDINGS. IMPACTS WOULD BE POTENTIAL SIGNIFICANT BUT MITIGABLE.

Project Construction

Project construction activities would have the potential to generate ground-borne vibration affecting nearby receptors. Construction activities known to generate excessive groundborne vibration, such as pile driving and blasting, would not be used to construct the proposed project. However, project construction would use heavy machinery that generates vibration, notably a vibratory roller used during on-site paving activities. The FTA has published the vibration levels for typical construction equipment at distances of 25 feet from the equipment (FTA 2018). These vibration levels include:

- Vibratory roller: 0.21 in/sec PPV
- Large bulldozer: 0.089 in/sec PPV
- Loaded trucks: 0.076 in/sec PPV
- Small bulldozer: 0.003 in/sec PPV
- Static roller: 0.050 in/sec PPV

The vibratory roller would create the most vibration at 0.21 in/sec PPV at 25 feet away, which is 0.01 in/sec PPV above the threshold of significance for human annoyance. With Caltrans recommending a 0.2 in/sec PPV as the threshold of human annoyance for vibration (Caltrans 2020),vibration levels from project construction would be well below this threshold because the nearest residential receptors are approximately 510 feet away. As shown in Table 4.3-3, below, vibration levels are well below 0.2 at distances of only 35 feet away from the project site (Appendix F).

Although construction vibration would not exceed levels of annoyance at the nearest residences to the project site, vibration levels would increase at the nearest structures to the site, regardless of whether or not occupants would be annoyed by vibration. Based on the project site plan, it is assumed the vibratory roller would be used within 10 feet of the nearest off-site industrial structures to the north and west of the project site during paving activities. Table 4.3-3 shows the estimated vibration levels for various pieces of construction equipment, including a vibratory roller, at the industrial structure approximately 10 feet away. Table 4.3-3 also shows the estimated vibration levels at other existing nearby industrial structures.

Table 4.3-3 Estimated Construction Vibration Levels (in/sec PPV)

Equipment	Reference Level 25 feet	Industrial Buildings to the North and West 10 feet	Industrial Building to the South 35 feet	Industrial Building to the East 95 feet
Vibratory Roller	0.210	0.830	0.127	0.028
Large Bulldozer	0.089	0.352	0.054	0.012
Loaded Trucks	0.076	0.300	0.046	0.010
Small Bulldozer	0.003	0.198	0.030	0.007
Static Roller	0.050	0.012	0.002	<0.001
Threshold for Structural Damage	-	0.5	0.5	0.5
Threshold Exceeded?	**-**	**Yes**	**No**	**No**

Source: FTA 2018 (see Appendix F)
PPV = peak particle velocity
in/sec = inches per second

As shown in Table 4.3-3, vibration levels during project construction would exceed the threshold for structural damage at the existing industrial buildings approximately 10 feet away from the project site. Impacts would be potentially significant and implementation of Mitigation Measure NOI-2 is required.

Project Operation

Project operation activities would not have the potential to generate substantial groundborne vibration. Vibration levels during project operation would result in less than significant impacts.

Mitigation Measures

NOI-2 Static Roller Requirement

The project applicant and/or its construction contractors shall use of a static roller in lieu of a vibratory roller for paving activities within 15 feet of the existing off-site buildings to the north and west of the project site. City staff shall verify that this requirement is incorporated into construction plans prior to issuance of a building permit and verified in the field.

Significance After Mitigation

Mitigation Measure NOI-2 would reduce vibration impacts by requiring use of a static roller when conducting paving activities near existing buildings. As shown in Table 4.3-3, vibration levels from a static roller at 10 feet away would be 0.012 in/sec PPV, which is below the threshold of 0.5 in/sec PPV. Therefore, the impact related vibration-induced structural damage would be less than significant with mitigation implemented.

Threshold 3:	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

IMPACT NOI-3 THE PROJECT WOULD RESULT IN EMPLOYMENT OPPORTUNITIES WITHIN AREAS THAT OCCUR INSIDE OF NOISE CONTOURS OF THE OAKLAND INTERNATIONAL AIRPORT. HOWEVER, THE PROJECT SITE WOULD BE WITHIN THE 60 DBA NOISE CONTOUR, AND 60 DBA IS NOT AN EXCESSIVE NOISE LEVEL. THEREFORE, PEOPLE WORKING IN THE PROJECT SITE WOULD NOT BE EXPOSED TO EXCESSIVE AIRPORT NOISE, AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described above in Section 4.3.1, *Setting*, the easternmost portion of the project site is within the 60 DBA CNEL contour of the Oakland International Airport (Alameda County Community Development Department 2010). According to the Occupational Safety and Health Administration, 60 dBA is the noise level typical of a conversation (Occupational Safety and Health Administration 2023). Conversational noise is common and not excessive or damaging to hearing. Therefore, people working in the project area would not be exposed to excessive airport noise levels. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.3.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative noise impacts is limited to the area within approximately 600 feet of the project site. This geographic scope is appropriate for noise

impacts, because as discussed above in Impact NOI-1, project noise would attenuate close to existing ambient levels at sensitive receptors at distances of 510 feet from the project site. By extending the cumulative impacts assessment area to 600 feet, project noise would attenuate and not combine with other more distance noise sources.

Several of the cumulative development projects listed in Table 3-1 are within the geographic scope of the cumulative impacts analysis. For example, the project identified as 1091 Doolittle Drive is approximately 600 feet southwest of the project site. If construction of this project and the proposed project occur concurrently, construction equipment noise could be louder than if either of these projects were constructed at a separate point in time. When two identical sources of noise operate concurrently, such as two bulldozers, the increased noise from the activity is approximately 3 dBA. However, because cumulative projects are even farther from the nearest sensitive receptors to the project site than the project site is to these receptors, increase cumulative noise would attenuate before reaching these receptors. For example, the noise from equipment operated at the aforementioned cumulative project at 1091 Doolittle Drive would attenuate before reaching the project site. Therefore, noise from cumulative projects would be less than the construction noise on-site, resulting in no discernible increase in noise at the nearest sensitive receptors than would occur from the proposed project, alone. Similarly, vibration from construction equipment would also attenuate. Accordingly, cumulative noise and vibration impacts resulting from construction activities would be less than significant.

Ambient noise levels in the project area, including at the sensitive residential receptors closest to the project site are effectively the result of operation of past and current projects in the area, including businesses, other residences, aircraft operations, roadways, railroad, and other prominent noise sources in the area. Despite the abundance of noise sources in the area, noise levels at the nearest sensitive receptors to the project site are generally within the 50 to 60 dBA range, which is comparable to noise levels of a conversation. The reasonably foreseeable future projects listed in Table 3-1 of this EIR would potentially increase ambient noise levels in the cumulative assessment area, depending on whether or not the noise levels from individual projects exceed or are equal to ambient noise levels. However, the projects listed in Table 3-1 are generally further from the nearest sensitive receptors to the project site than the project site is to these receptors. Therefore, on-site operational noises generated from these projects would attenuate to below existing ambient noise levels at the sensitive residential receptors. The reasonably foreseeable future projects would generate additional vehicle trips, which could increase traffic noise. However, the future projects are scattered throughout the cumulative impacts assessment area, which means that the vehicle trips would use a variety of roadways and not entirely pass by the nearest sensitive receptors to the project site. Additionally, a doubling of traffic volumes is generally required for a discernible difference in ambient noise levels from roadways. Traffic noise at the nearest sensitive receptors to the project site is affected by Interstate 880, which has tens of thousands of vehicle trips per day. Reasonably foreseeable future projects would not double the amount of vehicle trips in the area given that Interstate 880 is in the area. Cumulative impacts from operation of cumulative projects would be less than significant.

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4.4 Transportation

This section of the EIR analyzes transportation impacts associated with the proposed project. This section describes the local transportation network, including active transportation modes (i.e., pedestrian and bicycle), and describes vehicle miles traveled (VMT). This section of the EIR is based on a Transportation Impact Analysis prepared for the project by Kimley Horn. The Transportation Impact Analysis, which is dated January 2024, is provided as Appendix C to this EIR.

4.4.1 Setting

a. Roadway Network

The major roadways in the vicinity of the project site include Interstate 880 and a network of arterial, collector, and local streets. The major roadways in the vicinity of the project site are described below.

- **Interstate 880.** Interstate 880 is a north-south freeway that connects Interstate 280 and State Route 17 to the south to Interstate 80 and Interstate 580 to the north. Within the project area, the roadway consists of six southbound lanes (including one HOV lane) and four northbound lanes. Interstate 880 serves as regional access to the project site. The posted speed limit on I-880 within the project area is 65 miles per hour.
- **Doolittle Drive.** Doolittle Drive is a north-south arterial road. It connects to Otis Drive and Fernside Boulevard to the north and Belvedere Avenue to the south. The roadway within the project area is two lanes in each direction and has a center two-way left-turn lane (TWLTL). Doolittle Drive is State Route 61. It serves mainly industrial uses along the corridor. Within the project area, the speed limit on Doolittle Drive is 45 miles per hour.
- **Davis Street.** Davis Street is a four-lane, east-west arterial which runs between Business Center Drive to the west and E 14th Street to the east. The roadway serves residential and commercial uses and is State Route 112. Within the project area, the speed limit on Davis Street is 35 miles per hour.
- **Adams Avenue.** Adams Avenue is a two-lane, east-west collector between Doolittle Drive to the south and Bigge Street to the north. The roadway includes Class II bike lanes and on-street parking and serves industrial uses. Within the project area, the speed limit on Adams Avenue is 35 miles per hour.
- **Hester Street.** Hester Street is a two-lane, north-south local road connecting the project site to Adams Avenue. The roadway includes on-street parking and serves industrial uses. Within the project area, there is no posted speed limit but given the classification of the road, it is assumed that the speed limit is 25 miles per hour.
- **Airport Access Road.** Airport Access Road is a five-lane, minor collector that connects to Bessie Coleman Drive to the south and Hegenberger Road to the north. The roadway provides access to the Oakland International Airport. Within the project area, there is no posted speed limit but given the classification of the road, it is assumed that the speed limit is 35 miles per hour.
- **98th Avenue.** 98th Avenue is a minor arterial which connects to Bessie Coleman Drive to the west and Golf Links Road to the east. The roadway within the project area consists of six lanes and serves multiple uses. Within the project area, the posted speed limit is 30 miles per hour.

b. Transit, Bicycle, and Pedestrian Facilities

The Alameda-Contra Costa Transit District (AC Transit) operates bus routes 34, 35, 73, 98, and 805 within the project area. The nearest bus stop to the project site is located at the intersection of Westgate Parkway and Davis Street, which is approximately 0.9 mile southeast of the project site. The San Leandro Bay Area Rapid Transit (BART) station, which serves the Blue, Green, and Orange BART lines, is located approximately 2.1 miles east of the project site. The San Leandro LINKS shuttle is a free shuttle to and from the San Leandro BART station that operates a North Loop and South Loop. The North Loop runs along Davis Street from the BART station to Marina Boulevard, Merced Street, Williams Street, Doolittle Drive, and Davis Street. There is an existing stop located at Doolittle Drive and Davis Street, approximately 0.4 mile south of the project site. Pedestrians can travel between the LINKS bus stop and the project site using the existing sidewalks located along both sides of Davis Street.

Bicycle lanes in the project area include Class II bicycle lanes on both Doolittle Drive and Adams Avenue. More regionally, the bicycle lane on Doolittle Drive connects to a larger network of bicycle facilities providing bicycle access to other areas of San Leandro most distant from the project site, such as areas east of Interstate 880. Class II bicycle lanes are established lanes along streets using striping and painted patterns, such as painting a portion of the asphalt roadway a color to denote its use for bicycle travel (Caltrans 2020).

There are existing continuous sidewalks on both sides of Doolittle Drive adjacent to the project site where pedestrians can access the site, as well as existing continuous sidewalks on both sides of Adams Avenue and on the east side of Hester Street. There are also existing crosswalks along the east, south, and west legs at the signalized intersection of Doolittle Drive and Davis Street, and existing crosswalks on the east and south legs at the signalized intersection of Doolittle Drive and Adams Street.

c. Vehicle Miles Traveled

Vehicle miles traveled (VMT) measures the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. It is calculated as the sum of the number of miles traveled by each vehicle (Williams, et.al. 2016). VMT can be quantified in numerous ways depending on how the VMT data is to be applied, such as total annual VMT, VMT per capita, or VMT per employee. VMT per employee means the average commute trip length, in miles, made by employees over a set period, multiplied by the number of vehicle commute trips per employee.

The Alameda County Transportation Commission has developed maps displaying estimates of VMT per employee based on traffic analysis zone (TAZ) estimates from the Alameda Countywide Travel Demand Model. Based on the VMT per Employee map for the TAZs within the Central Planning Area, which is the planning area where the project site is located, the VMT per employee in 2020 provided by the Alameda County Transportation Commission is 15.34 miles. Based on the VMT per Employee table for the Central Planning Area in 2040 provided by the Alameda County Transportation Commission, the project is located in a TAZ with a VMT of 16.08 miles (Appendix C, page 15). The average VMT per employee in the overall Central Planning Area is 19.2 miles in 2020 and 19.1 miles in 2040, as shown on Page 16 of the Transportation Impact Analysis (Appendix C).

4.4.2 Regulatory Setting

a. Federal Regulations

The federal government routinely funds roadway and other transportation projects and also recognizes VMT as a transportation planning measurement. However, there are no federal transportation regulations applicable to this analysis.

b. State Regulations

Senate Bill 743

On September 27, 2013, California Governor Jerry Brown signed Senate Bill (SB) 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. SB 743 requires the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. In January 2018, OPR transmitted its proposed CEQA Guidelines implementing SB 743 to the California Natural Resources Agency for adoption, and in January 2019 the Natural Resources Agency finalized updates to the CEQA Guidelines, which incorporated SB 743 modifications. As of July 1, 2020, localities are required to rely on vehicle miles traveled (VMT), instead of traffic delay, as the primary metric for evaluating transportation impacts in CEQA documents. Under SB 743, automobile delay, as described solely by level of service or traffic congestion, shall not be considered a significant environmental impact except for certain types of transportation projects (Public Resource Code, § 21099 (b)(2)).

State CEQA Guidelines Section 15064.3

Originating from SB 743, Section 15064.3 of the State CEQA Guidelines establishes VMT as the most appropriate measure of transportation impacts, shifting away from the level of service analysis that evaluated a project's impacts on traffic conditions on nearby roadways and intersections. The primary components of new section 15064.3 include:

- Identifies VMT (amount and distance of automobile traffic attributable to a project) as the most appropriate measure of transportation impacts;
- Declares that a project's effect on automobile delay shall not constitute a significant environmental impact except for projects increasing roadway capacity;
- Creates a rebuttable presumption of no significant transportation impacts for (a) land use projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor, (b) land use projects that reduce VMT below existing conditions, and (c) transportation projects that reduce or have no impact on VMT;
- Allows a lead agency to qualitatively evaluate VMT if existing models are not available; and
- Gives lead agencies discretion to select a methodology to evaluate a project's VMT but requires lead agencies to document that methodology in the environmental document prepared for the project.

In December 2018, OPR issued a *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018). The technical advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The technical advisory suggests a significance threshold for VMT that is based on state mandated GHG emission reduction targets. The technical advisory recommends a quantitative per capita or per employee VMT that is 15

percent below that of existing development as a possible threshold of significance that would comply with the state's long-term climate goals.

California Assembly Bill 32, Senate Bill 32, and Senate Bill 375

The "California Global Warming Solutions Act of 2006" (AB 32) outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020, a reduction of approximately 15 percent below emissions expected under a "business as usual" scenario. On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline CEQA processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. ABAG was assigned a 19 percent reduction in per capita GHG emissions from passenger vehicles by 2035. SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements. On October 21, 2021, ABAG formally adopted the RTP/SCS titled Plan Bay Area 2050, which meets the requirements of SB 375.

c. Local Regulations

Alameda County Transportation Commission

The Alameda County Transportation Commission coordinates transportation planning efforts throughout Alameda County and programs local, regional, State and federal funding for project implementation. It prepares the CMP, a program mandated by California law to describe the strategies to address congestion problems on the CMP network, which includes state highways and principal arterials. The CMP requires analysis of Metropolitan Transportation System (MTS) roadway and transit system and uses level-of-service standards as a means to measure congestion and has established level-of-service standards to determine how local governments meet the standards of the CMP.

The Alameda County Transportation Commission also develops and manages the Countywide travel demand model, which is used for estimating future volumes and VMT based on future land uses and the future roadway network. The Alameda County Transportation Commission has developed maps displaying estimates of VMT per employee based on traffic analysis zone (TAZ) estimates from the Alameda Countywide Travel Demand Model.

City of San Leandro 2035 General Plan

The San Leandro 2035 General Plan Transportation Element establishes the following applicable goals and policies relevant to transportation:

Policy T-1.2: Mitigation of Development Impacts. Require developers to address the impacts that their projects will have on the City's transportation system. A variety of mitigation measures, including impact fees, street improvements, traffic signal and Intelligent Transportation Systems (ITS) improvements, transportation demand management (TDM) measures, and improvement of non-automobile transportation modes, should be considered.

Policy T-1.10: Reduced Trip Generation. Encourage local employers to develop programs that promote ridesharing, flextime and telecommuting, bicycle use, and other modes of transportation that reduce the number and distance of vehicle trips generated.

Policy T-2.6: Building Design and Site Planning. Ensure that the site planning and design of new development promotes the use of non-auto modes of transportation by including amenities such as sidewalks, bike lockers, and bus shelters.

Policy T-3.5: Accommodation of Bicycles and Pedestrians. Require new development to incorporate design features that make walking, bicycling, and other forms of nonmotorized transportation more convenient and attractive. Facilities for bicycles and pedestrians, including secured bicycle parking, clearly marked crosswalks, well-lit streets and sidewalks, landscaping, and street furniture should be provided within new employment areas, shopping destinations, multi-modal transportation facilities, and community facilities.

Policy T-6.7: Siting of Businesses with Truck Traffic. To the extent feasible, locate businesses projected to generate large amounts of truck traffic away from residential areas. Ingress and egress for such businesses should be designed to minimize the possibility of truck traffic impacting residential streets.

The Transportation Element also establishes a tiered Level of Service (LOS) system. LOS is a measure of the quality or performance of a transportation system based on factors such as travel time, traffic volume, and congestion. LOS is typically evaluated on a scale of "A," corresponding to no congestion and free-flowing traffic, to "F," corresponding to extreme congestion and delays. For planning purposes, LOS D is the minimum acceptable service level for intersections outside of designated Priority Development Areas and LOS E is the minimum acceptable service level for intersections within designated Priority Development Areas.

4.4.3 Impact Analysis

a. Methodology

The analysis presented herein is derived primarily from a Transportation Analysis prepared by Kimley-Horn for the proposed project, included as Appendix C to this EIR. The Transportation Impact Analysis assesses the VMT impacts of the project, as well as other transportation-related impacts. The VMT generated by the proposed project was estimated by referring to VMT estimates produced by the Alameda County Transportation Commission for 2020 and 2040. The Alameda County Transportation Commission developed their VMT estimates on a TAZ basis using the Alameda Countywide Travel Model. The average VMT of the TAZ containing the proposed project was compared against the significance thresholds to determine the severity of VMT impacts.

The Transportation Impact Analysis also includes a sight distance analysis for the proposed project driveways to determine if project vehicles exiting the driveways would have adequate sight distance to prevent traffic safety hazards. Intersection sight distance for the project driveways was evaluated using methodology from the American Association of State Highway and Transportation Officials, which is called *A Policy on Geometric Design of Highway and Street, 7th Edition*. Sight distance for each project driveway was determined based on the proposed project site plan and the following American Association of State Highway and Transportation Officials intersection sight distance criteria formula:

$$\text{Intersection Sight Distance} = 1.47 \times V_{major} \times t_g$$

In the above formula, V_{major} is the design speed of the major road and tg is the time gap for the vehicle to exit the project driveway and enter the major road.

b. Thresholds of Significance

According to CEQA Guidelines Appendix G, impacts related to transportation and circulation from the proposed project would be significant if the project would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
4. Result in inadequate emergency access.

CEQA checklist items 1 and 4 were found to be less than significant in the Initial Study (Appendix A). Therefore, no further analysis is warranted, and these topics will not be discussed further in this section.

Threshold 2:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

IMPACT TRA-1 THE PROJECT WOULD GENERATE VMT THAT IS MORE THAN 15 PERCENT BELOW THE AVERAGE VMT PER EMPLOYEE IN THE PROJECT AREA THEREFORE, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B), AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

According to the Transportation Impact Analysis (Appendix C) and the Alameda County Transportation Commission (2019), the project site is in a TAZ with a VMT of 15.34 per employee in 2020. Therefore, the Transportation Analysis determined that the proposed project would also generate 15.34 VMT per employee, consistent with the 2020 VMT of the TAZ (see Appendix C). This is a reasonable assumption because the TAZ covers a limited area surrounding the project site that is characterized by warehouses and industrial land uses, consistent with the proposed project. In other words, the proposed project would be in a TAZ that the Alameda County Transportation Commission indicates has an average VMT per employee of 15.34, and because the project would be a warehouse use similar to much of the other land uses in the TAZ, would be consistent with the average VMT per employee of 15.34. It should be noted that the Alameda County Transportation Commission VMT maps are consistent with methodology specified by the Governor's Office of Planning and Research (Appendix C). The project VMT of 15.34 miles per employee is below the

2020 VMT threshold of 16.3 miles per employee. Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), as it pertains to VMT. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

IMPACT TRA-2 THE PROJECT WOULD INTRODUCE TRACTOR TRAILERS ENTERING INTO ROADWAY TRAFFIC VIA DRIVEWAYS. HOWEVER, SUFFICIENT SIGHT DISTANCE EXISTS TO PREVENT TRACTOR TRAILERS EXISTING THE PROJECT SITE FROM CREATING HAZARDS RELATED TO DANGEROUS INTERSECTIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Project operations would involve the use of tractor trailers, in addition to standard passenger vehicles used for worker commute trips. Tractor trailers would use both proposed driveways on Hester Street, as well as the driveway on Doolittle Drive. Because tractor trailers typically have slower acceleration speeds than standard passenger vehicles, they could create potential hazards when exiting the project driveway onto Doolittle Drive, where other vehicles are travelling at posted speed limits presumably. This hazard would not exist at driveways on Hester Street because the driveways would be at the end of Hester Street where there are no vehicles traveling through at posted speed limits.

According to the Transportation Impact Analysis (Appendix C), the sight distance criteria for trucks making a right-turn from the driveway onto Doolittle Drive is 625 feet and the sight distance criteria for trucks making a left-turn is 750 feet. The Transportation Impact Analysis determines that these sight distances should be clear of obstructions, thereby providing the necessary sight distance for tractor trailers to exit the driveway onto Doolittle Drive without increasing hazards. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.4.4 Cumulative Impacts

The geographic scope used for the assessment of cumulative impacts related to transportation consists of the Central Planning Area, which is the transportation planning area used by the Alameda County Transportation Commission. The Central Planning Area includes the City of San Leandro and other surrounding areas generally adjacent to San Leandro. The Central Planning Area is an acceptable geographic scope for this analysis because it is the average VMT per employee

within this area on which the impact significance thresholds are based (see *Thresholds of Significance* in Section 4.4.3, *Impact Analys*is, above).

The analysis of cumulative transportation impacts does not use the list of reasonably foreseeable projects presented in Table 3-1 of this EIR. Instead, the analysis is based on VMT per employee that Alameda County Transportation Commission anticipates in the Central Planning Area in 2040. This approach is used for the analysis because it is more comprehensive of the growth and associated VMT that could result in the Central Planning Area rather than from the handful of projects in Table 3-1.

According to the Transportation Impact Analysis (Appendix C), the project site is in a TAZ that will have a VMT of 16.08 miles per employee in 2040. Therefore, the Transportation Analysis determined that the proposed project would also generate 16.08 VMT per employee, consistent with the 2040 VMT of the TAZ (see Appendix C). This is a reasonable assumption because the TAZ covers a limited area surrounding the project site that is characterized by warehouses and industrial land uses, consistent with the proposed project. The project VMT of 16.08 miles per employee is below the 2040 VMT threshold of 16.2 miles per employee. Therefore, the proposed project would not result in cumulatively considerable impacts as a result of a conflict or inconsistency with CEQA Guidelines Section 15064.3, subdivision (b), as it pertains to VMT. Cumulative impacts would be less than significant.

Impacts related to traffic hazards, such as geometric design features or incompatible uses are generally site- or project-specific hazards. The traffic hazards of a particular project are unique to the circumstances of that project within its surroundings and the proposed project type, for example, if the project would require farm tractors to operate on roadways. The potential traffic hazards of the proposed project include tractor trailers that would exit the project site using the driveway on Doolittle Drive. As described above in Impact TRA-2, there would be sufficient sight distance at the intersection of this driveway and Doolittle Drive such that substantial traffic hazards would not exist. Because the traffic hazards of cumulative projects generally do not combine and become more severe, and because the project would not substantially increase hazards, cumulative impacts would be less than significant.

5 Other CEQA Required Discussions

This section discusses growth-inducing impacts and irreversible environmental impacts that would be caused by the proposed project.

5.1 Growth Inducement

Section 15126(d) of the CEQA Guidelines requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

The proposed project would generate employment opportunities during construction. However, as construction would be temporary, few people would be expected to relocate to the area permanently for project construction jobs. Instead, construction workers would be expected to be drawn from the existing regional work force, which is robust in the San Francisco Bay Area. Therefore, construction of the project would not induce substantial population growth.

The project would involve the operation of a new warehouse which would create jobs. Job creation could indirectly cause population growth through employee relocations to the region. However, the project also includes demolishing existing industrial buildings, eliminating the potential jobs provided by business that could operate within them. Additionally, as discussed in Section 14, *Population and Housing*, of the Initial Study (Appendix A), the project site is located in a dense urban area and many of the warehouse employees would likely be drawn from the local population regardless of the job creation potential of existing on-site vacant buildings. Some employees may relocate to the area as a result of job opportunities resulting from operation of the proposed project; however, a substantial change in employment growth in the area would not occur.

5.1.2 Economic Growth

As described above in Section 5.1.1, *Population Growth*, and in Section 14, *Population and Housing*, of the Initial Study (Appendix A), the proposed project would not generate substantial population growth. Most employment opportunities resulting from the project would be filled by people already in the San Francisco Bay Area. As the project workforce would consist primarily of people already residing in the region, there would be no substantial economic growth associated with population growth, such as increased demand for housing, retail goods, or commercial services.

The project is located on an infill site that is largely surrounded by industrial and commercial uses. Development of the project site with a warehouse and incidental office space would be consistent with surrounding land uses. Therefore, the proposed project would not influence development patterns in the project area, such as redevelopment of surrounding properties with new uses that could generate additional economic growth.

Overall, the proposed project would not induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with future development in or around the City of San Leandro would be addressed as part of the CEQA environmental review for such development projects.

5.1.3 Removal of Obstacles to Growth

The project site is an infill property located adjacent to urbanized areas of the City of San Leandro. As discussed in Section 19, *Utilities and Service Systems*, of the Initial Study (Appendix A), there are existing water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunication facilities at the project site that are available to serve the project. The project would not require the extension of, or add substantial capacity to, roads or other infrastructure that would facilitate or accommodate development beyond the project site. Because the project does not involve or require the extension of new infrastructure through or to undeveloped areas, or increase infrastructure capacity in such a way as to facilitate or accommodate growth beyond the project site, project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

The CEQA Guidelines require that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

Construction and operation of the project would involve an irreversible commitment of construction materials and non-renewable energy resources. The project would involve the use of building materials and energy, some of which are non-renewable resources, to construct the overall building floor area. Consumption of these resources would occur with nearly all development in the region and are not unique to the proposed project.

The proposed project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of the project. The project would be required to comply with standards set forth in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation**.** CALGreen (as codified in CCR Title 24, Part 11) requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to achieve energy efficient performance. The standards are updated every three years, and each iteration increases energy efficiency standards.

The City adopted a Reach Code in January 2023 that requires efficiency beyond CalGreen, which would be applicable to the proposed project. Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the percentage of electricity generated by renewable resources provided by PG&E continues to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and GHG emissions. However, as discussed in Section 3, *Air Quality*, and Section 7, *Greenhouse Gas Emissions*, of the Initial Study (Appendix A), development and vehicle trips generated from the project would not generate air quality or GHG emissions that would result in a significant impact. However, as discussed in Section 4.1, *Greenhouse Gas Emissions*, the project would include new natural gas connections, which would be a long-term source of GHG emissions. Impacts would be significant and unavoidable.

The project would also require a commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in Section 15, *Public Services*, and Section 19, *Utilities and Service Systems*, of the Initial Study, impacts to these service systems would not be significant.

CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in impacts that are less than significant or less than significant with mitigation, except for potential impacts from GHG emissions. As described in Section 4.1, *Greenhouse Gas Emissions*, and below in 6.3, *Significant and Unavoidable Impacts*, implementation of the project would result in potentially significant unavoidable impacts, including cumulative impacts, due to GHG emissions.

5.3 Significant and Unavoidable Impacts

As described in Section 4.1, *Greenhouse Gas Emissions*, the proposed project would have a significant impact related to greenhouse gas emissions and resultant climate change. Specifically, the proposed project includes a natural gas connection and the potential for natural gas to be used as part of project operations, depending on the potential tenant(s). According to the Bay Area Air Quality Management District, projects that include natural gas appliances or natural gas plumbing should be found to make a significant climate impact because it will hinder California's efforts to address climate change (Bay Area Air Quality Management District 2022).

The City is unable to implement mitigation to reduce this significant impact based on a recent court case titled California Restaurant Association v. City of Berkeley. Briefly, in this case, the California Restaurant Association sued Berkeley in the U.S. District Court for the Northern District of California, arguing among other things that the federal Energy Policy and Conservation Act (EPCA) preempted the City's ordinance banning natural gas in new buildings. The District Court dismissed the California Restaurant Association's challenge. However, the Ninth Circuit reversed the District Court, holding that EPCA expressly preempts state and local regulations concerning the energy use of many natural gas appliances. The Ninth Circuit concluded that EPCA preempted Berkeley's ban of natural gas, because it prohibited the onsite installation of natural gas infrastructure necessary to support natural gas appliances covered under the EPCA. Accordingly, based on the decision of the Ninth Circuit in California Restaurant Association v. City of Berkeley, the City of San Leandro can only encourage but cannot require the project applicant to eliminate natural gas from the proposed project.

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6 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2, *Project Description*, the project applicant's objectives for the proposed project are as follows:

- Increase the economic base of the City's industrial corridor by maximizing the productive use of the City's industrial land, which is currently underutilized;
- Create a modern warehouse that contributes to the aesthetics of the surrounding area through the redevelopment of an obsolete and underutilized property;
- Create a new, efficient and updated warehouse that is attractive to future tenants, by incorporating the state's green building design and building health and safety standards;
- Maintain and protect the City's inventory of larger-scale industrial sites with easy access to freeways, rails, airports, and seaports; and
- Support and retain existing industrial uses and employment in the City of San Leandro's industrial sector.

Included in this analysis are three alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that would reduce the project-related potentially significant environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: No Natural Gas
- Alternative 3: Airport Parking Land Use

Detailed descriptions of the alternatives are included in the impact analysis for each alternative in Sections 6.2 through 6.4.

6.1 Potentially Significant Impacts

According to Section 15126.6(b) of the *CEQA Guidelines*, the discussion of EIR alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening significant effects of the project. The City prepared an Initial Study and this EIR to analyze the project for potentially significant impacts related to each of the environmental issues or resource areas contained in Appendix G of the State CEQA Guidelines (see Appendix A to this EIR). The results of the Initial Study and EIR analyses determined that the proposed project would have potentially significant and unavoidable impacts related to greenhouse gas (GHG) emissions (see Section 4.1, *Greenhouse Gas Emissions*).

Additionally, mitigation measures are identified in this EIR (including the Initial Study provided as Appendix A) for the following topics that would reduce the respective potentially significant impacts of the project to less than significant levels:

- Air Quality, specifically effects related to fugitive dust during project construction (mitigated to less-than-significant level by Mitigation Measure AQ-1)
- Biological Resources, specifically effects on migratory nesting birds, including their nests (mitigated to less-than-significant impact level by Mitigation Measure BIO-1)
- Cultural Resources, specifically effects related to previously unidentified subsurface resources (mitigated to less-than-significant impact level by Mitigation Measures CR-1)
- Hazards and Hazardous Materials, specifically effects related to exposure of project construction personnel to lead paint and/or asbestos containing materials during demolition of existing structures hazardous (mitigated to less-than-significant impact level by Mitigation Measure HAZ-1)
- Hazards and Hazardous Materials, specifically effects related to exposure of persons or groundwater to hazardous contamination (contaminated soil, soil vapor, etc.) during construction and operation (mitigated to less-than-significant impact level by Mitigation Measures HAZ-2 through HAZ-6)
- Noise and Vibration, specifically effects on sensitive residential noise receptors as a result of on-site HVAC and truck movements on the project site (mitigated to less-than-significant level by Mitigation Measure NOI-1)
- Noise and Vibration, specifically effects of construction vibration on structures nearest the project site (mitigated to less-than-significant level by Mitigation Measure NOI-2)
- Tribal Cultural Resources, specifically effects related to the unanticipated discovery of tribal cultural resources during construction of the project (mitigated to less-than-significant level by Mitigation Measure TCR-1)

6.2 Alternative 1: No Project Alternative

The No Project Alternative assumes that the two existing industrial masonry buildings would remain on the project site. These buildings are currently vacant. The City has no applications on file for occupancy of the buildings; therefore, this analysis assumes the buildings would remain vacant under this alternative. The project applicant or another person or organization could submit an application for occupancy of one or both buildings in the future. Granting an occupancy permit for a business or activity allowed by-right within the existing Industrial General zoning district of the site would be a ministerial permit, and CEQA may not be applicable.

The No Project Alternative would not fulfill any of the project objectives.

6.2.1 Impact Analysis

a. Air Quality

The No Project Alternative would not require or involve demolition or construction activities. Therefore, implementation of the No Project Alternative would not generate fugitive dust emissions from construction activities. Because the existing on-site buildings would remain vacant under this alternative, there would be no regular or routine operational emissions. The No Project Alternative would have no impacts on air quality.

The proposed project's impacts related to air quality would be less than significant with mitigation (see *Air Quality* in the Initial Study; Appendix A). Because the No Project Alternative would have no impact on air quality, the impacts of this alternative would be reduced compared to the proposed project, and no mitigation measures would be required.

b. Biological Resources

The No Project Alternative would not involve demolition of the existing on-site structures. This alternative would also not require construction activities. Therefore, implementation of the No Project Alternative would not have the potential to directly destroy or damage migratory bird nests or disrupt nesting from construction activities. The No Project Alternative would have no impact on biological resources.

The proposed project's impacts related to biological resources would be less than significant with mitigation (see *Biological Resources* in the Initial Study; Appendix A). Because the No Project Alternative would have no impact on biological resources, the impacts of this alternative would be reduced compared to the proposed project, and no mitigation measures would be required.

c. Cultural Resources

The No Project Alternative would not require grading, excavation, or other construction activities. Implementation of the No Project Alternative would preserve on-site conditions, which is primarily either structures or asphalt pavement. Accordingly, the No Project Alternative would have no potential to encounter and damage or destroy previously unidentified subsurface cultural resources. The No Project Alternative would have no impact on cultural resources.

The proposed project's impacts related to cultural resources would be less than significant with mitigation (see *Cultural Resources* in the Initial Study; Appendix A). Because the No Project Alternative would have no impact on cultural resources, the impacts of this alternative would be reduced compared to the proposed project, and no mitigation measures would be required.

d. Greenhouse Gas Emissions

The No Project Alternative would not require construction activities. Because no construction equipment would be operated, the potential GHG emissions resulting from equipment associated with the proposed project would be avoided. Additionally, because existing on-site buildings would remain vacant under this alternative, the No Project Alternative would not be a long-term source of GHG emissions. For example, the No Project Alternative would not generate vehicle trips or consume energy, both of which would generate GHG emissions if they were to occur. Because the No Project Alternative would not generate GHG emissions, it would not conflict with a plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Accordingly, the No Project Alternative would have no impacts related to GHG emissions.

The proposed project's impacts, including the cumulative impacts, related to greenhouse GHG emissions would be potentially significant and unavoidable (see Section 4.1, *Greenhouse Gas Emissions*). Because the No Project Alternative would have no impacts related to greenhouse gas emissions, the impacts of this alternative would be reduced compared to the proposed project, and no mitigation measures would be required.

e. Hazards and Hazardous Materials

Under the No Project Alternative, there would be no demolition of the existing on-site structures and no new construction. The existing buildings would remain vacant with no occupants. Therefore, there would be no impacts related to potential exposure to lead or asbestos-containing materials. Additionally, the proposed project would not be constructed, including bioretention areas for stormwater management. Therefore, the No Project Alternative would have no potential to create new preferential pathways for existing on-site contamination to migrate into deeper groundwater aquifers or to become airborne as dust during construction activities. Because the proposed building would not be constructed, it also would not be occupied and there would be no potential for vapor intrusion risk. Existing remediation and monitoring activities, such as the existing network of monitoring wells on the site, would continue until the DTSC or other regulatory agency with oversight deems the project site a closed case in terms of remediation. Accordingly, the No Project Alternative would have no impacts related to hazards and hazardous materials.

As described in Section 4.2, *Hazards and Hazardous Materials*, the proposed project would have potentially significant but mitigable impacts related to hazards materials and hazardous contamination. Because the No Project Alternative would have no impact, impacts of this alternative would be reduced compared to the proposed project and no mitigation would be required.

f. Noise and Vibration

The No Project Alternative would not generate temporary increases in noise because this alternative would not involve construction activities. Because no construction would occur on-site, there would be no potential for the No Project Alternative to generate groundborne vibration. Additionally, the existing on-site buildings would remain vacant, which would generate no long-term or permanent noise or vibration. While the property owner could visit the site, the operation of a single vehicle would have no discernible effects on noise levels at the nearest sensitive receptors approximately 510 feet from the project site, as these receptors are close to streets with hundreds to thousands of vehicle trips per day (e.g., Davis Street, Interstate 880, etc.). The No Project Alternative would have no impacts on noise and vibration.

As described in Section 4.3, *Noise and Vibration*, the proposed project would have potentially significant but mitigable impacts related to noise and vibration. Because the No Project Alternative would have no impact, impacts of this alternative would be reduced compared to the proposed project and no mitigation would be required.

g. Tribal Cultural Resources

The No Project Alternative would not require grading, excavation, or other construction activities. Implementation of the No Project Alternative would preserve on-site conditions, which is primarily either structures or asphalt pavement. Accordingly, the No Project Alternative would have no potential to encounter and damage or destroy previously unidentified tribal cultural resources. The No Project Alternative would have no impact on tribal cultural resources.

The proposed project's impacts related to tribal cultural resources would be less than significant with mitigation (see *Tribal Cultural Resources* in the Initial Study; Appendix A). Because the No Project Alternative would have no impact on tribal cultural resources, the impacts of this alternative would be reduced compared to the proposed project, and no mitigation measures would be required.

6.3 Alternative 2: No Natural Gas Alternative

Under the No Natural Gas Alternative, the proposed industrial building would be constructed on the project site, nearly consistent with the proposed project. Alternative 2 assumes that the industrial building and associated surface parking lot would be approximately the same size and design as the proposed project, which would require the same demolition and construction activities as the proposed project. Once construction is complete, Alternative 2 assumes the same on-site operations would occur as with the proposed project, with the exception of natural gas consumption. Under this alternative, natural gas connections would not be provided on the project site. Therefore, potential future occupants and uses in the new industrial building would not consume natural gas, as natural gas would be unavailable on the project site. Alternative 2 would instead require on-site building operations to rely entirely on electricity for energy.

The No Natural Gas Alternative would fulfill most project objectives but not all objectives. For example, this alternative would develop an industrial building with easy access to freeways and airports, while also supporting industrial employment opportunities within the city's industrial sector. Alternative 2 would also contribute to the aesthetics of the surrounding area because the vacant and aging existing buildings on-site would be demolished and replaced with a new building. However, Alternative 2 may not fulfill the objective of creating a warehouse that is attractive to future tenants to the same extent as the proposed project. While it is reasonable to assume a new warehouse proximate to freeways, rail, and the Oakland International Airport would be attractive to many tenants, the elimination of natural gas utility may deter some tenants from leasing or purchasing the warehouse, as natural gas could be critical to their business or operations. For example, businesses that manufacture products such as paper, glass, and steel typically use natural gas. Natural gas is also a raw input material for businesses that produce hydrogen fuel (Natural Gas Supply Association 2023).

6.3.1 Impact Analysis

a. Air Quality

The No Natural Gas Alternative would require virtually the same demolition and construction activities as the proposed project. These construction activities would have the potential to generate fugitive dust emissions. Fugitive dust emissions would increase the amount of particulate matter in the air, resulting in a potentially significant impact. Implementation of Mitigation Measure AQ-1 (see *Air Quality* in the Initial Study; Appendix A) would be required. With implementation of Mitigation Measure AQ-1, impacts from construction of Alternative 2 would be reduced to a less than significant level.

Operation of Alternative 2 would generate emissions of air pollutants. For example, Alternative 2 would involve the operation of trucks and vehicles on the project site, and operation of these trucks and vehicles would generate emissions of pollutants, such as carbon monoxide. The No Natural Gas Alternative would not generate emissions from the combustion of natural gas; however, generation of electricity used for this alternative would generate emissions. The amount of operational emissions of Alternative 2 would be similar to the proposed project given that there would be little difference in operations between this alternative and the proposed project, other than this alternative avoiding natural gas emissions. Without natural gas emissions, there would be an incremental decrease in operational emissions compared to the proposed project, which would include emissions from combustion of natural gas. The operational emissions of the proposed

project would not exceed thresholds of significance, and because operational emissions would be reduced with this alternative, significance thresholds would also not be exceeded by Alternative 2. Therefore, operation of Alternative 2 would also have less than significant impacts related to air quality.

The proposed project's impacts related to air quality would be less than significant with mitigation (see *Air Quality* in the Initial Study; Appendix A). Because the No Project Alternative would have approximately the same construction and reduced operational impacts on air quality, the impacts of this alternative would be slightly reduced compared to the proposed project. Implementation of Mitigation Measure AQ-1 would be required for Alternative 2.

b. Biological Resources

The No Natural Gas Alternative would involve demolition of the existing on-site structures and require construction equipment and workers to operate across the entire project site, similar to the proposed project. These activities would have the potential to directly damage or destroy active nests of migratory bird species or cause birds to abandon nests. This impact would be potentially significant and implementation of mitigation is required.

The proposed project's impacts related to biological resources would be potentially significant due to the possibility for demolition and construction activities to impact migratory nesting birds. Implementation of Mitigation Measure BIO-1 in the Initial Study, which is provided as Appendix A to this EIR, would reduce biological resources impacts to less than significant levels. Implementation of this mitigation measure would also be required for Alternative 2. Within implementation of Mitigation Measure BIO-1, biological resources impacts of Alternative 2 would be reduced to less than significant levels, and impacts would be similar compared to the proposed project.

c. Cultural Resources

The No Natural Gas Alternative would involve construction and ground disturbance across the entire project site, similar to the proposed project. During construction, grading of the site and excavation required for utility connections and the foundation of the new building would have the potential to uncover and disturb previously unknown or unidentified archaeological resources or human remains. Disturbance or damage to archaeological resources would be a potentially significant but mitigable impact. Implementation of the Mitigation Measure CR-1 in the Initial Study section titled *Cultural Resources* would be required for this alternative (see Appendix A). Implementation of mitigation measures would reduce impacts to archaeological resources to less than significant levels. Compliance with existing regulations, such as Public Resources Code Section 5097.98, would prevent significant impacts related to discovery of human remains. Compared to the proposed project the No Natural Gas Alternative would result in similar impacts to cultural resources, because the proposed project would have a similar grading and demolition program and therefore would also result in potentially significant impacts to archaeological resources that would be reduced to less than significant levels with implementation of Mitigation Measure CR-1.

d. Greenhouse Gas Emissions

The No Project Alternative would generate GHG emissions during construction, similar to the proposed project. Because the No Natural Gas Alternative would involve construction of the same sized building and surface parking areas as the proposed project, and would involve the same amount of demolition, temporary construction emissions would be similar between Alternative 2

and the proposed project. As described in Section 4.1, *Greenhouse Gas Emissions*, construction would not generate GHG emissions that result in significant impacts on the environment.

Operation of Alternative 2 would generate GHG emissions. For example, operations would routinely involve the use of tractor trailers given the warehouse design of the proposed building. However, while the new building would generate vehicle and truck trips, the VMT generated from the project would be at least 15 percent below the average existing VMT in the area. This would be below the BAAQMD's threshold of significance for GHG impacts related to transportation emissions. Additionally, under Alternative 2, no natural gas would be provided to the project site. By avoiding new natural gas connections to the site, Alternative 2 would avoid the long-term GHG emissions associated with natural gas combustion. With the absence of natural gas, Alternative 2 would not exceed the BAAQMD's threshold of significance for GHG emissions from new buildings. With the new building relying on electricity without natural gas, the No Natural Gas Alternative would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The No Natural Gas Alternative would generate GHG emissions but would not conflict with BAAQMD thresholds of significance or an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Accordingly, the GHG impacts of Alternative 2, including cumulative impacts, would be less than significant, and mitigation would not be required. The less than significant GHG impacts of Alternative 2 would be reduced compared to the proposed project, which would result in potentially significant and unavoidable GHG impacts.

e. Hazards and Hazardous Materials

Similar to the proposed project, the No Natural Gas Alternative would require demolition of the existing on-site buildings, which could contain lead paint or asbestos containing materials. There would be potential for construction workers to be exposed to these hazards accidentally during demolition. Impacts would be potentially significant, and implementation of mitigation would be required.

Construction of Alternative 2 would involve excavation, such as construction of the proposed building foundation or buried utility connections, similar to the proposed project. Excavation and grading could disturb contaminated soils or groundwater and expose construction workers to hazardous materials present as contamination. Because contaminated soils generally exist on-site at depths greater than 6 feet below ground surface outside of the mapped land use restriction areas, the risk of exposure would be low across most of the site, but construction would also occur within the land use restriction areas. Likewise, construction would generate dust. If soils from the contamination areas are stockpiled on site and become airborne dust, either from wind erosion or construction equipment, off-site receptors could be exposed, as well as construction workers. Construction of Alternative 2 would also require the demolition of the existing groundwater monitoring wells that were previously installed as part of the remediation actions on-site. Impacts would be potentially significant, and implementation of mitigation would be required.

During operation of Alternative 2, vapors from contaminated soil and groundwater underlying the site could potentially infiltrate the proposed building, including spaces within the building where employees would be routinely present, similar to the proposed project. The accumulation of vapors in the breathing zone inside the building could present a potential hazard to human health. Additionally, Alternative 2 would include bioretention areas where stormwater would collect during operation and be allowed to infiltrate the ground surface. This would have the potential to create a

pathway for hazardous contamination to migrate through soil layers and potentially reach other groundwater aquifers. Impacts would be potentially significant.

The potentially significant impacts of Alternative 2 related to hazards and hazardous materials would be reduced to less than significant levels with implementation of mitigation measures HAZ-1 through HAZ-6 in Section 4.2, *Hazardous and Hazardous Materials*. These mitigation measures are also required for the proposed project and would reduce proposed project impacts to less than significant levels. Accordingly, the potential hazards and hazardous materials impacts of the No Natural Gas Alternative would be similar to the potential impacts of the proposed project.

f. Noise and Vibration

The No Natural Gas Alternative would generate temporary increases in noise during demolition and construction activities, similar to the proposed project. The types of construction activities and equipment and the construction duration of this alternative would be the same as the proposed project, as Alternative 2 would construct the same project except no natural gas would be provided to the site. As described in Section 4.3, *Noise and Vibration*, construction noise levels would be below thresholds of significance at the nearest sensitive receptors to the project site. Accordingly, the temporary noise impacts of the No Natural Gas Alternative would be less than significant. However, the temporary groundborne vibration from construction activities would be potentially significant, same as the those of the proposed project.

On-site operations under this alternative would be the same as the proposed project in terms of on-site truck and vehicle operations, HVAC equipment, and trip generation on project area roads. Accordingly, the resulting noise levels at the nearest sensitive receptors to the project site would be the same under Alternative 2 as they would be under the proposed project. As described in Section 4.3, *Noise and Vibration*, when trucks operate on the eastern side of the proposed building, the combined noise of these trucks and rooftop HVAC equipment would generate noise levels of approximately 56 dBA at the nearest sensitive receptors to the project site. The threshold of significance is 55 dBA, and therefore operations on the east side of the building would be potentially significant.

The potentially significant impacts of Alternative 2 related to noise and vibration would be reduced to less than significant levels with implementation of mitigation measures NOI-1 and NOI-2 in Section 4.3, *Noise and Vibration*. These mitigation measures would also be required for the proposed project and would reduce the proposed project's noise impacts to less than significant levels. Accordingly, the potential noise and vibration impacts of the No Natural Gas Alternative would be similar compared to the potential impacts of the proposed project.

g. Tribal Cultural Resources

The No Natural Gas Alternative would involve construction and ground disturbance across the entire project site similar to the proposed project. During construction, grading of the site and excavation required for utility connections and the foundation of the new building would have the potential to uncover and disturb previously unknown or unidentified tribal cultural resources. Disturbance or damage to tribal cultural resources would be a potentially significant but mitigable impact. Implementation of Mitigation Measure TCR-1 in the Initial Study section titled *Tribal Cultural Resources* would be required for this alternative (see Appendix A). Implementation of mitigation measures would reduce impacts to tribal cultural resources to less than significant levels. Compared to the proposed project the No Natural Gas Alternative would result in similar impacts to tribal cultural resources, because the proposed project would also have potentially significant impacts to

archaeological resources that would be reduced to less than significant levels with implementation of Mitigation Measure TCR-1.

6.4 Alternative 3: Airport Parking Land Use Alternative

Under the Airport Parking Land Use Alternative, the proposed industrial building would be constructed on the project site, nearly consistent with the proposed project. Alternative 3 assumes that the industrial building and associated surface parking lot would be approximately the same size and design as the proposed project, which would require the same demolition and construction activities as the proposed project. Once construction is complete, Alternative 3 assumes the proposed building would not operate as a warehouse. Instead, the building would operate as covered vehicle parking serving the Oakland International Airport. The new surface parking areas would also be for airport parking. Because the building would not operate as a warehouse, more surface parking would be provided on-site compared to the proposed project because larger parking spaces and areas for tractor trailer maneuvers would be eliminated from the project design.

Because the building would be used for vehicle parking and storage, there would not be many people working inside of the building. Some workers, such as parking attendants, maintenance workers and cashiers, may be present, but generally the building would be dedicated to vehicle circulation and parking. Accordingly, Alternative 3 assumes that the new building would not include natural gas connections, as there would not be demand to heat internal spaces used solely for vehicle parking and storage that could not generally be met with electric heat.

The Airport Parking Land Use Alternative would fulfill the project objective to create a modern warehouse structure that contributes to the aesthetics of the surrounding area through the redevelopment of an obsolete and underutilized property, although the building would not operate as a warehouse. Alternative 3 would not fulfill the other objectives of the project, which are generally centered on creating industrial employment and industrial productivity, which would not be accomplished from airport parking.

6.4.1 Impact Analysis

a. Air Quality

The Airport Parking Land Use Alternative would require demolition and construction activities, similar to the proposed project. These construction activities would have the potential to generate fugitive dust emissions. Fugitive dust emissions would increase the amount of particulate matter in the air, resulting in a potentially significant impact. Implementation of Mitigation Measure AQ-1 (see *Air Quality* in the Initial Study; Appendix A) would be required. With implementation of Mitigation Measure AQ-1, impacts from construction of Alternative 3 would be reduced to a less than significant level.

Operation of Alternative 3 would generate emissions of air pollutants. For example, Alternative 3 would involve the passenger vehicles operating on the project site as they travel to and from parking spaces. While Alternative 3 would not affect the number of people arriving or departing from the Oakland International Airport, it could increase the number of vehicle trips associated with the airport. Specifically, the availability of more parking spaces proximate to the airport created by Alternative 3 could make it appealing to choose to drive to flights rather than use transit or rideshare options. However, unlike the proposed project, vehicle trips resulting from Alternative 3 would generally be traditional gasoline-powered vehicles instead of diesel. Diesel engines generally

emit emissions compared to the same number of gasoline-powered engines. Therefore, mobile source emissions would be comparable the proposed project. Additionally, the Airport Parking Land Use Alternative would not generate emissions from the combustion of natural gas; however, generation of electricity used for this alternative would generate emissions. However, airport parking would require minimal electricity, as there would be fewer on-site operational activities than warehousing or industrial uses. Electricity would be required primarily for lighting and ancillary uses such as electric vehicle charging, vehicle cleaning and administrative offices to support the parking operation. Therefore, operation of Alternative 3 would have less than significant impacts related to air quality.

Overall, the Airport Parking Land Use Alternative would have reduced air quality impacts compared with the proposed project's impacts, and impacts would be less than significant. The reduction in the severity of impacts would be primarily due to reduced emissions from operations. The operations of an active warehouse with diesel trucks under the proposed project would generate more air quality emissions than Alternative 3, which would avoid these emissions.

b. Biological Resources

The Airport Parking Land Use Alternative would involve demolition of the existing on-site structures and require construction equipment and workers to operate across the entire project site, similar to the proposed project. These activities would have the potential to directly damage or destroy active nests of migratory bird species or cause birds to abandon nests. This impact would be potentially significant and implementation of mitigation would be required.

The proposed project's impacts related to biological resources would be potentially significant due to the possibility for demolition and construction activities to impact migratory nesting birds. Implementation of Mitigation Measure BIO-1 in the Initial Study, which is provided as Appendix A to this EIR, would reduce biological resources impacts to less than significant levels. Implementation of this mitigation measure would also be required for Alternative 3. Within implementation of Mitigation Measure BIO-1, biological resources impacts of Alternative 3 would be reduced to less than significant levels, and impacts would be similar to those of the proposed project.

c. Cultural Resources

The Airport Parking Land Use Alternative would involve construction and ground disturbance across the entire project site, similar to the proposed project. During construction, grading of the site and excavation required for utility connections and the foundation of the new building would have the potential to uncover and disturb previously unknown or unidentified archaeological resources or human remains. Disturbance or damage to archaeological resources would be a potentially significant but mitigable impact. Implementation of the Mitigation Measure CR-1 in the Initial Study section titled *Cultural Resources* would be required for this alternative (see Appendix A). Implementation of this mitigation measure would reduce impacts to archaeological resources to less than significant. Compliance with existing regulations, such as Public Resources Code Section 5097.98, would prevent significant impacts related to discovery of human remains. Compared to the proposed project the Airport Parking Land Use Alternative would result in similar impacts to cultural resources, because the proposed project would also have potentially significant impacts to archaeological resources that would be reduced to less than significant levels with implementation of Mitigation Measure CR-1.

d. Greenhouse Gas Emissions

The Airport Parking Land Use Alternative would generate GHG emissions during construction. Because the Airport Parking Land Use Alternative would involve construction of the same sized building and surface parking areas as the proposed project, and would involve the same amount of demolition, temporary construction emissions would be similar between Alternative 3 and the proposed project. As described in Section 4.1, *Greenhouse Gas Emissions*, construction would not generate GHG emissions that result in significant impacts on the environment.

Operation of Alternative 3 would generate GHG emissions. Most operational emissions would be attributed to vehicles traveling on-site while parking. However, these vehicle trips would occur elsewhere in the general project vicinity regardless of the potential implementation of this alternative, as people driving to the Oakland International Airport would need to park their vehicles near the airport. This alternative could induce trips as people choose to drive and park at the project site rather than use transit for the airport. However, the number of induced trips would be minimal given that there is already an abundance of vehicle parking opportunities proximate to the airport. Therefore, the Airport Parking Land Use Alternative would not generate substantial new VMT, as it would not generate a substantial number of new vehicle trips that would have otherwise not occurred without the implementation of the alternative. This would be below the BAAQMD's threshold of significance for GHG impacts related to transportation emissions. Additionally, under Alternative 3, no natural gas would be provided to the project site. By avoiding new natural gas connections to the site, Alternative 3 would avoid the long-term GHG emissions associated with natural gas combustion. With the absence of natural gas, Alternative 3 would not exceed the BAAQMD's threshold of significance for GHG emissions from new buildings. With the new building relying on electricity without natural gas, the Airport Parking Land Use Alternative would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The Airport Parking Land Use Alternative would generate GHG emissions but would not conflict with BAAQMD thresholds of significance or an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Accordingly, the GHG impacts of Alternative 3, including cumulative impacts, would be less than significant, and mitigation would not be required. The less than significant GHG impacts of Alternative 3 would be reduced compared to the proposed project, which would have potentially significant and unavoidable GHG impacts.

e. Hazards and Hazardous Materials

The Airport Parking Land Use Alternative would require demolition of the existing on-site buildings, similar to the proposed project, which could contain lead paint or asbestos containing materials. There would be potential for construction workers to be exposed to these hazards accidentally during demolition. Impacts would be potentially significant, and implementation of mitigation would be required.

Construction of Alternative 3 would involve excavation, such as construction of the proposed building foundation or buried utility connections, similar to the proposed project. Excavation and grading could disturb contaminated soils or groundwater and expose construction workers to hazardous materials present as contamination. Likewise, construction would generate dust. If soils from the contamination areas are stockpiled on site and become airborne dust, either from wind erosion or construction equipment, off-site receptors could be exposed, as well as construction workers. Construction of Alternative 3 would also require the demolition of the existing

groundwater monitoring wells that were previously installed as part of the remediation actions on-site. Impacts would be potentially significant, and implementation of mitigation would be required.

During operation of Alternative 3, vapors from contaminated soil and groundwater underlying the site could potentially infiltrate the proposed building, similar to the proposed project. While there would not be many workers routinely present inside of the building, parking attendants may be present inside the building. Likewise, customers using the building to park their cars would also be exposed to vapors briefly. The accumulation of vapors in the breathing zone inside the building could present a potential hazard to human health. Additionally, Alternative 3 would include bioretention areas where stormwater would collect during operation and be allowed to infiltrate the ground surface. This would have the potential to create a pathway for hazardous contamination to migrate through soil layers and potentially reach other groundwater aquifers. Impacts would be potentially significant.

The potentially significant impacts of Alternative 3 related to hazards and hazardous materials would be reduced to less than significant levels with implementation of mitigation measures HAZ-1 through HAZ-6 in Section 4.2, *Hazardous and Hazardous Materials*. These mitigation measures would also be required for the proposed project and would reduce the proposed project's impacts to less than significant levels. Accordingly, the potential hazards and hazardous materials impacts of the Airport Parking Land Use Alternative would be similar to the potential impacts of the proposed project.

f. Noise and Vibration

The Airport Parking Land Use Alternative would generate temporary increases in noise during demolition and construction activities, similar to the proposed project. The types of construction activities and equipment and the construction duration of this alternative would be the same as the proposed project, as Alternative 3 would involve similar construction, except no natural gas would be provided to the site. As described in Section 4.3, *Noise and Vibration*, construction noise levels would be below thresholds of significance at the nearest sensitive receptors to the project site. Accordingly, the temporary noise impacts of the Airport Parking Land Use Alternative would be less than significant and similar to those of the proposed project. However, the temporary groundborne vibration from construction activities would be potentially significant.

On-site operations under this alternative would not include tractor trailers, which generate more noise than passenger vehicles due to air brakes, larger diesel engines, back-up alarms, and trailer coupling/decoupling activities. As described in Section 4.3, *Noise and Vibration*, when trucks operate on the eastern side of the proposed building, the combined noise of these trucks and rooftop HVAC equipment would generate noise levels of approximately 56 dBA at the nearest sensitive receptors to the project site. Therefore, it is reasonable to assume that noise levels from operation of the Airport Parking Land Use Alternative would be below 56 dBA at the nearest sensitive receptor, because this alternative would not include truck noise. The threshold of significance is 55 dBA, which would not be exceeded by Alternative 3. Accordingly, the impacts of operation noise of Alternative 3 would be less than significant and reduced compared to those of the proposed project.

The potentially significant impacts of Alternative 3 related to vibration would be reduced to less than significant levels with implementation of Mitigation Measure NOI-2 in Section 4.3, *Noise and Vibration*. This mitigation measure would also be required for the proposed project and would reduce proposed project impacts to less than significant levels. While both Alternative 3 and the proposed project would have less than significant noise and vibration impacts with mitigation, impacts of Alternative 3 would be reduced when compared to the potential impacts of the proposed

project. Impacts would be reduced because Alternative 3 would result in reduced operational noise impacts.

g. Tribal Cultural Resources

The Airport Parking Land Use Alternative would involve construction and ground disturbance across the entire project site, similar to the proposed project. During construction, grading of the site and excavation required for utility connections and the foundation of the new building would have the potential to uncover and disturb previously unknown or unidentified tribal cultural resources. Disturbance or damage to tribal cultural resources would be a potentially significant but mitigable impact. Implementation of the Mitigation Measure TCR-1 in the Initial Study section titled *Tribal Cultural Resources* would be required for this alternative (see Appendix A). Implementation of mitigation measures would reduce impacts to tribal cultural resources to less than significant levels. Compared to the proposed project the Airport Parking Land Use Alternative would result in similar impacts to tribal cultural resources, because the proposed project would also have potentially significant impacts to archaeological resources that would be reduced to less than significant levels with implementation of mitigation.

6.5 Alternatives Considered but Eliminated

Section 15126.6 of the *CEQA Guidelines* states that:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.
>
> The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

The California Supreme Court, in Citizens of Goleta Valley v. Board of Supervisors (1990), indicated that a discussion of alternative sites is needed if the project "may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved" at another site. Several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

1. Could the size and other characteristics of another site physically accommodate the project?
2. Is another site reasonably available for acquisition?
3. Is the timing of carrying out development on an alternative site reasonable for the applicant?
4. Is the project economically feasible on another site?
5. What are the land use designation(s) of alternative sites?
6. Does the lead agency have jurisdiction over alternative sites? and
7. Are there any social, technological, or other factors which may make the consideration of alternative sites infeasible?

Site characteristics that could support a project that meets the project objectives include appropriate size to accommodate an economically viable industrial building; proximity to freeways, rails and airports in the San Francisco Bay Area; and proximity to other industrial, warehousing, and logistics land uses to avoid land use conflicts. In order to accommodate the needed industrial use, the building must be located on a property or contiguous properties measuring approximately 14 acres or larger. This size is needed to accommodate the building plus provide the space for tractor trailers to operate and park safely on the site alongside worker vehicles used for daily commutes. Additionally, the property must be zoned Industrial General or for industrial uses that allow for warehouses and logistics.

Initially the City of San Leandro considered analyzing an alternative that involved locating the project on an alternate site. However, the alternate site alternative was dismissed from further consideration because there are few if any properties that are 14 acres or larger, vacant, available to the project applicant, and proximate to freeways and the Oakland International Airport. The project applicant owns other land in the region, but these holdings are generally smaller than the project site and would not facilitate the proposed project without displacing ongoing operations or for other reasons related to site characteristics as listed above. For these reasons the alternate site alternative was dismissed from further consideration.

6.6 Environmentally Superior Alternative

Table 6-1 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied in this section of the EIR. Based on the alternatives analysis provided above, Alternative 1 would be the environmentally superior alternative, though it is the No Project Alternative, and therefore would not meet the objectives of the proposed project. The environmentally superior development alternative would be Alternative 3, as it would reduce impacts in the categories of air quality, greenhouse gas emissions, hazards and hazardous materials, and noise. Alternative 3, however, would not meet all the objectives of the proposed project, such as establishing providing industrial productivity and employment in San Leandro that is near freeways and airports. Alternative 2 would meet most of the project objectives but would not reduce project impacts to the same extent as Alternative 3. None of the alternatives analyzed above would result in significant or unavoidable impacts; thus, all alternatives would avoid the proposed project's significant and unavoidable impacts related to GHG emissions, which are the only significant and unavoidable impacts identified for the proposed project.

Table 6-1 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification[1]	Alternative 1: No Project Alternative	Alternative 2: No Natural Gas Alternative	Alternative 3: Airport Parking Land Use Alternative
Air Quality	Less than Significant with Mitigation	+	+	+
Biological Resources	Less than Significant with Mitigation	+	=	=
Cultural Resources	Less than Significant with Mitigation	+	=	=
Greenhouse Gas Emissions	Significant and Unavoidable	+	+	+
Hazards and Hazardous Materials	Less than Significant with Mitigation	+	=	+
Noise and Vibration	Less than Significant with Mitigation	+	=	+
Tribal Cultural Resources	Less than Significant with Mitigation	+	=	=

[1] Most severe level of impact determination for proposed project is presented in this table.

+ Superior to the proposed project (reduced level of impact)

- Inferior to the proposed project (increased level of impact)

= Similar level of impact to the proposed project

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7.2 List of Preparers

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Appendix A

Initial Study

Appendix B

Notice of Preparation (NOP) and NOP Comment Letters

Appendix C

Transportation Impact Analysis

Appendix D

Revised Soil and Groundwater Management Plan

Appendix E

Evaluation of Site Sound Emissions

Appendix F

Noise Letter Report