



1111 Aladdin Avenue Manufacturing Project (PLN24-0036)

Draft Initial Study–Mitigated Negative Declaration

prepared by

City of San Leandro
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San Leandro, California 94577
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Initial Study

The City of San Leandro (City), as the Lead Agency, prepared this Initial Study for the 1111 Aladdin Avenue Manufacturing Project (hereinafter also referred to as proposed project or project) in compliance with the California Environmental Quality Act (CEQA), *CEQA Guidelines* (California Code of Regulations [CCR] Section 15000 et seq.), and regulations and policies of the City. As discussed further in Section 8, *Project Description*, the project would involve demolition of an existing office building and alteration and expansion of an existing manufacturing building at the project site. The project would also include associated site improvements and landscaping.

1. Project Title

1111 Aladdin Avenue Manufacturing Project

2. Lead Agency Name and Address

City of San Leandro
835 East 14th Street
San Leandro, California 94577
510-577-3458

3. Contact Person and Phone Number

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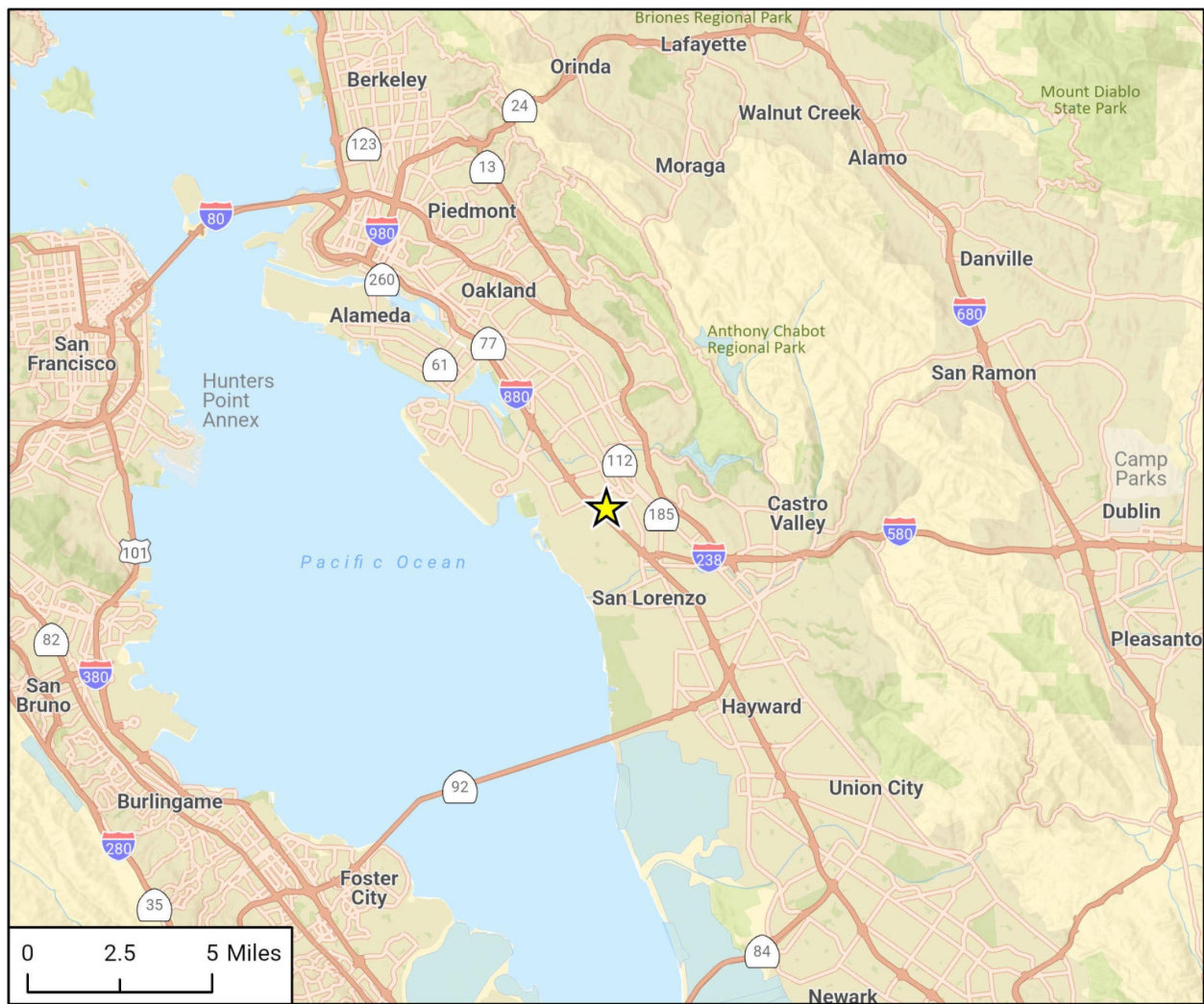
4. Project Sponsor's Name and Address

ACCO Engineered Systems
1111 Aladdin Avenue
San Leandro, California 94577
510-346-4466

5. Project Location

The project site is located at 1111 and 1133 Aladdin Avenue (Assessor's Parcel Number 077A-0648-003-12), on the north side of Aladdin Avenue between Alvarado Street and Teagarden Street. The site is approximately 7.3 acres. Figure 1 shows the regional location of the project site, and Figure 2 provides an aerial image of the project site in its neighborhood context.

Figure 1 Regional Location



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Map created by Rincon Consultants, Inc., 2026.

25-18529 EPS
Fig 1 Regional Location

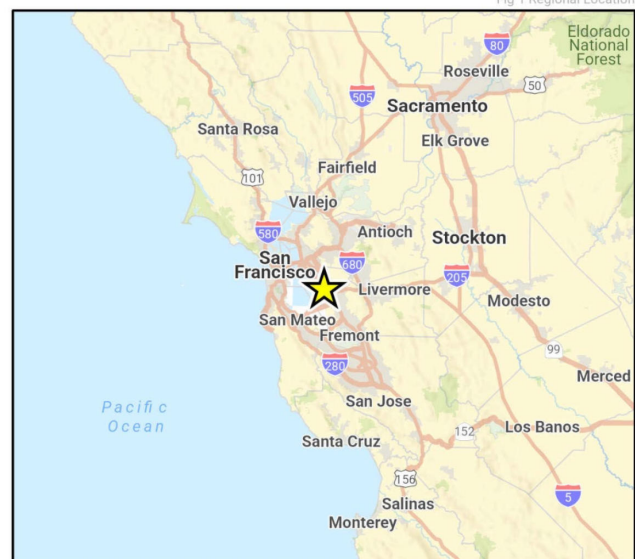


Figure 2 Project Site



Imagery provided by Esri and its licensors © 2026. Map created by Rincon Consultants, Inc., 2026.

25-18529 EPS
EIRFig 2 Project Location

6. General Plan and Zoning Designation

The City 2035 General Plan designates the project site as Light Industrial, and the San Leandro Zoning Code (SLZC) designates the site as General Industrial.

7. Surrounding Land Uses and Setting

The project site is located within a developed commercial and industrial area. Surrounding land uses include a San Leandro Unified School District (SLUSD) maintenance facility to the west, logistics and warehouse services to the north and east, and manufacturing and warehouses to the south across Aladdin Avenue. The site is within the bounds of the Davis Street-Washington Avenue-Alvarado Street (DWA) plume, a comingled, regional groundwater plume impacted by volatile organic compounds (VOCs), petroleum-related compounds, and metals from multiple industrial sites to the northwest of the site.

The relatively level, rectangular-shaped project site is currently developed with two buildings, a 102,236-square-foot, one-story manufacturing building at 1111 Aladdin Avenue, inclusive of a 7,925-square-foot canopy and office mezzanine space, and one 44,758-square-foot, two-story office building at 1133 Aladdin Avenue.

The site includes three driveways that provide access from Aladdin Avenue, one on the southwest corner of the site near the existing office building and two along the site's frontage near the existing manufacturing building. The site includes a parking lot that wraps around the existing manufacturing building and landscaping, such as trees and shrubs, throughout the parking lot. There is a row of hedges that separates the parking lot from the front façade of the manufacturing building and a row of shrubs and trees along the properties front gate that separates the property from Aladdin Avenue.

Photographs of existing conditions on the project site are shown in Figure 3, and Figure 4 shows the existing site plan.

Figure 3 Site Photographs

Photograph 1. View of project site frontage at the westernmost driveway on Aladdin Avenue and the southern façade of the existing office building to be demolished, looking northwest from across Aladdin Avenue.



Photograph 2. View of project site frontage with southern façade of the main building, looking northeast from across Aladdin Avenue.



Photograph 3. View of the western façade of the existing main building, looking north from the site interior.



Photograph 4. View of the southern façade and canopy area of the existing main building, looking northeast from the site interior.

8. Project Description

The project would involve complete demolition of the existing 44,758-square-foot office building at 1133 Aladdin Avenue and the interior demolition, remodel, and expansion of the existing manufacturing building at 1111 Aladdin Avenue. The manufacturing building would be expanded by approximately 49,136 square feet, which would mostly be in the form of the construction of a standalone building addition separated from the existing building by a 12-inch expansion gap. The project would also include enclosing the existing 7,925-square-foot canopy and remodeling existing office and mezzanine spaces in the manufacturing building. The expansion would be 35 feet in height, which is slightly taller than the existing building, which is 33 feet in height. Overall, the project would include an updated total building area of 142,645 square feet. Figure 4 shows the existing site plan, and Figure 5 shows the proposed site plan for the expansion of the main building. Figure 6 shows the existing and proposed street views of the project.

The project would also involve reconfiguration of the existing parking areas on-site, demolition of existing planting strips, installation of two new exterior canopies and recessed loading docks, expansion of an existing outdoor bridge crane, upgrades to perimeter fencing and lighting, security enhancements, and modification of curb cuts to reduce the number of driveways from three to two. The project would also include construction of a new mezzanine within the existing manufacturing building and electrical and mechanical infrastructure installation and modifications in the expanded areas of the existing manufacturing building.

Materials for the exterior of the expanded manufacturing space would consist of light gray and blue metal panels. Modifications to the fencing around the project site would match the existing perimeter wall and fencing.

Wall-mounted and pole light fixtures would be located on the structure's exterior and in the parking areas, respectively, to provide nighttime lighting.

Landscaping and Open Space

There are 38 trees on the project site. Demolition and site preparation would include the removal of 27 trees (17 Brisbane box [*Lophostemon confertus*], and 10 Cajuput paperbark [*Melaleuca quinquenervia*]) and the preservation of 11 trees (1 Yoshino cherry [*Prunus × yedoensis*], and 10 Brisbane box). None of the trees on-site are protected trees pursuant to SLZC, Chapter 5. Of the 27 trees to be removed, 18 trees are located within the proposed construction footprint, and 9 trees are located within the existing parking area that would be reconfigured as part of the proposed project.

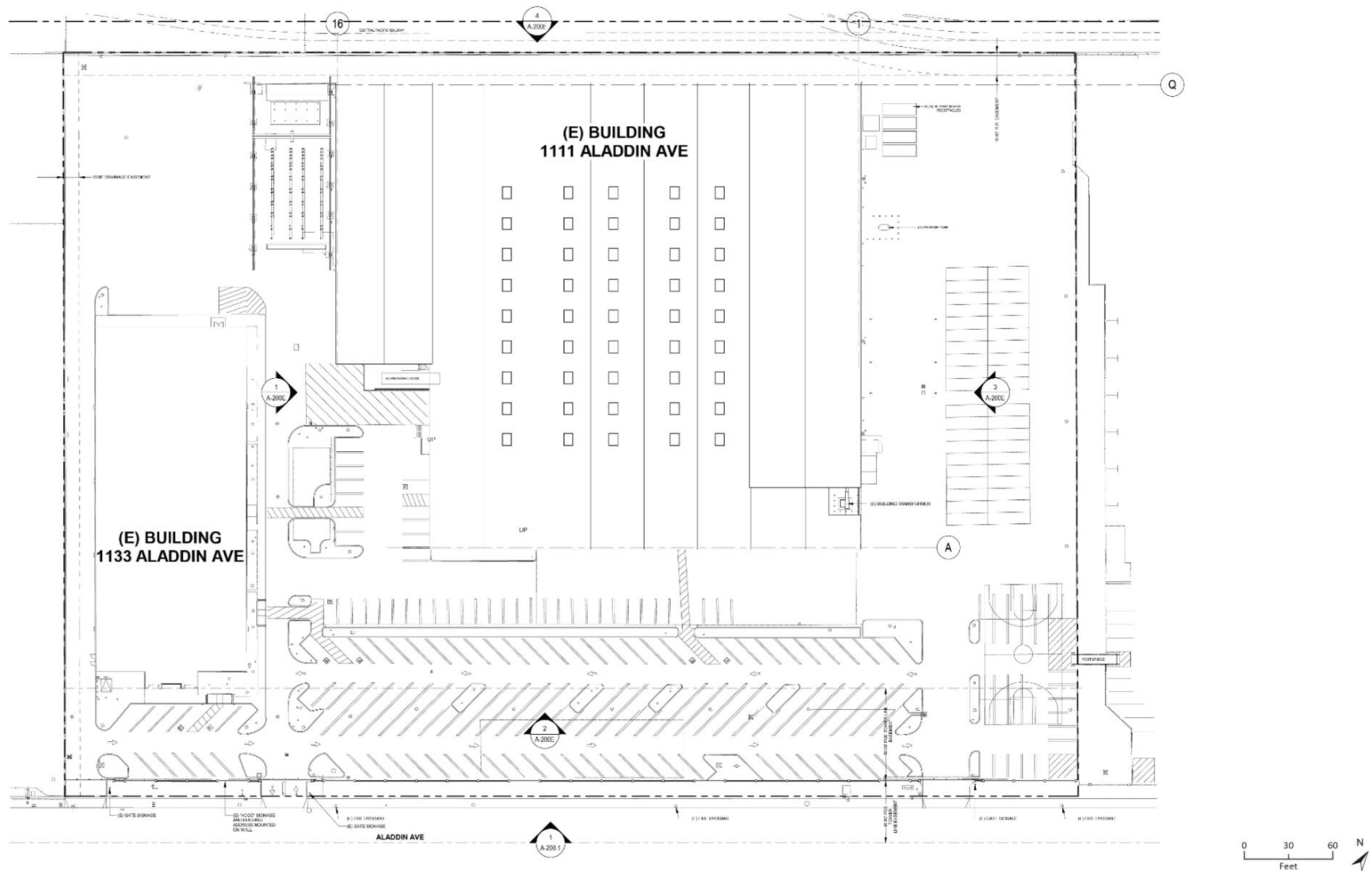
Landscaping for the project would consist of the planting of 28 additional trees, shrubs, grasses, and groundcover plants along the perimeter of the project site, around the proposed manufacturing structure, and a maintained area along the western boundary of the project site. Approximately 20,390 square feet of the project site would include landscaping that would comply with the Model Water Efficient Landscape Ordinance (MWELO) and bioswales that would help with stormwater treatment.

Site Access, Circulation, and Parking

Vehicle access to the project site would be available via two existing two-way driveways on Aladdin Avenue, located in the southwest and southeast corners of the project site. The project would include removal of one existing driveway that currently provides direct access to the existing office building, since that building would be demolished. Pedestrian access to the project site would be provided via concrete sidewalks along Aladdin Avenue.

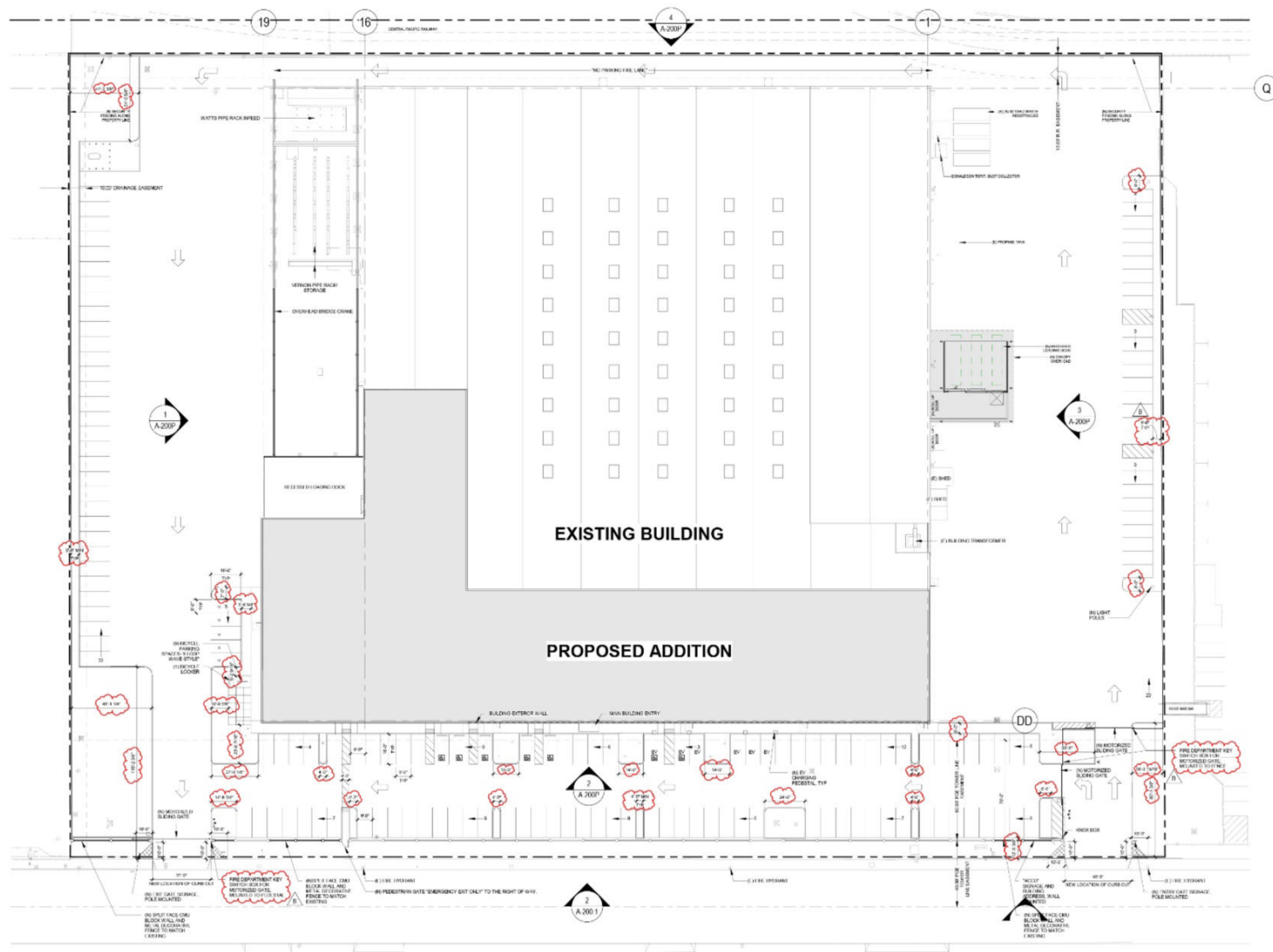
The proposed project would be required to provide 148 vehicle parking spaces and eight short-term bicycle parking spaces pursuant to SLZC, Chapter 4.08. A total of 155 vehicle parking spaces would be provided and 9 short-term and 1 long-term bicycle parking spaces. Parking provided would exceed the required parking for office and industrial general space on site. Seven accessible parking spaces and six electric vehicle charging spaces would be included.

Figure 4 Existing Site Plan



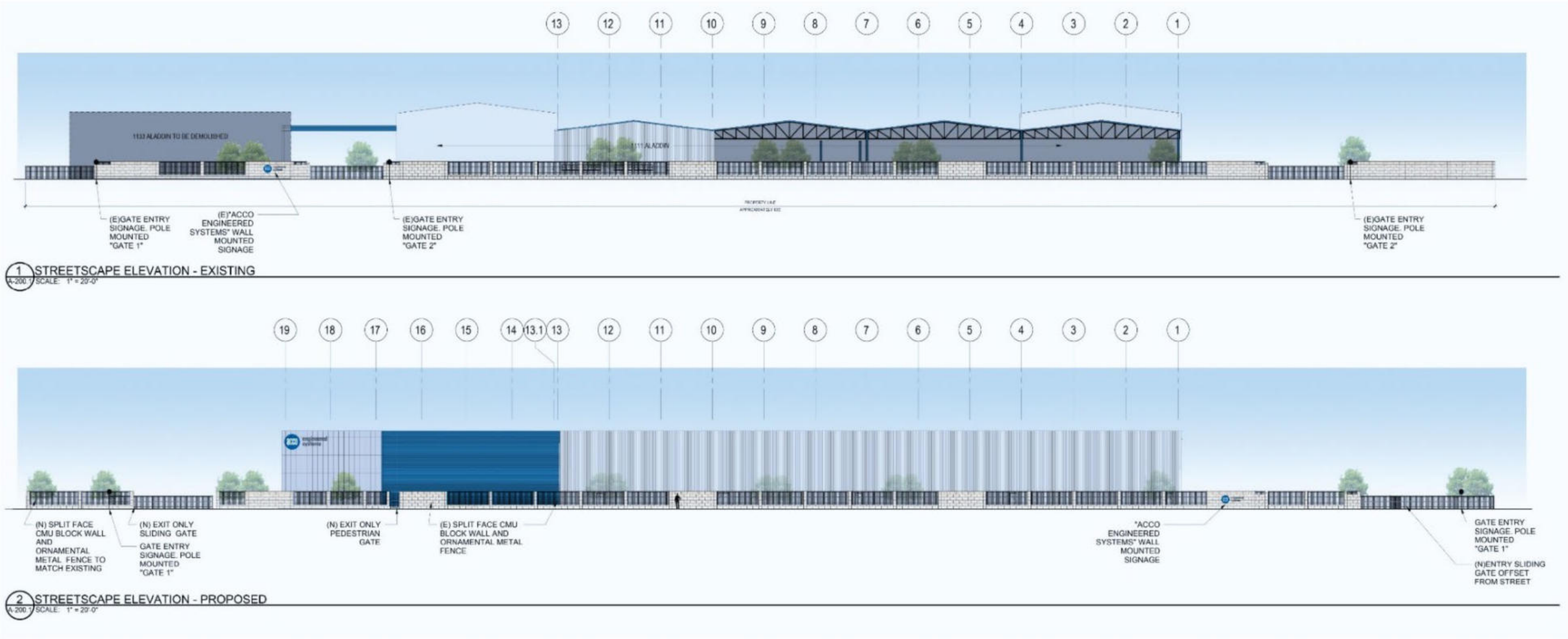
Source: TNLDB Architecture 2025

Source: TNLDB Architecture 2025



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Figure 6 Proposed Street-View (Aladdin Avenue) Elevations



Source: TNLDB Architecture, 2025.

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Utilities and Public Services

Water would continue to be provided to the project site by the East Bay Municipal Utility District (EBMUD) and wastewater treatment for the project site would continue to be provided by San Leandro Sanitary District (SLSD). The City Department of Public Works owns and maintains 175 miles of storm drain conduits throughout the city. The project would continue to connect to the existing storm drain system operated and maintained by the city. Stormwater from the project site drains to Aladdin Avenue, where it is collected by storm drains into the City's stormwater system. Electricity would be provided to the project site by Ava Community Energy (Ava) via Pacific Gas and Electric Company (PG&E) infrastructure. Infrastructure capable of supporting electric and telecommunications is present at the project site and in the project vicinity. The project site would be served by existing public services within the city. The Alameda County Fire Department (ACFD) would provide fire protection and emergency medical service to the project site. The San Leandro Police Department (SLPD) would provide law enforcement services to the project site.

9. Site Preparation and Construction

Site preparation would include demolition of paving and other on-site features, as well as grading. Construction activities would include construction, paving, architectural coating, and trenching for utility connections. The project would require 675 cubic yards of exported soil and excavation to a maximum depth of 4.5 feet. Construction is anticipated to begin in mid-2026 and would be completed by the end of 2027. Pursuant to Section 4-1.1115 of the San Leandro Municipal Code (SLMC), construction would occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 7:00 p.m. on Saturday and Sunday.

10. City of San Leandro Permits and Approvals Required

The following permits and approvals are required from the City prior to project construction. Discretionary permits are not required from other public agencies.

- Administrative Site Plan Review
- Administrative Exception for street tree distances and landscaping strip along the rear property line
- Building Permit

11. Other Public Agencies Whose Approval is Required

The proposed project does not require the discretionary approval of any other public agency except for the City.

12. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

The Confederated Villages of Lisjan Nation requested notification of new development within San Leandro. On March 30, 2026, the City, pursuant to Public Resources Code (PRC) 21080.3.1 and Assembly Bill (AB) 52, sent via email and a certified mail notification letter regarding the proposed project to the Confederated Villages of Lisjan Nation.

Additional information regarding consultation is included in Environmental Checklist Section 18, *Tribal Cultural Resources*.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☐ Geology and Soils | ☐ Greenhouse Gas Emissions | ☒ Hazards and Hazardous Materials |
| ☐ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

Determination

Based on this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- ☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

Title

Environmental Checklist

1 Aesthetics



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Setting

The project site is currently developed with two existing structures, a one-story manufacturing building and a two-story office building, as well as paved parking areas, driveways, and limited landscaped areas. Surrounding land uses include an SLUSD maintenance complex to the west and logistics, warehouse, and manufacturing uses to the north, east, and south. The surrounding landscape includes street trees, ornamental shrubs, and other landscaped features within parking lots and along property frontages, and the broader area is characterized by urban industrial development with minimal natural vegetation.

The nearest officially designated or eligible State Scenic Highway is Interstate 580 (I-580), which is officially designated as a State Scenic Highway north of San Leandro Creek and eligible for designation south of San Leandro Creek (California Department of Transportation [Caltrans] 2024). The project site is approximately 1.8 miles southwest of the officially designated portion and approximately 1.5 miles west of the eligible portion at their closest points.

Regulatory Setting

San Leandro 2035 General Plan

The following Land Use Element policies of the San Leandro 2035 General Plan describe the intended aesthetic vision for the project site:

Policy CD-6.8 Improve the visual appearance of the City's commercial and industrial areas by applying high standards of architectural design and landscaping for new commercial and industrial development and the re-use or remodeling of existing commercial and industrial buildings.

Policy LU-8.5 Maintain areas in the City that are appropriate for lumberyards, construction suppliers, automotive repair shops, and other commercial uses that are industrial in character or that are typically located in industrial areas. While development standards in these areas should respect the operational characteristics of these uses, they should still promote aesthetic improvements, adequate buffering for nearby uses, traffic safety, and a more positive visual image.

San Leandro Zoning Code

SLZC establishes use and development regulations for industrial districts. These regulations are summarized below in Table 1.

Table 1 Industrial General Development Regulations

Feature	Requirement
Minimum Lot Area	5,000 square feet
Minimum Lot Width	50 feet
Minimum Setback	20 feet (required for structures over 40 feet in height)
Maximum Height	Up to 50 feet with approval by the Zoning Enforcement Official
Maximum Lot Coverage	75%, floor area ratio of 1.0
Minimum Site Landscaping	5%

The following section of SLZC would also be applicable to the project.

Section 4.08.156 Lighting. Outdoor lighting in a landscaped parking area shall not employ a light source higher than 12 feet. Outdoor parking area lighting shall create no cone of direct illumination greater than 60 degrees from a light source higher than six feet and shall not directly shine onto an adjacent street. Maximum illumination at ground level shall be three foot candles and shall not exceed one-half foot candles in an R district.

Impact Analysis

a. *Would the project have a substantial adverse effect on a scenic vista?*

A *scenic vista* is usually defined as a panoramic view from an elevated position or a long-range view from a public vantage point. This can include views of natural features or of the built environment.

The San Leandro 2035 General Plan does not formally recognize specific scenic vistas in the city. However, the General Plan does designate scenic views, which the City has identified as aesthetic priorities that contribute to a sense of place. These scenic views include long-range views of the San Francisco Bay to the west and views of hills above I-580 to the east. Due to intervening development and distance, there are no views of the San Francisco Bay from the project site. Views of the hills above I-580 to the east are visible from Aladdin Avenue adjacent to the site; however, the views through the site itself are already blocked by the existing buildings. In addition, removal of the existing two-story office building as proposed would incrementally open views through the site toward the hills. The project would not substantially obstruct existing views, and the resulting building height would remain below the maximum allowable building height established in SLZC. The project would not result in a substantial adverse effect on a scenic vista, and there would be no impact.

NO IMPACT

b. *Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

I-580 is a designated State Scenic Highway north of San Leandro Creek and eligible for designation south of San Leandro Creek (Caltrans 2024). There are no scenic resources, including mature or large trees, rock outcroppings, or historic buildings on the site, and due to intervening development and distance, the project site is not visible from either highway segment. Therefore, implementation of the project would have no effect on scenic resources in view of a State Scenic Highway. There would be no impact.

NO IMPACT

c. *Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The project site is a developed industrial property within an urbanized area, surrounded by an SLUSD maintenance complex to the west and logistics, warehouse, and manufacturing uses to the north, east, and south. The project would involve the addition of manufacturing space on-site, but this addition would be similar in height to existing buildings on-site and the site’s surroundings. Similar materials would be used to ensure the additional manufacturing space blends in with the existing building on-site, which would further ensure that the project does not alter existing visual character in the project vicinity. Table 2 and Table 3 below show policies and standards from the City’s General Plan and SLZC that govern scenic quality and demonstrate the project’s consistency with both.

Table 2 Project Consistency with The San Leandro General Plan

Policy/Standard	Project Consistency
City of San Leandro 2035 General Plan	
Policy CD-6.8. Improve the visual appearance of the City’s commercial and industrial areas by applying high standards of architectural design and landscaping for new commercial and industrial development and the re-use or remodeling of existing commercial and industrial buildings.	Consistent. The project would involve construction and operation of a manufacturing structure. Existing land uses surrounding the project site include warehouses, logistics buildings, and manufacturing. Therefore, the proposed development would be consistent with the existing commercial and industrial character of the project site surroundings.
Policy LU-8.5. Maintain areas in the City that are appropriate for lumberyards, construction suppliers, automotive repair shops, and other commercial uses that are industrial in character or that are typically located in industrial areas. While development standards in these areas should respect the operational characteristics of these uses, they should still promote aesthetic improvements, adequate buffering for nearby uses, traffic safety, and a more positive visual image.	

Source: City of San Leandro 2016a

As shown in Table 2, the proposed project would be consistent with the City’s applicable General Plan policies related to scenic quality.

Table 3 below demonstrates that the proposed project would be in compliance with Industrial General zone standards, specifically those that regulate scale and massing, pursuant to SLZC Section 2.12.300. Compliance with these standards would ensure that the scale and massing of the proposed project would be limited as required by SLZC, which would ensure that the visual character of the project is consistent with the City’s vision for the area and that the project would be designed to be visually compatible with the surrounding area.

Table 3 Project Consistency with City Zoning Requirements

Feature	Zoning Requirements	Proposed Project
Minimum Lot Area	5,000 square feet	146,000 square feet
Minimum Lot Width	50 feet	650 feet
Minimum Setback	20 feet (required for structures over 40 feet in height)	70 feet
Maximum Height	Up to 50 feet with Zoning Enforcement Official approval	35 feet
Maximum Lot Coverage	75%, FAR of up to 1.0	43%, FAR of 0.43
Minimum Site Landscaping	5%	6%

FAR = floor area ratio

As shown above, the project would be consistent with applicable San Leandro General Plan policies and standards related to aesthetics. The project would comply with applicable SLZC standards. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The project site is in an urban area with moderate levels of existing lighting. Lighting sources around the project site include wall-mounted security lights on adjacent buildings, streetlights on Aladdin Avenue, and lights from vehicles on Aladdin Avenue or in surrounding parking lots. The primary source of glare in the area is sunlight reflected off light-colored and reflective building materials and finishes, and metallic and glass surfaces of vehicles parked in parking lots adjacent to or across the street from the project site.

The proposed project would be constructed of similar materials as the existing building on-site and others in the vicinity. Glare from sunlight typically occurs when building surfaces directly face low-angle morning or afternoon sun. Because the building would front Aladdin Avenue on its northern side, drivers traveling along Aladdin Avenue would primarily view the building's south façade, which does not directly face either sunrise or sunset. As a result, the project is not expected to create substantial sun-related glare for roadway users. In addition, proposed landscaping along the northern, eastern, and western boundaries would further screen building surfaces from public viewpoints.

The project site is located in a commercial and industrial area with existing sources of lighting and reflection, and the introduction of new exterior lighting would be consistent with the surrounding visual environment. The project would be required to comply with applicable provisions of SLZC Section 4.08.156 (Lighting), which limit outdoor lighting in landscaped parking areas to fixtures no higher than 12 feet, restrict cones of direct illumination to 60 degrees for any fixture above 6 feet and prohibits light spillover onto adjacent streets. The nearest residences are located approximately 500 feet to the southwest and 1,000 feet to the east and are separated from the site by intervening development, privacy fencing, and other built features, which would limit visibility of nighttime lighting. No parks or other public gathering areas immediately abut the site. Accordingly, the project would not substantially alter existing light or glare conditions in the vicinity, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

Setting

The City 2035 General Plan designates the project site as light industrial, and SLZC designates the site as general industrial.

The California Department of Conservation (DOC) manages the Farmland Mapping and Monitoring Program (FMMP) to assess and record suitability of land for agricultural purposes. In each county, the land is analyzed for soil and irrigation quality. The highest quality land is designated as Prime Farmland. According to the Alameda County Important Farmland Map prepared by the DOC, the project site and vicinity are designated as Urban and Built-Up Land and the site does not have any identified agriculture or forest land (DOC 2022).

Regulatory Setting

The DOC's FMMP monitors the conversion of the state's farmland to and from agricultural use. County-level data is collected, and a series of maps are prepared that identify eight classifications and uses based on a minimum mapping unit size of 10 acres. The program also produces a biennial report on the amount of land converted from agricultural to non-agricultural use. The program maintains an inventory of state agricultural land and updates the Important Farmland Series Maps every two years. The FMMP is an informational service only and does not constitute state regulation of local land use decisions. Agricultural land is rated according to several variables, including soil quality and irrigation status with Prime Farmland being considered the most optimal for farming practices. Other FMMP designations include Farmland of Local Importance, Grazing Land, and Water.

Land Conservation Act

Better known as the “Williamson Act” (California Administrative Code Section 51200 et seq.), the California Land Conservation Act of 1965 creates a legal arrangement whereby private landowners’ contract with local governments to voluntarily restrict land to agricultural and open space uses, protecting it from unnecessary or premature conversion to urban uses. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year.

Generally, Williamson Act contracts have an initial term of 10 years, with renewal occurring automatically each year thereafter. The contracts run with the land and are binding on all succeeding landowners. Land must be in an agricultural preserve to enter into a Williamson Act contract. Agricultural preserves under Williamson Act contract contain at least 100 contiguous acres of agricultural land unless specific findings are made.

Non-renewal initiations are requested either by the landowner or the local government and are often filed in anticipation of converting farmland to other uses. Most contracted land is terminated through non-renewal. Upon the expiration of the contract, the restrictions are removed and the property tax assessment, which had been gradually increasing over the previous nine-year non-renewal period, returns to full market value.

To characterize the environmental baseline for agricultural resources, Important Farmland Maps produced by the DOC were reviewed. Unless otherwise expressed, the future use of “Important Farmland” specifically includes the following definitions provided by the DOC:

- **Prime Farmland:** Land which has the best combination of physical and chemical characteristics for producing crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming standards.
- **Unique Farmland:** Land of lesser quality soils used for the production of specific high economic value crops. It has the special combination of soil quality, location, growing season and moisture supply needed to produce sustained high quality or high yields of a specific crop when treated and managed according to current farming methods. It is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Examples of crops include oranges, olives, avocados, rice, grapes and cut flowers.
- **Farmland of Local Importance:** Land of importance to the local agricultural economy as determined by each county’s board of supervisors following recommendations by a local advisory committee.

PRC, Section 12220(g) defines *forest land* as:

land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits

PRC, Section 4526 defines *timberland* as:

land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

Government Code, Section 51104(g) defines a *timberland production zone* as:

an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h)

Impact Analysis

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

The project site is not designated as, is not adjacent to, and is not proximate to lands classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared by the DOC's FMMP maps (DOC 2022). The project site is designated as urban and built-up land. Since the project would only modify the project site; no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by project implementation, and no impact would occur.

NO IMPACT

- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

The project site and surrounding areas are not subject to Williamson Act contracts (DOC 2024). The project would only involve construction and modification at the project site. Therefore, no Williamson Act contracts would be affected by project implementation, and no impact would occur.

NO IMPACT

- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

The project site does not currently provide forest and timber resources and would not be used for forest and timber resources. While some landscaping trees are present on the industrial project site, the site itself is not considered forest or timberland (California Department of Fish and Wildlife [CDFW] 2026). As such, the project would not convert forest or timberland uses, and no impact would occur.

NO IMPACT

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3 Air Quality



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	■

Overview of Air Pollution

The federal Clean Air Act (CAA) and California CAA mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory) into the atmosphere, including carbon monoxide (CO), VOCs/reactive organic gases (ROG),¹ nitrogen oxides (NO_x), particulate matter with diameters of 10 microns or less (PM₁₀) and 2.5 microns or less (PM_{2.5}), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_x. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog).

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources that may be legally operated on roadways and highways
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

¹ CARB defines VOC and ROG similarly as, “any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOCs are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOCs are considered comparable in terms of mass emissions, and the term ROG is used in this Initial Study-Mitigated Negative Declaration.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than 1 micron in diameter (about 1/70th the diameter of a human hair) and thus is a subset of PM_{2.5}. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2022).

TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

TACs include both organic and inorganic chemical substances. While DPM is a main source, TACs may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. People exposed to toxic air pollutants at sufficient concentrations and durations may have an increased chance of developing cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2020).

Regulatory Setting

California Clean Air Act

The California CAA, signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practical date. CARB is the state air pollution control agency and is a part of the California Environmental Protection Agency (CalEPA). CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California, and for implementing the requirements of the California CAA. CARB oversees local district compliance with federal and California laws, approves local air quality plans, submits state implementation plans to USEPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

Air Quality Standards and Attainment

The project site is located in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air District (Air District). The Air District has jurisdiction over much of the nine-county Bay Area, including Alameda County. As the local air quality management agency, the Air District is required to monitor air pollutant levels to ensure that NAAQS and CAAQS are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, SFBAAB is classified as being in "attainment" or "non-attainment." In areas designated as non-attainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants, and the human health impacts associated with these criteria pollutants, presented in Table 4, are already occurring in that area as part of the environmental baseline condition.

Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. SFBAAB is designated a non-attainment area for the federal 8-

hour ozone standard, federal PM_{2.5} annual and 24-hour standards, state 8-hour and 1-hour ozone standards, state PM₁₀ annual and 24-hour standards, and the state PM_{2.5} annual standard (Air District 2023). This non-attainment status is a result of several factors, such as mobile sources, wood burning, industrial combustion, and dust, in SFBAAB.

Table 4 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ¹
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.

Source: United States Environmental Protection Agency 2021

California Low-Emission Vehicle Program

CARB first adopted Low-Emission Vehicle (LEV) program standards in 1990. These first LEV standards ran from 1994 through 2003. LEV II regulations, running from 2004 through 2010, represent continuing progress in emission reductions. As the State's passenger vehicle fleet continues to grow and more sport utility vehicles and pickup trucks are used as passenger cars rather than work vehicles, the more stringent LEV II standards were adopted to provide reductions necessary for California to meet federally mandated clean air goals outlined in the 1994 State Implementation Plan. In 2012, CARB adopted the LEV III amendments to California's LEV regulations. These amendments, also known as the Advanced Clean Car Program, include more stringent emission standards for model years 2017 through 2025 for both criteria pollutants and greenhouse gas (GHG) emissions for new passenger vehicles.

California On-Road Heavy-Duty Vehicle Program

CARB has adopted standards for emissions from various types of new on-road heavy-duty vehicles. CCR, Section 1956.8, Title 13 contains California's emission standards for on-road heavy-duty engines and vehicles, and test procedures. CARB has also adopted programs to reduce emissions from in-use heavy-duty vehicles, including the Heavy-Duty Diesel Vehicle Idling Reduction Program, Heavy-Duty Diesel In-Use Compliance Program, Public Bus Fleet Rule and Engine Standards, and School Bus Program and others.

Verified Diesel Emission Control Strategies

USEPA and CARB tiered off-road emission standards only apply to new engines and off-road equipment can last several years. CARB has developed Verified Diesel Emission Control Strategies (VDECS), which are devices, systems, or strategies used to achieve the highest level of pollution control from existing off-road vehicles, to help reduce emissions from existing engines. VDECS are designed primarily for the reduction of diesel PM emissions and have been verified by CARB. There are three levels of VDECS, the most effective of which is the Level 3 VDECS. Tier 4 engines are not required to install VDECS because they already meet the emissions standards for lower tiered equipment with installed controls.

California Diesel Risk Reduction Plan

CARB Diesel Risk Reduction Plan has led to the adoption of new state regulatory standards for all new on-road, off-road, and stationary diesel-fueled engines and vehicles to reduce DPM emissions by about 90 percent overall from year 2000 levels. The projected emission benefits associated with the full implementation of this plan, including federal measures, are reductions in DPM emissions and associated cancer risks of 75 percent by 2010, and 85 percent by 2020.

Tanner Air Toxics Act and Air Toxics Hot Spots Information and Assessment Act

TACs in California are primarily regulated through the Tanner Air Toxics Act (AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588), also known as the Hot Spots Act. To date, CARB has identified more than 21 TACs and has adopted the USEPA list of Hazardous Air Pollutants as TACs.

Air Quality Management

Because SFBAAB currently exceeds the federal ozone and PM_{2.5} standards and the state ozone, PM₁₀, and PM_{2.5} standards, the Air District is required to implement strategies to reduce pollutant levels to achieve attainment of NAAQS and CAAQS. The Air District adopted the 2017 Clean Air Plan (2017 Plan) as an update to the 2010 Clean Air Plan. The 2017 Plan provides a regional strategy to protect public health and the climate. Consistent with GHG reduction targets adopted by the state, the 2017 Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. To fulfill state ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors (ROG and NO_x) and reduce transport of ozone and its precursors to neighboring air basins. In addition, the 2017 Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter and TACs (CARB 2017).

Sensitive receptors are facilities or land uses that include members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. According to the Air District, sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas (CARB 2017). The nearest sensitive receivers are residences approximately 1,040 feet southwest of the project site.

San Leandro 2035 General Plan

The current City General Plan contains objectives and policies that minimize air pollutant emissions and reduce population exposed to significant health risk. The following objectives and policies from the City's General Plan are relevant to air quality and apply to the project:

Policy EH-3.3 Land Use Compatibility. Discourage new uses with potential adverse air quality impacts, including the emission of toxic air contaminants and fine particulates, near residential neighborhoods, schools, hospitals, nursing homes, and other locations where public health could potentially be affected.

Policy EH-3.4 Design, Construction, and Operation. Require new development to be designed and constructed in a way that reduces the potential for future air quality problems, such as odors and the emission of any and all air pollutants. This should be done by:

- a) Requiring construction and grading practices that minimize airborne dust and particulate matter;
- b) Ensuring that best available control technology is used for operations that could generate air pollutants;
- c) Encouraging energy conservation and low-polluting energy sources;

- d) Promoting landscaping and tree planting to absorb carbon monoxide and other pollutants;
- e) Implementing the complementary strategies to reduce greenhouse gases identified in the Climate Action Plan.

Policy EH-5.4 Separation from Sensitive Uses. Provide adequate and safe separation between areas where hazardous materials are present and sensitive uses such as schools, residences, and public facilities. Zoning and other development regulations should include performance standards to avoid safety hazards and achieve compatibility between uses.

Policy LU-10.2 Off-Site Impacts. Consider the setting and context of each site when evaluating proposals for development in industrial areas. The potential for impacts on adjacent uses, including the potential for land use conflicts and increased parking demand and truck traffic, should be a key consideration.

Significance Thresholds

The Air District has adopted guidelines for quantifying and determining the significance of air quality emissions in its *California Environmental Quality Act Air Quality Guidelines* (Air District 2023). The Air District recommends that lead agencies determine appropriate air quality emissions thresholds of significance based on substantial evidence in the record. The Air District's significance thresholds in the updated 2022 *CEQA Air Quality Guidelines* for project operations within the SFBAAB are the most appropriate thresholds for use in determining air quality impacts of the project. The Air District developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts.

Table 5 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions used for the purposes of this analysis. These represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to SFBAAB existing air quality conditions. For the purposes of this analysis, the project would result in a significant impact if construction or operational emissions would exceed any of the thresholds shown in Table 5.

Table 5 Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices		Not Applicable

ROG = reactive organic gases, NO_x = nitrogen oxides, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns in diameter or less; lbs./day = pounds per day

Source: Air District 2023

The Air District maintains rules and regulations to regulate sources of air pollution. Applicable rules and regulations are listed below. Additionally, the Air District does not have quantitative thresholds for fugitive dust emissions during construction. Instead, the Air District recommends Best Management Practices (BMPs) be implemented to reduce fugitive dust emissions, which are also listed below.

Air District Rules and Regulations

Regulation 2, Rule 1 (Permits–General Requirements)

The Air District regulates new sources of air pollution and the modification and operation of existing sources through the issuances of authorities to construct and permits to operate. Regulation 2, Rule 1 provides an orderly procedure which the project would be required to comply with to receive authorities to construct or permits to operate from the Air District, for new sources of air pollutants, as applicable.

Regulation 2, Rule 5 (New Source Review Permitting)

The Air District regulates backup emergency generators, fire pumps, and other sources of TACs through its New Source Review (Regulation 2, Rule 5) permitting process. Although emergency generators are intended to be used only during periods of power outages, monthly testing of each generator is required. The Air District limits testing to no more than 50 hours per year. Each emergency generator installed is assumed to meet a minimum of Tier 2 emission standards (before control measures). As part of the permitting process, the Air District limits the excess cancer risk from any facility to no more than 10 per 1-million-population for any permits that are applied for within a two-year period, and would require any source that would result in an excess cancer risk greater than 1 per 1 million to install best available control technology for toxics.

Regulation 6, Rule 1 (Particulate Matter–General Requirements)

The Air District regulates particulate matter emissions through Regulation 6 by means of establishing limitations on emission rates, emissions concentrations, and emission visibility and opacity. Regulation 6, Rule 1 provides existing standards for particulate matter emissions that could result during project construction or operation that the project would be required to comply with, as applicable, such as the prohibition of emissions from any source for a period or aggregate periods of more than three minutes in any hour which are equal to or greater than 20 percent opacity.

Regulation 6, Rule 6, (Particulate Matter–Prohibition of Trackout)

One rule by which the Air District regulates particulate matter includes Regulation 6, Rule 6, which prohibits particulate matter trackout during project construction and operation. Regulation 6, Rule 6 requires the prevention or timely cleanup of trackout of solid materials onto paved public roads outside the boundaries of large bulk material sites, large construction sites, and large disturbed surface sides such as landfills.

Regulation 8, Rule 3 (Architectural Coatings)

This rule governs the manufacture, distribution, and sale of architectural coatings and limits the ROG content in paints and paint solvents. Although this rule does not directly apply to the project, it does dictate the ROG content of paint available for use during the construction.

Air District Best Management Practices for Construction-Related Fugitive Dust Emissions

The applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the Air District 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 miles per hour (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.

In the absence of a qualified Community Risk Reduction Plan,² the Air District has established the following *Thresholds of Significance* for local community risks and hazards associated with TACs and PM_{2.5} for assessing individual source impacts at a local level. Impacts would be significant if:

- The project would result in an increased cancer risk of greater than 10 in one million
- The project would result in an increased non-cancer (i.e., chronic or acute) risk of greater than 1.0 Hazard Index
- The project would result in an ambient PM_{2.5} concentration increase of greater than 0.3 micrograms per cubic meter annual average

A project would be considered to have a cumulatively considerable impact if the aggregate total of current and proposed TAC sources within a 1,000 feet radius of the project fence line in addition to the project would exceed the *Cumulative Thresholds of Significance*. Impacts would be significant if:

- The project would result in an increased cancer risk of greater than 100 in one million
- The project would result in an increased non-cancer (i.e., chronic or acute) risk of greater than 10 Hazard Index
- The project would result in an ambient PM_{2.5} concentration increase of greater than 0.8 micrograms per cubic meter annual average

Excess cancer risks are defined as those occurring in excess of or above and beyond those risks that would normally be associated with a location or activity if toxic pollutants were not present. Non-carcinogenic health effects are expressed as a hazard index, which is the ratio of expected exposure levels to an acceptable reference exposure level.

The Air District defines *sensitive receptors* as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and those with pre-existing health problems. These facilities include schools, parks, daycare centers and pre-schools, medical care facilities, and residential communities (Air District 2022).

The Air District establishes operational screening criteria for criteria air pollutants and precursors. If a project meets the screening criteria outlined in Section 4.1.2 and Table 4-1 of the Air District *CEQA Guidelines* (Air District 2023), the project would not result in the generation of operational-related criteria air pollutants and/or precursors that exceed the emissions thresholds shown in Table 5 above. For manufacturing uses, the size screening threshold is 1,009,000 square feet. In addition, for operational-

² The goal of a Community Risk Reduction Plan is to bring TAC and PM_{2.5} concentrations for the entire community covered by the Plan down to acceptable levels as identified by the local jurisdiction and approved by the Air District. This approach provides local agencies a proactive alternative to addressing communities with high levels of risk on a project-by-project approach. The Air District has developed detailed guidelines for preparing Community Risk Reduction Plans which can be found on the Air District web site at: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/draft_community_risk_reduction_plan_guidelines_may_2010.pdf

related emissions to be considered less than significant, projects must meet the following criteria in addition to being below the applicable screening level (Air District 2023):

1. Operational activities would not include stationary engines (e.g., backup generators) and industrial sources subject to Air District rules and regulations.
2. Operational activities would not overlap with construction-related activities.

Methodology

The project's construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.41. CalEEMod uses project-specific information including the project's land uses, square footage for different uses (e.g., office building, parking lot, and landscaped area), and location, to model a project's construction and operational emissions. Calculations are included in Appendix A.

Construction emissions modeled include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as workers and vendor trips. Project construction was analyzed based on the applicant-provided information regarding the construction schedule and phasing. Standardized assumptions were used where project-specific information was unknown. Project construction would involve demolition and material export of the existing 44,758-square-foot office building. Approximately 675 cubic yards of excavated material would be exported off-site during the grading phase. This analysis also includes all applicable regulatory standards the project would be required to comply with. Specifically, the project would be required to comply with Air District Regulation 8, Rule 3, which limits the quantity of VOCs in architectural coatings.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The California CAA requires that air districts create a Clean Air Plan that describes how the jurisdiction will meet air quality standards. The most recently adopted applicable air quality plan is the Air District's 2017 Plan. As described in the *Air Quality Management* Section, the 2017 Plan updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan. Pursuant to air quality planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—ROG and NO_x—and reduce transport of ozone and its precursors to neighboring air basins. The 2017 Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter and TACs. The 2017 Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes control measures related to stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super GHG-pollutants. The 2017 Plan focuses on two goals:

- Protect air quality and health at the regional and local scale by attaining all national and state air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TACs
- Protect the climate by reducing Bay Area GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050

Under the Air District's methodology, a determination of consistency with the 2017 Plan should demonstrate that a project:

- Supports the primary goals of the air quality plan
- Includes applicable control measures from the air quality plan
- Does not disrupt or hinder implementation of any air quality plan control measures

A project that would not support the 2017 Plan's goals would not be considered consistent with the 2017 Plan. On an individual project basis, consistency with the Air District's quantitative thresholds is interpreted as demonstrating support for the Clean Air Plan's goals.

As discussed under Threshold 2 below, the project's building characteristics and activity would meet the Air District's operations screening criteria for manufacturing uses. Therefore, the project's operations emissions would not exceed significant thresholds, eliminating the need for a detailed assessment.

The project would include applicable control measures from the 2017 Plan. Applicable control measures such as green building construction, waste diversion, and water conservation would indicate support for the clean air plan goals on an individual project basis. The proposed project would include construction of six electric vehicle charging stations. Additionally, the project would utilize energy efficient LED lighting and controls that would meet the requirements of Title 24 of the California Energy Commission's (CEC) Building Energy Efficiency Standards, as well as City energy efficiency requirements. Plumbing fixtures used for the proposed project would be high-efficiency fixtures, consistent with the requirements of Title 24 of the CEC's Building Energy Efficiency Standards which would minimize the potential inefficient or wasteful consumption of energy related to water and wastewater. As shown in the response to criteria b and c (see below), with regard to construction emissions, the proposed project would not result in exceedances of the Air District's 2017 thresholds for criteria air pollutants and thus, would not disrupt or hinder implementation of 2017 Plan control measures. Therefore, the proposed project would be consistent with the criteria of the 2017 Plan. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

SFBAAB is designated as a non-attainment area for NAAQS for ozone and PM_{2.5}, and CAAQS of ozone, PM₁₀ and PM_{2.5}. The following subsections discuss emissions associated with construction and operation of the proposed project.

Construction Emissions

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM₁₀ and PM_{2.5}) and exhaust emissions from heavy construction equipment and construction vehicles in addition to ROG emissions that would be released during the drying phase of architectural coating. Table 6 summarizes the estimated average daily emissions of pollutants during project construction.

Table 6 Estimated Daily Construction Emissions

Construction Year	Estimated Average Daily Emissions (lbs/day)			
	ROG	NO _x	Exhaust PM ₁₀	Exhaust PM _{2.5}
2026	2.3	17.5	0.7	0.7
2027	2.9	10.6	0.4	0.4
Air District Thresholds	54	54	82	54
Threshold Exceeded?	No	No	No	No

ROG = reactive organic gases, NO_x = nitrogen oxides, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns in diameter or less; lbs./day = pounds per day

Notes: All emissions modeling was completed using CalEEMod in accordance with applicant-provided information and data. Emissions presented are the highest of the winter and summer modeled emissions.

See Appendix A for model output results.

As shown in Table 6 construction-related emissions would not exceed Air District thresholds. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

Fugitive Dust

Construction-related fugitive dust emissions would vary from day to day, depending on the level and type of activity, silt content of the soil, and the weather. In the absence of mitigation, construction activities may result in significant quantities of dust, and as a result, local visibility and PM₁₀ concentrations may be adversely affected on a temporary and intermittent basis during construction. In addition, the fugitive dust generated by construction would include not only PM₁₀, but also larger particles, which would settle out of the atmosphere within several hundred feet of the project site and could result in nuisance-type impacts. The Air District considers fugitive dust impacts to be significant unless BMPs are implemented. The proposed project would be required to comply with the following City Standard Conditions of Approval (COAs) related to dust control and adherence to the Air District's *Basic Construction Mitigation Measures Recommended for All Proposed Projects*, which would reduce fugitive dust impacts to a less-than-significant level:

STANDARD COA – DUST CONTROL

Construction activity shall not create dust, noise or safety hazards for adjacent businesses and properties. Dirt and mud shall not be tracked onto public streets from the project site during construction. Standard construction dust control procedures, such as wetting, daily road washing and other maintenance functions to control emissions, shall be implemented at all times during outdoor construction. Dust generating activities such as grading, excavation, paving, etc. shall be scheduled the early morning and other hours when wind speeds are low. All construction activities entailing soil disturbance shall cease when winds exceed 30 miles per hour as an hourly average.

STANDARD COA – AIR QUALITY

The Applicant/Owner shall comply with current Air District basic control measures for reducing construction emissions of PM₁₀ (Table 8-1, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the Air District's *CEQA Guidelines*). (Review of all demolition, grading, and building permits. Implementation shall remain in place throughout project construction and verification shall occur during normal construction site inspections).

Operational Emissions

The Air District operational screening level size for manufacturing uses is 1,009,000 square feet. The screening table was developed using default assumptions and does not account for project-specific design features or local requirements that could further reduce emissions. The project includes the addition of 49,136 square feet of manufacturing area, does not involve stationary engines or industrial sources, and operational activities would not overlap with construction-related activities. Therefore, the project's operational activities meet the operational screening criteria, which indicates that the operational emissions would not exceed significant thresholds, eliminating the need for a detailed assessment. The operational screening criteria are designed to ensure that emissions remain below levels that would cause significant air quality impacts. Therefore, pursuant to the Air District's guidance, a detailed air quality assessment of the project's operational criteria air pollutant emissions is not necessary, and project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

LESS-THAN-SIGNIFICANT IMPACT

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Therefore, the majority of sensitive receptor locations are schools, hospitals, and residences. Sensitive receptors in the project vicinity include single-family residences located 1,040 feet southwest of the project site.

The following four criteria based on Air District health risk and hazard significance thresholds were applied to determine if the proposed project would significantly impact the exposure of sensitive receptors to project emissions (Air District 2023). The project would have a significant impact if:

- Construction of the project would generate TACs that exceed health risk significance thresholds
- The cumulative health impact would exceed cumulative health risk significance thresholds
- Operation of the project would result in an exceedance of the health risk significance thresholds
- A CO hotspot assessment demonstrates that the project would result in a CO hotspot which would exceed ambient air quality standards

These criteria are discussed in the following subsections.

Toxic Air Contaminants

Construction Impacts

Construction-related activities would result in temporary project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for demolition, site preparation, grading, building construction, paving, and other construction activities. DPM was identified as a TAC by CARB in 1998 (CARB 2026).

Generation of DPM from construction projects typically occurs in a single area for a short period of time. Construction of the project would occur over approximately 18 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual Receptor. The risks estimated for a Maximally Exposed Individual Receptor are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., 18 months) is approximately 5 percent of the total exposure period used for 30-year health risk calculations. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (Air District 2023).

The maximum daily PM₁₀ emissions would range from less than 0.4 to 3.1 lbs./day of exhaust (DPM), with the maximum emissions occurring during simultaneous demolition, site preparation, and grading activities. These activities would occur simultaneously for approximately 20 days. PM emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less intensive construction equipment. Additionally, the nearest sensitive receptor is located more than 1,000 feet from the project site boundary, and DPM emissions would disperse rapidly over this distance. The project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these requirements would minimize emissions of TACs during construction. Therefore, project construction would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

Operational Impacts

The proposed project would include operation of a manufacturing building and office space which would not include land uses that could result in substantial on-site TAC sources during operation such as metal smelting or refining operations. The proposed project would not include use of stationary source equipment (e.g., back-up generators, fire pumps), and any stationary source equipment which would be greater than 50 horsepower that would require permitting through the Air District to be installed and operated. Compliance with mandatory permitting requirements would ensure that permitted source would not have a significant impact related to health risk impacts.

The proposed project would result in a net decrease of approximately 298 trips per day due to the demolition of the existing office building on-site (Appendix C); therefore, vehicle activities associated with project operation are not anticipated to result in a substantial source of TACs.

CO Hotspots

CO emissions from traffic generated by the proposed project are a concern at the local level because congested intersections can result in high, localized concentrations of CO referred to as CO hotspots. The Air District recommends comparing a project's attributes with the following screening criteria as a first step to evaluating whether the project would result in the generation of CO concentrations that would substantially contribute to an exceedance of the *Thresholds of Significance*. The project would result in a less-than-significant impact to localized CO concentrations if:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the regional transportation plan (RTP), and local congestion management agency plans
2. The project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour
3. Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway)

Based on the Traffic Impact Analysis prepared for the proposed project (Appendix B), the project would result in a net decrease of approximately 298 trips per day due to the demolition of the existing office building on-site. Therefore, the proposed project would not cause a nearby roadway segment or intersection to exceed 44,000 vehicles per hour. Localized CO emissions would not be significant.

Overall, the proposed project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust and during idling. However, these odors would be intermittent and temporary and would cease upon completion of construction activities, and odors would disperse with distance. Overall, project construction would not generate other emissions, such as those leading to odors, affecting a substantial number of people. Construction-related impacts would be less than significant.

Table 5-4 in the Air District's 2022 *CEQA Air Quality Guidelines* provides screening distances for land uses that have the potential to generate substantial odor complaints. The uses in the table include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food processing facility, smelting plants, and chemical manufacturing facilities (Air District 2023). Operation of the project would not include any of these uses or generate other emissions, such as those leading to odors, which would affect a substantial number of people. Furthermore, truck idling at the

proposed manufacturing building would be limited to five minutes at any location as required by CARB's Commercial Vehicle Idling Airborne Toxics Control Measure (CARB 2005), which would minimize generation of odors from trucks at the project site. No operational impacts would occur.

NO IMPACT

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4 Biological Resources



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?	☐	☐	☐	☒

Setting

The project site is currently developed with an existing manufacturing building and office building. The site is in an urbanized area, surrounded by paved parking lots, manufacturing, and warehouses. The site is approximately 1.8 miles northeast of San Francisco Bay, 1.54 miles north of San Lorenzo Creek, and 1.17 miles south of San Leandro Creek. The site is relatively flat with an elevation of approximately 30 feet.

There is a total of 38 trees on the project site, including 27 Brisbane box trees, 10 Cajeput paperbark trees, and one Yoshino cherry tree. Minimal on-site landscaping includes trees and shrubs throughout the parking lot and a row of shrubs separating the parking lot from the manufacturing building, and a row of shrubs and trees along the property's front gate that separates the site from Aladdin Avenue.

Wetlands, riparian zones, and other natural communities do not occur on the project site. The likelihood of occurrence of listed, candidate, and other special-status species in the site is generally low. Migratory nesting birds that could use the existing trees on and around the project site are protected under the Migratory Bird Treaty Act (MBTA). Protected birds include all common songbirds, waterfowl, shorebirds,

hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts, martins, swallows, and others, including their body parts (feathers, plumes, etc.), nests, and eggs.

Regulatory Setting

Federal and State Regulations

Regulatory authority over biological resources is shared by federal, state, and local agencies under a variety of laws, ordinances, regulations, and statutes. Primary authority for biological resources lies with the land use control and planning authority of local jurisdictions (in this instance, the City).

CDFW is a trustee agency for biological resources throughout the state under CEQA and has direct jurisdiction under the California Fish and Game Code (CFGF). Under the California Endangered Species Act and the federal Endangered Species Act, CDFW and United States Fish and Wildlife Service (USFWS), respectively, have direct regulatory authority over species formally listed as threatened or endangered (and listed as rare for CDFW). Native and/or migratory bird species are protected under the CFGF Sections 3503, 3503.5, and 3511.

Statutes in the Clean Water Act (CWA), CFGF, and CCR protect wetlands and riparian habitat. The United States Army Corps of Engineers has regulatory authority over wetlands and waters of the United States under Section 404 of the CWA. The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) ensure water quality protection in California pursuant to Section 401 of the CWA and Section 13263 of the Porter-Cologne Water Quality Control Act. CDFW regulates waters of the State under CFGF Section 1600 et seq.

Special-status species are those plants and animals: 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and the National Marine Fisheries Service under the federal Endangered Species Act; 2) listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act; 3) recognized as California Species of Special Concern by the CDFW; 4) afforded protection under CFGF; and 5) occurring on Lists 1 and 2 of the CDFW California Rare Plant Rank system.

San Leandro Municipal Code

SLMC, Chapter 5-2 establishes tree preservation requirements that would apply to the project. Section 5-2-205 establishes all street trees within the city as property of the City, and Section 5-2-220 outlines requirements for street tree planting and replacement as included below:

- (a) Upon approval of the Director, any person may undertake privately, or by agreement with a private nursery or tree service, the planting of a street tree provided that the location, species and manner of planting are acceptable to the Director.
- (b) The Director shall prepare a list of those tree species which are acceptable for use as street trees. The Director shall also establish such criteria relating to the location and manner of planting such street trees as will protect public safety and public and private improvement.
- (c) All new planting of street trees as replacements for street trees existing on the effective date of this Chapter shall conform to the species and planting criteria set forth in subsection (b) of this section.
- (d) There may be imposed a condition of approval for all parcel and subdivision maps that the subdivider plant street trees at such locations and in such manner as may be determined by the Director.

Impact Analysis

- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

As described in the Setting section above, the project site is in a heavily disturbed industrialized area of San Leandro and includes an existing office and manufacturing building, limited landscaping, and 38 trees. The site does not support viable habitat for special-status plant or wildlife species, nor does it contain sensitive natural communities. It also lacks riparian habitat and is not situated within a known regional wildlife movement corridor or other sensitive biological area, as indicated by the USFWS Critical Habitat portal (USFWS 2026a). Given the highly developed nature of the site and its surroundings, along with the absence of native or riparian habitats on or adjacent to the property, no federal or state listed endangered, threatened, rare, or otherwise sensitive species are expected to occur within the project site.

Native and non-native bird species adapted to urban environments could be present, and there is some potential for birds protected under the MBTA to nest on the site. Although vegetative cover is limited, common nesting opportunities could occur in building crevices, isolated trees, small shrubs, or in ground level areas. Because the potential exists for nesting birds to occur within the project area, impacts on nesting birds could be potentially significant. However, the project would be required to comply with the following City Standard COA, which would reduce impacts on nesting birds to a less-than-significant level.

STANDARD COA – MIGRATORY BIRDS

Tree removal, landscape grubbing, building demolition, and other construction activities such as grading and utility installation shall be performed in compliance with the Migratory Bird Treaty Act and relevant sections of the California Fish and Game Code to avoid loss of nests in active use. This shall be accomplished by scheduling tree removal and building demolition outside of the bird nesting season (which occurs from February 1 to August 31) to avoid possible impacts on nesting birds if new nests are established in the future. Alternatively, if tree removal and building demolition cannot be scheduled during the non-nesting season (September 1 to January 31), a pre-construction nesting survey shall be conducted. The survey shall be completed by a qualified wildlife biologist no more than 14 days prior to the start of tree removal. If active nests are identified, a no disturbance buffer of 25-500 feet (depending on species and setting) shall be established around each nest until the young are fledged or the nest becomes inactive.

With implementation of the Standard COA, project impacts to special-status plant and wildlife species would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The project site does not contain riparian habitat or sensitive natural communities as identified by CDFW or USFWS (City of San Leandro 2016). There would be no impact.

NO IMPACT

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The National Wetlands Inventory was reviewed to determine if wetland and/or non-wetland waters had been previously documented and mapped on or in the vicinity of the project site (USFWS 2026b). No such features occur on or adjacent to the project site according to the National Wetlands Inventory mapper. As discussed in the *Setting*, the closest waterbody San Leandro Creek located approximately 1.17 miles south of the site. Therefore, construction and operation of the proposed project would not involve or require the direct removal, filling, hydrological interruption, or other means to the bed, bank, channel, or adjacent upland area of a creek or wetland. Additionally, the proposed project would be required to adhere to applicable California Building Standards Code (CBC) and SLMC requirements to reduce soil erosion, including SLMC Section 7-12-230, which requires erosion and sedimentation control measures and drainage plans to be prepared by a civil engineer and submitted to the City for approval prior to issuance of a grading permit. Where appropriate, the control measures must include measures, including, but not limited to, short-term erosion control planting, waterproof slope covers, stormwater retention basins, and devices to trap, store, and filter sediment during project construction and operation. Therefore, the proposed project would not have a substantial adverse effect on state or federally protected wetlands, and this impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

The project site does not contain hydrologically connected waters that would support native resident or migratory fish. In addition, the project site is not located in a migratory wildlife corridor. The project site is developed with an existing office and manufacturing building, which limits wildlife movement. Because the project site does not include sensitive biological resources or movement corridors, project implementation would not interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. There would be no impact.

NO IMPACT

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

As discussed in the Arborist Report prepared by HortScience | Bartlett Consulting in January 2025 (Appendix C), a total of 38 trees are present on the project site. Trees include 27 Brisbane box, 10 Cajeput paperbark, and 1 Yoshino cherry.

The proposed project would remove 27 trees, including 17 Brisbane box trees and 10 Cajeput paperbark trees, while preserving 11 trees (one Yoshino cherry tree and 10 Brisbane box trees). None of the trees on the project site are protected trees pursuant to SLZC, Chapter 5. Of the 27 trees to be removed, 18 trees are located within the proposed construction footprint, and 9 trees are located within the existing parking area that would be reconfigured as part of the proposed project. Additionally, the Arborist Report recommended the implementation of a tree preservation plan for the project which would include the establishment of Tree Protection Zones, plans reviewed by the consulting Arborist, proper irrigation setup in accordance with the Tree Protection Zones, and tree protection during construction measures as well. Approximately 6 percent of the site's area, or approximately 20,390 square feet, would include landscaping that would comply with MWEO. Additionally, the arborist report concluded that no street trees were present on the project site. As a result, the project is not subject to SLMC, Chapter 5-2, which governs the planting, maintenance, protection, removal, and alteration of street trees located within public

right-of-way. Compliance with permitting requirements would result in no conflict with local policies or ordinances protecting biological resources. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?

The project site is not located in an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. The project would not conflict with such a plan and no impact would occur.

NO IMPACT

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5 Cultural Resources



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Setting

Rincon Consultants, Inc. (Rincon) prepared a Cultural Resources Assessment for the project in February 2026 (Appendix D). The Assessment consisted of a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center of the project site as well as a 0.25-mile radius around the project site, a search of the Sacred Lands File (SLF) with the Native American Heritage Commission (NAHC), archival and background research, geoarchaeological review, and evaluation of 1111–1133 Aladdin Avenue. Work was completed in accordance with CEQA and applicable local regulations.

The CHRIS records search and background research through the National Register of Historic Places (NRHP) and Built Environment Resources Directory for Alameda County identified no cultural resources within a 0.25 mile of the project site. No resources are recorded within or adjacent to the project site. Review of the California Register of Historical Resources (CRHR), State Historic Landmarks, and State Points of Interest identified one historic resource near the project site, San Leandro Ball Park (2663 Teagarden Street). The resource is 0.1 mile west of the project site and listed as a California Point of Interest (P166) on March 19, 1970.

Additionally, the City provided a previous evaluation of 1111 Aladdin Avenue completed in 2025 (Shores 2025). Prepared on California Department of Parks and Recreation 523 Series Forms, the property was recommended ineligible for listing in NRHP and CRHR under all criteria. It is not a historical resource as defined by *CEQA Guidelines* Section 15064.5(a). On February 10, 2026, NAHC responded to Rincon's SLF request, stating the results of the SLF search were negative.

Regulatory Setting

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (PRC, Section 21084.1). A historical resource is a resource listed in, or determined to be eligible for listing in CRHR; a resource included in a local register of historical resources; and/or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (*CEQA Guidelines*, Section 15064.5[a][1-3]). Historical resources may include eligible built environment resources and archaeological resources from any time period.

Pursuant to *CEQA Guidelines* Section 15064.5(a)(3), a resource is considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
2. Is associated with the lives of persons important in our past

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. Has yielded, or may be likely to yield, information important in prehistory or history

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a “unique archaeological resource” as identified in PRC Section 21083.2. If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a-b]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person

CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during implementation of a project.

Impact Analysis

The impact analysis included herein is organized based on the cultural resources checklist questions included in *CEQA Guidelines* Appendix G: Environmental Checklist Form. Checklist question “a” broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, analysis under checklist question a is limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to *CEQA Guidelines* Section 15064.5 and those that may be considered unique archaeological resources pursuant to PRC, Section 21083.2, are considered under checklist question b.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

As detailed above under Setting, the project site contains one built-environment resource, 1111-1113 Aladdin Avenue, which was previously evaluated in 2025 as ineligible for listing in the NRHP and CRHR. Because 1111-1133 Aladdin Avenue is ineligible for NRHP and CRHR and the San Leandro Ball Park would not be impacted by the proposed project, the proposed project would result in no impact to historical resources under CEQA.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

CHRIS records search and background research identified no archaeological resources within or immediately adjacent to the project site. The geoarchaeological review suggests the likelihood for encountering intact subsurface archaeological resources is low given the soils, proximity to water, lack of documented resources within 0.25 mile of the project site, and previous grading and development of the project site. As such, project-related ground disturbance is not likely to encounter intact subsurface archaeological resources that may qualify as historical resources or unique archaeological resources pursuant to CEQA. The proposed project would be required to comply with the following Standard COA

related to the unanticipated discovery or archaeological resources and human remains, which would reduce impacts related to archaeological resources:

STANDARD COA – DISCOVERY OF HISTORIC/PREHISTORIC ARTIFACTS OR HUMAN REMAINS

If currently unknown historic/prehistoric artifacts or human remains are discovered during ground disturbing activities, the following measures shall be implemented:

- a. In compliance with State law (Section 7050.5 of the Health and Safety Code and Section 5097.94 of the Public Resources Code), in the event that historical artifacts are found, all work within 50 feet of the find shall stop and a qualified archaeologist shall examine the find. The archaeologist shall then submit a plan for evaluation of the resource to the City of San Leandro Planning Services Division for approval.
- b. If the evaluation of the resource concludes that the found resource is eligible for the California Register of Historic Resources, a mitigation plan shall be submitted to the City of San Leandro Planning Services Division for approval, which shall consider reasonable efforts for the resources to be preserved in place or left in an undisturbed state.
- c. If the artifacts and samples recovered during construction are determined to be significant and cannot be preserved in place, the artifacts shall be cataloged and curated by a qualified archaeologist and placed in an appropriate curation facility. The mitigation plan shall be completed before earthmoving or construction activities can recommence within the designated resource area.
- d. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant (MLD) to inspect the site and provide recommendation.

Nonetheless, impacts would still remain potentially significant, and Mitigation Measure CUL-1 would be required to provide additional specificity in the event that unanticipated cultural resources are discovered.

Mitigation Measures

CUL-1 Unanticipated Discovery of Cultural Resources

In the event archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 100 feet of the find shall halt and an archaeologist meeting or exceeding the Secretary of the Interior's Professional Qualifications Standards for Archeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, a Native American representative of the Confederated Villages of Lisjan Nation 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 is determined to be eligible for CRHR and significant impacts to the resource cannot be avoided via project redesign, the entity shall retain a Tribal representative and the qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR, Section 15126.4(b)(3)(C) and prepared in coordination with the Confederated Villages of Lisjan Nation. The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any potential significant impacts to the resource. 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, Section 15126.4(b)(3)(C).

Significance After Mitigation

Implementation of Mitigation Measures CUL-1 would reduce potential impacts to less than significant by ensuring any subsurface archaeological resources are identified and evaluated. Should any identified resources be identified as eligible for CRHR, those resources would be avoided or appropriate measures, such as data recovery, would be identified on a case by case basis.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

No human remains are known to be present within the project site. However, the discovery of human remains is always a possibility during ground-disturbing activities. If human remains are discovered during ground-disturbing activities, the State of California Health and Safety Code Section 7050.5 states no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner must notify the NAHC, which would determine and notify a Most Likely Descendent (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the City shall reinter the remains in an area of the property secure from subsequent disturbance. With adherence to existing regulations, potential impacts to human remains would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting

Electricity is primarily consumed by the built environment for lighting, appliances, heating and cooling systems, and other uses, such as industrial processes in addition to being consumed by alternative fuel vehicles. Most of California’s electricity is generated in state, with approximately 22 percent imported from the northwest and southwest regions of the United States in 2024 (CEC 2024a). In addition, approximately 62 percent of California’s electricity supply in 2024 came from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2024a). In 2018, Senate Bill (SB) 100 accelerated the state’s Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

The smallest scale at which energy consumption information is readily available is the county level. Therefore, energy consumption in Alameda County is used herein to characterize the city’s existing consumption of electricity and natural gas. According to CEC, Alameda County consumed approximately 11,700 gigawatt-hours of electricity in 2024 from residential and non-residential uses (CEC 2024b). San Leandro is served by Ava, which supplies electricity to all accounts (residential, business, and municipal) and is delivered through PG&E infrastructure. Ava buys power mainly from clean sources like wind, solar, and hydropower (Ava 2026). Alameda County consumed approximately 350.5 millions of therms of natural gas in 2024 in both residential and non-residential uses (CEC 2024c).

Petroleum fuels are primarily consumed by on-road vehicles and trucks and off-road equipment in addition to some industrial processes, with California being one of the top petroleum-producing states in the nation. Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most used transportation fuel in California with approximately 11.7 billion gallons sold in 2024 (CEC 2024d). Diesel, which is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 1.9 billion gallons sold in 2024 (CEC 2024d). Table 7 summarizes the petroleum fuel consumption for Alameda County, in which the project site would be located, as compared to statewide consumption.

Table 7 2024 Annual Gasoline and Diesel Consumption

Fuel Type	Alameda County (millions of gallons)	California (millions of gallons)
Gasoline	456	11,681
Diesel	51	1,904

Source: California Energy Commission 2024d

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and GHG emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the project's energy consumption are discussed in detail in Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, respectively.

Regulatory Setting

Title 24, California Code of Regulations

CCR, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods. The most recent update is the 2025 Energy Code, which was formally adopted in September 2024 and went into effect on January 1, 2026. This update includes expanded electrification measures, stronger lighting and mechanical performance requirements, and new solar photovoltaic and battery-storage readiness standards. The 2025 Energy Code replaces the 2022 standards, which had taken effect on January 1, 2023. All building permit applications submitted on or after January 1, 2026, must comply with the 2025 Energy Code. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in Title 24.

Part 6 (Building Energy Efficiency Standards)

CCR Title 24, Part 6, known as the Building Energy Efficiency Standards, establishes California's mandatory requirements for energy performance in residential and nonresidential buildings. These standards were first adopted in 1978 to reduce statewide energy consumption, and they are updated every three years to reflect improvements in building science, cost-effective technologies, and statewide policy goals for energy efficiency and decarbonization. The standards govern building envelope performance, heating, ventilation, and air conditioning (HVAC) efficiency, ventilation and indoor air quality, water heating, and interior and exterior lighting, as well as demand-management measures such as solar photovoltaic system design and energy-storage readiness. Compliance is demonstrated through submittal and approval of a Title 24 energy compliance report during building permit review.

The most recent update is the 2025 Building Energy Efficiency Standards, which take effect January 1, 2026. These standards strengthen requirements for mechanical system performance, update lighting controls for nonresidential buildings, expand solar photovoltaic and battery-storage readiness requirements, and further integrate high-efficiency electric heat pumps into both residential and nonresidential building types. Collectively, the 2025 Standards increase energy efficiency in new construction and major renovations and support California's efforts to reduce GHG emissions from the building sector.

California Green Building Standards Code, CCR Title 24, Part 11

California's green building code, referred to as CALGreen, was developed to provide a consistent approach to green building within the state. CALGreen lays out the minimum requirements for newly constructed residential and nonresidential buildings to reduce GHG emissions through improved efficiency and process improvements. The requirements pertain to energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air

contaminants. It also includes voluntary tiers to further encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

Plan Bay Area 2050

Plan Bay Area 2050 is a state-mandated, integrated long-range transportation, land-use, and housing plan, known as a RTP/Sustainable Communities Strategy (SCS), that would support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution in the nine-county San Francisco Bay Area (Association of Bay Area Governments [ABAG]/Metropolitan Transportation Commission [MTC] 2021). Plan Bay Area 2050 focuses on advancing equity and improving resiliency in the Bay Area by creating strategies in the following four elements: Housing, Economy, Transportation, and Environment. Strategies include allowing higher-density in proximity to transit-corridors, optimizing the existing roadway network, creating complete streets, providing subsidies for public transit, and reducing climate emissions, which will reduce overall per capita energy use from non-renewable resources.

San Leandro Municipal Code

SLMC, Chapter 7.5.7, Energy Code, mandates the implementation of CBC, Title 24, Part 6, the California Energy Code, which has specific requirements for building design to reduce energy consumption. Some of the measures in the California Energy Code include the use of certain building materials to ensure a greater degree of energy efficiency during building operation and construction and energy efficiency standards for appliances, lighting amenities, and water fixtures, among other project components. SLMC, Chapter 3.19 requires all new municipal building projects to meet the United States Green Building Council LEED Silver rating. SLMC, Chapter 7.5.6, Green Building Code, adopts CBC, Title 24, part 11, Green Building Standards Code (CALGreen).

San Leandro 2021 Climate Action Plan

In July 2021, the City adopted an update to its Climate Action Plan (CAP), a citywide strategy to reduce GHG emissions. Chapter 4 of the CAP includes strategies that target energy reduction through energy efficiency and conservation, including prioritizing increasing and installing renewable energy generation systems and energy storage systems on rental homes, multi-family buildings, and affordable housing; reducing automobile dependency and increasing transit-oriented development; and committing to developing a reach code limiting natural gas use in new construction, or as directed by the state or regional agencies (City of San Leandro 2021).

San Leandro 2035 General Plan

There are several energy-related policies of the 2035 General Plan in the Open Space and Conservation, Environmental Hazards, Land Use, and Transportation Elements. Policies include using best practices for energy conservation in building and construction, using renewable energy sources where possible, utilizing energy-reducing transportation strategies and alternative fuel vehicles, reducing vehicle miles travelled (VMT) and increasing active transportation options, and reducing emissions.

Impact Analysis

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The anticipated use of energy throughout project construction and operation is detailed in the following subsections. Applicant-provided information, the CalEEMod outputs for the air pollutant and GHG emissions modeling (Appendix A), and the VMT calculations based on the Focused Transportation Study prepared for the project (Appendix B) were used to estimate energy consumption associated with the proposed project.

Construction Energy Demand

The project would require site preparation and grading, including hauling material off-site; building construction; architectural coating; and landscaping and hardscaping. During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. As shown in Table 8, project construction would require approximately 13,181 gallons of gasoline and approximately 103,212 gallons of diesel fuel. These construction energy estimates are conservative because they assume that the construction equipment used in each phase of construction would operate every day of construction.

Table 8 Estimated Project Construction Energy Consumption

Source	Energy Consumption ¹	
Gasoline	13,181 gallons	1,447 MMBtu
Diesel	103,212 gallons	13,155 MMBtu

MMBtu = million metric British thermal units
¹ Energy consumption is converted to MMBtu for each source.
 See Appendix E for energy calculation sheets.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of CCR, Title 13, Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements such as CalGreen, the project would comply with construction waste management practices to divert a minimum of 65 percent of construction debris. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. While the proposed project would include some demolition, grading, site preparation and removal of existing infrastructure, there are no other unique site features of project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in other parts of the state. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction impacts related to energy consumption would be less than significant.

Operational Energy Demand

Operation of the project would contribute to regional energy demand by consuming electricity. The project would result in a net decrease in vehicle trips; therefore, fuel consumption associated with project-generated vehicle trips were not quantified. Natural gas would be used for heating and cooling systems, and electricity would be used for lighting, appliances, and water and wastewater conveyance, among other purposes. Table 9 summarizes estimated operational energy consumption for the proposed project.

Table 9 Proposed Project Annual Operational Energy Usage

Source	Energy Consumption	
	Gigawatt-Hours	Million Metric British Thermal Units
Electricity	0.54	1,829
Natural Gas	0.63	2,152

Source: Appendix E

As shown therein, project operation would require approximately 0.54 gigawatt-hours, or 1,829 MMBtu, of electricity annually. The project would be required to comply with all standards set in the latest iteration of the CBC (CCR, Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. California's CalGreen standards (CCR, Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. The City also requires new construction to comply with the California Green Building Standards Code and incorporates requirements to be consistent with the City's GHG reduction goals. Furthermore, the 2022 Building Energy Efficiency Standards (CCR, Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, it would be expected that building energy consumption associated with the proposed project would not be more inefficient, wasteful, or unnecessary than for any other similar buildings in the region. Pursuant to CalGreen, all plumbing fixtures used for the proposed project would be high-efficiency fixtures, which would minimize the potential inefficient or wasteful consumption of energy related to water and wastewater.

Project operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City's 2035 General Plan and CAP include energy conservation and energy efficiency strategies intended to enable the state and City to achieve GHG reduction and energy conservation goals. As shown in Table 10 and Table 11, the project would be consistent with (and not conflict with nor obstruct) state and local renewable energy and energy efficiency plans.

Table 10 Project Consistency with State Renewable Energy and Energy Efficiency Plans

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
2025 Integrated Energy Policy Report. The 2025 report highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy, as well as provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.	Consistent. The project would be required to comply with San Leandro Municipal Code (SLMC) Chapter 7.5.7, which mandates the implementation of Title 24. Furthermore, electricity would be provided either by PG&E or Ava, which source some or all their power from renewable sources. Given these features, the project would involve reduced greenhouse gas emissions from power, an increase in energy efficiency savings, and integration of more renewable energy into the electricity system. The project would not conflict with or obstruct implementation of the 2025 Integrated Energy Policy Report.
California Renewable Portfolio Standard. California's Renewable Portfolio Standard obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045.	Consistent. Ava and PG&E supply electricity in the city and they are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. Ava already has an option for residents to source 100 percent renewable energy. Because Ava and PG&E would provide electricity service to the project site, the project would not conflict with or obstruct implementation of the California Renewable Portfolio Standard.

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Energy Action Plan (EAP). In the October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the state's ongoing actions in the context of global climate change. The nine major action areas in the EAP include energy efficiency, demand response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.	Consistent. Development facilitated by the project would be required to comply with SLMC Chapter 7.5.7, which mandates the implementation of Title 24. Further, electricity would be provided either by PG&E or Ava, which source some or all their power from renewable sources. Given these features, the project would involve reduced greenhouse gas emissions from power, an increase in energy efficiency savings, and integration of more renewable energy into the electricity system. The project would not conflict with or obstruct implementation of the EAP.
Assembly Bill 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality. Bioenergy Action Plan, EO S-06-06. The Executive Order establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.	Consistent. The project would not interfere with or obstruct the production of biofuels in California. Vehicles used by future project site tenants would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. The project would not conflict with or obstruct implementation of the Bioenergy Action Plan or the State Alternative Fuels Plan.
Title 24, CCR – Part 6 (Building Energy Efficiency Standards) and Part 11 (CALGreen). The 2022 Building Energy Efficiency Standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less. The CALGreen Standards establish green building criteria for residential and nonresidential projects. The 2022 Standards include the following: increasing the number of parking spaces that must be prewired for electric vehicle chargers in residential development; requiring all residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of HVAC ducts.	Consistent. The project would be required to comply with SLMC Chapter 7.5.7, which mandates the implementation of Title 24. Therefore, the project would not conflict with or obstruct implementation of the Title 24 standards. The project would also be required to comply with CALGreen standards pursuant to Section 7-5-600 of the SLMC. The project would not conflict with or obstruct implementation of CALGreen.

Table 11 Project Consistency with the 2035 General Plan and Climate Action Plan

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
General Plan Policies	
Goal OSC-8: Energy. Promote the efficient use of energy and the increased use of renewable energy by San Leandro residents and businesses. 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.	Consistent. The project would be required to comply with San Leandro Municipal Code Chapter 7.5.7, which mandates the implementation of Title 24. The project would be required to use efficient lighting and appliances. Ava and PG&E supply electricity in the city and they are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. Ava already has an option with 100 percent renewable energy sources. Because Ava and PG&E would provide electricity service to the project site, the project would be consistent with the general plan's goals and policies regarding energy efficiency and renewable energy mix.
Climate Action Plan Measures	
Measure RE-1: Encourage San Leandro households and businesses to switch from PG&E electricity supplies to East Bay Community Energy, and commit to defaulting to Renewable 100 tier for 100-percent renewable energy.	Consistent. Ava and PG&E supply electricity in the City and they are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. Ava already has an option for residents to source 100 percent renewable energy. Because Ava and PG&E would provide electricity service to the project site, the project would not conflict with or obstruct implementation of the City's CAP. The project would be required to comply with San Leandro Municipal Code Chapter 7.5.7, which mandates the implementation of Title 24. The project would not conflict with or obstruct implementation of the Title 24 standards.
Source: City of San Leandro 2016a, 2021	

As shown in Table 10 and Table 11, the project would be consistent with state plans and the City's adopted energy conservation and efficiency strategies contained in the 2035 General Plan, SLMC, and City's CAP. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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7 Geology and Soils



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☒	☐
2. Strong seismic ground shaking?	☐	☐	☒	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Setting

Active faults are defined by the State of California to be a fault that has surface displacement within the Holocene time (approximately the last 10,000 years). Potentially active faults as defined by the State of California to be a fault that has shown evidence of surface displacement during the Quaternary (last 1.6 million years). Any fault that is sufficiently active describes a fault that has some evidence of Holocene displacement on one or more of its segments or branches. Associated issues with earthquakes include liquefaction, which is the rapid transformation of sediment to a fluid-like state. It occurs when water-saturated, loose to medium dense, relatively clay-free sands and silts are subjected to earthquake ground motion.

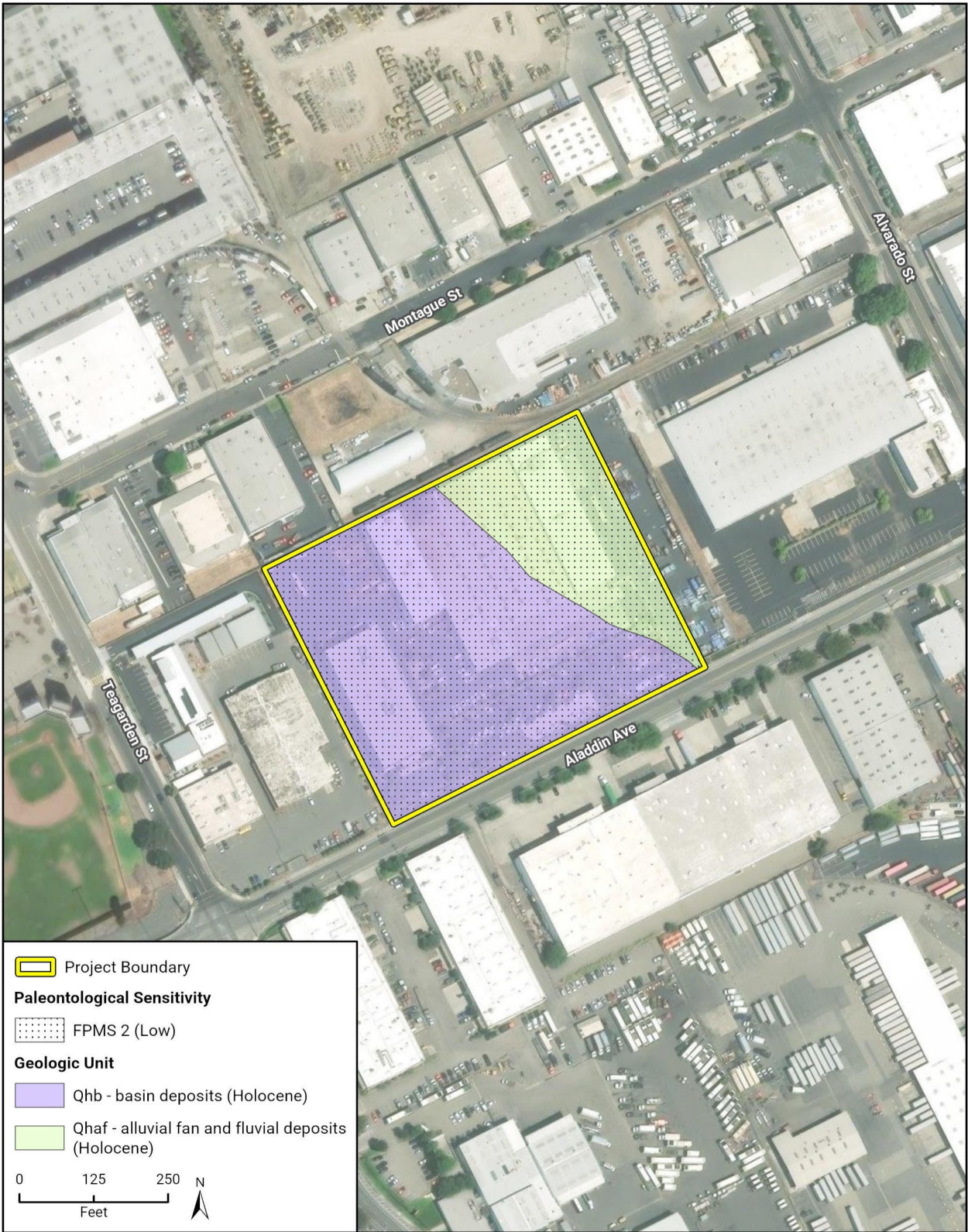
The Bay Area contains both active and potentially active faults. Major active faults in the area are the San Andreas, San Gregorio, Hayward, and Calaveras faults. The project site itself is not located within an Earthquake Fault Zone (California Geological Survey [CGS] 2016).

Expansive soils are soils that swell in density and volume as they absorb water and contract as they lose water. Associated problems include cracking and deterioration of roadway surface, as they expand and contract during seasonal wet and dry cycles. The surface soils of the site have been mapped as Clear Lake clay by United States Department of Agriculture Natural Resources Conservation Service (Natural Resources Conservation Service [NRCS] 2018a), which are not known to be expansive. Additionally, the project site is within a known liquefaction zone (CGS 2019a). The project site is flat, and there are no hillsides near the project site. Therefore, landslide risk is low on site.

The project site is located in the Coast Ranges geomorphic province, one of the eleven geomorphic provinces of California (CGS 2002). The Coast Ranges extend along the majority of California's coast from the California-Oregon border to Point Arguello in Santa Barbara County in the south and consist of northwest-trending mountain ranges and valleys. The Coast Ranges are composed of Mesozoic and Cenozoic sedimentary, igneous, and metamorphic strata. The eastern side is characterized by strike-ridges and valleys in the Upper Mesozoic strata (CGS 2002). Locally, the project site is on the East Bay Plain which is a coastal plain consisting of Pleistocene- and Holocene-aged alluvial fan, fluvial, and wetland deposits connecting the Diablo Range, Berkeley Hills, and San Lorenzo Hills to the east and San Francisco Bay in the west. The East Bay Plain has been almost entirely developed with urban uses.

The project is located in the *San Leandro, California* USGS 7.5-minute topographic quadrangle. The geology of the region surrounding the project site was mapped by Graymer (2000) who identified two geologic units, Holocene alluvial fan and fluvial deposits and Holocene basin deposits, underlying the project site, which are shown in Figure 7.

Figure 7 Geologic Map of the Project Site



Imagery provided by Esri and its licensors © 2026. Map created by Rincon Consultants, Inc. 2026.
Additional data sourced from Graymer Oakland, 2000.

25-18529 CR
Fig X Paleo Sensitivity

Regulatory Setting

Alquist-Priolo Earthquake Fault Zoning Act

Following the 1989 Loma Prieta earthquake, the Seismic Hazards Mapping Act (SHMA) was passed by the California legislature in 1990. SHMA (PRC Chapter 7.8, Section 2690-2699.6) directs the DOC and CGS to identify and map areas prone to liquefaction, earthquake-induced landslides and amplified ground shaking. It also requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the identified hazard is present and the inclusion of appropriate mitigation to reduce earthquake-related hazards.

Seismic Hazards Mapping Act

SHMA was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under the Alquist-Priolo Act, the State Geologist is responsible for identifying and mapping seismic hazards. *CGS Special Publication 117*, adopted in 1997 by the State Mining and Geology Board, constitutes guidelines for evaluating seismic hazards other than surface faulting and for recommending mitigation measures as required by PRC, Section 2695(a). In accordance with the mapping criteria, the CGS seismic hazard zone maps identifies areas with the potential for a ground shaking event that corresponds to 10 percent probability of exceedance in 50 years.

The purpose of SHMA is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. SHMA requires site-specific geotechnical investigations prior to permitting most urban development projects in seismic hazard zones.

California Building Standards Code

CBC, Title 24, Part 2, provides building codes and standards for the design and construction of structures in California. The purpose of CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of building and structures. CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, soil conditions, and site demolition. It also regulates grading activities, including drainage and erosion control. Chapter 16 of CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

CBC is updated every three years by order of the legislature, with supplements published in intervening years. State law mandates that local governments enforce the CBC. In addition, a city and/or county may establish more restrictive building standards reasonably necessary because of local climatic, geological, or topographical conditions. The 2025 CBC is based on the International Building Code.

San Leandro 2035 General Plan

Policy EH-1 Risk Management. Minimize risks from geologic, seismic, flood, and climate change-related hazards by ensuring the appropriate location, site planning, and design of new development. The City's development review process, and its engineering and building standards, should ensure that new construction is designed to minimize the potential for damage.

Impact Analysis

- a.1. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

The project site is not within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site (CGS 2016). The nearest known Alquist-Priolo Earthquake Fault Zone is the Hayward Fault zone located approximately 2.1 miles east of the site. Direct ground rupture of a known earthquake fault would be unlikely, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- a.2. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

The nearest mapped active fault, the Hayward Fault, is approximately 2.1 miles east of the project site (CGS 2016). USGS has stated that there is a 72 percent chance of at least one magnitude 6.7 or greater earthquake striking the San Francisco Bay region between 2014 and 2043 (USGS 2016). Therefore, the site could be subjected to at least one moderate to severe earthquake that would cause strong ground shaking. Project construction would be required to comply with the seismic safety requirements in the International Building Code, CBC, and City Building Code. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering methods. In addition, the project includes only manufacturing and office uses and does not include habitable space. Therefore, impacts related to strong seismic ground shaking would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- a.3. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that lie close to the ground surface. The project site is identified as having Clear Lake clay soils, which are defined as poorly drained and fine textured (NRCS 2018b). The project site is located within an identified liquefaction zone (CGS 2016).

Most land in San Leandro is underlain by materials that have moderate to very high liquefaction potential. In addition, USGS indicates that the project site is located in an area that experiences moderate liquefaction susceptibility (USGS 2023). Seismic-related ground failure, including liquefaction, could occur during a major seismic event in the region.

The proposed project would be required to comply with CBC which has been adopted by the City pursuant to SLMC, Section 7-5-100. CBC includes design and construction standards intended to reduce risks associated with seismic hazards, including liquefaction and other forms of seismic-related ground failure. Compliance with CBC would ensure that structures are designed to minimize risks to public safety associated with ground shaking and ground failure.

With compliance with applicable building codes and regulations, including CBC as adopted by the City, the project would not expose people or structures to substantial seismic-related hazards beyond existing conditions. Therefore, impacts related to seismic-related ground failure, including liquefaction, would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- a.4. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

Earthquakes can trigger landslides that may cause injuries and damage many types of structures. Landslides are typically a hazard on or near slopes or hillside areas, rather than on generally level areas, like the project site. The project site is on generally level terrain and is not within an area mapped as having landslides (CGS 2019b). Additionally, no habitable structures are proposed as part of the project. The project has a low potential for slope instability occurring at the site and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- b. *Would the project result in substantial soil erosion or the loss of topsoil?*

Project construction, particularly grading and site preparation, could result in erosion and loss of topsoil from the project site. The project developer would be required to follow applicable CBC and SLMC requirements to reduce soil erosion, including SLMC, Section 7-12-230, which requires erosion and sedimentation control measures and drainage plans to be prepared by a civil engineer and submitted to the City for approval prior to issuance of a grading permit. Where appropriate, the control measures must include measures including, but not limited to, short-term erosion control planting, waterproof slope covers, stormwater retention basins, and devices to trap, store, and filter sediment during project construction and operation. In addition, as the project would disturb more than one acre, the project applicant would be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water associated with Construction Activity, Construction General Permit Order 2009-0009 DWQ (Construction General Permit), administered by the SWRCB pursuant to Section 402 of the CWA. Coverage under the NPDES Permit would require implementation of a Stormwater Pollution Prevention Program and various site-specific BMPs to reduce erosion and loss of topsoil during project construction. Compliance with federal, State, and City regulations would reduce impacts related to soil erosion and the loss of topsoil to less than significant levels.

LESS-THAN-SIGNIFICANT IMPACT

- d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Expansive soils are those that have a potential to undergo significant changes in volume, either shrinking or swelling, due to their composition and moisture content. Periodic shrinking and swelling of expansive soils can cause extensive damage to other structures and roads. According to the NRCS, soil within and around the project site consists of Clear Lake clay. Clear Lake clay is very deep, poorly drained soil formed from mixed rock resources, and are not known to be expansive (NRCS 2018a, 2018b). The project would not be located on expansive soil, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The project site would be served by the municipal sewer system and would not require the installation of an on-site septic tank or alternate wastewater treatment systems. No impacts from septic systems or alternative wastewater disposal systems would occur.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows). Paleontological resources are not found in “soil” but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 11,700 years old (i.e., Pleistocene or older) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2025). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon evaluated the paleontological sensitivity of the geologic units that underlie the project site to assess the project’s potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. In the absence of other sensitivity criteria required by certain federal, state, or local regulatory agencies, the Society of Vertebrate Paleontology’s Fossil Prediction Map System (FPMS) is used to assign paleontological sensitivity to geologic units (SVP 2025). FPMS assignments are based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. Fossil occurrences are correlated with the geologic units that contain them, and the history of a geologic unit in producing fossils can be used to predict its potential for producing fossils in the future. FPMS is a 5-tier scale ranging from FPMS 1 (Very Low Potential) to FPMS 5 (Very High Potential) geologic units along with other rankings for geologic units with unknown potential or areas covered by water or ice. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the project site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

Holocene alluvial fan and fluvial deposits underlie the western half of the project site. Holocene alluvial fan and fluvial deposits consist of brown or tan gravelly sand or sandy gravel that grades upward to sandy or silty clay and brown medium dense sand that fines upward into sandy or silty clay (Graymer 2000). Holocene-aged sediments are generally considered too young (i.e., less than 11,700 years old) to contain paleontological resources (SVP 2025). Therefore, areas designated as Holocene alluvial fan and fluvial deposits have FPMS 2 (Low) paleontological sensitivity.

Holocene basin deposits underlie the eastern half of the project site. Holocene basin deposits consist of very fine silty clay to clay (Graymer 2000). Holocene-aged sediments are generally considered too young (i.e., less than 11,700 years old) to contain paleontological resources (SVP 2025). Therefore, areas designated as Holocene basin deposits have FPMS 2 (Low) paleontological sensitivity.

Pleistocene-aged sediments may appear beneath the Holocene deposits at depths as shallow as 10 feet due to the depositional environment. Pleistocene-aged alluvial, fluvial, and basin sediments are known to preserve paleontological resources in Alameda County and are designated as FPMS 4 (High) paleontological sensitivity (Jefferson 2010, University of California Museum of Paleontology 2026).

Ground-disturbing activities within previously undisturbed sediments with high paleontological sensitivity could result in significant impacts to paleontological resources. Impacts would be significant if construction activities result in the destruction, damage, or loss of scientifically important paleontological resources and associated stratigraphic and paleontological data. The project will require grading and excavation for site preparation and utilities (e.g., water, sewer, electricity) that will reach a maximum

depth of 4.5 feet below the current grade. Only FPMS 2 (Low) paleontological sensitivity sediments are expected to be impacted at this depth and thus will have less-than-significant impacts to paleontological resources.

The following mitigation measure would address the potentially significant impacts if paleontological resources were discovered during project implementation and ground-disturbing activities. This measure would apply to all phases of project construction and would ensure that any significant fossils present on-site are preserved. Implementation of Mitigation Measure GEO-1 would reduce potential impacts to paleontological resources to less-than-significant level and would effectively mitigate the project's impacts to these resources through the recovery, identification, and curation of previously unrecovered fossils.

Mitigation Measures

GEO-1 Unanticipated Fossil Discovery

Unanticipated Discovery of Paleontological Resources

The project proponent shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Paleontological Principal Investigator per SVP standards. If the find is determined to be significant, the Paleontological Principal Investigator shall direct all mitigation efforts related to paleontological resources consistent with SVP standards, which may include, but are not limited to: paleontological monitoring; fossil salvage, preparation, and curation; and reporting to summarize the paleontological mitigation efforts.

Significance After Mitigation

Implementation of Mitigation Measures GEO-1 would reduce potential impacts to less than significant by ensuring that any potential fossil recovered during project construction be examined for significance. Should any identified resources be significant, mitigation efforts such as paleontological monitoring; fossil salvage, preparation, and curation; and reporting would be conducted.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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. The majority of 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 as a result of 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 (CO₂), 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 (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO₂e), which is the amount of GHG emitted multiplied by its GWP. CO₂ 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 CO₂ on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2022).³

The principal climate change gases resulting from human activity that enter and accumulate in the atmosphere are listed below:

- **Carbon Dioxide.** CO₂ enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and chemical reactions (e.g., the manufacture of cement). CO₂ is also removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.
- **Methane.** Methane is emitted during the production and transport of coal, natural gas, and oil. CH₄ emissions also result from livestock and agricultural practices and the decay of organic waste in municipal solid waste landfills.
- **Nitrous Oxide.** Nitrous oxide is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

³ 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 CARB 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.

- **Hydrofluorocarbons.** Hydrofluorocarbons are one of several high GWP gases that are not naturally occurring and are generated from industrial processes. Hydrofluorocarbon (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- **Perfluorocarbons.** Perfluorocarbons are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes.
- **Sulfur Hexafluoride.** Sulfur Hexafluoride is another high GWP gas that is not naturally occurring and is generated in a variety of industrial processes.

There are uncertainties as to exactly what the climate changes will be in various local areas of the earth. There are also uncertainties associated with the magnitude and timing of other consequences of a warmer planet: sea level rise, spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, increased air pollution episodes, and the consequence of these effects on the economy.

Regulatory Setting

California Global Warming Solutions Act of 2006 (Assembly Bill 32, and Senate Bill 32, and Assembly Bill 1279)

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 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 million metric tons (MT) of CO₂e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use.

On September 8, 2016, the governor signed 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). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed later). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six MT CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

AB 1279, The California Climate Crisis Act, was passed on September 16, 2022, and declares the state would achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the state would reduce GHG emissions by 85 percent below 1990 levels no later than 2045. CARB's 2022 Scoping Plan for achieving Carbon Neutrality lays out a path to achieve AB 1279 targets and SB 32 (CARB 2022). The actions and outcomes in the 2022 Scoping Plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

San Leandro 2035 General Plan

The City'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 Climate Action Plan

The City adopted its 2021 CAP in July 2021 (City of San Leandro 2021). The 2021 CAP is the City's comprehensive strategy to reduce GHG emissions and to adapt to changing climate conditions. The CAP allows 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 CAP is prepared consistent with CEQA Guidelines for Plans for the Reduction of Greenhouse Gas Emissions (CEQA Guidelines Section 15183.5). Additionally, the CAP meets the criteria from the Air District CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans, as described under *Significance Thresholds*.

City of San Leandro Municipal Code

SLMC, Section 3.24.400 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.

SLMC, Section 7.5.600 requires compliance with the California Green Building Code, Title 24, Part 11, which details requirements for energy conservation and green design. SLMC, Section 7.5.700 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.

Significance Thresholds

Individual projects do not generate sufficient GHG emissions to influence climate change directly. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means the incremental effects of an individual project are significant when considered in conjunction with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]).

According to *CEQA Guidelines* Section 15183.5(b), projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (2016) in its white paper, *Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions.

The Air District's 2022 *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans* guidance document contains two approaches for determining significance of GHGs (Air District 2023). The two approaches are as follows:

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 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 SB 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

- 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 Air District's 2022 *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, a qualified GHG reduction strategy that can enable CEQA streamlining benefits for future land use projects 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

This analysis will evaluate the project in terms of consistency with the San Leandro 2021 CAP, a local GHG reduction strategy that contains the components required under Criterion 2 above.

Methodology

GHG emissions were modeled under the same assumptions and methodology outlined in Section 3, *Air Quality*. As discussed under *Significance Thresholds* above, projects consistent with a qualified CAP are assumed to have less-than-significant impacts related to GHG emissions. Therefore, the proposed project's estimated GHG emissions during construction and operation are presented for informational purposes only.

Impact Analysis

- a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Construction

The proposed project would generate GHG emissions during construction activities, resulting from emission sources such as construction equipment, haul trucks, vendor deliveries, and construction worker vehicles. Table 12 below summarizes the annual construction GHG emissions in terms of MT of CO₂e per year. The total emissions generated during construction were amortized over 30 years, a typical estimated operational lifetime for a project, and added to the operational emissions.

Table 12 Project Construction GHG Emissions

Construction Year	Total GHG Emissions (MT CO ₂ e)
2026	608
2027	505
Total Construction Emissions	1,113
Construction Emissions Amortized over 30 years	37

MT CO₂e = metric tons of carbon dioxide equivalent
Totals may not sum due to rounding. Construction emissions are amortized over the 30-year lifetime of the project.
Source: Appendix A

Operation

Operational GHG emissions would occur over the life of the project. Sources of operational GHG emissions include electricity and natural gas consumption, water use, waste generation, refrigerant use, and area sources, such as landscaping and consumer products. The project would result in a net decrease in vehicle trips (Appendix B); therefore, mobile source emissions are excluded from this analysis. Table 13 summarizes estimated annual GHG emissions from the project's operational activities.

Table 13 Project Operational GHG Emissions

GHG Emissions Source	Total GHG Emissions (MT CO ₂ e per year)
Area	2
Energy	165
Water	23
Waste	19
Refrigerants	2
Amortized Construction Emissions	37
Total Annual Operational Emissions	248

MT CO₂e = metric tons of carbon dioxide equivalent
Mobile sources include estimated passenger vehicle and truck use associated with the project.
Totals may not sum due to rounding. Construction emissions are amortized over the 30-year lifetime of the project.
Source: Appendix A

The City updated and approved its CAP 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. According to the CAP, "The CAP is prepared consistent with CEQA Guidelines for Plans for the Reduction of Greenhouse Gas Emissions (CEQA Guidelines Section 15183.5). Additionally, the CAP meets the criteria from the Air District CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans, as described under *Significance Thresholds*. This allows the 2021 CAP to support and streamline environmental review of GHG emissions related to future development projects within the city." Therefore, a project that would comply with the goals and policies of the City's CAP would have less-than-significant GHG impacts.

Table 14 below compares the project's consistency with the City's CAP. As shown therein, the proposed project would be consistent with the CAP and accordingly would be consistent with an adopted, qualified GHG reduction strategy. Therefore, the proposed project would not generate GHG emissions that would have a significant impact on the environment. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

Table 14 Project Consistency with the San Leandro CAP

San Leandro CAP 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.	Not Applicable. This CAP measure would be the responsibility of the City of San Leandro to implement rather than individual development projects.
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.	Not Applicable. This CAP measure would be the responsibility of the City of San Leandro to implement rather than individual development projects.
Residential Energy Efficiency (RF)	
RF-1: Increase education and outreach for existing energy efficiency financing mechanisms, including the Program for All-Inclusive Elder Care (PACE) programs and utility programs. Create new financing programs, such as a revolving loan program.	Not applicable. The proposed project would include the expansion of a manufacturing use and would not include residential uses.
RF-2: Prioritize City-funded energy retrofit programs in majority people of color census tracts or high energy cost burdened households.	
RF-3: Homeowner energy retrofits. Continue to promote energy efficiency programs and incentives available to residential property owners.	
RF-4: Work with landlords and tenants’ groups to increase energy efficiency and decrease energy costs in rental homes, including multi-family properties.	
Mitigate displacement risk by strengthening tenant protections, including relocation assistance and right of return for tenants temporarily displaced by housing retrofits. Utilize methods such as the green lease to address the split incentive issue and prevent tenants paying for property improvements.	
Renewable Energy (RE)	
RE-1: East Bay Community Energy participation Encourage San Leandro households and businesses to switch from PG&E electricity supplies to East Bay Community Energy, and commit to defaulting to Renewable 100 tier for 100 percent renewable energy.	Consistent. The project site is located in the East Bay Community Energy service area and tenants would be able to register for this electricity provider.
RE-2: Residential owner-occupied renewable energy Promote greater adoption of renewable energy generation and energy storage systems on owner-occupied new and existing homes. Leverage existing solar financing, tax, and rebate opportunities, and consider new financial incentives as needed.	Not Applicable. The proposed project would include the expansion of a manufacturing use and would not include residential uses.
RE-3: Prioritize increasing and installing renewable energy generation systems and energy storage systems on rental homes, multi-family buildings, and affordable housing.	Not Applicable. The proposed project would include the expansion of a manufacturing use and would not include residential uses.

San Leandro CAP Measure	Project Consistency
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 SLMC 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-2: Transit-oriented development. Continue to concentrate multi-family development and pedestrian- oriented mixed-use development within existing [Transit Oriented Development] TOD areas and along major transit corridors.	Not Applicable. The proposed project is not a multi-family development or pedestrian-oriented mixed-use development.
AD-3: Infill development. Focus new housing development on underutilized or vacant infill sites on flatter lands and continue to discourage new development in hillside areas.	Not Applicable. The proposed project would include the expansion of a manufacturing use and would not include residential uses.
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 SLMC.
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. In addition, the CAP does not provide a numerical quantity of employees where a TDM program would be applicable.
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 not prevent the installation of bicycle lanes or infrastructure adjacent to the project site. Additionally, the project would include 10 bicycle parking spaces.
AT-3: Active transportation and micro-mobility. Commit to implementing bikeshare, scooters, and micro-mobility options, and accompanying creative payment options, such as accepting cash deposits for access.	Not Applicable. These CAP measures would be the responsibility of the City of San Leandro to implement , rather than individual development projects.
AT-4: Walkability. Improve walkability of all streets and paths in San Leandro, including removing barriers to walking and adding places of rest and shade. Prioritize new infrastructure and modernized curb ramps in majority people of color census tracts and near assisted living facilities and senior centers.	

San Leandro CAP Measure	Project Consistency
AT-5: Public transit. Work collaboratively with AC Transit and BART for abundant, affordable, and accessible public transit through improved service frequency, coverage, and quality throughout San Leandro. Support efforts to increase schedule integration. AT-6: BART shuttles. Continue LINK and FLEX shuttle bus services connecting BART stations and other major activity centers, including efforts to improve shuttle efficiency and comprehensiveness. AT-7: Car sharing. Expand car sharing through additional incentives, location of car sharing sites, and education and outreach. AT-8: Autonomous vehicles. Explore opportunities to effectively reduce GHG emissions associated with autonomous vehicles.	
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 expansion of a manufacturing building that would be subject to Title 24 requirements mandating EV charging infrastructure.
TE-3: Alternative commercial fuels. Support increases in community-wide uses of biomethane, biofuels from sustainable sources, and other emerging clean fuel technologies. TE-4: Municipal fleet fuel reduction. Further reduce fossil fuel use in municipal fleet operations. TE-5: EV financing. Support funding mechanisms (e.g., revolving loan fund, grants, public bank finance) to enable low-income truck owner-operators to upgrade to EVs without undue debt burden. TE-6: Electric taxis and TNCs. Promote fuel efficiency and alternative fuels for taxis and Transportation Network Companies (TNCs), including a funding mechanism to support ride sharing drivers to move from fossil-fueled cars to EVs (e.g., require Lyft/Uber to pay for upgrade).	Not Applicable. These CAP measures would be the responsibility of the City of San Leandro to implement rather than individual development projects.
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 the San Leandro 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 San Leandro 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.

San Leandro CAP Measure	Project Consistency
WM-3: Recycling expansion. Continue to promote programs for recycling electronic waste and other materials that are not accepted in curbside bins.	Not Applicable. This CAP measure would be the responsibility of the City of San Leandro to implement, rather than individual development projects.
Waste Reduction and Reuse (WR)	
WR-1: Waste minimization. Explore emerging opportunities for waste minimization, including maker spaces, material reuse, and tool-lending libraries.	Not Applicable. This CAP measure would be the responsibility of the City of San Leandro to implement, rather than individual development projects.
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 proposed project construction contractor would be required to comply with SLMC Section 3-7 related to construction waste and debris recycling.
WR-3: Commercial food waste reduction. Work with restaurants and other food-processing businesses to reduce food waste.	Not Applicable. The proposed project would not include restaurant or food processing land uses.
WR-4: Industrial waste reduction. Work with business leaders and organizations to reduce industrial waste, including packaging materials.	Consistent. The City would initiate coordination with the proposed project owners to identify industrial waste reduction goals or programs that would apply and would seek to develop a plan to reduce industrial waste.
WR-5: Styrofoam and single-use plastics reduction. Continue to enforce bans on Styrofoam for food-related businesses and explore opportunities to reduce single-use plastic items.	Not Applicable. This CAP measure would be the responsibility of the City of San Leandro to implement, rather than individual development projects.
WR-6: Local compost. Support programs for locally-produced compost, including programs run by local and regional partners.	
Water Efficiency (WE)	
WE-1: Reclaimed water. Expand San Leandro's reclaimed water system.	Not Applicable. This CAP measure would be the responsibility of the City of San Leandro to implement, rather than individual development projects.
WE-2: Greywater retrofits. Support installation of greywater recycling systems and other systems that capture runoff for domestic use and landscaping.	Not Applicable. This CAP measure would be the responsibility of the City of San Leandro to implement, rather than individual development projects.
WE-3: Water-efficient retrofits. Promote water efficiency in existing homes and businesses.	Consistent. The proposed project would include water efficient installations consistent with Title 24 and City of San Leandro requirements.
WE-4: New Greywater Installations. Continue to require water conservation and green infrastructure strategies as a condition of approval for major developments.	Consistent. The proposed project would include drought landscaping consistent with Title 24 and City of San Leandro requirements that would be appropriate for the local climate and contribute to conserving outdoor water use.
Community Consumption (CC)	
CC-1: Environmentally Preferred Purchasing. Continue to promote and enforce Environmentally Preferred Purchasing policies for City operations and encourage community businesses to adopt similar policies.	Not Applicable. These CAP measures would be the responsibility of the City of San Leandro to implement, rather than not individual development projects.
CC-2: Local Goods and Services. Continue Keep It Local SL campaign efforts and encourage businesses providing a variety of goods and services to locate in San Leandro.	

San Leandro CAP Measure	Project Consistency
CC-3: Low Carbon Building Materials. Work with local, regional, and State partners to expand the awareness of, availability, and cost-effectiveness of low carbon or carbon-free construction materials.	
CC-4: Carbon Sequestration. Promote increasing soil carbon and planting high carbon sequestering, climate appropriate species in landscaping projects.	Consistent. The proposed project would include landscaping consistent with City of San Leandro requirements that would be appropriate for the local climate and contribute to carbon sequestration on- site.
Equity and Just Transition (EJ)	
EJ-1: Green Job Training. Maximize opportunities for green jobs by supporting workforce training and other economic development activities in a manner that supports labor unions and improved equity.	Not Applicable. These CAP measures would be the responsibility of the City of San Leandro to implement, rather than individual development projects.
EJ-2: Workforce Equity. Prioritize formerly incarcerated individuals, individuals with barriers to employment for green workforce development programs through ‘ban the box’ and other procurement standards. Perform culturally-sensitive targeted outreach for these programs.	
EJ-3: Just Transition. Work to replace environmentally harmful industries with green jobs in a manner that benefits the health and well-being of workers from these industries.	
Source: City of San Leandro 2021	

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9 Hazards and Hazardous Materials



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☒	☐
d. 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?	☐	☒	☐	☐
e. For a project located in 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 result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based primarily on a Phase I Environmental Site Assessment (ESA) prepared for the project site by Terraphase Engineering, Inc. (Terraphase) in March 2025, attached as Appendix F.

Hazards and Hazardous Materials Setting

There are no schools within 0.25 mile of the project site. The nearest school is Halkin elementary School which is approximately 0.6mile north of the project site.

As part of their 2025 Phase I ESA for the project site, Terraphase performed a records review to identify Recognized Environmental Conditions (RECs). American Society for Testing Materials International is an international standards organization that develops and publishes voluntary consensus technical standards for a wide range of materials, products, systems, and services (Appendix F). American Society for Testing Materials International defines RECs as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property due to a release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a

future release to the environment. In addition, Terraphase evaluated the project site for Controlled Recognized Environmental Conditions (CRECs) and Historical Recognized Environmental Conditions (HRECs). CRECs are RECs that have been addressed to the satisfaction of the applicable regulatory authority with hazardous substances allowed to remain in place subject to the implementation of required controls. HRECs are a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority without subjecting the property to any required controls (Appendix F). As part of the Phase I ESA, Terraphase contracted Environmental Data Resources, Inc. to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which release or incident has occurred for the project site and surrounding area. Federal, state, and county lists were reviewed as part of the research effort (Appendix F).

No known or suspected HRECs or CRECs were identified in connection with the current and historical operations at the project site (Appendix F).

Based on information obtained from the records review, the following RECs were identified in association with current and historical operations at the project site or adjacent properties (Appendix F):

- **REC 1: "Onsite petroleum hydrocarbons and solvent usage throughout the [project site] from the sitewide historical industrial use.** The [project] site has been developed for industrial use since at least 1956. Former tenant industries include metal fabrication, fleet fueling, heating, ventilation, and air conditioning manufacturers and suppliers, industrial blower manufacturing, auto body repair, and auto glass repair. Historical onsite features and equipment include solvent tanks, aboveground storage tanks (ASTs), gasoline underground storage tanks (USTs), metal spray paint booths, transformers, compressor enclosures, incinerator, sand blasting area, plating area, drying oven, and oil house. The sitewide historical industrial use is considered a REC."
- **REC 2: "Presence of a regional groundwater contaminant plume intersecting the [project] site.** The [project] site is within the boundaries of the DWA plume, a comingled, regional groundwater plume impacted by VOCs, petroleum-related compounds, and metals from multiple sites in San Leandro. The extent of the plume includes a 2-square-mile area within central San Leandro. Depth to groundwater at the [project] site is approximately 19–20 feet below ground surface; therefore, the presence of a regional groundwater contaminant plume intersecting the [project] site is considered a REC."
- **REC 3: "Onsite presence of an unidentified vent or manhole feature.** During the site reconnaissance conducted as part of the Phase I ESA, a manhole cover labeled as a vent was identified towards the southeastern side of the [project] site. The site contact was unaware of this particular feature when asked during the site reconnaissance, and no additional information was uncovered during public records requests related to the feature. Terraphase indicated that photographs from a utility locate and ground-penetrating radar scans identified shallow pipes located diagonal to the manhole and a potential concrete block or vessel. The presence of an unidentified vent or manhole feature is considered a REC."
- **REC 4: "Historic plating operations at the eastern adjacent property.** Based on the historical resources reviewed as part of the Phase I ESA, plating was conducted on a portion of the eastern adjacent property (2661 Alvarado Street). Although this property is east of the [project] site, the western 100 feet of the property was transferred to and is currently a part of the [project] site. Based on the chemicals used during the plating process, the historical plating operations at 2661 Alvarado Street are considered a REC to the [project site]."
- **REC 5: "Former UST at the adjacent property located at 2661 Alvarado Street.** A 6,000-gallon UST was installed at the eastern adjacent property. Based on maps reviewed, the UST was likely located outside of the western 100 feet of 2661 Alvarado Street that was transferred to the [project] site; however, when the UST was removed in 1990, soil samples collected detected low levels of BTEX, but no residual total petroleum hydrocarbons (TPH). The former UST at 2661 Alvarado Street is considered a REC."

- **REC 6: “Residual petroleum impacts from the former UST area of the [project] site.** Two 3,000-gallon gasoline USTs with pump islands were located at the property adjacent to the west of the [project] site, present day 1133 Aladdin Avenue. Both of the tanks installed in 1979 were removed, due to potential leaking in the early 1980s and replaced with two steel-constructed 3,000-gallon gasoline USTs. In 1991, the two steel tanks were removed. Soil and groundwater sampling between 1994 and 2004 indicate that contaminant concentrations have decreased through natural attenuation. The residual contamination from the former UST at the western adjacent property is considered a REC.”
- **REC 7: “Residual lead and chromium III impacts in soil at the former painting area of the [project] site.** Impacts to shallow soil were discovered in the former painting area in the northwestern corner of the [project] site and were remediated via excavation down to 18 inches below ground surface in March 2002. Lead was not detected above San Francisco Bay RWQCB (SFBRWQCB) Tier 1 environmental screening levels (ESLs) in any of the confirmation samples collected from the excavation area. A ‘no further action’ determination was granted to the former painting area at the [project] site on May 30, 2002. Based on residual lead and chromium III contamination in soil at the [project] site, the former painting area is considered a REC” (Appendix F).

Regulatory Setting

Occupational Safety and Health Act Standard 1917.156

Created by the Occupational Safety and Health Act of 1970 (Code of Federal Regulations [CFR] Title 29), the Occupational Safety and Health Administration (OSHA) is the federal agency responsible for ensuring worker safety. OSHA regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling. Standard 1917.156 designates fueling locations, regulates liquid fuel, and specifies standards for fueling operation and storage.

Hazardous Materials Transportation Act

The United States Department of Transportation (USDOT), in conjunction with USEPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 (49 United States Code 5101) directs USDOT to establish criteria and regulations regarding the safe storage and transportation of hazardous materials. CFR (49) Parts 171 to 180 define the types of material classified as hazardous, regulate the transportation of hazardous materials, and specify the marking of vehicles transporting hazardous materials.

Comprehensive Environmental Response, Compensation, and Liability Act and Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was enacted in 1980 and amended by the Superfund Amendments and Reauthorization Act in 1986. This law 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, CERCLA 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. CERCLA also enabled revision of the National Contingency Plan, which provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants.

In 1986, the Superfund Amendments and Reauthorization Act (SARA) amended CERCLA, reflecting the USEPA’s experience in administering the Superfund program over six years. SARA provided new enforcement authorities and tools, increased the amount of funds available for hazardous waste site cleanups, and increased the awareness of human health problems affiliated with hazardous waste sites. SARA also revised the USEPA’s Hazard Ranking System to accurately assess the risk posed to human health and the environment by uncontrolled hazardous waste sites.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 established a program administered and enforced by USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA gives USEPA the authority to regulate hazardous waste from “cradle to grave,” meaning anyone involved in the lifecycle of hazardous waste, from creation to disposal, must comply with RCRA regulations.

Hazardous and Solid Waste Amendments Act of 1984

The Hazardous and Solid Waste Amendments Act amended RCRA by extending the “cradle to grave” system of regulating hazardous wastes and specifically prohibited the use of certain techniques for the disposal of some hazardous wastes. The Hazardous and Solid Waste Amendments Act includes more than 70 provisions, including the establishment of permitting deadlines for hazardous waste facilities, the regulation of small-quantity generators of hazardous waste, and the formation of RCRA Corrective Action requirements, which assist hazardous waste facilities in investigating and cleaning up any release of hazardous waste.

Toxic Substances Control Act

Congress enacted the Toxic Substances Control Act (TSCA) of 1976, codified in CFR, Title 40, to give USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. More specifically, in California, polychlorinated biphenyls (PCBs) are regulated by both State (Title 22 of the CCR) and federal (TSCA) rules. TSCA has banned the manufacture, processing, use, and distribution in commerce of PCBs. TSCA gives USEPA the authority to develop, implement, and enforce regulations concerning the use, manufacture, cleanup, and disposal of PCBs. TSCA also establishes USEPA’s Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

Department of Toxic Substances Control

As a department of CalEPA, the Department of Toxic Substances Control (DTSC) 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 RCRA and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law (California Health and Safety Code Section 25100, et seq.) to regulate hazardous wastes. The Hazardous Waste Control Law lists chemicals and 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.

California Government Code Section 65962.5 requires DTSC, the State Department of Health Services, SWRCB, and California Department of Resources Recycling and Recovery (CalRecycle) 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 soil is excavated from a site containing hazardous materials, it is considered a hazardous waste if it exceeds specific criteria in Title 22 of the CCR. 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.

California Code of Regulations, Title 8, Section 1532.1

Because of its toxic properties, lead is regulated as a hazardous material as well as a TAC. State-certified contractors must perform inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations. 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. The California Division of OSHA (Cal/OSHA) Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when lead-based paint (LBP) 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.

Bay Area Air District Regulation 11, Rule 2

The Air District regulates demolition and renovation of asbestos-containing materials (ACM) through Rule 2, which applies to any planned renovation that involves 100 square feet, 100 linear feet, or 35 cubic feet or more of ACM, as well as to all demolitions regardless of ACM content. The requirements include a noticing period, the conducting of a pre-demolition survey for ACM materials by a certified inspector, and a general prohibition on demolition until ACM has been abated and removed from the location and requires that abatement be conducted by persons with specific asbestos certification (primarily Asbestos Hazard Emergency Response Act certification).

San Leandro Environmental Services Section

The City's Environmental Services Section is designated as the City's Certified Unified Program Agency (CUPA), which is overseen by CalEPA and coordinates the regulation of hazardous materials and hazardous wastes in the city. CUPA 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, CUPA 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.

CUPA, through the Hazardous Materials Office, regulates USTs containing hazardous materials, including installation, operation and maintenance, temporary closure, and removal and disposal of USTs. Additionally, CUPA 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 City Environmental Services.

San Leandro 2035 General Plan

The following Environmental Hazards Element policies of the San Leandro 2035 General Plan reduce potential hazards related to hazardous materials.

Policy EH-4.6 Groundwater Protection. Protect San Leandro's groundwater from the potentially adverse effects of urban uses. Future land uses should be managed to reduce public exposure to groundwater hazards and minimize the risk of future hazards.

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-5.4 Separation from Sensitive Uses. Provide adequate and safe separation between areas where hazardous materials are present and sensitive uses such as schools, residences, and public facilities. Zoning and other development regulations should include performance standards to avoid safety hazards and achieve compatibility between uses.

Policy EH-5.5 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.

Impact Analysis

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *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?*

Construction

The proposed project would involve demolition of the existing office building at 1133 Aladdin Avenue and the interior demolition and remodel of the existing manufacturing building at 1111 Aladdin Avenue, which were constructed in the 1950s and therefore would have the potential to contain ACMs, LBP, mercury, and PCBs. Therefore, project demolition and construction (remodeling) activities would have the potential to result in the accidental release of ACMs, LBP, mercury, or PCBs.

In California, any facility known to contain ACMs is required to have a written asbestos management plan (also known as an Operations and Maintenance Program). The Air District enforces the Asbestos National Emission Standards for Hazardous Air Pollutants, which regulate the control of asbestos during the renovation and demolition of buildings under the federal CAA. The federal CAA requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all ACMs, wetting all regulated ACMs, sealing the material in leak tight containers, and disposing of the asbestos-containing waste material as expeditiously as practicable (USEPA 2026a). Title 8, CCR, Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

Similarly, the removal of LBP-containing materials would be subject to specific and detailed Cal/OSHA requirements to ensure proper containment, handling, notification, and monitoring, and removal would be performed by a licensed LBP abatement contractor. Title 8, CCR, Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal/OSHA standards. Under this rule, construction workers may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period, and exposure must be reduced to lower concentrations if the workday exceeds eight hours.

The removal of mercury- and PCB-containing products and materials during demolition of the project would also be subject to all applicable federal, state, and local laws, regulations, standards, and guidelines established by USEPA, the State of California, County of Alameda, and City related to handling disposal of hazardous building materials. These regulations would minimize potential risks associated with upset and accidental conditions involving the release of ACM, LBP, mercury, and PCBs during demolition. Therefore, demolition activities associated with the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, and this impact would be less than significant.

Project construction would involve the use of small quantities of potentially hazardous materials such as vehicle fuels and fluids. These materials would be contained within vessels specifically engineered for safe storage and would not be transported, stored, or used in quantities that would pose a significant hazard to the public or construction workers themselves. If spilled, these substances could pose a risk to the environment and to human health. Additionally, the project would include the demolition of one of the existing buildings and interior demolition of the other existing building, which could result in disturbance of potentially contaminated soil related to the previous project site uses and on-site and adjacent leaking UST (LUST) cases. The use of potentially hazardous materials during construction of the project would be required to comply with all local, state, and federal regulations regarding the handling of hazardous materials, including the USDOT Hazardous Material Transportation Act, RCRA, the California Hazardous Materials Management Act, and CCR, Title 22, Division 4.5, which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the RCRA. DTSC is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (CCR, Title 22, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and state requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction. Impacts would be less than significant.

Operation

Commercial manufacturing structures typically do not use or store large quantities of hazardous materials other than those typically used for office cleaning, maintenance, and landscaping. If the operation of the proposed project would require handling of hazardous materials, the use, storage, and disposal of hazardous materials would be regulated through the RCRA which is implemented by DTSC. Transport of hazardous materials during the operation of the proposed project would be required to be transported under USDOT regulations (USDOT Hazardous Materials Transport Act, CFR, Title 49), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In the case of spills at a project site, the responsible party would notify the City, SFBWRQCB, or DTSC and a lead agency would be determined. Additionally, the proposed project would be required to update the existing hazardous materials business plan created for the site in compliance with existing state and local regulations. Therefore, project operation would not involve the

use, storage, transportation, or disposal of substantial quantities of hazardous materials and would not result in the release of such materials into the environment. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school?*

There are no schools within 0.25 miles of the project site; The nearest school is Halkin elementary School which is approximately 0.6 mile north of the project site . There would be no impact on hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.

NO IMPACT

- d. *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?*

Potential Regional Hazards

There are no oil and gas wells located on or within 1,000 feet of the project site (DOC 2026). There is a natural gas pipeline south of the project site that runs along Aladdin Avenue (USDOT 2026). There are no current landfills located within 1,000 feet of the project site (CalRecycle 2026). There are no current landfill, airport, chrome plating, publicly owned treatment works, or bulk fuel storage terminal/refinery sites with per- and polyfluoroalkyl substances (PFAS) orders located within 1,000 feet of the project site (SWRCB 2026a).

Hazardous Material Release Case Listings

The following databases, compiled pursuant to Government Code Section 65962.5, were reviewed in February 2026 for known hazardous materials contamination at the project site:

- SWRCB's GeoTracker database (SWRCB 2026b)
- SWRCB's list of solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit (SWRCB 2026c)
- California DTSC EnviroStor database (DTSC 2026)
- Superfund Enterprise Management System (SEMS) database (USEPA 2026b)
- CalEPA Active Cease and Desist Orders and Cleanup Abatement Orders (CalEPA 2026a)
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (CalEPA 2026b).

Based on the review of the listed databases, several hazardous materials release cases were identified within or directly adjacent to the project site. There is a LUST case associated with the project site address for a gasoline UST. The status is listed as *case closed* as of 2004. There is a LUST case listed at the property adjacent to the west of the project site. The status is listed as *case closed* as of 1995. There is a LUST case listed at the property adjacent to the north of the project site. The status is listed as *case closed* as of 1998 (SWRCB 2026b). As discussed in the Phase I ESA prepared by Terraphase, the project site is within the regional DWA groundwater contamination plume which is listed on EnviroStor with a status of *active cleanup* since 1999 (DTSC 2026).

The project site is not listed in other Cortese List data resources available via CalEPA (CalEPA 2025). There are no Brownfields or Toxics Release Inventory hazardous materials/waste sites within 1,000 feet of the project site (USEPA 2026).

Because of the closed LUST case associated with 1111 Aladdin Avenue, the project site would be included on existing lists of hazardous materials sites compiled pursuant to Government Code, Section

65962.5. As described in the Hazards and Hazardous Materials Setting section above, the Terraphase Phase I ESA prepared for the project site also identified several RECs in connection with the project site, including historical industrial use, residual petroleum hydrocarbon-impacted soil and groundwater on-site from former USTs, and residual metals-impacted soil on-site from former painting activities. Based on the known hazardous materials release sites within and adjacent to the project site and the known soil and groundwater impacts on-site, there is a potential for excavation, grading, and construction workers to be exposed to contaminants (e.g., total petroleum hydrocarbons, VOCs, and metals) via impacted dust and/or soil at the project site. Additionally, if off-site disposal of soil from the project site would occur during project construction, the soil may require special handling or disposal as a waste.

Depth to groundwater measured in the upper aquifer ranges from 10 to 23 feet below ground surface, with an average depth to groundwater near the project site measured at approximately 19 feet below ground surface (RMD Environmental Solutions 2023). The maximum excavation depth within the project site is anticipated to be approximately 4.5 feet below ground surface; therefore, groundwater is unlikely to be encountered during construction activities at the project site. Given the potential for exposure to contaminated soil, soil vapor, and groundwater on-site, project construction and operation could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. This impact would be potentially significant and Mitigation Measures HAZ-1 and HAZ-2 are required.

Mitigation Measures

The following mitigation measures are required to reduce the potential construction impacts related to known and unknown hazardous substance releases to a less-than-significant level.

HAZ-1 Regulatory Agency Notification

Because the project site is listed as a former SFBRWQCB LUST Cleanup case (GeoTracker ID#T0600101783), GeoTracker ID# T0600101783 shall continue to be utilized for agency oversight of assessment and remediation of the project site. Prior to commencement of demolition, construction, and grading activities at the project site, the City shall submit the following documents to the SFBRWQCB project manager of the former LUST Cleanup case:

- Current development plan (e.g., architectural drawings and project description) and any modifications to the development plan
- All environmental assessment documents completed for the project site, including this Initial Study
- All future environmental documents completed for the project site

Upon submittal of the listed information, and in accordance with, SFBRWQCB or the City may require additional assessment, remediation, and/or mitigation activities and issue a “no further action” (or similar) designation.

The City shall retain a qualified environmental consultant (i.e., Professional Geologist or Professional Engineer) to conduct any required subsurface soil, soil vapor, groundwater investigations, remediation, management, or human health risk assessments, as reviewed and approved by SFBRWQCB or the City. In the event SFBRWQCB or the City identifies the need for installation of soil vapor or groundwater monitoring wells to assess potential hazards to the public or the environment, the City shall identify soil vapor or groundwater monitoring wells on the final project plans for review and approval by SFBRWQCB or the City. In the event SFBRWQCB or the City identifies the need for soil excavation and off-site disposal or vapor intrusion mitigation, including, but not limited to, soil vapor extraction and engineering controls (e.g., vapor intrusion mitigation system) to reduce potential hazards to the public or the environment, the City shall designate soil excavation and off-site disposal on final grading plans, and shall designate vapor intrusion mitigation on final project design plans, prior to issuing grading permits. If required workplans, investigations, or other remediation or mitigation actions require SFBRWQCB or the City’s approval, such

documents shall be submitted to and reviewed by SFBRWQCB or the City prior to issuing construction/grading permits.

HAZ-2 Preparation of a Soil Management Plan

Prior to commencement of construction and grading activities at the project site, the City shall retain a qualified environmental consultant (Professional Geologist or Professional Engineer) to prepare a Soil Management Plan (SMP) for the project site. The SMP shall address:

1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, and soil with solvent or chemical odors) if such soils or impacted wastes are encountered
2. Specific actions to reduce hazards to construction workers and off-site receptors during the construction phase

The SMP must establish engineering controls and soil management practices to protect construction worker safety, protect the health of future workers and visitors, and prevent the off-site migration of contaminants from the project. These measures and practices shall include, but are not limited to:

- Stockpile management, including stormwater pollution prevention and the installation of BMPs
- Proper disposal procedures of contaminated materials
- Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities
- Monitoring and reporting
- An environmental health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. The environmental health and safety plan shall outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The City shall review the final SMP prior to issuance of grading permits and shall implement the SMP during demolition, grading, and construction at the project site.

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 and HAZ-2 during demolition, construction, and operation of the project would reduce potential hazardous material impacts at the project site below applicable thresholds of significance by ensuring additional investigation and remedial measures, transportation of impacted materials, and/or site management practices protect construction worker safety and protect the health of future workers, occupants, and visitors. Impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- e. *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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The project site is approximately 2.6 miles southeast of Oakland San Francisco Bay Airport and 3.5 miles north of the Hayward Executive Airport. The project site is not within the noise or safety compatibility zones of Oakland San Francisco Bay Airport or Hayward Executive Airport (County of Alameda 2010). Therefore, the project would not result in a safety hazard or excessive noise for people working in the project area. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Project construction would not require the closure of nearby roads and would not result in the need for detours. Construction activities would be limited to the project site and equipment, and vehicles would be stationed within the site. The proposed project would not obstruct existing roadways or require the construction of new roadways or access points. The proposed project would not block emergency response or evacuation routes or interfere with adopted emergency response and emergency evacuation plans. No impact would occur.

NO IMPACT

- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The project site is in a developed, urbanized area surrounded by industrial development and roadways. No wildlands or densely vegetated areas are located nearby that would represent a significant fire hazard. The project does not fall within a High Fire Hazard Severity Zone or Very High Fire Hazard Severity Zone for wildland fires; the nearest Fire Hazard Severity Zone is 2.9 miles east of the project site (California Department of Forestry and Fire Protection [CAL FIRE] 2024). As discussed further in Section 20, *Wildfire*, the project would not expose people or structures to significant hazards related to wildland fires and there would be no impact.

NO IMPACT

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10 Hydrology and Water Quality



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Setting

The project site is approximately 7.3 acres and generally flat, with an elevation of 30 feet above sea level (Google Earth 2026). There is an existing storm drain system on Aladdin Avenue. The site is approximately 1.8 miles northeast of the San Francisco Bay, 1.54 miles north of San Lorenzo Creek, and 1.17 miles south of San Leandro Creek. Both creeks flow to the west and terminate in the San Francisco Bay. The City receives approximately 21 inches of rain annually, with rainfall concentrated in the winter months (National Oceanic and Atmospheric Administration 2026). According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the project site is located in Zone X, which is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance to be inundated by flood waters as a result of a storm event (FEMA 2024). Additionally, according to the California Governor's Office of Emergency Services (CalOES) MyHazards online database, the project site is not located in a 100-year floodplain (CalOES 2015).

Regulatory Setting

Clean Water Act

Congress enacted the CWA, formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. NPDES permit process regulates those discharges (CWA Section 402). NPDES permitting authority is administered by the SWRCB and its nine RWQCBs. The project site is in a watershed administered by the SFBRWQCB (SFBRWQCB 2026).

California Porter Cologne Water Quality Control Act

The Porter Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect state waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for state waters in the region are contained in the *Water Quality Objectives* Chapter of the Basin Plan for the SFBRWQCB (SFBRWQCB 2017). The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of state waters through the issuance of Waste Discharge Requirements and through the development of total maximum daily loads. Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB, as appropriate, in compliance with Porter-Cologne.

Alameda County Clean Water Program

The City is a member agency of the Alameda County Clean Water Program (ACCWP), which was established in response to federal stormwater NPDES regulations. Pursuant to the ACCWP Stormwater C.3 Technical Guidance (ACCWP 2025), projects that create or replace 10,000 square feet or more of impervious surface must comply with Provision C.3, which requires incorporation of appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows. The proposed project would be subject to this provision and would be required to implement appropriate measures.

Municipal Regional Permit Provision C.3

The SFBRWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in 2015 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara counties. Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained. In addition, the City would require a Stormwater Treatment Measures and Hydromodifications Management Controls Maintenance Agreement.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if they do not meet the minimized size threshold, drain into

tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

The project would be required to comply with all requirements in the MRP. This permit was reissued by the RWQCB in May 2022.

City of San Leandro Municipal Code

SLMC, Chapter 3-15 regulates discharges into the City's stormwater system. Chapter 3-15 requires implementation of stormwater and erosion BMPs and compliance with CWA and NPDES permits to eliminate non-stormwater discharges to the municipal separate storm sewer. Furthermore, SLMC, Chapter 7-12 requires development projects to submit erosion and sedimentation control plans and drainage plans to the City for approval prior to project construction.

San Leandro 2035 General Plan

The following policies included in the San Leandro General Plan are applicable to the proposed project:

Policy OSC-7.2 Water Conservation. Promote the efficient use of existing water supplies through a variety of water conservation measures, including the use of recycled water for landscaping.

Policy OSC-7.3 Drought Tolerant Landscaping. Encourage the use of native vegetation and Bay-friendly landscaping and enforce the State Department of Water Resources Model Water Efficient Landscape Ordinance.

Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Construction

Project construction has the potential to impact water quality through erosion and through debris carried in runoff. Construction would involve heavy equipment that could result in an increase in fuel, oil, and lubricants in stormwater runoff due to leaks or accidental releases. To minimize these impacts, the project would be required to comply with SLMC, Chapter 7-12, which details requirements for erosion and sediment control plans, and with SLMC, Chapter 3-15, which regulates discharge of materials into curbside gutters, storm sewers, and storm drains. The project would be required to implement BMPs for drainage and erosion control during construction and meet requirements for stormwater and sewer discharge.

In addition, as the project would disturb more than one acre, the project applicant would be required to obtain coverage under the statewide NPDES General Permit for Discharges of Storm Water associated with Construction Activity, Construction General Permit Order 2009-0009 DWQ (Construction General Permit), administered by the SWRCB pursuant to Section 402 of CWA. Coverage under the NPDES Permit would require implementation of a Stormwater Pollution Prevention Program and various site-specific BMPs to reduce erosion and loss of topsoil during project construction. Compliance with the NPDES permit and BMPs during construction such as straw wattles, silt fencing, concrete washouts, and inlet protection during construction would reduce impacts resulting from loss of topsoil. Construction would require water for dust suppression, but water use would be temporary and would cease upon the completion of construction. The project would not extract groundwater or directly interfere with the groundwater table through construction activities on the site, as ground disturbance would not occur

below the water table. Compliance with state and local requirements would reduce impacts to surface and ground water quality to less than significant levels.

Operation

San Leandro overlies the Santa Clara Valley (East Bay Plain) Groundwater Subbasin, which is bounded by San Pablo Bay to the north, the Diablo Range to the east, the San Francisco Bay to the west, and a groundwater divide near the city of Hayward to the south (California's Groundwater 2004). Currently, the project site is almost completely developed with hardscaped surfaces. Runoff from these surfaces can mobilize pollutants, such as oil and grease, metals, sediment, and pesticide residues and convey them to nearby waterways through the storm drain system.

Following construction, the project site would continue to be primarily impervious surfaces, with some small pervious areas for landscaping. Precipitation falling on the project site would continue to generate urban runoff carrying typical surface contaminants. Landscaping on site, such as the existing shrubs that separate the project site from Aladdin Avenue, would slow runoff, reduce flow volumes, and remove pollutants through sedimentation, filtration, sorption, microbial uptake, and biodegradation, thereby improving the quality of stormwater before it enters the storm drain system.

Stormwater that does not infiltrate within the bioretention areas would discharge to the City's existing storm drain system. Operational stormwater discharges are regulated under the Municipal Separate Storm Sewer System Permit and associated NPDES requirements. Locally, stormwater quality is managed through the Alameda County Clean Water Program, which incorporates Provision C.3 of the SFBRWQCB's Municipal Regional Permit. Because the project would replace more than 10,000 square feet of impervious surface area, it must comply with C.3 requirements, as well as SLMC, Chapter 3-15. These provisions require the project to incorporate site design measures, source control features, and stormwater treatment BMPs; minimize pollutant discharges; and avoid increasing runoff volumes above pre-development levels. A Stormwater Control Plan must be submitted to the City, and the project must also meet LID standards. Consistent with these requirements, the project would direct rooftop, sidewalk, and parking area runoff to on-site bioretention areas for treatment prior to entering the storm drain system. With required compliance with NPDES C.3 provisions, the project's SWPPP, and an approved Stormwater Control Plan, the project would not violate water quality standards or result in substantial degradation of water quality during operation. As such, water quality impacts associated with stormwater runoff would be less than significant.

The project would connect to the City's sanitary sewer system, which conveys wastewater to the City's Water Pollution Control Plant for treatment prior to discharge to San Francisco Bay under a RWQCB permit. Because the Water Pollution Control Plant is a publicly owned treatment facility, all treated effluent must comply with applicable RWQCB waste discharge requirements. Compliance with conditions or permit requirements established by the City, as well as water discharge requirements outlined by the RWQCB would ensure that wastewater discharges coming from the project site and treated by the Water Pollution Control Plant system would not exceed applicable RWQCB wastewater treatment requirements. Mandatory compliance with the permit requirements would prevent stormwater runoff and effluent discharges from violating water quality standards or substantially degrading water quality. Thus, the proposed project would not conflict with or obstruct implementation of a water quality control plan, and impacts would be less than significant.

Finally, the project would not rely on groundwater supplies, as potable water is provided by EBMUD, which obtains water from surface reservoirs in the Mokelumne River watershed. Although no sustainable groundwater management plan applies to the underlying basin, the project would not interfere with groundwater resources because it does not use groundwater and would not substantially decrease infiltration compared to existing conditions. Groundwater impacts would therefore be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- c.(i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*
- c.(iv) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The nearest creeks to the project site, San Lorenzo Creek and San Leandro Creek, are 1.54 miles and 1.17 miles away from the site, respectively. Existing development between the project site and San Lorenzo and San Leandro creeks include roadways, as well as residential, commercial, and industrial development. Neither project construction nor operation would alter the course of these creeks or other nearby creeks, streams, or rivers.

The project site is currently developed and paved. The project would continue to connect to the existing storm drain system operated and maintained by the City. Stormwater from the project site drains to Aladdin Avenue, where it is collected by storm drains into the City's stormwater system. The site is currently developed almost entirely with impervious surfaces and proposed landscaping under the project would result in approximately the same amount of impervious surfaces as existing conditions. The project would include approximately 20,390 square feet, or 6 percent, of the site's area with landscaping that would comply with MWEL0 and bioswales that help with stormwater treatment. Additionally, the project would be required to incorporate stormwater control measures and NPDES permit requirements to reduce the amount of runoff that would enter the storm drain system compared to existing conditions.

The project would connect to the City's storm drain system, which delivers stormwater and other runoff into local streams and creeks and ultimately to the San Francisco Bay. The project would not substantially change the amount of impervious surfaces, and the proposed landscaping on-site in addition to the existing shrubs that separate the project site from Aladdin Avenue would act as bioretention areas to ensure that post project stormwater runoff would not exceed existing conditions. Therefore, the project would not result in flooding on or off site or substantial erosion or siltation of a creek or river.

LESS-THAN-SIGNIFICANT IMPACT

- d. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

As described in the setting section, above, the project site is located in Zone X, which is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance to be inundated by flood waters as a result of a storm event (FEMA 2024). Additionally, the project site is not located in a 100-year floodplain (CalOES 2015).

The project site is located approximately 1.8 miles northeast of the San Francisco Bay and is not located in a tsunami or seiche zone, as shown in the Alameda County Tsunami Hazard Areas maps produced by the DOC (DOC 2021). The nearest body of water that could experience seiche (water level oscillations in an enclosed or partially enclosed body of water) is the San Francisco Bay. No other large bodies of water with the potential to inundate the project site by a seiche are located near the site. The proposed project

would not result in the risk of release of pollutants due to inundation by a tsunami, seiche, or flooding. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

EBMUD would serve the project site and this agency maintains an Urban Water Management Plan (UWMP). EBMUD maintains a wastewater treatment plant in Oakland to ensure that water quality standards and goals are met. As discussed above in Criterion a, the project would not interfere with the ability of the City to maintain water quality standards pursuant to EBMUD's UWMP (EBMUD 2021). EBMUD does not rely on groundwater sources. Project implementation would not conflict with a sustainable groundwater management plan. Moreover, as outlined above in item (a), the proposed grading would be required to comply with applicable provisions of SLMC 7-12, which ensures protection of watercourses and drainages. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

11 Land Use and Planning



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Setting

As stated in the *Project Description*, the project site has a General Plan land use designation of Light Industrial and is zoned as Industrial General. The Light Industrial designation corresponds to areas that may contain wholesale activities, distribution facilities, research and development or e-commerce uses, business services, technology, and manufacturing operations which produce minimal off-site impacts (City of San Leandro 2016). Industrial General zones include, but are not limited to, business services and office uses.

Impact Analysis

a. Would the project physically divide an established community?

The project would involve redevelopment of an existing site. No new roads, linear infrastructure, or other development features are proposed that would divide an established community or limit movement, travel, or social interaction between established land uses. Project construction would not physically divide an established community; therefore, there would be no impact on established communities.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

San Leandro 2035 General Plan

The City's General Plan contains several land use policies with the purpose of avoiding or mitigating an environmental effect. Table 15 shows applicable General Plan land use policies that aim to avoid or mitigate environmental effects and the project's consistency with those policies.

Table 15 Project Consistency with San Leandro 2035 General Plan Land Use Policies

General Plan Policy	Project Consistency
Policy LU 1.14. Construction Impacts. Ensure that construction activities are regulated and monitored in a manner that minimizes the potential for adverse off-site impacts such as noise, dust, erosion, exposure to hazardous materials, and truck traffic.	Consistent. The project would comply with existing applicable regulations that would minimize impacts to noise, dust, erosion, and exposure to hazardous materials. As discussed in Section 13, <i>Noise</i> , project construction and operation would not exceed noise limits established by the City and would not result in a significant impact. As discussed in Section 3, <i>Air Quality</i> , the project would not exceed applicable thresholds for particulate matter and would not result in a significant impact related to dust or air quality. As discussed in Section 10, <i>Hydrology and Water Quality</i> , the project would be required to comply with SLMC, Section 3-15 and Section 7-12, which outline construction erosion and stormwater best management practices and require the preparation of an erosion and sedimentation control plan. As concluded therein, the project would not result in substantial erosion or runoff. Finally, as discussed in Section 9, <i>Hazards and Hazardous Materials</i> , the project would not result in the release of hazardous materials to the environment and would not expose project occupants to substantial hazards and hazardous materials. As an expansion of an existing manufacturing use, the project would involve continued truck traffic. As discussed in Section 17, <i>Transportation</i> , traffic generated by the project would be consistent with existing commercial and light industrial uses in the project area and would not result in significant impacts related to vehicle miles traveled.
Policy LU-10.2. Off-Site Impacts. Consider the setting and context of each site evaluating proposals for development in industrial areas. The potential for impacts on adjacent uses, including the potential for land use conflicts and increased parking demand and truck traffic, should be a key consideration.	Consistent. The project would involve an expansion of a manufacturing building, which would be consistent with surrounding land uses including logistics and warehouse services to the north and east, manufacturing and warehouses to the south, and the San Leandro Unified School District maintenance facility to the west. The project would not result in a land use conflict. The project would include 155 parking spaces, which would exceed the amount of parking spaces required by City parking standards. As discussed in Section 17, <i>Transportation</i> , traffic generated by the project would be consistent with existing commercial and light industrial uses in the project area and would not result in significant impacts related to vehicle miles traveled.
Source: City of San Leandro 2016a	

As shown above, the project would be consistent with applicable City's General Plan policies that aim to avoid or mitigate environmental effects.

San Leandro Municipal Code

The SLMC contains several regulations that intend to avoid or mitigate environmental effects in the city. Table 16 shows policies that aim to avoid or mitigate environmental effects and the project's consistency with those regulations.

Table 16 Project Consistency with the San Leandro Municipal Code

San Leandro Municipal Code	Project Consistency
Section 7-5-600. Section 7-5-600 adopts the California Green Building Standards Code (CALGreen) as the Green Building Code of San Leandro.	Consistent. As described in Section 6, <i>Energy</i> , the project would be required to implement the California Green Building Standards Code.
Chapter 5-2. Chapter 5-2 establishes that street trees in San Leandro are property of the City, and outlines requirements for removal and planting of street trees.	Consistent. According to the arborist report (Appendix C) the project would not require the removal of street trees. As described in the <i>Project Description</i> , the project would involve the removal of 27 on-site trees, none of which are street trees protected by this ordinance. The project would be consistent with this chapter of SLMC.
Chapter 3-15. Chapter 3-15 contains standards and requirements for development projects to avoid non-stormwater discharges into the municipal separate storm sewer. Chapter 7-12. Chapter 7-12 contains standards and permit requirements for grading and excavation, and requires preparation of an erosion and sedimentation control plan and drainage plan in order to reduce water quality impacts of stormwater runoff from the site for the life of the project.	Consistent. As described in Section 10, <i>Hydrology and Water Quality</i> , the project would be required to comply with NPDES permit requirements, C.3 Stormwater Guidelines, and would involve the installation of bioretention areas to treat and direct stormwater flows. The project would also be required to comply with grading and excavation regulations established by the City and obtain appropriate permits prior to project approval. The project would be consistent with these chapters of the SLMC.
Chapter 3-22. Chapter 3-22 outlines Bay-friendly landscaping requirements for projects in San Leandro, which consists of native, low-water use vegetation.	Consistent. As described in the <i>Project Description</i> , the project would incorporate water efficient landscaping for plantings throughout the project site.
Source: San Leandro Municipal Code	

As shown above, the project would be consistent with the SLMC and applicable building codes that intend to avoid or mitigate environmental effects.

LESS-THAN-SIGNIFICANT IMPACT

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12 Mineral Resources



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Setting

According to mapping completed by the State of California, it was determined that no minerals or aggregate resources of statewide importance are located within San Leandro (DOC 1996). In addition, there are no natural gas, oil, or geothermal resources identified in or adjacent to San Leandro.

Regulatory Setting

Surface Mining and Reclamation Act of 1975

Pursuant to the mandate of the Surface Mining and Reclamation Act of 1975, the State Mining and Geology Board requires all cities to incorporate into their general plans mapped mineral resources designations approved by the State Mining and Geology Board.

Impact Analysis

- Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The project site and surrounding properties are part of an urbanized area with no current oil or gas extraction. San Leandro's 2035 General Plan does not identify mineral deposits of regional significance within the city (City of San Leandro 2016). No mineral resource activities would be altered or displaced by the proposed project. There would be no impact.

NO IMPACT

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13 Noise



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than - Significant Impact	No Impact
Would the project result in:				
a. 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?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. 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?	☐	☐	☐	☒

Noise Fundamentals

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called “A-weighting” is used to filter noise frequencies that are not audible to the human ear. A-weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the “A-weighted” levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving the human perception of noise. In this analysis, all noise levels are A-weighted, and the abbreviation “dBA” is understood to identify the A weighted decibel.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A 10 dB increase represents a 10-fold increase in sound intensity, a 20 dB increase is a 100-fold intensity increase, a 30 dB increase is a 1,000-fold intensity increase, etc. Similarly, a doubling of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the noise source would result in a 3 dB decrease.

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two equivalent noise sources combined do not sound twice as loud as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA (increase or decrease); that a change of 5 dBA is readily perceptible; and that an increase or decrease of 10 dBA sounds twice (half) as loud (Caltrans 2013).

Descriptors

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. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this analysis are the 1-hour equivalent noise level (Leq) and the community noise equivalent level (CNEL).

The Leq is the level of a steady sound that, in a specific time period and at a specific location, has the same A-weighted sound energy as the time-varying sound. For example, Leq(1-hour) is the equivalent

noise level over a 1-hour period and Leq (8-hour) is the equivalent noise level over an 8-hour period. Leq(1h) is a common metric for limiting nuisance noise, whereas Leq (8-hour) is a common metric for evaluating construction noise.

The CNEL is a 24-hour equivalent sound level. The CNEL calculation applies an additional 5 dBA penalty to noise occurring during evening hours (between 7:00 p.m. and 10:00 p.m.) and an additional 10 dBA penalty to noise occurring during the night (between 10:00 p.m. and 7:00 a.m.). These increases for certain times are intended to account for the added sensitivity of humans to noise during the evening and night.

Propagation

Sound from a small, localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of 6 dBA for each doubling of distance.

Traffic noise is not a single, stationary point source of sound. Over some time interval, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The drop-off rate for a line source is 3 dBA for each doubling of distance.

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 (Hz). 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 is from a low of less than 1 Hz up to a high of about 200 Hz.

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 may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). Vibration may also damage infrastructure when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from 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 much 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 2013). 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 actually 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). The ppv is defined as the maximum instantaneous positive or negative peak of a vibration signal. The FTA established standards for vibration impact assessments. These guidelines are published in its *Transit Noise and Vibration Impact Assessment Manual* and are summarized below in Table 17.

Table 17 Federal Transit Administration Construction Vibration Impact Criteria

Building Category	in/sec ppv
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

in/sec = inches per second; ppv = peak particle velocity
Source: Federal Transit Administration 2018

Regulatory Setting

California Code of Regulations

CCR, Title 24, Section 1207.4 requires interior noise levels attributable to exterior sources to be at or below 45 dBA in any habitable room of a development based on the noise metric used in the noise element of the local general plan. All residential windows, exterior doors, and exterior wall assemblies would be required to have sound transmission class ratings that would ensure adequate attenuation of noise at a range of frequencies. The Environmental Hazards Element of the City's 2035 General Plan uses a noise metric of CNEL, consistent with the reference level for state noise law. Therefore, interior noise levels of the project would need to be at or below 45 dBA CNEL to be compliant with CCR requirements.

San Leandro 2035 General Plan

The Environmental Hazards Element of the General Plan provides goals, policies, and program to assure the appropriateness of new development with the noise environment of San Leandro. Table 18 shows the General Plan's land use compatibility chart. Applicable goals and policies are as follows:

Goal NOI-1: 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-8.4 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 CNEL should generally be considered a significant adverse impact. Therefore, a significance threshold of 3 dBA was used to evaluate the project's operational noise impacts.

Table 18 City of San Leandro Noise and Land Use Compatibility Guidelines

Land Use Category	Community Noise Exposure (CNEL dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential: Low Density, Single-family, Duplex, Mobile Homes	<60	55-70	70-75	75<
Residential: Multi Family	<65	60-70	70-75	75<
Transient lodging (hotels/motels)	<60	60-70	70-80	80<
Schools, Libraries, Churches, Hospitals, Nursing Homes	<70	60-70	70-80	80<
Auditoriums, Concert Halls, Amphitheaters	NA	70>	NA	65<
Playgrounds, Neighborhood Parks	<70	70-80	NA	7.25<
Golf Courses, Riding Stables, Water Recreation, Cemeteries	<75	70-80	NA	80<
Office Buildings, Business Commercial and Professional	<70	67.5-75	75<	NA
Industrial, Manufacturing, Utilities, Agriculture	<75	70-80	75<	NA

CNEL = community noise equivalent level; dBA = A-weighted decibel
Source: City of San Leandro 2016a

City of San Leandro Municipal Code

Article 11 of Chapter 4-1 of the SLMC 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.

SLMC, Section 4-1-1110 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 4-1-1115 prohibits certain acts related to noise, such as construction-related noise near residential uses outside of the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 7:00 p.m. on weekends. Noise within public parks and noise that conflicts with residential uses is also prohibited.

Neither the City nor the County of Alameda has specific and/or quantitative regulatory standards for construction or operational vibration sources. SLZC, 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.

Operational Noise

San Leandro 2035 General Plan

The Environmental Hazards Element of the San Leandro 2035 General Plan (City of San Leandro 2016) contains goals and policies intended to reduce noise created within the city. Policy EH-8.4 states “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 CNEL should

generally be considered a significant adverse impact.” Therefore, a significance threshold of 3 dBA was used to evaluate the project’s operational noise impacts.

Project Noise Setting

Existing Ambient Noise Levels

The primary source of noise in the vicinity of the project site is motor vehicle traffic, including automobiles, trucks, buses, and motorcycles. Among area roadways, Nimitz Freeway (Interstate 880 [I-880]), Aladdin Avenue, and Teagarden Street produce noise from vehicles adjacent to the project site. Secondary sources of noise include garbage trucks and other industrial noise, delivery trucks, pedestrian activity and conversations. While typical activities such as conversations may occur at nearby residences, traffic is the main contributor to existing ambient noise levels. According to the Environmental Hazards Element of the City’s General Plan, the project site is located in the 70 dBA CNEL noise contour, which means ambient noise levels at the project site would be 70 dBA CNEL or greater. For a conservative analysis, a 70 dBA noise level was used.

Sensitive Receptors

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 2016). The nearest noise-sensitive receptors are the Pacific Rec Complex located approximately 530 feet to the west and single-family residences located approximately 1,040 feet southwest of the project site, which are shielded from the project site by an existing 10-12-foot-high masonry sound wall at their north side property boundary.

Methodology

Construction Noise

The City has not adopted quantified levels to regulate construction noise. For purposes of this analysis, the FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential uses, the daytime noise threshold is 80 dBA L_{eq} (8-hour).

The SLMC has established limits on permissible hours of construction for any construction work or related activity adjacent to or across a street of right-of-way from residential use, except between the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday, and 8:00 a.m. to 7:00 p.m. on Saturday and Sunday. Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Operational Noise

A significant impact would occur if implementation of the proposed project would result in a substantial increase in traffic noise levels compared to existing noise levels (Federal Highway Administration [FHWA] 2018). The City considers an increase of 3 dBA as a significant adverse impact in ambient noise levels (FHWA 2011). Therefore, a significance threshold of 3 dBA above ambient noise levels was used to evaluate the project’s stationary and mobile operational noise impacts.

Groundborne Vibration

Groundborne noise is generated when vibrating building components radiate sound, or noise generated by groundborne vibration. In general, if groundborne vibration levels do not exceed levels considered to

be perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

A significant impact would occur if the project would generate groundborne vibration or groundborne noise levels in excess of established standards. The City has not adopted criteria for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact criteria established in the Transit Noise and Vibration Impact Assessment Manual that are summarized in Table 17.

Impact Analysis

- a. *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?*

Construction Noise

Daytime Construction Work

Temporary noise levels caused by construction activity would be a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of noise-generating activities. For a construction noise assessment, construction equipment can be considered to operate in two modes: stationary and mobile. As a rule, stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Conversely, mobile equipment moves around the construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Noise impacts from stationary equipment are assessed from the center of the equipment, while noise impacts from mobile construction equipment are assessed from the center of the equipment activity area (e.g., construction site). Due to the complex and mobile nature of construction activity within a project site, the FTA *Transit Noise and Vibration Impact Assessment Manual* document recommends evaluating construction noise impacts from all equipment at the center of the construction site, stating that the distance variable in its recommended construction noise calculation "assumes that all equipment operates at the center of the project" (FTA 2018). For purposes of this analysis, construction noise was evaluated from the approximate center of the proposed building footprint, as this is assumed to represent the average location where construction equipment would operate for extended periods of time.

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). Typical construction projects have long-term noise averages that are lower than louder short-term noise events due to equipment moving around the site, work breaks, and idle time. Each phase of construction has a specific equipment mix depending on the work to be carried out during that phase. Accordingly, each phase is characterized by varying noise conditions; some phases will have higher continuous noise levels than others, while others may have intermittent, higher instantaneous noise levels. The maximum hourly L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2018). Project construction would include demolition, site preparation, grading, building construction, paving, and architectural coating phases. It is assumed that diesel engines would power all construction equipment. Noise levels generated during each phase of construction were estimated based on the equipment list provided by the project applicant. For a conservative evaluation of noise impacts, it was assumed that up to the three loudest pieces of equipment during each phase would be operating simultaneously (RCNM calculations are included in Appendix G).

Table 19 shows the estimated noise levels at the nearest sensitive receptors during each phase of construction. As shown in Table 19, construction noise levels would reach up to approximately 65 dBA L_{eq} (8-hour) at the nearest sensitive recreation area (Pacific Rec Complex) located to the west and up to 56 dBA L_{eq} (8-hour) at the nearest residential property located to the southwest, which would not exceed the

FTA's recommended daytime construction noise threshold of 80 dBA L_{eq} (8-hour). All other sensitive receptors would be located further away and construction noise levels would be lower. In addition, per information provided by the project applicant, construction would occur between 7:00 a.m. and 2:00 p.m. on Mondays through Saturdays and would therefore not conflict with the City's Development Code regulations. Therefore, temporary noise impacts associated with construction of the project would be less than significant.

Table 19 Estimated Noise Levels at Sensitive Receptors by Construction Phase

Construction Phase	Construction Noise Level (dBA L_{eq} [8-hour])			
	RCNM Reference Noise Level	Pacific Rec Complex to West	Nearest Single-Family Residential Property to Southwest	Kaiser Permanente Hospital to the West
Distance (feet)	50	530 ¹	1,370 ¹	1,900 ¹
Demolition	85	65	56	53
Site Preparation	82	62	53	50
Grading	81	61	52	49
Building Construction	77	57	48	45
Paving	78	58	49	46
Architectural Coating	74	54	45	42
Trenching & Utilities	81	61	52	49

¹ For purposes of this analysis, construction noise was evaluated from the approximate edge of the proposed building footprint, as this is assumed to represent the average location where construction equipment would operate for extended periods of time.

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; RCNM = Roadway Construction Noise Model

See Appendix G for construction noise modeling results.

Nighttime Construction Work

Nighttime construction may occur during construction of the proposed project on an as-needed basis, which would result in a temporary increase in noise at the nearest residences and Kaiser Permanente Hospital where people may be sleeping. (Pacific Rec Complex is not considered a noise-sensitive receiver for nighttime construction work because it would not typically be open during these hours.) As shown in Table 19, at a distance of 1,370 feet (i.e., the distance to the nearest residence), demolition would generate a noise level of 56 dBA L_{eq} , which would not increase the existing ambient noise environment of 70 dBA CNEL by 3 dBA or more at the nearest residential sensitive receptors located to the southwest or the nearest hospital receptor to the west. Therefore, nighttime construction noise impacts associated with the project would be less than significant.

Operational Noise

The proposed project would generate operational noise associated with the following sources: landscaping maintenance, loading and unloading activities; parking lot activities, which would include people conversing, doors shutting, engine startup, and slow-moving vehicles consistent with existing uses on-site; and from new exterior mechanical equipment sources, such as proposed rooftop ventilation systems. Due to the distances and low noise levels associated with loading and unloading activities and landscape maintenance, these sources are not considered substantial and are not analyzed further. Potential impacts from these noise sources are discussed below.

Rooftop HVAC Equipment

The project would include three 5-ton and one 3.5-ton roof-mounted HVAC units. These units would be located along the rooftop of the proposed project building. HVAC units were assumed to be operating simultaneously and continuously during both daytime and nighttime hours for a conservative estimate of

noise impacts. The client has indicated the use of Whalen HVAC units will be used during operation. Sound data for these units is unavailable; therefore, this analysis assumes a reference noise level from the use of a typical HVAC system for commercial applications, which is a 5-ton Carrier 25SCA5 unit that produces a noise level of 65 dBA at a reference distance of one meter (see Appendix G for equipment specification sheets). The combined noise level generated by simultaneous operation of three HVAC units would be 70 dBA at a distance of one meter.

Noise impacts associated with simultaneous operation of each grouping of three HVAC units were calculated at the nearest recreation use property line to the west and residential property line to the southwest. Noise levels were calculated assuming that combined noise levels from this grouping of equipment would emit from the center of the grouping and accounting for both the horizontal and vertical distances between the roof-mounted equipment and nearest residential property line at the ground level (i.e., the direct horizontal path between the roof-mounted equipment and ground-level receptor was used to calculate noise levels). Based on these calculations, it is estimated that the simultaneous operation of three HVAC units would generate noise levels up to 25 dBA at the nearest recreation sensitive receptor to the west and up to 17 dBA at the nearest residential property lines to the southwest. Conservatively assuming this noise level would be sustained over the course of a 24-hour period, the resulting 24-hour average noise level would be 24 dBA CNEL. Therefore, operational noise levels generated by the project's rooftop HVAC equipment would not increase the existing ambient noise environment of 70 dBA CNEL by 3 dBA or more at the nearest sensitive receptors located to the west or southwest. Operational noise impacts associated with the project's rooftop HVAC equipment would be less than significant.

Parking Lot Activities

Typical parking lot activities include people conversing, doors shutting, and vehicles idling, which generate noise levels ranging from approximately 60 dBA to 70 dBA L_{max} at a distance of 50 feet. These activities are anticipated to occur sporadically throughout the day, as visitors and staff arrive and leave parking lot areas at the project site.

The nearest noise-sensitive receptor to proposed parking areas is the recreational sensitive receptor (Pacific Rec Complex) located 480 feet west of the project site. It was conservatively assumed that these activities would occur for a 24-hour period and that minimal shielding would be provided. Noise levels generated from typical parking lot activity would result in a 24-hour average noise level of 44 dBA CNEL at the nearest sensitive receptors.

Therefore, operational noise levels from project-related parking lot activity would not increase the existing ambient noise environment of 70 dBA CNEL by 3 dBA or more at the nearest sensitive receptors located to the west or southwest. Operational noise impacts associated with the project's parking lot activity would be less than significant.

Off-Site Traffic Noise

Implementation of the proposed project would not result in an increase in traffic noise levels on roadway segments adjacent to the project site as the vehicle trips generated by the proposed project would be less than the vehicle trips of the existing use. Therefore, impacts related to project-related traffic noise levels would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction Vibration

The site preparation phase of project construction would involve use of vibratory rollers, which would produce the greatest groundborne vibration levels during project construction. Vibratory rollers produce groundborne vibration levels up to 0.210 in/sec ppv at a distance of 25 feet. The nearest receptor to the project site is a commercial building, located 35 feet west of the project site. At this distance,

groundborne vibration levels would be approximately 0.127 ppv (Appendix G). This would be below the FTA's Construction Vibration Impact Criteria of 0.3 in/sec PPV for this type of structure – Engineered concrete and masonry (no plaster) (Table 17). Therefore, project construction activities would not generate groundborne vibration or groundborne noise levels in excess of established standards. Impacts related to construction vibration would be less than significant.

Operational Vibration

Operation of the project would not include any substantial sources of vibration. No vibration impacts during operation of the project would occur.

LESS-THAN-SIGNIFICANT IMPACT

- c. *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?*

The nearest public airport to the project site is the Oakland San Francisco Bay Airport, located approximately 2.5 miles northwest of the project site. According to the Oakland San Francisco Bay Airport Land Use Compatibility Plan, the project site is located outside the 60 dBA CNEL airport noise contours (Alameda County 2010). While flying aircraft noise is occasionally audible on the project site, aircraft noise associated with nearby airport activity would not expose people residing or working near the project site to excessive noise levels. Therefore, implementation of the project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur.

NO IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

According to the California Department of Finance, San Leandro had an estimated population of 87,813 people with 33,294 housing units as of January 2025 (Department of Finance 2025). The average number of persons per household is estimated at 2.84 (City of San Leandro 2025a). The City’s General Plan Environmental Impact Report provides projections for the city’s population through the year 2030. The population of San Leandro is projected to be 103,300 by the year 2030 (City of San Leandro 2016).

Impact Analysis

a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The proposed project would involve demolition of an existing office building and the interior remodel, enclosure, and expansion of an existing manufacturing building. The project would not involve the development of new dwelling units and therefore would not directly induce population growth in San Leandro.

The project could facilitate the creation of jobs associated with expanded manufacturing capacity that could indirectly cause population growth through future employee relocations. However, the project also includes demolishing an existing office building, offsetting the potential increase of people employed on site. Additionally, the project site is located in a dense urban area and many of these employees would likely be drawn from the local population regardless of the job creation potential of the project. Some employees may relocate to the area as a result of job opportunities resulting from the proposed project; however, a substantial change in employment growth in the area would not occur.

As discussed in Section 11, *Land Use and Planning*, the proposed project is consistent with the General Plan’s Industrial General land use designation and would not induce substantial growth beyond what was considered in the General Plan assumptions for the area. The project would be within the growth envisioned under the City’s General Plan and would not result in substantial population growth. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project site is developed with an existing office building that would be demolished and an existing manufacturing building. No housing exists on the project site, and no people currently reside within either building. The proposed project would not displace any existing housing or residents, nor would it necessitate the development of replacement housing elsewhere. No impact would occur.

NO IMPACT

15 Public Services



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	☐	☐	☒	☐
2 Police protection?	☐	☐	☒	☐
3 Schools?	☐	☐	☒	☐
4 Parks?	☐	☐	☒	☐
5 Other public facilities?	☐	☐	☒	☐

Setting

ACFD provides fire protection and emergency medical service to San Leandro. ACFD is divided into four branches: Operations, Special Operations, Fire Prevention, and Administrative Support Services (ACFD 2026a). ACFD operates five fire stations in San Leandro (Station Nos. 9 through 13) (ACFD 2026b). The closest fire station to the project site is ACFD Station No. 12, located 0.9 mile east of the project site at 1065 43rd Avenue (ACFD 2026b).

SLPD provides law enforcement services for the city. SLPD has one police station located at San Leandro City Hall at 835 East 14th Street, approximately 1.3 miles north of the project site. As of 2019, SLPD is staffed by 90 sworn personnel and 44 civilian employees (SLPD 2019).

The SLUSD and San Lorenzo Unified School District provide public educational services to San Leandro. SLUSD serves approximately 8,866 students across eight elementary schools, three middle schools, two high schools, and one adult education school (SLUSD 2024). According to SLUSD's 2024 Developer Fee Justification Study, the district is slightly over capacity (SLUSD 2024). San Lorenzo Unified School District, specifically Dayton Elementary School, Corvallis Elementary School, and Washington Manor Middle School, serve a small portion of southwestern San Leandro (San Lorenzo Unified School District 2022).

The City Public Works Department maintains neighborhood parks, special use recreation areas, community parks, and golf courses in the city, totaling 382.8 acres of improved parkland. The City's General Plan Open Space, Parks, and Conservation Element outlines a goal to provide at least 5 acres of improved parkland for every 1,000 residents (City of San Leandro 2016). As discussed in Section 14, *Population and Housing*, the population of San Leandro is currently estimated at 87,813 people; therefore, the city has approximately 4.36 acres of improved parkland per 1,000 residents.⁴

Regulatory Setting

San Leandro 2035 General Plan

The City's 2035 General Plan Community Services and Facilities Element addresses the provision of community services, including fire protection and police protection. Additionally, the element emphasizes

⁴ 382.8 acres of improved parkland divided by 87,813 residents in San Leandro is approximately 4.36 acres.

the importance of reducing risk and the effects of disaster prevention and/or preparedness (City of San Leandro 2016). The following policies found within the element are applicable to fire and police protection services within the city:

Goal CSF-1: Provide and maintain high-quality police, fire, and emergency medical services.

Policy CSF-1.1 Maintain high-quality police and fire protection services through the most efficient and effective possible means. The following minimum level of service standards for police and fire response time (exclusive of dispatch time) shall be maintained: (a) Police Services: 5 minute response time for 90 percent of all Priority One calls; (b) Fire Services: 5 minute response time for first due company for 90 percent of all emergency incidents, excluding freeway responses (3 firefighters including at least one paramedic); 10 minute response time for 90 percent for a full first alarm assignment response (17 firefighters).

Policy CSF-1.5 Require Police and Fire Department review of proposed development plans to ensure that sufficient provisions for emergency access and response are made, fire code requirements are satisfied, and adequate levels of service can be provided.

The Community Services and Facilities Element also address parkland, open space, and recreational facilities in and nearby San Leandro. The following policies found within the element are applicable to recreational facilities within the city:

Goal OSC-2: Develop additional parkland in the city to better meet existing needs and to respond to future needs.

Policy OSC-2.1 Achieve the following service standard for parks: (a) At least 5.00 acres of improved parkland per 1,000 residents; (b) A park within one-half mile of each San Leandro resident.

City of San Leandro Municipal Code

Section 7-5-800 adopts the California Fire Code, which contains regulations for safeguarding life and property from the hazards of fire and explosion; dangerous conditions arising from the storage, handling, and use of hazardous materials; and hazardous conditions in the use of occupancy of buildings. Development within San Leandro would be required to comply with the requirements on the California Fire Code.

San Leandro Recreation and Parks Master Plan

The City adopted its Recreation and Parks Master Plan on June 9, 2025, establishing a long-range framework for upgrading and expanding the city's parks, recreation programs, and community facilities. The plan provides a 10-year, system-wide blueprint grounded in extensive community engagement, including over 1,000 survey responses and multiple public workshops. The Master Plan outlines strategies to enhance San Leandro's 23 public parks, recreation facilities, and trails, emphasizing inclusive play spaces, aquatics, safety and accessibility, and diverse recreational opportunities that support community health. The plan identifies gaps in the current system, including a ratio of approximately 1.5 acres of parkland per 1,000 residents, a substantial shortfall relative to the City's General Plan parkland standard of 5 acres per 1,000 residents, and recommends targeted capital improvements, partnerships, and operational strategies to address existing and projected needs.

Impact Analysis

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- 1 *Fire protection?*
- 2 *Police Protection?*

ACFD and SLPD serve the project site and would continue to serve the site during and after project construction. As the project would not introduce a new use or activity onto the project site associated with substantially increased calls for services (e.g., nursing home, rehabilitation facility), and because the project would not result in substantial population or employment growth within the area (see Section 14, *Population and Housing*), it would not result in substantially increased demand for fire or police protection services on the site. The project would not result in the need for new or physically altered fire or police protection facilities, and impacts would be less than significant.

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- 3 *Schools?*

The project includes construction of a manufacturing building and would not include residential development. The project would not result in substantial population or employment growth within the area, and new employment positions would be anticipated to be filled by the local labor force. Substantial numbers of people would not be expected to have to relocate into the project area to fill employment generated by the project (see Section 14, *Population and Housing*). Thus, a substantial increase in the number of school-aged children as a result of the project would not occur. Additionally, pursuant to SB 50 (Section 65995[h]), payment of mandatory fees to the affected school district would reduce potential school impacts to less than significant level under CEQA. The project would not generate a substantial number of new students, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- 4 *Parks?*
- 5 *Other public facilities?*

The nearest park to the proposed project is San Leandro Ball Park located approximately 600 feet west of the project site. There are no other public facilities in the immediate vicinity of the project site. As described above, the project would not directly or indirectly increase the City's population substantially as it does not involve the creation of housing units. Impacts to parks and other public facilities would be less than significant.

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16 Recreation



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Setting

As discussed in Section 15, *Public Services*, the City's Public Works Department maintains approximately 382.8 acres of improved parkland, and that there are approximately 4.33 acres of improved parkland per 1,000 residents. The nearest parks to the project site are the San Leandro Ball Park, located approximately 600 feet west of the project site, and Halcyon Park, located approximately 1 mile east of the project site.

Regulatory Setting

Quimby Act

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative tract map or parcel map.

See Section 15, *Public Services*, subsection *Regulatory Setting* for additional policies and regulations relevant to recreation.

Impact Analysis

- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The project would not include recreational facilities. The proposed project would expand existing manufacturing uses while also demolishing office space. Overall, the project would not lead to substantial direct or indirect population growth that would generate substantially increased demand for parks or other recreational facilities. This impact would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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17 Transportation



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	■	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	■	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
d. Result in inadequate emergency access?	☐	☐	■	☐

Setting

The transportation setting and analysis is based in part on the Focused Transportation Study prepared by W-trans in March 2025 (Appendix B). The site is located on Aladdin Avenue, which is locally accessible via Alvarado Street and Teagarden Street. Regional access is available to the site from I-880, which is approximately 1,100 feet west of the site. The following descriptions are provided for roadways that would provide access to the site and are most likely to serve most of the project's generated vehicle, bicycle, pedestrian and transit traffic.

Existing Roadway Network

- **I-880** is a nine-lane, north-south freeway that connects San Leandro with nearby cities, such as Hayward and Oakland, and regional destinations, such as Fremont and San José. It also provides access to the greater freeway network with direct connections to Interstates 80, 580, 980, 238, US Highway 101, and State Routes 92, 237 and 17. The project site is served by the interchange at Marina Boulevard. The average daily traffic on I-880 in the vicinity of Marina Boulevard ranges between 190,000 and 237,500 vehicles per day.
- **I-238** is a seven-lane, east-west freeway that serves as a connection between I-880 and I-580. The project site is served by the interchange at Washington Avenue. The average daily traffic on I-238 in the vicinity of Washington Avenue ranges between 102,000 and 162,000 vehicles per day.
- **I-580** is an eight-lane, north-south freeway that connects San Leandro with nearby cities, such as Oakland and Pleasanton, and regional destinations, such as Stockton. It also provides access to the greater freeway network with direct connections to Interstates 5, 205, 238, 680, 80 and 880, and State Routes 13, 24, and 84. The project site is served by the interchange at Fairmont Drive. The average daily traffic on I-580 in the vicinity of Fairmont Drive ranges between 119,300 and 143,500 vehicles per day.
- **Alvarado Street** is a north-south road with three lanes and extends from Fremont Avenue to Accolade Drive in Downtown San Leandro. Sidewalks are located along the east and west sides of Alvarado Street in the project area.
- **Aladdin Avenue** is a two-lane, east-west arterial adjacent to the southeast of the project site. It spans from Alvarado Street to Fairway Drive. Sidewalks are provided on both sides of the street in the project area.

- **Fairway Drive** is an east-west collector roadway with one travel lane in each direction in the site vicinity. It extends westerly from Aladdin Avenue at Teagarden Street. The speed limit is 30 mph.
- **Teagarden Street** is a collector roadway that extends from Alvarado Street to Marina Boulevard. It has one lane in each direction with a speed limit of 30 mph.

Existing Bicycle Facilities

Bicycle facilities are defined by the following four classes by the Caltrans *Highway Design Manual*:

- **Class I (Bike Path):** Provides a completely separate facility designed for the exclusive use of bicyclists and pedestrians with crossing points minimized. Bike paths typically serve corridors not served by streets and highways or where wide right of way exists, permitting such facilities to be constructed away from the influence of parallel streets.
- **Class II (Bike Lane):** Provides a restricted right-of-way designated lane for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with vehicle parking and cross-flows by pedestrians and motorists permitted. Bike lanes are established along streets in corridors where there is significant bicycle demand, and where there are distinct needs that can be served by them.
- **Class III (Bike Route):** Shared facilities which provide continuity to other bicycle facilities (usually Class II bikeways) or designate preferred routes through high demand corridors.
- **Class IV (Separated Bikeways):** Provides an exclusive right-of-way including a separation required between the separated bikeway and the through vehicular traffic.

In the project vicinity, the following bicycle facilities exist:

- **Aladdin Avenue**
 - Bike Lane (Class II) – Alvarado Street to Teagarden Street
- **Alvarado Street**
 - Buffered Bike Lane (Class II) – Fremont Avenue to Aladdin Avenue
 - Bike Lane (Class II) – Aladdin Avenue to Marina Boulevard
 - Bike Route (Class III) – Marina Boulevard to Williams Street
- **Fairway Drive**
 - Bike Lane (Class II) – Teagarden Street to Aurora Drive
- **Teagarden Street**
 - Bike Lane (Class II) – Alvarado Street to Aladdin Avenue
 - Bike Route (Class III) – Aladdin Avenue to Marina Boulevard

Existing Pedestrian Facilities

Most streets in the project vicinity are equipped with sidewalks on both sides. Continuous sidewalks are provided on both sides of the roadway along Aladdin Avenue near the project site. At the signalized intersection of Aladdin Avenue and Teagarden Street, marked crosswalks with pedestrian signals facilitate safe pedestrian crossings. A marked crosswalk with pedestrian signals is also present on the east leg of the Aladdin Avenue and Alvarado Street intersection.

Existing Transit Facilities

The transit system in the study area includes bus and rail services provided by Alameda-Contra Costa Transit District (AC Transit), San Leandro LINKS shuttles, and Bay Area Rapid Transit (BART).

BART is the rapid transit rail system serving the San Francisco Bay Area. The Green, Orange, and Blue lines operate through San Leandro, with connections to the Red and Yellow lines. The San Leandro Station is located about 1.2 miles north of the project site, and the Bay Fair Station is located about 2.7 miles southeast of the site. Service on all BART lines begins at 5:00 a.m. on weekdays, 6:00 a.m. on Saturdays, and 8:00 a.m. on Sundays. All lines operate until 9:00 p.m., while the Blue, Orange, and Yellow lines operate until Midnight.

AC Transit operates Route 28 along Alvarado Street which is approximately 0.8 mile north of the project site. Route 28 extends from the San Leandro BART station to the Hayward BART station, with access to the Bay Fair and Castro Valley BART stations. Route 28 operates in each direction at hourly frequencies from approximately 6:00 a.m. to 10:00 p.m. on weekdays, Saturdays, Sundays, and Holidays.

LINKS provides a free and convenient shuttle to and from the San Leandro BART station. Shuttles run every 30 minutes, Monday through Friday, during peak commute hours (5:45 a.m. to 10:30 a.m., and 3:00 p.m. to 7:20 p.m.). The South Loop stops at the same location as the southbound AC Transit Route 28 on Alvarado Street.

Regulatory Setting

The determination of significance for project impacts is based on applicable policies, regulations, goals, and guidelines defined by the City, Santa Clara County, Metropolitan Transportation Commission, and state.

Senate Bill 743

On September 27, 2013, SB 743 was signed into law. The legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled and thereby contribute to the reduction of GHG emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32). In December 2018, the Governor's Office of Planning and Research (OPR) finalized new *CEQA Guidelines* (*CEQA Guidelines* section 15064.3), that identify VMT as the most appropriate criteria to evaluate a project's transportation impacts.

In November 2017, OPR released a technical advisory containing recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in SB 743. Also in November 2017, OPR released the proposed text for Section 15064.3, "Determining the Significance of Transportation Impacts," which summarized the criteria for analyzing transportation impacts for land use projects and transportation projects and directs lead agencies to "choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure." OPR recommends that for most instances a per service population threshold should be adopted and that a fifteen percent reduction below that of existing development would be a reasonable threshold.

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 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 are required to adopt an SCS, which allocates land uses in the Metropolitan Planning Organization's 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.

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.

Screening Criteria and Thresholds of Significance

As described in the Focused Transportation Study (Appendix B), VMT was analyzed based on SB 743 and the memorandum "City of San Leandro Proposed Guidelines for Analyzing VMT" prepared by W-Trans on December 8, 2023. . These documents allow the use of screening criteria to identify projects that are anticipated to result in less-than-significant VMT impacts without requiring detailed modeling. Under the City's screening approach, industrial and warehouse projects may be presumed to have a less-than-significant impact when located in areas where baseline VMT per employee is below the existing regional average.

The Central Planning Area, which includes the project site, has an existing VMT per employee of 19.2 miles (W-Trans 2025). The City's published VMT screening map shows that the project site is located within a low-VMT area in which projected VMT per employee is at least 15 percent below the regional average. Because the proposed project is an industrial use located within this low-VMT area, it would

screen out from further VMT analysis and is therefore presumed to result in a less-than-significant VMT impact.

Impact Analysis

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Trip Generation

Trip generation refers to the process of estimating the amount of vehicular traffic a project would add to the surrounding roadway system. For this project, W-Trans estimated trip generation using standard rates published in the *Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition*, applying rates for “General Office Building” and “Manufacturing,” which most closely represent the existing and proposed site uses. The proposed manufacturing use is estimated to generate approximately 187 daily trips, including 27 AM Peak-Hour trips and 29 PM Peak-Hour trips, before accounting for removal of the existing office use. When the existing 44,758-square-foot office building is removed, the net effect of the project would be a reduction of approximately 298 daily trips, including 41 fewer AM Peak-Hour trips and 36 fewer PM Peak-Hour trips (see Table 20) (Appendix B).

Table 20 Project Trip Generation Compared to Existing Conditions

Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Existing	-485	-60	-8	-68	-11	-54	-65
Proposed	187	21	6	27	9	20	29
Total Project Trips	-298	-39	-2	-41	4	36	-36

Source: W-Trans 2025

Public Transit Facilities

The project would generate additional public transit trips on existing transit services near the project site. Because the project would not be expected to substantially increase vehicle traffic or vehicle speed in the existing roadway network around the project site, the project would not result in delays or interruptions to existing transit services. Due to the project’s proposed manufacturing use, it would be expected to generate negligible transit trips (Appendix B). The project would not include features that would conflict with City or regional plans, policies, or ordinances pertaining to public transit. No significant impacts to transit facilities would occur, and the project would not conflict with the City’s General Plan.

Bicycle Facilities

An impact would occur to bicycle facilities if the proposed project were to disrupt existing bicycle facilities or be inconsistent with adopted City standards. There are several bike facilities in the vicinity of the project site, as described under *Existing Bicycle Facilities*. Because the project would not be anticipated to substantially increase vehicle traffic or vehicle speed in the existing roadway network around the project site, the bicycle level of traffic stress would not substantially change as a result of the project. Furthermore, the project would provide nine short-term bicycle rack and one long-term bicycle storage enclosures. The project would not include features that would be hazardous to bicycles, nor would it generate bicycle demand that would exceed the capacity of the area’s bicycle network. The project would not conflict with City or regional plans, policies or ordinances pertaining to bicycle facilities or travel (Appendix B). No significant impacts to bicycle facilities would occur.

Pedestrian Facilities

An impact to pedestrian facilities would occur if the project were to disrupt existing pedestrian facilities or be inconsistent with pedestrian system plans, guidelines, or policies. Because the project would not be anticipated to substantially increase vehicle traffic or vehicle speed in the existing roadway network around the project site, the pedestrian facilities in the project site vicinity would not be substantially diminished as a result of the project. The project would not result in changes to the existing sidewalk along the Aladdin Avenue frontage, and so pedestrian access to the site would not be changed or reduced. Therefore, no impact to pedestrian facilities would occur.

Table 21 below describes project consistency with applicable policies from the San Leandro General Plan Transportation Element.

Table 21 Project Consistency with General Plan Transportation Element

Policy	Consistency
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.	Consistent. The project applicant would be required to pay development impact fees pursuant to Chapter 7-11 of the SLMC.
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.	Consistent. The project would include bicycle parking spaces and would be located near public transit stops, which would encourage alternative modes of transportation. Additionally, as discussed under <i>Roadways</i> , the project would not generate a number of trips that would adversely affect the LOS of intersections near the project site.
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.	Consistent. The project would include nine bicycle parking spaces and improved sidewalks.
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.	Consistent. The project would include nine bicycle parking spaces, maintaining existing sidewalks, and exterior lighting to accommodate bicycles and pedestrians.
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.	Consistent. As shown in Table 20, the project would reduce truck loads compared to current conditions. The project site would utilize the two existing driveways for ingress and egress, which would minimize truck traffic impacts on Aladdin Avenue. In addition, this region is industrial with access to major highways, so truck traffic created by the project would not impact residential streets.

Source: City of San Leandro 2016a

The project would be consistent with the San Leandro General Plan Transportation Element. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

As the basis for evaluating transportation impacts under this threshold, the project's transportation analysis relies on VMT consistent with *CEQA Guidelines* Section 15064.3. The full VMT analysis is provided in Appendix B.

As described under *Setting*, *CEQA Guidelines* Section 15064.3 identifies VMT as the most appropriate criteria to evaluate a project's transportation impacts. As described under *Screening Criteria and Thresholds of Significance*, the project must be consistent with Alameda County Transport Commission screening criteria in order to assume that VMT impacts would be less than significant.

The project site is within the Central Planning Area (which includes all of San Leandro). As described in Appendix B, based on OPR guidance and the City's Proposed *Guidelines for Analyzing VMT*, an industrial project generating a VMT that is equal to this value would have a less-than-significant VMT impact. The *City of San Leandro's Proposed Guidelines for Analyzing VMT* publishes a screening map which shows that this project is located inside an area with a projected VMT per employee at least 15 percent below the regional average. Therefore, the project would be considered to have a less-than-significant VMT impact.

LESS-THAN-SIGNIFICANT IMPACT

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

Vehicle access to the project site would be available via two existing two-way driveways on Aladdin Avenue, located in the southeast and northeast corners of the project site. A total of 155 vehicle parking spaces and nine short-term and one long-term bicycle parking spaces would be provided. Emergency vehicles would be able to enter the project site via either driveway and, if necessary, circulate through the parking lot on the southern side of the proposed manufacturing building to turn around or exit via the other driveway. Pedestrian access to the project site would be provided via existing concrete sidewalks along Aladdin Avenue. The project would not involve geometric design features or incompatible uses that would substantially increase hazards at the project site. Therefore, impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

The project would not require lane or road closures during construction. During operation, emergency access to the project site would be available via the two existing two-way driveways that provide access to Aladdin Avenue. The parking lot is adjacent to the proposed development and would provide adequate emergency access to the structure. If necessary, emergency vehicles would be able to circulate through the parking lot to make a U-turn or turn through the swing gates to turn around and exit onto Aladdin Avenue. The project would provide adequate emergency access, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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18 Tribal Cultural Resources



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Regulatory Setting

Assembly Bill 52

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 establishes a formal consultation process for California Tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

On April 1, 2026, the City of San Leandro, pursuant to Public Resources 21080.3.1 and AB 52, sent via email and a certified mail notification letter to the Confederated Villages of Lisjan Nation (Lisjan Nation). The City received a response from the Lisjan Nation on April 1, 2026 requesting the SLF results from the

NAHC, the CHRIS records search results, and any cultural resource reports prepared. On April 15, 2026, the City provided the requested materials via email. On April 15, 2026, the Lisjan Nation responded via email stating they felt a consultation meeting was not necessary at this time; however, the Lisjan Nation requested that the following standard culturally appropriate mitigation measures for inadvertent discovery of Tribal Cultural Resources be implemented and that Lisjan Nation be notified if any cultural resources of Native American origin are inadvertently discovered during the project.

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

As described in Section 5, *Cultural Resources*, neither the cultural resources records search nor Sacred Lands File search identified cultural resources listed on or eligible for listing on the CRHR or a local register within the project site. However, there is always potential to uncover buried archaeological and tribal cultural resources during ground disturbing activities, which could potentially be considered tribal cultural resources eligible for listing in the CRHR or a local register or determined by the lead agency to be tribal cultural resources. Should project construction activities encounter and damage or destroy a tribal cultural resource or resources, impacts would be potentially significant. Implementation of Mitigation Measure TCR-1 would be required.

Mitigation Measures

TCR-1 Inadvertent Discovery of Tribal Cultural Resources

If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 100 feet shall cease until a representative from the Confederated Villages of Lisjan Nation is consulted by the government agency. If the entity in consultation with the consulting Tribe(s), determines that the resource is a Tribal Cultural Resource and thus significant under CEQA, the entity shall retain a Tribal representative and, if applicable, a qualified archaeologist, at the applicant's expense, to prepare a mitigation plan, which shall be implemented in consultation with the consulting Tribe. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe. Examples of appropriate mitigation for Tribal Cultural Resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery.

TCR-2 Inadvertent Discovery of Human Remains

If human remains are encountered during construction and ground disturbing activities, all work within 100 feet of the remains should be redirected and the County Coroner notified immediately. At the same time, an archeologist shall be contacted to assess the situation. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendent (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and any associated funerary objects. There shall be no pictures taken or testing done on the Native American human remains. All bone, until identified as not human, shall be treated as potential human remains and the appropriate protocols followed. The archaeologist shall record information, as appropriate and in

accordance with the recommendations of the MLD and/or Tribal representative. Upon completion of the archeologist's assessment, a report should be prepared documenting methods and results, as well as the MLD's recommendations regarding the treatment of the human remains and any associated funerary objects. The report should be submitted to the lead government agency, the NWIC and the consulting Tribe. Tribal representatives will rebury the Native American human remains and associated funerary objects with the appropriate dignity either; in accordance with the recommendations of the MLD if available or in the project vicinity at a location agreed upon between the Tribe and the entity, where the reburial would be accessible to Tribal members in perpetuity and would not be subject to further disturbance. The discovery and reburial is to be kept confidential and secure to prevent any further disturbance.

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 and TCR-2 would minimize impacts to tribal cultural resources encountered during project construction. Impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting

Potable Water

Water service to San Leandro is provided by EBMUD, a public utility. EBMUD is responsible for service connections and water delivery to most of Alameda County and much of Contra Costa County. San Leandro comprises about 6 percent of the EBMUD's customer base and uses about 5 percent of its water. As discussed in Section 10, *Hydrology and Water Quality*, approximately 90 percent of the EBMUD water supply originates from the Sierra Nevada via the Mokelumne River watershed, with the other 10 percent sourced from runoff on East Bay Area watershed lands. Water delivered to San Leandro customers is treated at the Orinda or Upper San Leandro water treatment plants (EBMUD 2021).

Each water district adopts an UWMP, which is a long-range planning document used to assess current and projected water usage, water supply planning and conservation and recycling efforts. The EBMUD adopted a 2020 UWMP and a 2020 Water Shortage Contingency Plan which determined that under base condition assumptions, EBMUD can meet customer demand out to 2050 during normal years and single dry years; however, during multi-year droughts, even with customer demand reduction measures in place, EBMUD will need to obtain supplemental supplies to meet customer demands (EBMUD 2021). Projections are summarized across the different water supply scenarios through the year 2050 in Table 22.

Table 22 EBMUD Normal and Dry Year Supply and Demand Comparison 2020-2050

EBMUD Planning Level of Demand	2020	2025	2030	2035	2040	2045	2050
Normal Year							
Mokelumne Supply (mgd)	>181	>186	>190	>194	>201	>209	>218
Demand (taf)	181	186	190	194	201	209	218
Need for Water (taf)	0	0	0	0	0	0	0
Single Dry Year							
Mokelumne Supply (mgd)	121	126	129	132	138	144	151
CVP Supplies (mgd)	60	60	60	60	60	60	60
Total Supplies (mgd)	181	186	189	192	198	204	211
Voluntary Rationing (%)	0	0	1	1	2	2	3
Need for Water (taf)	0	0	0	0	0	0	0
Second Dry Year							
Mokelumne Supply (mgd)	82	86	89	92	98	104	111
CVP Supplies (mgd)	74	74	74	74	74	74	74
Total Supplies (mgd)	156	161	164	167	172	178	185
Mandatory Rationing (%)	13	13	13	14	14	14	15
Need for Water (taf)	0	0	0	0	0	0	0
Third Dry Year							
Mokelumne Supply (mgd)	141	145	146	145	132	118	105
CVP Supplies (mgd)	12	12	12	12	12	12	12
Total Supplies (mgd)	153	157	158	157	144	130	117
Mandatory Rationing (%)	15	15	15	15	15	15	15
Need for Water – Base Condition (taf)	0	0	0	0	28	52	75
Need for Water – High Demand Scenario (taf)	0	0	21	35	60	97	125
Need for Water – Extreme Drought Scenario (taf)	0	0	0	13	32	55	84

CVP = Central Valley Project; mgd = million gallons per day; taf = thousand acre-feet

Source: East Bay Municipal Utility District 2021

EBMUD distributes its water through a system of pipelines, storage reservoirs, water treatment plants, and pumping plants. Within the EBMUD service area, the water distribution network includes 4,200 miles of pipe, 167 water distribution reservoirs, and 131 water pumping plants. EBMUD's water supply system delivers 325 million gallons per day (mgd) to its 1.4 million customers and has a capacity of 830 million gallons (EBMUD 2021).

There are currently no major water storage facilities in San Leandro. Rather, the city is served by nearby facilities in Castro Valley and Oakland, including the Dunsmuir Reservoir just outside the northeastern city limits. Pipelines in San Leandro range from 4 to 36 inches in diameter. EBMUD operates and maintains all water distribution lines within the city and is responsible for all facilities up to the location of the water meter (EBMUD 2021).

Wastewater

The City's sewer system consists of approximately 130 miles of pipe, ranging from 6 inches to 42 inches in diameter, and 13 remote lift stations. The City maintains roughly two thirds of the sewers within city limits, primarily serving the northern portion of the city. The remainder of the city, including the project site, is served by OLSD. The SFBWQCB established wastewater treatment requirements for the OLSD Wastewater Treatment Plant and the East Bay Dischargers Authority outfall in an NPDES Permit (Order No. R2-2022-0018), adopted in 2022. The NPDES Order sets a framework for operation of the plant and effluent from the plant.

The OLSD serves a population of approximately 141,000, which includes residents and businesses. OLSD and Castro Valley Sanitary District jointly own OLSD's treatment plant, which has a permitted capacity of 20 mgd and treats an average dry weather flow of 12 mgd (OLSD 2026).

Stormwater

The City's Department of Public Works owns and maintains 175 miles of storm drain conduits throughout the city. The City's storm drain system feeds into a larger system owned and operated by the Alameda County Flood Control and Water Conservation District. Stormwater from the project site drains south to Aladdin Avenue, where it is collected by storm drains into the City's stormwater system. Stormwater runoff is collected and disposed of by an integrated system of storm drains, inlets, curbside gutters, catch basins, drainage ditches, and man-made channels. Ultimately, stormwater that enters the City's system drains to the San Francisco Bay (City of San Leandro 2026a).

Solid Waste

The City has two distinct service areas for refuse and recycling services: San Leandro Sanitary District and OLSD. The two service providers that serve these areas are Alameda County Industries (City's franchisee) and Waste Management of Alameda County (OLSD's franchisee). As of 2019, the City's solid waste was primarily sent to seven landfills, as summarized below in Table 23. About 81 percent of San Leandro's solid waste was sent to the Altamont Landfill Resource Recovery Facility and the Vasco Road Sanitary Landfill (CalRecycle 2019).

Table 23 Estimated Landfill Capacities and Closure Date

Landfill Facility	Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)	Maximum Permitted Throughput (tons per day)	Anticipated Closure Date
Altamont Landfill Resource Recovery Facility	124,400,000	52,300,000	11,150	2060
Fink Road Landfill	28,289,900	18,993,322	2,400	2050
North County Landfill and Recycling Center	41,200,000	35,400,000	825	2048
Potrero Hills Landfill	83,100,000	13,872,000	4,330	2048
Recology Hay Road Landfill	37,000,000	30,433,000	2,400	2077
Redwood Landfill	26,077,000	26,000,000	2,300	2036
Vasco Road Sanitary Landfill	40,207,100	11,560,000	2,518	2051

Notes: The California Department of Resources Recycling and Recovery identifies Maximum Permitted Throughput only in tons/day, while maximum permitted capacity and remaining capacity are only provided in cubic yards; therefore, standard conversion factors provided by the USEPA are used to provide all figures in both tons and cubic yards. USEPA identifies a standard conversion factor for Municipal Solid Waste compacted to "Landfill Density" of 1,700 pounds per cubic yard, equating to approximately 0.8 ton per cubic yard of compacted Municipal Solid Waste.

Source: California Department of Resources Recycling and Recovery 2019

Other Utilities

Electricity would be provided to the project site by Ava via PG&E infrastructure. Infrastructure capable of supporting electric and telecommunications is present at the project site and in the project vicinity.

Regulatory Setting

California Green Building Standards Code

In January 2020, the State of California adopted CalGreen that establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a mandatory set of guidelines, as well as more rigorous voluntary measures, for new construction projects to achieve specific green building performance levels.

- Reducing indoor water use by 20 percent
- Reducing wastewater by 20 percent
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris
- Providing readily accessible areas for recycling by occupant

Assembly Bill 939

The California Integrated Waste Management Act (AB 939, Sher, Chapter 1095, Statutes of 1989 as amended [IWMA]) made all California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 25 percent of their solid waste by 1995 and 50 percent by year 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year. CalRecycle oversees and provides assistance to local governments as they develop and implement plans to meet the mandates of the IWMA and subsequent legislation.

San Leandro 2035 General Plan

The following policies of the City's General Plan are related to the provision of utilities and service systems in San Leandro:

Policy CSF-6.2 Fair Share Costs. Require future development to pay its fair share of the cost of improving the water, sewer, storm drainage, and other infrastructure systems needed to serve that development. Development impact fees, development agreements, and other appropriate forms of mitigation should be used to cover the costs of upgrading or expanding public infrastructure.

Policy CSF-6.4 Wastewater Collection and Treatment. Maintain efficient, environmentally sound, and cost-effective wastewater collection and treatment services in San Leandro.

Policy CSF-6.5 Capacity. Maintain adequate capacity at the San Leandro wastewater treatment plant to accommodate projected levels of growth within the service area and encourage the Oro Loma Sanitary District to do the same. Support efforts to maintain and/or improve the high quality of treated effluent at both plants and increase the feasibility and cost-effectiveness of using recycled wastewater for non-potable purposes.

San Leandro Stormwater Management and Discharge Control Ordinance

The City manages stormwater and regulates discharge into storm drains through a Storm Water Management and Discharge Control Ordinance. The City adheres to the SWRCB requirements for permitting for specific types of industrial and construction activities, such as obtaining an NPDES permit prior to construction.

Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*
- c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Water

Water service to the project site would continue to be provided by EBMUD. The project would maintain the site's existing industrial use and would be served by existing water infrastructure. The project would involve an incremental increase in water use associated with the expansion of manufacturing uses; however, this would be partially offset by the reduction in office space on the project site. Overall, the increase in water demand associated with expanded building area and manufacturing functions would be incremental and within the capacity of EBMUD's established supply system. EBMUD's UWMP demonstrates that the agency can meet projected water demands within its service area during normal, single-dry, and multiple-dry years. The project's water needs would be typical of light industrial and commercial operations already served in the area, and EBMUD has confirmed service availability for the site.

The project would not require construction or expansion of water supply or treatment facilities, and adequate water supplies are available to serve the project. Impacts would be less than significant.

Wastewater

Wastewater generated by the project would continue to be conveyed to OLSD through existing sewer infrastructure. Because the project would maintain an industrial land use similar to existing conditions, increases in wastewater generation would be minimal and would fall within the treatment capacity of OLSD's existing system. The OLSD treatment plant includes available capacity to accommodate typical increments in wastewater flows from redevelopment within its service area.

The project would connect to existing sewer lines and would comply with OLSD's requirements for sewer plan approval and permitting. No new or expanded off-site wastewater treatment facilities would be needed to serve the project. Impacts would be less than significant.

Stormwater

Stormwater conveyance would continue through the City's storm drain system, which currently receives runoff from the site through storm drains on Aladdin Avenue. The project would not alter drainage patterns in a way that would exceed the capacity of the municipal storm drain system. As described in the Hydrology and Water Quality section, implementation of new landscaping, bioretention areas such as the shrubs that separate the project site from Aladdin Avenue, and other low-impact development features would improve stormwater retention and treatment compared to existing conditions.

The project would also be required to comply with Municipal Regional Permit (NPDES) requirements and the City's C.3 Stormwater Guidelines, ensuring adequate on-site treatment and flow control. No new or expanded storm drainage infrastructure would be required. Impacts would be less than significant.

Electricity, Natural Gas, and Telecommunications

Electricity would continue to be supplied by Ava using PG&E infrastructure, and telecommunications service is already available at the site. As discussed in Section 6, *Energy*, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy. Therefore, the project would not result in significant environmental impacts due to the construction of new utility facilities. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The proposed project would generate solid waste during construction and operation. During construction, the current CalGreen code would require that 65 percent of construction and demolition debris be diverted.. Handling of debris and waste generated during construction would be subject to CalGreen requirements and SLMC, Chapter 3-7, which would require the project applicant to submit a Debris Recycling Statement. This statement would require the applicant to report the estimated volume or weight of construction debris, the amount of debris that was diverted via reuse or recycling, and information regarding the facility the applicant proposed to use to salvage, collect, or receive diverted material. Therefore, the project would not impair the attainment of solid waste reduction goals.

Operation of the project would generate an additional 698 pounds of solid waste compared to existing conditions. This estimation is based on solid waste generation rates provided by CalRecycle, which estimate that manufacturing uses generate 1.42 pounds per 100 square feet per day (CalRecycle 2015).⁵ The additional solid waste generated per day would equate to 0.35 ton per day or approximately 128 tons per year.

Solid waste from the project site would be collected by Waste Management of Alameda County and likely sent to the Altamont Landfill Resource Recovery Facility. Table 24 shows the project's estimated solid waste generation and the remaining capacity of these landfills (CalRecycle 2024).

Table 24 Additional Generated Solid Waste and Estimated Landfill Capacity

Project Solid Waste Generation (tons/day)	Permitted Throughput of Altamont (tons/day)	Remaining Capacity of Altamont (cubic yards)
0.35	11,150	52,300,000

Source: California Department of Resources Recycling and Recovery 2024

Project generated waste would be less than 0.01 percent of Altamont Landfill's allowable waste limit and less than 0.01 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 AB 939. The project's incremental increase in solid waste would not adversely affect solid waste facilities. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

⁵ Approximately 698 pounds per day is the result of 1.42 pounds per 100 square feet of manufacturing space per day, multiplied by 49,136 square feet of manufacturing use.

20 Wildfire



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Setting

According to maps prepared by CAL FIRE, most of San Leandro is within a Local Responsibility Area and is not located within a Fire Hazard Severity Zone. However, small portions of the city along its eastern border are classified as Very High Fire Hazard Severity Zones within Local Responsibility Areas (CAL FIRE 2024). The project site is not within a Fire Hazard Severity Zone and is located approximately 2.9 miles west of the nearest Very High Fire Hazard Severity Zone.

Impact Analysis

- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project site is not in a CAL FIRE designated Very High Fire Hazard Severity Zone and is located approximately 2.9 miles west of the nearest Very High Fire Hazard Severity Zone (CAL FIRE 2024). The project site is separated from the nearest Very High Fire Hazard Severity Zone by urban development, which does not facilitate the spread of wildfire. Additionally, the prevailing wind direction in San Leandro is west to east for nine months of the year and from north to south for three months of the year (WeatherSpark 2026). Therefore, prevailing winds would blow wildfires away from the project site and from the city.

Project implementation would not impair an adopted emergency response plan or emergency evacuation plan, as discussed in Section 9, *Hazards and Hazardous Materials*, or exacerbate wildfire risks. Furthermore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post fire slope instability, or drainage changes in or near state responsibility areas or lands classified as very high fire severity zones. No impact would occur.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

The project site is located within a fully developed urban area and does not contain native habitat, aquatic features, or other natural communities that would support fish species, wildlife populations, or special-status plant or animal species. As summarized in Section 4, *Biological Resources*, no fish or wildlife habitat occurs on-site, and the absence of natural vegetation and water features precludes the presence of self-sustaining wildlife populations or sensitive biological communities. While nesting migratory birds could temporarily utilize ornamental vegetation, implementation of the City's Standard COA for Migratory Birds, as well as compliance with the MBTA and applicable sections of CFGC, would ensure that any potential impacts are avoided or minimized. With implementation of this Standard COA, project impacts to biological resources would be less than significant.

The project site has been previously disturbed by urban development and does not contain known historical, archaeological, paleontological, or tribal cultural resources. As discussed in Section 5, *Cultural Resources*, Section 7, *Geology and Soils*, and Section 18, *Tribal Cultural Resources*, no resources related to important examples of the major periods of California history or prehistory have been identified on-site, and the likelihood of encountering such resources during construction is low given existing site conditions. Nevertheless, if previously undiscovered cultural, paleontological, or tribal cultural resources were encountered during ground-disturbing activities, implementation of mitigation measures CUL-1, GEO-1, and TCR-1 would ensure appropriate evaluation, protection, and treatment. Therefore, the project would not eliminate important examples of California history or prehistory, and impacts would be less than significant.

As noted throughout the Initial Study, other potential environmental impacts related to the quality of the environment would be less than significant.

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b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As described in Sections 1 through 20, the project would not result in significant and unmitigable impacts to the environment with respect to all environmental issues. This is largely because project construction activities would be temporary, and construction and operational activities would not significantly alter the environmental baseline condition.

As defined in *CEQA Guidelines* Section 15335, “cumulative impacts” refer to two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project when added to other closely related past, present and reasonably foreseeable probable future nearby projects. If a significant cumulative impact is identified, it must then be determined whether the project’s contribution to that impact would be cumulatively considerable. Cumulative impacts could occur if the construction of other projects occurred recently, at the same time as the proposed project or is proposed in the near future, and in the same geographic scope, such that the effects of similar impacts of multiple projects combine to create greater levels of impact than would occur at the project-level. For example, if the construction of other projects in the area occurs at the same time as project activities, combined air quality and noise impacts may be greater than at the project level.

Six planned development projects are within 1 mile of the project site, which are summarized in Table 25. The exact implementation timing of these projects is not known at this time; therefore, it is conservatively assumed that construction of these planned projects could overlap with construction of the proposed project.

Table 25 Cumulative Development Projects

No.	Project Name	Project Location	Project Components	Distance/ Direction from Project Site	Status
1	PLN24-0030	3199 Alvarado Street	Approximately 241,400 sf industrial development	2,000 feet southeast	Proposed
2	PLN17-0049	342 Marina Boulevard	6-unit residential townhome development	2,900 feet northeast	Approved
3	PLN24-0032	2420 Merced Street	Approximately 18,000 sf commercial (adult day care and medical clinic) facility	3,600 feet west	Approved
4	PLN16-0067	601 Parrot Street	197-unit mixed-use development with 197 multi-family residential units and 13,000 sf of office located at the southern portion of the San Leandro Technology Campus	4,300 feet north	Approved
6	PLN2009-00006	2436 Washington Avenue	66-unit multi-family residential development	3,200 feet northeast	Approved
7	PLN21-0031	14143 Washington Avenue	Approximately 52,269 sf speculative warehouse development with up to approximately 5,000 sf of office space	3,500 feet east	Approved

No.	Project Name	Project Location	Project Components	Distance/ Direction from Project Site	Status
8	PLN20-0039	1800 Williams Street	Approximately 9,306 sf industrial building and related site improvement	4,200 feet northwest	Approved
9	PLN20-0044	1919 Williams Street	Approximately 221,000 sf industrial building, including approximately 3,400 sf of office space, and related site improvements	4,400 feet west	Approved

sf = square feet
Source: City of San Leandro 2026b

Construction impacts are primarily temporary, localized effects. Therefore, the potential for the project to contribute to cumulative impacts would be limited to the infrequent periods of project activities and the following issue areas:

- **Air Quality.** Because the SFBAAB currently exceeds the federal ozone and PM_{2.5} standards and the state ozone, PM₁₀, and PM_{2.5} standards, cumulative air quality impacts currently exist for these pollutants. As discussed in Section 3, *Air Quality*, project construction activities would not generate emissions of air pollutants exceeding Air District significance thresholds, which are intended to assess whether a project's contribution to existing cumulative air quality impacts is considerable. Therefore, the project's contribution to cumulative air quality impacts would not be cumulatively considerable.
- **Biological Resources.** Most cumulative impacts to biological resources occur when a disproportionate number of development projects occur at once and regionally impact a local population of a special-status species, riparian habitat, sensitive natural communities, wetlands, or other locally protected biological resources. In this case, all cumulative projects would occur within previously developed areas, and would not be anticipated to result in significant impacts to special status plant and wildlife species or sensitive natural communities. Additionally, the proposed project would be required to comply with applicable COAs referenced in Section 4, Biological Resources, to reduce impacts to biological resources to less than significant levels such that the project's contribution to cumulative biological resource impacts would not be cumulatively considerable.
- **Cultural and Tribal Cultural Resources.** Cumulative development in the region would continue to disturb areas with the potential to contain cultural and tribal cultural resources. The cumulative development projects have undergone or would be required to undergo CEQA review, which would determine the extent of potential cultural and tribal cultural resources impacts and mitigate those impacts appropriately. If these cumulative projects would result in impacts to known or unknown cultural or tribal cultural resources, impacts to such resources would be addressed on a case-by-case basis. Given the uncertainty in the extent of impacts associated with these projects, this analysis conservatively assumes a significant cumulative impact to cultural and tribal cultural resources would occur. Nevertheless, the proposed project would be required to implement mitigation measures CUL-1, TCR-1, and TCR-2 to reduce its impacts to cultural and tribal cultural resources to a less-than-significant level such that the project's contribution to cumulative cultural resource impacts would not be cumulatively considerable.
- **Greenhouse Gas Emissions.** GHG emissions and climate change are, by definition, cumulative impacts. As discussed in Section 8, *Greenhouse Gas Emissions*, the adverse environmental impacts of cumulative GHG emissions are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. As discussed in Section 8, *Greenhouse Gas Emissions*, project emissions would be below the identified threshold of significance and therefore would not be cumulatively considerable.

- **Hazards and Hazardous Materials.** Similar to the proposed project, cumulative projects would be required to comply with regulations applicable to the use, disposal, and transportation of hazardous materials during construction activities, and compliance with applicable regulations would reduce potential cumulative impacts to less-than-significant levels. With respect to the use and accidental release of hazardous materials in the environment at construction, effects are generally limited to site-specific conditions. As part of project approval for the cumulative projects, the City would assess the need for fire protection services, which would inform efforts to improve or expand needed facilities. Cumulative development would comply with emergency access requirements as directed by respective city and fire department regulations. Therefore, the project's contribution to cumulative hazards and hazardous materials impacts would not be cumulatively considerable.
- **Noise.** Overlapping construction activities associated with cumulative development projects in conjunction with proposed project activities could result in cumulative noise impacts related to a temporary increase in ambient noise levels at the same noise-sensitive receivers located throughout the area, especially during construction activities. However, similar to the proposed project, cumulative development projects would be subject to compliance with the noise level limits established in SLMC, Chapter 4-1. Therefore, cumulative construction noise impacts would be less than significant. Although there could be other cumulative projects simultaneously under construction near construction of the proposed project, the potential for construction groundborne vibration and noise impacts is within relatively close distances (e.g., within approximately 25 feet for a vibratory roller). Since no two construction cumulative projects would be within 25 feet of a given sensitive structure, the project's contribution to cumulative noise impacts would not be cumulatively considerable.
- **Public Services.** Cumulative developments would be required to comply with the California Fire Code, Part 9 of the CBC and would follow standards for fire safety such as fire flow requirements for buildings, fire hydrant location and distribution criteria, automated sprinkler systems, and fire-resistant building materials. For these reasons, the cumulative projects would not result in the need to construct new or expand existing fire protection or emergency medical services facilities beyond those anticipated for expected population growth. Therefore, the cumulative impact related to fire protection facilities would be less than significant. Cumulative plans and projects within the service area of the SLPD would be reviewed for impacts on police protection services, would be required to address any potential impacts with mitigation, and would need to provide adequate emergency access for police services with proper signage and lighting. Because demand for law enforcement services is highly dependent on a number of factors that vary substantially by project (clientele, hours of operation, crime prevention measures, etc.), it is unlikely that there would be substantial overlap in demand that would result such that new facilities are necessary. The cumulative impact related to police protection facilities would be less than significant. Cumulative projects would be required to pay development impact fees towards school operation which, pursuant to Section 65995(3)(h) of the California Government Code (SB 50, chaptered August 27, 1998), are "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, the project's contribution to cumulative public services impacts would not be cumulatively considerable.
- **Transportation.** Overlapping construction schedules associated with cumulative development projects in conjunction with proposed project activities could result in cumulative transportation impacts. Similar to the proposed project, cumulative projects would be required to be consistent with VMT screening criteria or complete a VMT analysis and also be consistent with LOS standards established by the City's General Plan. The proposed project would not result in significant impacts related to VMT or significant adverse effects related to LOS. The project's contribution to cumulative transportation impacts would not be cumulatively considerable.
- **Utilities and Service Systems.** Operation of cumulative development projects in conjunction with proposed project activities could result in cumulative utilities impacts. Similar to the proposed project, cumulative projects would be required to undergo individual environmental review for potential impacts to existing utilities that serve San Leandro. The project would not require or result in the relocation or

construction of new or expanded water facilities, and the project would have sufficient water supplies available to serve the project during normal, dry, and multiple dry years. The project would not require or result in the relocation or construction of new or expanded wastewater facilities and would be served by a wastewater treatment provider with adequate capacity for the project's projected demand. The project would not require the construction of new electric power, natural gas, or telecommunications facilities because it is located in an urban area already served by those utilities and would not require additional capacity. The project's contribution to cumulative utilities and service system impacts would not be cumulatively considerable.

Based on this information, the proposed project would not result in a cumulatively considerable contribution to a significant cumulative impact with mitigation incorporated.

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c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As discussed in Section 3, *Air Quality*, the project would implement the City's Standard COAs for dust control. As discussed in Section 9, *Hazards and Hazardous Materials*, impacts related to groundwater, vapor, or soil contamination would not be significant as a result of project implementation with Mitigation Measures HAZ-1 and HAZ-2 and would not have a cumulatively considerable contribution to significant cumulative hazards impacts. As discussed in Section 13, *Noise*, the project would not have significant noise impacts in construction or operation. Therefore, the project would not cause substantial adverse effects on human beings with implementation of applicable mitigation measures.

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