

Exhibit B



Housing Element and General Plan Update

Final Supplemental Environmental Impact Report
State Clearinghouse No. 2022010214

prepared by

City of San Leandro

Department of Community Development

835 East 14th Street

San Leandro, California 94577

Contact: Avalon Schultz

prepared with the assistance of

Rincon Consultants, Inc.

449 15th Street, Suite 303

Oakland, California 94612

November 2022

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RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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1 Introduction

1.1 Final SEIR Contents

This Final Supplemental Environmental Impact Report (Final SEIR) has been prepared by the City of San Leandro (City) to evaluate the potential environmental impacts of the proposed City of San Leandro Housing Element and General Plan Update Project (“proposed project” or “project”).

As prescribed by the California Environmental Quality Act (CEQA) Guidelines Sections 15088 and 15132, the lead agency, the City, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft SEIR and to prepare written responses to those comments. This document, together with the Draft SEIR (incorporated by reference) comprise the Final SEIR for this project. This Final SEIR includes individual responses to each letter received during the public review period for the Draft SEIR. In accordance with CEQA Guidelines Section 15088(c), the written responses describe the disposition of significant environmental issues raised.

The City has provided a good faith effort to respond to all significant environmental issues raised by the comments. The Final SEIR also includes amendments to the Draft SEIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft SEIR. The Final SEIR includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft SEIR, which also includes a list of all commenters and comment letters
- Section 3: Amendments to the Draft SEIR
- Section 4: Draft SEIR Recirculation Not Required
- Section 5: Mitigation Monitoring and Report Program

1.2 Draft SEIR Public Review Process

Pursuant to CEQA, lead agencies are required to consult with public agencies with jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft SEIR.

The City of San Leandro filed a notice of completion (NOC) with the Governor’s Office of Planning and Research to begin the 45-day public review period (Public Resources Code [PRC] Section 21161), which began on September 16, 2022, and ended on October 31, 2022. The Draft SEIR was made available on the City’s website.¹ In addition, the NOC was posted at the Alameda County Clerk’s office on September 16, 2022. A notice of availability (NOA) of the Draft SEIR was published on September 16, 2022. As a result of these notification efforts, written comments on the content of the Draft SEIR were received from three state agencies. Section 2, “Responses to Comments on the Draft SEIR,” identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute “significant new information” by CEQA standards (CEQA Guidelines Section 15088.5).

¹ Draft SEIR for the 2023-2031 Housing Element and General Plan Updates: <https://slhousingelement.com/project-resources/>

1.3 SEIR Certification Process and Project Approval

Before adopting the proposed project, the lead agency is required to certify that the SEIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the SEIR, and that the SEIR reflects the independent judgment of the lead agency.

Upon certification of an SEIR, the lead agency makes a decision on the project analyzed in the SEIR. A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines Sections 15042 and 15043).

In approving a project, for each significant impact of the project identified in the SEIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). Pursuant to PRC Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors.

While the information in the SEIR does not constrain the City's ultimate decision under its land use authority, the City must respond to each significant effect and mitigation measure identified in the SEIR as required by CEQA by making findings supporting its decision. If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision and explains why the project's benefits outweigh the significant environmental effects (CEQA Guidelines Section 15093).

When an agency makes findings on significant effects identified in the SEIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (CEQA Guidelines Section 15091[d]).

2 Responses to Comments on the Draft SEIR

This section includes comments received during public circulation of the Draft Environmental Impact Report (Draft SEIR) prepared for the City of San Leandro Housing Element and General Plan Update.

The comment letters included herein were submitted to the City of San Leandro by public agencies. Responses to written comments received have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the Draft SEIR addresses pertinent environmental issues.

The Draft SEIR was circulated for a 45-day public review period that began on September 16, 2022 and ended on October 31, 2022. The City of San Leandro received three comment letters on the Draft SEIR. The commenters and the page number on which each commenter’s letter appears are listed below.

Letter No. and Commenter		Page No.
Agency Commenters		
1	California Department of Toxic Substances Control	2-2
2	East Bay Municipal Utility District	2-7
3	Alameda County Transportation Commission	2-12

2.1 Comment Letters and Responses

Written responses to each comment letter received on the Draft SEIR are provided in this section. All letters received on the Draft SEIR are provided in their entirety. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

Any changes made to the text of the Draft SEIR are provided in Section 3, *Errata to the Draft SEIR*, including correcting information, data, or intent, other than minor typographical corrections or minor working changes. Where a comment results in a change to the Draft SEIR text, a notation is made in the response indicating that the text is revised. Within the *Errata to the Draft SEIR*, changes in text are signified by strikeouts (~~strikeouts~~) where text is removed and by underlined font (underlined font) where text is added.

Letter 1



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 31, 2022

Ms. Avalon Schultz
AICP. Planner
City of San Leandro
835 E 14th Street
San Leandro, CA 94557
ASchultz@sanleandro.org

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT – DATED
SEPTEMBER 2022 (STATE CLEARINGHOUSE NUMBER: 2022010214)

Dear Ms. Schultz:

The Department of Toxic Substances Control (DTSC) received a Draft Supplemental Environmental Impact Report (EIR) for the City of San Leandro Housing Element and General Plan Update (Project). The Lead Agency is receiving this notice from DTSC because the Project potentially includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

1.1

DTSC recommends that the Hazards and Hazardous Materials section of the EIR address actions to be taken for any sites impacted by hazardous waste or hazardous materials within the Project area. DTSC hazardous waste facilities and sites with known or suspected contamination issues can be found on DTSC's [EnviroStor](#) data management system. The [EnviroStor Map](#) feature can be used to locate hazardous waste facilities and sites for a county, city, or a specific address. A search within EnviroStor indicates that numerous hazardous waste facilities and sites are present within the Project's region. DTSC also recommends consulting with other agencies that may provide oversight to hazardous waste facilities and sites in order to determine a comprehensive listing of all sites impacted by hazardous waste or hazardous materials within the Project area.

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the EIR:

1.2

1. A State of California environmental regulatory agency such as DTSC, a Regional Water Quality Control Board (RWQCB), or a local agency that meets the requirements of [Health and Safety Code section 101480](#) should provide regulatory concurrence that project sites are safe for construction and the proposed use.

1.3

2. The EIR should acknowledge the potential for historic or future activities on or near Project sites to result in the release of hazardous wastes/substances. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

1.4

3. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil, DTSC recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the Project described in the EIR.

1.5

4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers](#).

1.6

5. If any projects initiated as part of the proposed Project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to

1.6 cont.

ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 [Information Advisory Clean Imported Fill Material](#).

6. If any sites included as part of the proposed Project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 [Interim Guidance for Sampling Agricultural Properties \(Third Revision\)](#).

1.7

DTSC appreciates the opportunity to comment on the EIR. Should you choose DTSC to provide oversight for any environmental investigations, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website](#).

If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,



Gavin McCreary, M.S.
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Letter 1

COMMENTER:	Gavin McCreary, M.S., Project Manager, Department of Toxic Substances Control (DTSC)
DATE:	October 31, 2022
SUMMARY:	The commenter summarizes recommended actions and consultation to undertake and lists recommended topic areas to address in the Hazards and Hazardous Materials section of the SEIR.

Response 1.1

The commenter summarizes why the City is receiving this comment letter from the DTSC and recommends that the Hazards and Hazardous Materials section of the SEIR address actions to be taken for any sites impacted by hazardous waste or hazardous materials. The commenter recommends use of the DTSC's EnviroStor database and consultation with other agencies.

The SEIR provides a program-level analysis for development in the project area; it does not provide site-specific analysis because individual development projects are not proposed. No groundbreaking activities, work in close proximity to a roadway, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site are proposed.

Potential impacts related to hazards and hazardous materials are discussed in Section 4.10.6 of the Draft SEIR. As discussed therein, potential impacts related to hazards and hazardous materials from development on identified sites were previously analyzed in the 2035 General Plan EIR, which concluded that impacts related to hazards and hazardous materials would be less than significant because the City of San Leandro Environmental Services Section serves as the Certified Unified Program Agency for the City and regulates the storage, use, treatment, and disposal of hazardous materials in San Leandro in accordance with Senate Bill 1082. Adherence to applicable regulations and standards would ensure that the use, release, or emission of hazardous materials throughout the city does not result in substantial adverse impacts. Adherence with these regulations and standards would also ensure that development located on a hazardous materials site pursuant to Government Code Section 65962.5 would not create a significant hazard to the public. If greater ground disturbance and construction would be required for utility upgrades to serve additional residences accommodated under the project than anticipated under the 2035 General Plan EIR, all work would be required to comply with federal, State, and local policies and regulations. Required site-specific studies prior to approval of individual development projects would prevent or reduce potential impacts. In addition, none of the sites proposed on the City's Housing Inventory¹ were determined to be identified or listed sites under Geotracker, EnviroStor, and the City's database. No revisions to the Draft SEIR are required.

Response 1.2

The commenter recommends that DTSC, the Regional Water Quality Control Board, or a qualified local agency provide regulatory concurrence that project sites are safe for construction and the proposed use.

¹ See Appendix B of the Housing Element at https://slhousingelement.com/wp-content/uploads/2022/11/Appendix-B-Sites-Inventory_Nov-2022.pdf for a full list of inventory sites.

As discussed in Section 4.10.6, *Hazards and Hazardous Materials*, of the Draft SEIR, potential impacts related to hazards and hazardous materials were previously analyzed in the 2035 General Plan EIR, which concluded that impacts to hazards and hazardous materials would be less than significant because adherence to applicable regulations and standards would ensure that the use, release, or emission of hazardous materials throughout the city does not result in substantial adverse impacts. The SEIR provides a program-level analysis for development in the project area; it does not provide site-specific analysis because individual development projects are not proposed. If greater ground disturbance and construction were required under the project, all work would comply with federal, State, and local policies and regulations and would obtain regulatory approval and concurrence as required. No revisions to the Draft SEIR are required.

Response 1.3

The commenter states that the SEIR should acknowledge the potential for project sites to result in the release of hazardous wastes or substances due to previous uses or future uses.

This comment is similar to Comment 1.1. See Response 1.1; as discussed therein, no revisions to the Draft SEIR are required.

Response 1.4

The commenter summarizes former use of lead additives in gasoline, and recommends collection of soil samples for lead analysis prior to intrusive activities.

This comment is similar to Comment 1.1. See Response 1.1; as discussed therein, no revisions to the Draft SEIR are required.

Response 1.5

The commenter recommends that buildings or structures to be demolished should be surveyed for the presence of lead-based paints, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. The commenter states that removal, demolition, and disposal of any of the aforementioned chemicals should be conducted in compliance with California environmental regulations and policies.

This comment is similar to Comment 1.1. See Response 1.1; as discussed therein, no revisions to the Draft SEIR are required.

Response 1.6

The commenter recommends that imported soil to backfill excavated areas should be sampled to ensure that imported soil is free of contamination.

This comment is similar to Comment 1.1. See Response 1.1; as discussed therein, no revisions to the Draft SEIR are required.

Response 1.7

The commenter recommends that project sites that have been used for agricultural, weed abatement, or related activities should be properly investigated for organochlorinated pesticides should be discussed in the SEIR.

This comment is similar to Comment 1.1. See Response 1.1; as discussed therein, no revisions to the Draft SEIR are required.

Letter 2



October 27, 2022

Avalon Schultz, Principal Planner
City of San Leandro
835 East 14th Street
San Leandro, California 94557

Re: Notice of Availability and Public Review of the City of San Leandro Housing Element and General Plan Update and Supplemental Program Environmental Impact Report, San Leandro

Dear Ms. Schultz:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Supplemental Draft Program Environmental Impact Report for the City of San Leandro Housing Element and General Plan Update located in the City of San Leandro (City). EBMUD has the following comments.

WATER SERVICE

2.1

Effective January 1, 2018, water service for new multiunit structures shall be individually metered or sub-metered in compliance with Section 537 of California's Water Code & Section 1954.201-219 of California's Civil Code, which encourages conservation of water in multifamily residential and mixed-use multi-family and commercial buildings by requiring metering infrastructure for each dwelling unit, including appropriate water billing safeguards for both tenants and landlords. EBMUD water services shall be conditioned for all development projects that are subject to these metering requirements and will be released only after the project sponsor has satisfied all requirements and provided evidence of conformance with Section 537 of California's Water Code & Section 1954.201-2019 of California's Civil Code.

2.2

Main extensions that may be required to serve any specific developments within the Housing Element and General Plan Update to provide adequate domestic water supply, fire flows, and system redundancy will be at the project sponsor's expense. Pipeline and fire hydrant relocations and replacements due to modifications of existing streets, and off-site pipeline improvements, also at the project sponsor's expense, may be required depending on EBMUD metering requirements and fire flow requirements set by the local fire department. When the development plans are finalized for individual projects within the Housing Element and General Plan Update, project sponsors for individual projects should contact EBMUD's New Business Office and request a water service estimate to determine costs and conditions of providing water service to the development. Engineering and installation of new and relocated pipelines and services require substantial lead time, which should be provided for in the project sponsor's development schedule.

2.3

A minimum 20-foot wide right-of-way is required for installation of new and replacement water mains. Additional utilities installed in the right-of-way with the water mains must be located such that the new water mains meet the minimum horizontal and vertical separation distances as set forth in the California (Waterworks Standards) Code of Regulations, Title 22, Section 64572 (Water Main Separation) and EBMUD requirements for placement of water mains within a right-of-way. The minimum horizontal separation distance requirements include, but are not limited to, 10 feet between the water main and sewer, 5 feet between the water main and storm drain, 7 feet from the face of the curb, and 5 feet from the edge of the right-of-way. In addition, water mains must be vertically located a minimum of one foot above sewers and storm drains. EBMUD cannot maintain water mains and services installed under pervious pavement; therefore, an alternative to pervious pavement would be required if installation of EBMUD water mains or services on site is required.

2.4

Project sponsors for individual projects within the Housing Element and General Plan Update should be aware that EBMUD will not install piping or services in contaminated soil or groundwater (if groundwater is present at any time during the year at the depth piping is to be installed) that must be handled as a hazardous waste or that may be hazardous to the health and safety of construction and maintenance personnel wearing Level D personal protective equipment. Nor will EBMUD install piping or services in areas where groundwater contaminant concentrations exceed specified limits for discharge to the sanitary sewer system and sewage treatment plants. The project sponsor must submit copies to EBMUD of all known information regarding soil and groundwater quality within or adjacent to the project boundary and a legally sufficient, complete and specific written remediation plan establishing the methodology, planning and design of all necessary systems for the removal, treatment, and disposal of contaminated soil and groundwater.

2.5

EBMUD will not design piping or services until soil and groundwater quality data and remediation plans have been received and reviewed and will not start underground work until remediation has been carried out and documentation of the effectiveness of the remediation has been received and reviewed. If no soil or groundwater quality data exists, or the information supplied by the project sponsor is insufficient, EBMUD may require the project sponsor to perform sampling and analysis to characterize the soil and groundwater that may be encountered during excavation, or EBMUD may perform such sampling and analysis at the project sponsor's expense. If evidence of contamination is discovered during EBMUD work on the project site, work may be suspended until such contamination is adequately characterized and remediated to EBMUD standards.

WATER CONSERVATION

2.6

Individual projects within the Housing Element and General Plan Update present an opportunity to incorporate water conservation measures. EBMUD requests that the City include in its conditions of approval a requirement that the project sponsor comply with Assembly Bill 325, "Model Water Efficient Landscape Ordinance," (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495). The project

2.6 cont. sponsor should be aware that Section 31 of EBMUD's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense.

If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Sincerely,



David J. Rehnstrom
Manager of Water Distribution Planning

DJR:EZ:djr
sb22_318 City of San Leandro Housing Element and General Plan Update

Letter 2

COMMENTER:	David J. Rehnstrom, Manager of Water Distribution Planning, East Bay Municipal Utility District (EBMUD)
DATE:	October 27, 2022
SUMMARY:	The commenter summarizes current state water service and conservation regulations and existing EBMUD standards and practices as applicable to the proposed project.

Response 2.1

The commenter states that water service for new multi-unit structures shall be individually metered or sub-metered, and that requirements of Section 537 of California's Water Code and Section 1954.201-2019 of California's Civil Code must be satisfied to receive EBMUD water services.

This comment is noted and has been given to the City for consideration. The SEIR provides a program-level analysis for development in the project area; it does not provide site-specific analysis because individual development projects are not proposed. This comment does not pertain to the analysis of the Draft SEIR; therefore, no revisions to the Draft SEIR are required.

Response 2.2

The commenter states that water main extensions, pipeline and fire hydrant relocations, replacements due to modifications of existing streets, and off-site pipeline improvements would occur at the project sponsor's expense. The commenter recommends that project sponsors should contact EBMUD to request a water service estimate and to include required EBMUD services into the project's development schedule.

This comment is noted and has been given to the City for consideration. The SEIR provides a program-level analysis for development in the project area; it does not provide site-specific analysis because individual development projects are not proposed. This comment does not pertain to the analysis of the Draft SEIR; therefore, no revisions to the Draft SEIR are required.

Response 2.3

The commenter states that a 20-foot-wide right-of-way is required for installation of new or replaced water mains. The commenter states that additional utilities installed within the right-of-way must meet requirements of EBMUD and the California Code of Regulations.

This comment is noted and has been given to the City for consideration. As discussed on page 4.9-16 in Section 4.9, *Utilities and Service Systems*, of the Draft SEIR, minor infrastructure improvements (including new or replaced water mains) may be required to meet increased demand generated by additional residents accommodated by the project. The precise location and sizing of water conveyance pipes would be determined at the project level, and would be subject to EBMUD requirements, the California Code of Regulations, and City approval. Due to the small scope of minor infrastructure upgrades and limited ground disturbance, the environmental impacts of these upgrades would not be significant. No revisions to the Draft SEIR are required.

Response 2.4

The commenter states that project sponsors should be aware EBMUD will not install services in areas with contaminated soil or groundwater, and project sponsors must submit all known information regarding soil and groundwater quality in work areas to EBMUD.

This comment is noted and has been given to the City for consideration. As discussed in Section 4.10.6, *Hazards and Hazardous Materials*, of the Draft SEIR, potential impacts related to hazards and hazardous materials were previously analyzed in the 2035 General Plan EIR, which concluded that impacts related to hazards and hazardous materials would be less than significant. The SEIR provides a program-level analysis for development in the project area; it does not provide site-specific analysis since individual projects have not been proposed. If greater ground disturbance and construction would be required for utility upgrades to serve additional residences accommodated under the project than anticipated under the 2035 General Plan EIR, all work would be required to comply with federal, State, and local policies and regulations. No revisions to the Draft SEIR are required.

Response 2.5

The commenter states that EBMUD will not design services until soil and groundwater quality data and remediation plans have been received and reviewed. The commenter states that EBMUD may require the project sponsor to perform soil and groundwater sampling and analysis or may do so at the project sponsor's expense.

This comment is noted and has been given to the City for consideration. This comment is similar to Comment 2.4; please refer to Response 2.4 above. As discussed therein, no revisions to the Draft SEIR are required.

Response 2.6

The commenter requests that the City includes compliance with Assembly Bill 325 as a condition of approval for individual projects. The commenter states that EBMUD's Water Service Regulations require that water services shall not be furnished unless all applicable water efficiency measures are installed at the project sponsor's expense.

This comment is noted and has been given to the City for consideration. The SEIR provides a program-level analysis for development in the project area; it does not provide site-specific analysis because individual development projects are not proposed. This comment does not pertain to the analysis of the Draft SEIR; therefore, no revisions to the Draft SEIR are required.



Letter 3

October 31, 2022

Avalon Schultz, AICP, Principal Planner
City of San Leandro
835 East 14th Street
San Leandro, CA, 94557

SUBJECT: Response to the Draft Supplemental Environmental Impact Report for the City of San Leandro Housing Element and General Plan Update

Dear Avalon,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) for the San Leandro Housing Element and General Plan Update. The project will encompass the entirety of the City of San Leandro, which is located in central Alameda County. The proposed Housing Element and General Plan updates will amend the previously approved 2035 General Plan and adopt a new 2023-2031 Housing Element based on the City’s latest Regional Housing Needs Allocation (RHNA), which require the City to plan for a minimum of 3,855 residential units.

3.1 The Alameda County Transportation Commission (Alameda CTC) respectfully submits the following comments:

- Alameda CTC appreciates the use of the Countywide Travel Demand Model to determine the project’s impacts on Vehicle Miles Traveled (VMT), as well as the SEIR’s acknowledgement on page 4.8-12 that the modeling assessment does not reflect the impacts of COVID-19 on traffic and environmental conditions. However, on page 4.8-13, the SEIR states that the transportation analysis was based on the Countywide Travel Demand Model dated May 2015. The model was last updated in May 2019. Please ensure the SEIR analysis employs the most current version of the model, which Alameda CTC can make available upon request.

- On page 4.8-13, the SEIR discusses mitigation measures that would widen roads where Level of Service (LOS) impacts are significant, such as on various freeways in and near San Leandro. State Congestion Management Legislation obligates Alameda CTC to require an analysis of project impacts using a delay-based metric (e.g. LOS), however the provisions of Senate Bill 743 prohibit the use of LOS as the sole basis for determining project impacts. As acknowledged on page 4.8-15 and in the TRA Appendix, the overall impact of project buildout would be to shorten trip lengths, promote transit mode share, and reduce VMT per capita given the project’s concentration of development in Priority Development Areas. Alameda CTC does not require individual projects to identify mitigation measures or address potential delay generated by proposed projects. However, mitigation measures that support transit and active transportation improvements are generally encouraged in lieu of roadway capacity expansion, which would have a deleterious effect on VMT.

- The SEIR also identifies road widening mitigations for a number of local facilities, many of which are located on the County’s High-injury Network. Measure TRAF-2A for example, calls for widening Doolittle Dr. by one lane in the northbound direction or providing transit or shuttle service between the city and key locations (e.g. BART stations). Alameda CTC strongly discourages any infrastructure changes that would induce additional vehicle trips and/or

**3.3
cont.**

facilitate faster vehicle speeds. Instead, Alameda CTC encourages measures that support and facilitate the expansion of high-quality transit service and a safe active transportation network.

- On page 4.8-14, the SEIR discusses significant and unavoidable impacts of the project on transit operations in mixed-flow travel lanes. Alameda CTC recommends close coordination with AC Transit to support efficient transit operations as the city experiences population and trip growth.

3.4

Thank you for the opportunity to comment on this SEIR. Please contact me at (510) 208-7400 or Shannon McCarthy at (510) 208-7489 if you have any questions.

Sincerely,



Colin Dentel-Post
Principal Planner

cc: Shannon McCarthy, Associate Transportation Planner
Chris G. Marks, Senior Transportation Planner

Letter 3

- COMMENTER:** Shannon McCarthy, Associate Transportation Planner, Alameda County Transportation Commission (Alameda CTC)
- DATE:** October 31, 2022
- SUMMARY:** The agency recommends use of an updated transportation model and expresses that Alameda CTC encourages mitigation measures that support an efficient transit system in place of measures that increase roadway capacity.

Response 3.1

The commenter provides a brief summary of the project. The commenter states that the transportation analysis of the Draft SEIR used the Countywide Travel Demand Model dated May 2015; the commenter states the model was updated in May 2019, and the transportation analysis should use the updated model.

Potential impacts to transportation are discussed in Section 4.8 of the Draft SEIR. As stated on page 4.8-13 of the Draft SEIR, the transportation analysis provided in the 2035 General Plan EIR utilizes the 2015 version of the Countywide Travel Demand Model. However, the transportation analysis for the proposed project is based on the Vehicle Miles Traveled (VMT) Impact Assessment Memorandum prepared by Kittelson & Associates in August 2022, which utilizes the 2019 version of the Countywide Travel Demand Model. The VMT Impact Assessment Memorandum is included as Appendix TRA to the Draft SEIR.

The text of the Impact Analysis section of Section 4.8, *Transportation*, of the Draft SEIR was revised on pages 4.8-12, 4.8-13, 4.8-16, and 4.8-17 to specify that the VMT modeling performed for the Draft SEIR utilized the May 2019 version of the Countywide Travel Demand Model. See Chapter 3, Errata to the SEIR for more details.

Response 3.2

The commenter summarizes mitigation measures from the San Leandro 2035 General Plan related to transportation Level of Service (LOS) and states that, as discussed in the Draft SEIR, the provisions of Senate Bill 743 prohibit the use of LOS as the sole basis for determine project impacts. The commenter states that the Alameda CTC encourages mitigation measures that support transit and active transportation improvements in lieu of roadway capacity expansion, which would negatively impact VMT.

Potential impacts to transportation are discussed in Section 4.8 of the Draft SEIR. As discussed on page 4.8-6 of Section 4.8, California Senate Bill (SB) 743 changed the approach to transportation impact analysis by establishing measures such as VMT, VMT per capita, or automobile trip generation rates as the primary measures of transportation impacts and eliminates the traditionally used measures of auto delay and congestion, such as LOS, and other measures of traffic congestion as a basis for determining significant impacts. The transportation mitigation measures from the 2035 General Plan EIR are included as a reference. The City uses VMT, VMT per capita, and automobile trip generation rates as the primary measures of transportation impacts, consistent with SB743 and is drafting VMT policies to formalize its approach that will apply to all future development projects. The City anticipates releasing a public draft of proposed VMT policies in early 2023 with adoption in Summer 2023. At that time, City decision-makers may reconsider whether

mitigation measures designed to reduce LOS impacts as described in the 2035 General Plan EIR are still warranted.

As concluded in the Impact Analysis of Section 4.8, beginning on page 4.8-11, the project would not result in significant impacts to transportation and no mitigation measures would be required. No revisions to the Draft SEIR are required in response to this comment.

Response 3.3

The commenter states the Draft SEIR discusses road widening mitigation measures from the 2035 General Plan EIR, and states that the Alameda CTC discourages any infrastructure changes that would induce additional vehicle trips or facilitate faster vehicle speeds.

As discussed under Response 3.2, SB 743 changed the approach to transportation impact analysis by eliminating LOS and other measures of traffic congestion as a basis for determining significant impacts. While the 2035 General Plan EIR analysis identified road widening mitigations, the SEIR analysis did not recommend any new widenings as mitigation for deficient roadway segments. The Draft SEIR does not propose new or amended mitigation measures related to transportation. No revisions to the Draft SEIR are required.

On March 21, 2022, the City Council of the City of San Leandro adopted a Vision Zero Traffic Safety Policy and on October 17, 2022, the Council adopted a resolution approving the Local Roadway Safety Plan, which prioritizes safety of vulnerable road users and multimodal access with projects and initiatives identified to reduce vehicle trips and manage vehicle speeds. These measures support and facilitate the expansion of high-quality transit service and a safe active transportation network

Response 3.4

The commenter recommends coordination with Alameda CTC to support transit operations as the city experiences population and trip growth.

This comment is noted and has been given to the City for consideration. This comment does not pertain to the environmental impact analysis of the Draft SEIR; therefore, no revisions to the Draft SEIR are required.

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3 Errata to the Draft SEIR

This chapter presents specific text changes made to the Draft SEIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft SEIR page number. Text deletions are shown in ~~striketrough~~, and text additions are shown in underline. The information contained within this chapter clarifies and expands on information in the Draft SEIR and does not constitute “significant new information” requiring recirculation, as described in Section 4, Recirculation Not Warranted.

3.1 Revisions to the Draft SEIR

Project Description

Page 2-16, Section 2.4.3, Proposed Zoning and Land Use Changes

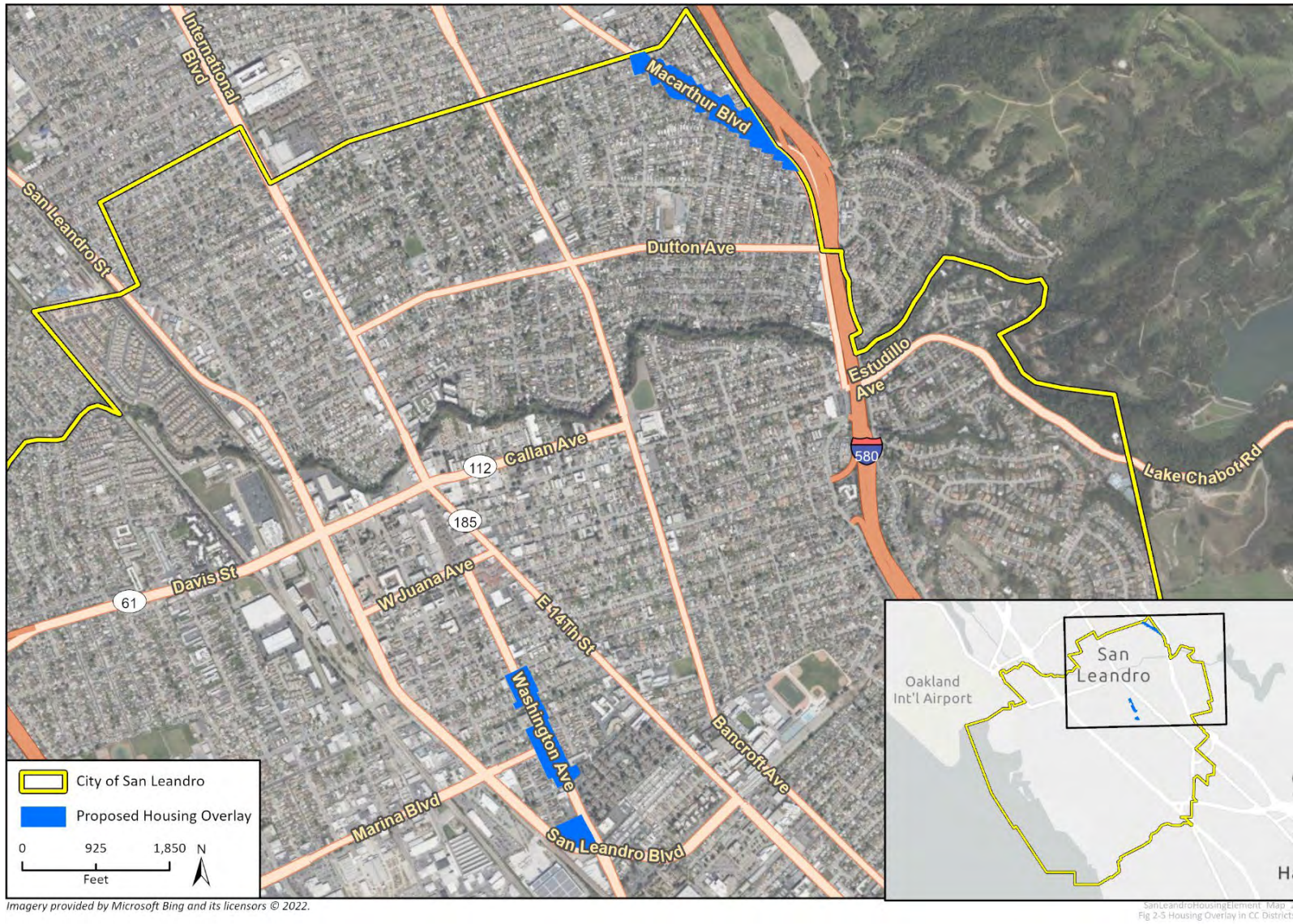
Additionally, the City would adopt Zoning Text and Zoning Map Amendments to further implementation of the 2035 General Plan and 2015-2023 Housing Element by:

- Amending the Zoning Code to establish new Chapter 3.38, Housing (H) Overlay District. Pursuant to San Leandro Zoning Code Section 2.08.200, multi-family housing is currently conditionally permitted in existing Commercial Community Districts and, where applied, the Housing Overlay District would allow multi-family and mixed-use housing as a permitted use. A Zoning Map Amendment would apply the H Overlay to the following select locations within the existing Commercial Community (CC) District, as shown in Figure 2-5. These two locations are also within the Corridor Mixed Use (CMU) General Plan Land Use Designation, which “allows a mix of commercial and residential uses oriented in a linear development pattern along major transit-served arterials:”
 - MacArthur Boulevard in northeastern San Leandro between Durant Avenue and Foothill Boulevard
 - Washington Avenue in central San Leandro between Castro Street and San Leandro Boulevard
- Amending Zoning Code Section 2.04.304 to establish the following minimum densities for RM Districts:
 - RM-2500, RM-2000, RM-1800: 12 dwelling units/acre
 - RM-875: 20 dwelling units/acre

The City would also adopt a variety of Zoning Code amendments to implement the 2023-2031 Housing Element and HCD direction and be consistent with state law. These changes include:

- Updates to definitions of housing types
- Adjustments to Accessory Dwelling Unit (ADU) height limits consistent with State Law
- Revisions to existing standards and establishment of new standards for Supportive and Transitional Housing, Low Barrier Navigation Centers, Employee Housing, and Emergency Shelters

Figure 2-5 Housing Overlay in Commercial Community Districts



- Revision to allowances for Emergency Shelters and Residential Hotels in the Community Commercial (CC), Industrial General (IG), and Industrial Limited (IL) Districts as follows:
 - CC District - Permit Residential Hotels and Emergency Shelters by right up to 25 beds and allow such uses over 25 beds with a Conditional Use Permit
 - IG District - Permit Emergency Shelters by right up to 45 beds and allow such uses over 45 beds with a Conditional Use Permit
 - IL District - Increase beds allowed in Emergency Shelters by right from 25 to 45 beds and allow such uses over 45 beds with a Conditional Use Permit
- Removal of Single-Family Residential development as a permitted use in the Residential Multi-Family (RM) District
- Revise standards for Residential Congregate Care Facilities that serve seven or more individuals to reduce the separation requirement from 1,000 to 750 feet and change in review authority for consideration of a reduction in the separation requirement from Board of Zoning Adjustments to Zoning Enforcement Official
- Establishment of ministerial review of certain housing developments on sites from previous housing element inventories
- Elimination of parking requirements for development within a ½ mile of transit (AB2097)
- Revised parking requirements for group housing, supportive housing, transitional housing, and residential hotels
- Revised Site Plan Review Standards to clearly establish that Administrative Site Plan Review is ministerial
- Updated Density Bonus provisions to reference State law

The City would also modify Table 3-2 Correspondence between Land Use Diagram and Zoning Designations to correct nomenclature and remove the RM-2500, RM-3000, CN, P, and PS zoning designations from the list of zoning designations that are conditionally compatible with the Corridor Mixed Use (MUC) General Plan Land Use Category.

Page 2-16, Section 2.4.4, Development Capacity Assumptions

Although there is no change at this time to the Bay Fair Transit Oriented District (BTOD) zoning districts, for purposes of the environmental analysis and to be conservative, this SEIR assumes an increase of 2,460 housing units and 75,000 square feet of office space in the BTOD area over what was assumed in the 2018 BTOD Specific Plan EIR due to the identification of new housing and mixed use opportunity sites in the BTOD area. As shown in Figure 2-5, the proposed Housing Overlay would apply to specific areas of the city that have a Corridor Mixed Use General Plan Designation and Commercial Community Zoning and currently conditionally allow multi-family housing. However, the Housing Overlay would not increase development capacity in those areas beyond the buildout assumptions of the 2035 General Plan EIR. Therefore, this SEIR analyzes a net increase of 4,960 residential units and 75,000 square feet of office space in the three Priority Development Areas in the city compared to the assumptions analyzed in the 2035 General Plan EIR.

Page 4.5-16, Section 4.5.3, Impact Analysis

Transportation-Related Noise

The project would generate additional vehicle trips. Traffic noise impacts were estimated using average daily traffic (ADT) roadway volumes provided by Kittelson & Associates (see Appendix TRA). The percent increase between with and without project ADT traffic volumes was used to determine roadways that would experience at 100 percent increase (or doubling in traffic volumes) or more. The threshold of significance for traffic noise throughout the entire city is 3 dBA Ldn, or an approximate doubling of traffic volume, which is the barely perceptible limit of human ear response to noise level changes. Figure 4.5-1 shows the roadway segments in the city that would experience a doubling of traffic volume due to the project above 2020 conditions. Based on 2020 conditions, the project would result in a decrease in traffic volume on I-580 and I-880 but would result in double or more traffic volumes on roadways near Downtown San Leandro and the BTOD area. Figure 4.5-2 shows the roadway segments in the city that would experience a doubling of traffic volume due to the project above 2040 No Project conditions. Based on 2040 conditions, the project would result in double or more traffic volumes on roadway segments throughout the city. The doubling of traffic volumes would result in a 3 L_{DN} dBA increase in noise levels. Therefore, the project would contribute to ambient noise increase related to traffic. Impacts attributed to off-site traffic noise would ~~be~~ remain significant. However, the project's contribution to the significant and unavoidable transportation related noise impact as determined in the 2035 General Plan EIR would not result in a significant increase in the severity of the impact.

Page 4.8-12, Section 4.8.3, Impact Analysis

The VMT analysis is based on residential and office space assumptions associated with amendments to land use designations and zoning districts, including allowable densities, FAR, and building heights as described in Chapter 2, *Project Description*. Travel demand modeling was conducted using the Alameda CTC Countywide Model (May 2019 version) and SB 743 requirements.

Page 4.8-13, Section 4.8.3, Impact Analysis

The travel forecasting that supports the analysis in this SEIR is derived from the ACTC Countywide model (May 2019 version), which has established 2020 and 2040 as the planning horizon years based on ABAG Plan Bay Area 2040. The modeling horizon years are unaffected by the Covid pandemic since no traffic counts were collected during the Covid-19 Pandemic. The VMT analysis utilizes 2020 as the base year and 2040 as the cumulative year, so it is unaffected by any pandemic slowdown.

Page 4.8-16, Section 4.8.3, Impact Analysis

Impact TRA-2 THE DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN CITY VMT PER CAPITA THAT WOULD BE A GREATER REDUCTION THAN 15 PERCENT THAN THE PLANNING AREA AVERAGE PER CAPITA VMT. EMPLOYEE VMT ASSOCIATED WITH THE PROJECT WOULD BE SCREENED OUT DUE TO PROXIMITY TO THE BART STATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The 2035 General Plan EIR analyzed the daily (24-hour) VMT for existing (2015) conditions using the Alameda Countywide Model (May 2015 version) but did not conclude significance for project impacts, as guidelines were not yet adopted by the State at the time of the preparation of the 2035 General Plan EIR. The VMT analysis conducted for the 2035 General Plan EIR found that VMT per

population (residential) and VMT per service population (employment) would decrease under the 2035 General Plan EIR (page 4.13-72).

Page 4.8-17, Section 4.8.3, Impact Analysis

The VMT analysis examined the citywide VMT per capita with the project under 2020 and 2040 conditions. The citywide VMT analysis examines VMT impacts at the level of TAZs. The VMT analysis utilizes the Alameda CTC's Countywide Model, which was updated in May 2019.

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4 Recirculation Not Warranted

As presented in Chapter 3, *Errata to the Draft SEIR*, the additional Housing Overlay and other minor revisions to the Draft SEIR would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts. Revisions to Section 2, *Project Description*, of the Draft SEIR are incorporated to clarify these changes, and would not substantially change them such that additional public review would be necessary. The Errata (Chapter 3) identifies textual modifications to the Final SEIR. The revised text serves to amplify, correct, supplement or clarify, information in the public review Draft SEIR. It does not substantively affect the level of impact nor the conclusions presented. Therefore, recirculation of the Draft SEIR is not warranted.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred but before the EIR is certified (Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5). Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (CEQA Guidelines Section 15088.5(b)).

The relevant portions of CEQA Guidelines Section 15088.5 (items a, b, and e) read as follows:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:
 - 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

The revised project description illustrates that there are no significant changes to the degree of environmental impact already presented in the Draft SEIR. As detailed in Chapter 3, *Errata to the Draft SEIR*, implementation of the revised project would not alter impacts to 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, and wildfire as compared to the original project because the proposed revisions only modify the processing of potential development already considered under the Draft SEIR, which would not result in an intensification of development beyond what was assumed in the General Plan EIR and would therefore not have a greater impact on the environment, or include other textual changes, which would not have a physical impact on the environment. Impacts would remain less than significant and would not differ in type from those disclosed in the Draft SEIR that analyzed the original project.

As demonstrated in this analysis, the proposed revisions to the project do not constitute significant new information because updates to the Draft SEIR's analysis would not result in any new significant impacts nor a substantial increase in the severity of any impact already identified in the Draft SEIR. Thus, recirculation is not required under *CEQA Guidelines* Section 15088.5.

The revisions to Section 2, *Project Description*, describe an additional Housing Overlay proposed by the City that would allow multi-family housing in select locations within existing Commercial Community Districts without a conditional use permit. Pursuant to San Leandro Zoning Code Section 2.08.200, multi-family housing is currently conditionally permitted in existing Commercial Community Districts. In addition, the City proposes zoning code amendments to be fully compliant with state law.

As described in the 2035 General Plan EIR Appendix C, Buildout Methodology, the full buildout analyzed in that EIR was based on regional forecasts tailored to factor in 2015-2023 Housing Element sites, the Downtown TOD Strategy, South Area development opportunity sites, the Shoreline area, and other -locations where housing was considered. The analysis assumed the top end of the density range on each site rather than the middle of the density range. Establishing minimum densities in the RM District would therefore not result in an intensification of development beyond what was assumed in the General Plan EIR and would not have a greater impact on the environment . None of these revisions would induce additional growth or increase the amount of development currently evaluated in the Draft SEIR.

Recirculation is not required where new information added to the SEIR merely clarifies or amplifies or makes minor modifications in an SEIR (*CEQA Guidelines* Section 15088.5(b)). Revisions to Section 2, *Project Description*, clarify and amplify the standards established by these measures and they would not result in any secondary or otherwise undisclosed effect.

The information and revised wording of the project description added to this Final SEIR would not result in a substantial increase in the severity of an environmental impact, nor a new significant environmental impact that would result from the additional Housing Overlay. Finally, additional information provided in this Final SEIR does not present a feasible project alternative or mitigation measure considerably different from others previously analyzed in the SEIR that the City has declined to adopt and that would lessen an environmental impact.

The information added to this Final SEIR supplements, clarifies, amplifies, and corrects information in the Draft SEIR. The City has reviewed the information in the Errata and has determined that it does not change any of the basic findings or conclusions of the SEIR, does not constitute "significant new information" pursuant to *CEQA Guidelines* Section 15088.5, and does not require recirculation of the Draft SEIR. This decision is supported by substantial evidence provided in this SEIR.

5 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Supplemental Environmental Impact Report (Final SEIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

The following table lists mitigation measures from the SEIR, as well as relevant 2035 General Plan EIR mitigation measures, that are necessary to mitigate or avoid significant effects on the environment.

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
Air Quality							
AQ-2A. Preparation of Air Quality Technical Assessments							
Prior to issuance of construction permits, development project applicants that are subject to CEQA and exceed the screening sizes in the Bay Area Air Quality Management District’s (BAAQMD) CEQA Guidelines shall prepare and submit to the City of San Leandro a technical assessment evaluating potential air quality impacts related to the project’s operation phase. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If operation-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD’s CEQA Guidelines, the City of San Leandro Community Development Department shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operation activities.	Development project applicants whose projects are subject to CEQA and exceed BAAQMD screening criteria shall prepare and submit a technical assessment which evaluates potential air quality impacts related to the project’s operation. The evaluation shall be prepared in conformance with BAAQMD methodology.	The technical assessment shall be submitted to the City of San Leandro prior to the issuance of construction permits.	Not applicable	City of San Leandro Community Development Department			
AQ-2B-1. Implementation of BAAQMD Particulate Matter Control Measures							
As part of the City’s development approval process, the City shall require applicants for future development projects to comply with the current Bay Area Air Quality Management District’s basic control measures for reducing construction emissions of particulate matter (PM) 10 (Table 8-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).	Development project applicants shall ensure that future development projects comply with BAAQMD’s basic control measures for reducing particulate matter construction emissions.	BAAQMD particulate matter control measures shall be implemented during project construction.	Not applicable	City of San Leandro Community Development Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
AQ-2B-2. Preparation of Air Quality Technical Assessments and Implementation of BAAQMD Mitigation Measures							
Prior to issuance of construction permits, development project applicants that are subject to CEQA and exceed the screening sizes in the BAAQMD’s CEQA Guidelines shall prepare and submit to the City of San Leandro a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines, the City of San Leandro shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds (Table 8-2, Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold, of the BAAQMD CEQA Guidelines, or applicable construction mitigation measures subsequently approved by BAAQMD). These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City’s Engineering/Transportation Department, Building and/or Planning Division, and/or Community Development Department.	Development project applicants whose projects are subject to CEQA and exceed BAAQMD screening criteria shall prepare and submit a technical assessment which evaluates potential air quality impacts related to the project’s operation. The evaluation shall be prepared in conformance with BAAQMD methodology. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, development project applicants shall incorporate BAAQMD’s Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold or applicable construction mitigation measures subsequently approved by BAAQMD.	The technical assessment shall be submitted to the City of San Leandro prior to the issuance of construction permits. Mitigation measures shall be submitted to the City and verified by the City.	Not applicable	City of San Leandro Community Development Department			

City of San Leandro
Housing Element and General Plan Update

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
Noise							
NOI-4 (Revised): Use of Noise Barriers in Residential Areas							
Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 A-Weighted Decibel (dBA) Equivalent Continuous Noise Level (Leq) at residential receptors during the daytime) and when the anticipated construction duration is greater than is typical (e.g., two years or greater). Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.	Temporary noise barriers, where feasible, shall be erected when construction noise is predicted to exceed acceptable standards and when the anticipated construction duration is greater than two years. Noise barriers shall conform with the stated specifications.	Noise barriers shall be erected when construction noise is predicted to exceed acceptable standards and when the anticipated construction duration is greater than two years.	Not applicable	City of San Leandro Community Development Department			
Transportation							
TRAF-1A: Intersections							
The City of San Leandro should implement the following traffic improvements and facilities to reduce impacts to standard:	N/A						
<ul style="list-style-type: none"> ▪ E. 14th Street and Davis Street (SR-112) (#3). The addition of Cumulative with proposed Plan traffic would cause the intersection level of service (LOS) to degrade from LOS C to LOS F in the AM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. Implementation of the following measures would improve intersection operations 							

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
<p>during the AM peak hour to LOS D:</p> <ul style="list-style-type: none"> □ Add an additional northbound left-turn lane on E. 14th Street. This would result in the northbound approach having two exclusive left-turn lanes, an exclusive through lane, and a shared through/right-turn lane. ▪ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. ▪ Because this intersection is within the East 14th Street Priority Development Area (PDA), implementation of the following measures would improve intersection operations during the AM peak hour to LOS E: <ul style="list-style-type: none"> ▪ Implement proposed Policy T-5.2: Evaluating Development Impacts. ▪ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>This mitigation is considered feasible if the intersection was under City control. However, this intersection is under California Department of Transportation’s (Caltrans’) jurisdiction, so the implementation and timing of the mitigation measures remain uncertain since the intersection is not under the City’s control. Consequently, the Cumulative with proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ E. 14th Street and San Leandro Boulevard (#4). The addition of Cumulative with proposed Plan traffic would cause the intersection level of service to degrade from 							

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
<p>LOS C to LOS E in the AM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. Implementation of the following measure would improve intersection operations during the AM peak hour to LOS D:</p> <ul style="list-style-type: none"> □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>This intersection is within the Bay Fair BART Transit Village PDA and Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission (MTC) has already designated Bay Fair BART Transit Village a potential PDA. Upon adoption of the Bay Fair Transit Oriented Development (TOD) Specific Plan, currently anticipated in 2017, Bay Fair will achieve official PDA status. Since this intersection is currently in a potential PDA area the degradation of intersection operations from LOS C to LOS E in the AM peak hour due to the addition of Cumulative with Proposed Plan traffic would not be considered a significant impact under proposed Plan Policy T-5.2: Evaluating Development Impacts.</p> <p>Upon implementation of this measure, intersection operations would improve to LOS D during the AM peak hour. This mitigation is considered feasible if the intersection was under City control. However, this intersection is under Caltrans' jurisdiction, so the implementation and timing of the mitigation measures remain uncertain since the intersection is under Caltrans' jurisdiction. Consequently, the Cumulative with proposed Plan impact</p>							

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
<p>remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ E. 14th Street and Hesperian Boulevard/Bancroft Avenue (#5). The addition of Cumulative with proposed Plan traffic would cause the intersection level of service to degrade from LOS C to LOS E in the AM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. <p>Implementation of the following measure would improve intersection operations during the AM peak hour:</p> <ul style="list-style-type: none"> □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology <p>This intersection is within the Bay Fair BART Transit Village PDA and ABAG/MTC has already designated Bay Fair BART Transit Village a potential PDA. Upon adoption of the Bay Fair TOD Specific Plan, currently anticipated in 2017, Bay Fair will achieve official PDA status. Since this intersection is currently in a potential PDA area, the degradation of intersection operations from LOS C to LOS E in the AM peak hour due to the addition of Cumulative with Proposed Plan traffic would not be considered an impact under proposed Plan Policy T-5.2: Evaluating Development Impacts.</p> <p>Upon implementation of this measure, intersection operations would improve to LOS D during the AM peak hour. This mitigation is considered feasible if the intersection was under City control. However, this intersection is under Caltrans' jurisdiction, so the implementation and timing of the mitigation measures remain</p>							

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
<p>uncertain since the intersection is under Caltrans' jurisdiction.</p> <ul style="list-style-type: none"> ▪ Hesperian Boulevard and Halcyon Drive/Fairmont Drive (#10). The addition of Cumulative with proposed Plan traffic would cause the intersection level of service to degrade from LOS D to LOS F in the AM peak hour and LOS D to LOS E in the PM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. <p>Implementation of the following measures would improve intersection operations during the AM and PM peak hours to LOS D:</p> <ul style="list-style-type: none"> □ Widen the south leg of the intersection in order to add a second northbound left-turn lane. This would result in the northbound approach having two exclusive left-turn lanes, two exclusive through lanes, and an exclusive right-turn lane. □ Provide an overlap signal phase for the northbound right turns. □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>This intersection is within the Bay Fair BART Transit Village PDA and ABAG/MTC has already designated Bay Fair BART Transit Village a potential PDA. Upon adoption of the Bay Fair TOD Specific Plan, currently anticipated in 2017, Bay Fair will achieve official PDA status. Since this intersection is currently in a potential PDA area, the degradation of intersection operations from LOS D to LOS E in the PM peak hour due to</p>							

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
<p>the addition of Cumulative with Proposed Plan traffic would not be considered an impact under proposed Plan Policy T-5.2: Evaluating Development Impacts. Implementation of the following measures, which do not involve evaluation or acquisition of right-of-way, would improve intersection operations during the AM peak hour to LOS E:</p> <ul style="list-style-type: none"> □ Implement proposed Policy T-5.2: Evaluating Development Impacts. □ Provide an overlap signal phase for the northbound right turns. □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>Upon implementation of the first three measures, intersection operations would improve to LOS D during the AM and PM peak hours. The availability of right-of-way for the required widening on the south leg of the intersection is uncertain; therefore, the measures may be infeasible. Consequently, the Cumulative with Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ Washington Avenue and San Leandro Boulevard (#15). The addition of Cumulative with proposed Plan traffic would cause the intersection level of service to degrade from LOS C to LOS F in the AM peak hour. Therefore, the Cumulative with proposed Plan impact is considered to be significant. Implementation of the following measure would improve intersection operations during the AM peak hour to LOS D: 							

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<ul style="list-style-type: none"> □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>Upon implementation of this measure, intersection operations would improve to LOS D during the AM peak hour and lessen the Cumulative with Proposed Plan impact to less than significant.</p>							
<ul style="list-style-type: none"> ▪ San Leandro Boulevard and Marina Boulevard (#16). The addition of Cumulative with Proposed Plan traffic would cause the intersection level of service to degrade from LOS D to LOS F in the AM peak hour and LOS C to LOS F in the PM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. <p>Implementation of the following measures would improve intersection operations during the AM and PM peak hours:</p>							
<ul style="list-style-type: none"> □ Add a northbound left-turn lane on San Leandro Boulevard to provide two exclusive left-turn lanes, one exclusive through lane and one shared through/right-turn lane. (Consistent with the findings of the San Leandro Shoreline Development Project EIR) □ Restripe lanes on the west leg to provide two corresponding receiving lanes. (Consistent with the findings of the San Leandro Shoreline Development Project EIR) □ Provide an exclusive southbound right-turn lane to feed the existing channelized right-turn lane from San Leandro Boulevard southbound to 							

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	<p>Marina Boulevard westbound so that southbound through traffic does not block access to the channelized southbound right-turn lane.</p> <ul style="list-style-type: none"> □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>Upon implementation of these measures, intersection operations would improve to LOS D during the AM and PM peak hours. The availability of right-of-way for the required widening on the south and north legs of the intersection is uncertain; therefore, the measure may be infeasible. Consequently, the Cumulative with Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ San Leandro Boulevard and Davis Street (#17). The addition of Cumulative with Proposed Plan traffic would cause the intersection level of service to degrade from LOS C to LOS F in the AM peak hour and LOS C to LOS E in the PM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. Implementation of the following measures would improve intersection operations during the AM and PM peak hours to LOS D: <ul style="list-style-type: none"> □ Add a northbound right-turn lane on San Leandro Boulevard to provide two exclusive left-turn lanes, two exclusive through lanes and one exclusive right-turn lane. □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. 						

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
<p>Because this intersection is within the Downtown Transit Oriented Development PDA, the degradation of intersection operations from LOS C to LOS E in the PM peak hour due to the addition of Cumulative with Proposed Plan traffic would not be considered an impact under Proposed Plan Policy T-5.2: Evaluating Development Impacts. Implementation of the following measures, which do not involve evaluation or acquisition of right-of-way, would improve intersection operations during the AM peak hour to LOS E:</p> <ul style="list-style-type: none"> □ Implement proposed Policy T-5.2: Evaluating Development Impacts. □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>Upon implementation of the first two measures, intersection operations would improve to LOS D during the AM and PM peak hours. The availability of right-of-way for the required widening on the south leg of the intersection is uncertain; therefore, the measure may be infeasible. This intersection is under Caltrans’ jurisdiction, and the implementation and timing of the mitigation measures are not under the City’s control. Consequently, the Cumulative with proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ Philips Lane and Davis Street (#28). The addition of Cumulative with Proposed Plan traffic would cause the intersection level of service to degrade from LOS C to LOS F in the PM peak hour. Therefore, the 							

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<p>Cumulative with Proposed Plan impact is considered to be significant.</p> <p>Implementation of the following measures would improve intersection operations during the PM peak hour:</p> <ul style="list-style-type: none"> □ Convert the existing shared through/right-turn lane on the westbound approach to an exclusive through lane to provide an exclusive left-turn lane, two exclusive through lanes and an exclusive right-turn lane. □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>Upon implementation of these measures, intersection operations would improve to LOS D during the PM peak hour. This intersection is under Caltrans' jurisdiction, and the implementation and timing of the mitigation measures are not under the City's control. Consequently, the Cumulative with Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ Warden Avenue/Timothy Drive and Davis Street (#29). The addition of Cumulative with Proposed Plan traffic would cause the intersection level of service to degrade from LOS C to LOS E in the PM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. <p>Implementation of the following measures would improve intersection operations during the PM peak hour:</p> <ul style="list-style-type: none"> □ Restripe the three northbound lanes from Timothy Drive to provide an 							

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<p>exclusive left-turn lane, a shared left-turn/through/right-turn lane and an exclusive right-turn lane.</p> <ul style="list-style-type: none"> □ Optimize the traffic signal cycle length and splits in conjunction with adaptive traffic control technology. <p>Upon implementation of these measures, intersection operations would improve to LOS D during the PM peak hour. This intersection is under Caltrans’ jurisdiction, and the implementation and timing of the mitigation measures are not under the City’s control. Consequently, the Cumulative with Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ Doolittle Drive and Davis Street (#30). The addition of Cumulative with Proposed Plan traffic would cause the intersection level of service to degrade from LOS C to LOS F in the PM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. <p>Implementation of the following measures would improve intersection operations during the PM peak hour:</p> <ul style="list-style-type: none"> □ Restripe the four westbound lanes from Davis Street to provide one exclusive left-turn lane, one exclusive through lane and two exclusive right-turn lanes. □ Restrict westbound right turns on red to reduce conflict between right-turning vehicles in the two exclusive right-turn lanes as well as between right-turning vehicles and movements with the right-of-way. □ Optimize the traffic signal cycle length 							

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<p>and splits.</p> <p>Upon implementation of these measures, intersection operations would improve to LOS D during the PM peak hour. Even if this intersection was under City control, the availability of right-of-way for the required widening on the east leg of the intersection is uncertain; therefore, the measure may be infeasible. This intersection is under Caltrans' jurisdiction, and the implementation and timing of the mitigation measures are not under the City's control. Consequently, the Cumulative with Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ Doolittle Drive and Marina Boulevard (#31). The addition of Cumulative with Proposed Plan traffic would cause the intersection level of service to degrade from LOS C to LOS F in the AM peak hour and from LOS D to LOS E in the PM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. Implementation of the following measures would improve intersection operations during the AM and PM peak hours to LOS D and lessen the Cumulative with Proposed Plan impact to less than significant: <ul style="list-style-type: none"> □ Restripe the eastbound approach on Marina Boulevard to provide an exclusive left-turn lane, an exclusive through lane and a shared through/right-turn lane. (Consistent with the findings of the San Leandro Shoreline Development Project EIR). □ Optimize the traffic signal cycle length and splits. (Consistent with the findings 							

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<p>of the San Leandro Shoreline Development Project EIR).</p> <ul style="list-style-type: none"> □ Implement a right-turn overlap signal phase for the northbound and westbound approaches. (A new mitigation not called for in the San Leandro Shoreline Development Project EIR). ▪ Alvarado Street and Aladdin Avenue (#35). The addition of Cumulative with Proposed Plan traffic would cause the intersection level of service to degrade from LOS D to LOS F in the AM peak hour. Therefore, the Cumulative with Proposed Plan impact is considered to be significant. Implementation of the following measures would improve intersection operations during the AM peak hour to LOS D and lessen the proposed Plan impact to less than significant: <ul style="list-style-type: none"> □ Convert the left-turn signal phasing for the eastbound and westbound approaches on Aladdin Avenue from protected left-turn signal phasing to permitted left-turn signal phasing with flashing yellow arrows. □ Convert the northbound left-turn signal phasing on Alvarado Avenue from protected left-turn signal phasing to protected/permitted left-turn signal phasing with flashing yellow arrows. □ Convert the southbound left-turn signal phasing on Alvarado Avenue from protected left-turn signal phasing to permitted left-turn signal phasing with flashing yellow arrows. 							

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<ul style="list-style-type: none"> □ Optimize the traffic signal cycle length and splits. <p>While implementation of Mitigation Measure TRAF-1A would secure future roadway and infrastructure improvements that are necessary to mitigate impacts from future development in the city based on current standards, some impacts would remain significant and unavoidable because the City cannot guarantee improvements at all of the impacted intersections.</p>							
TRAF-1B: Freeway Segments							
<p>The City of San Leandro shall initiate efforts to coordinate with Caltrans and Alameda CTC to identify</p> <ul style="list-style-type: none"> ▪ I-880 Northbound segments between Washington Avenue and 98th Avenue. These three mainline segments experience LOS F conditions during the AM peak hour under both existing and cumulative plus Proposed Plan conditions. Implementation of the following measure would improve freeway segment operations during the AM peak hour to LOS D or better and lessen the proposed Plan impact to less than significant: <ul style="list-style-type: none"> □ Add additional capacity to the freeway segment by increasing the number of travel lanes in the northbound direction. <p>However, the implementation and timing of the Mitigation Measure is not under the City’s control and widening I-880 is not considered to be feasible due to cost and freeway right-of-way constraints. Consequently, the Cumulative plus</p>	N/A						

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<p>Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ I-580 Northbound segment between 150th Avenue and Benedict Drive, which is at LOS F during the AM peak hour under both existing and cumulative plus Proposed Plan conditions. <p>Implementation of the following measure would improve freeway segment operations during the AM peak hour to LOS D or better and lessen the proposed Plan impact to less than significant:</p> <ul style="list-style-type: none"> □ Add additional capacity to the freeway segment by increasing the number of travel lanes in the northbound direction. <p>However, the implementation and timing of the Mitigation Measure is not under the City’s control and widening I-880 is not considered to be feasible due to cost and freeway right-of-way constraints. Consequently, the Cumulative plus Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ I-580 Northbound segment between Foothill Boulevard and 106th Avenue, is at LOS E during the AM peak hour under existing and LOS F under cumulative plus Proposed Plan conditions. <p>Implementation of the following measure would improve freeway segment operations during the AM peak hour to LOS D or better and lessen the proposed Plan impact to less than significant:</p> <ul style="list-style-type: none"> □ Add additional capacity to the freeway segment by increasing the number of travel lanes in the northbound direction. 							

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<p>However, the implementation and timing of the Mitigation Measure is not under the City’s control and widening I-880 is not considered to be feasible due to cost and freeway right-of-way constraints. Consequently, the Cumulative plus Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ I-880 Southbound segment between Marina Boulevard and Washington Avenue would operate at LOS F during the PM peak hour under cumulative plus Proposed Plan condition, which is considered to be significant. <p>Implementation of the following measure would improve freeway segment operations during the AM peak hour to LOS D or better and lessen the Proposed Plan impact to less than significant:</p> <ul style="list-style-type: none"> □ Add additional capacity to the freeway segment by increasing the number of travel lanes in the southbound direction. <p>However, the implementation and timing of the Mitigation Measure is not under the City’s control and widening I-880 is not considered to be feasible due to cost and freeway right-of-way constraints. Consequently, the Cumulative plus Proposed Plan impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> ▪ I-238 Eastbound segment between Hesperian Boulevard and SR 185 would operate at LOS E during the PM peak hour under cumulative plus Proposed Plan condition, which is considered to be 							

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<p>significant.</p> <p>Implementation of the following measure would improve freeway segment operations during the AM peak hour to LOS D or better and lessen the proposed Plan impact to less than significant:</p> <ul style="list-style-type: none"> □ Add additional capacity to the freeway segment by increasing the number of travel lanes in the eastbound direction. <p>However, the implementation and timing of the Mitigation Measure is not under the City’s control and widening I-880 is not considered to be feasible due to cost and freeway right-of-way constraints. Consequently, the Cumulative plus Proposed Plan impact remains significant and unavoidable.</p> <p>All impacted freeway sections would require additional capacity or widening to mitigate the impacts to less than significant. If the widenings are feasible, then future development implementing the Proposed Plan would contribute its fair share through development fees for street improvements. To this end, the City shall coordinate with Caltrans and the Alameda County Transportation Commission (CTC) to develop a co-operative agreement to fund these improvements and determine the fair share contribution.</p>							
TRAF-2A: Improvements							
<p>Implementation of the following improvement would reduce the impact to acceptable levels:</p> <ul style="list-style-type: none"> ▪ Widen Doolittle Drive to provide an additional travel lane in the northbound direction; or 	N/A						

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<ul style="list-style-type: none"> ▪ Provide transit or shuttle service that operates between the Proposed Plan site and key locations such as San Leandro and Coliseum BART stations and Oakland International Airport. <p>Widening Doolittle Drive to provide an additional travel lane in the northbound direction would improve the level of service to LOS D in Year 2040 and would mitigate the Proposed Plan impact to less than significant. However, the feasibility of this measure is uncertain due to right of way constraints along this mostly developed corridor.</p> <p>Alternatively, provision of a shuttle service that operates between the City site and key locations, such as San Leandro and Coliseum BART stations and Oakland International Airport, during the AM and PM peak hour would likely lessen the Proposed Plan’s impact on the segment. However, the effectiveness of the shuttle service in reducing the number of Proposed Plan trips on Doolittle Drive cannot be adequately quantified.</p> <p>As discussed above, the ongoing I-880 Integrated Corridor Management effort led by the MTC that aims to optimize freeway, arterial signal, rail, and bus systems and incorporate Intelligent Transportation System would also help enhance efficiency on the freeway. However, for the reasons listed above this impact would remain significant and unavoidable.</p>							

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