

March 17, 2017

Consistency Memorandum - Environmental Documentation for the 2000 Marina Boulevard Project, Overton Moore Properties (PLN17-0005).

The City of San Leandro c/o Michael Baker International reviewed the proposed project at 2000 Marina Boulevard to determine the appropriate level of environmental review required under the California Environmental Quality Act (CEQA). As documented below, the City has determined that additional environmental review is not required and that the project is consistent with the San Leandro Zoning Code and the San Leandro 2035 General Plan.

PROJECT DESCRIPTION

REGIONAL AND LOCAL SETTING

The project site is located at 2000 Marina Boulevard in southern San Leandro. San Leandro is located in western Alameda County in the San Francisco Bay Area (**Figure 1**). The city is located between Oakland to the northwest and Hayward to the southeast. Regional access to the project area is via Interstate 880 (I-880) and locally via Marina Boulevard and Menlo Street. The project site is located approximately 0.5 mile west of I-880 and is in the southwest corner of a block of industrial buildings and an A&W fast-food restaurant (**Figure 2**).

An auto shop is located to the north of the project site, a paper mill is located to the east, and public storage warehouses are located to the south and west of the project site, across Marina Boulevard and Menlo Street, respectively. Mulford Gardens, a residential community, is located 0.3 mile to the west of the project site, and San Leandro Kaiser Permanente Medical Center is located 0.5 mile east, adjacent to I-880.

PROJECT DESCRIPTION

The project site encompasses approximately 13 acres. The project is located on the former Georgia Pacific Gypsum plant site, which manufactured paper for use in gypsum drywall. The plant is vacant and no longer functioning. Four existing buildings and leftover gypsum drywall paper supplies are currently located on the project site. The project would remove the paper supplies, demolish the existing buildings on the site, and construct a 293,174-square-foot industrial warehouse for advanced manufacturing use.

The project elements are shown in **Table 1**. The main building, which would be used as a warehouse, would be 39 feet tall. Two offices and one potential office/mezzanine would be located on the south side of the warehouse. The entrance to the project site would be marked by two metal swing gates in the northeast and northwest corners.

Table 1: Building Footprint	
Office	15,000 sf
Mezzanine	4,000 sf
Warehouse	274,174 sf
Total	293,174 sf

Source: HPA Architecture 2016

Note: sf = square feet

Two parking lots would be located on the project site, one on the north side and one on the south side. The site would accommodate 315 parking spots, including 88 compact stalls and 8 stalls designated for disabled drivers. **Figure 3** shows the project site plan. A 6-foot-wide landscaped area would separate the proposed warehouse from the parking lot. The landscaped area widens to 24 feet around the southeast and southwest corners of the warehouse. A 24.5-foot-wide landscaped area would be located along the south side of the southern parking lot, adjacent to Marina Boulevard. **Figure 4** shows the proposed landscape plan.

Construction

Project construction would last approximately 11 months and would entail demolition, site preparation, grading, building construction, asphalt and hardscape paving, landscaping, and architectural coating (i.e., painting). Building demolition and asphalt removal is anticipated to begin in June 2017 and end in May 2018.

Construction vehicles would access the site via Marina Boulevard and Menlo Street. Roads would not be closed during construction, and all road access would be maintained. Approximately seven truckloads of equipment would be hauled off-site, and two battery-powered forklifts would be used to load the trucks during demolition. Existing concrete and asphalt would be crushed and recycled for reuse on-site. The project would generate approximately 6,690 tons of building debris to be hauled off-site.

BACKGROUND AND LEGAL STANDARDS

The City of San Leandro 2035 General Plan guides long-range physical development in the city. The City Council adopted the General Plan on September 19, 2016. The San Leandro General Plan Environmental Impact Report (EIR) analyzed the physical impacts of General Plan implementation and was certified in September 2016 (SCH #2001092001). The EIR addressed impacts related to aesthetics, air quality, biological resources, cultural resources, greenhouse gas emissions, geology, soils, and seismicity, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services and recreation, transportation, and utilities and service systems. The EIR is a program EIR, pursuant to CEQA Guidelines Section 15168.

CEQA provides that after a public agency certifies an EIR (including a program EIR, such as for a general plan or other comprehensive land use plan), the agency must consider whether further environmental review is required for a subsequent discretionary decision. Whether a supplemental EIR or other environmental document must be prepared depends on an analysis of the subsequent activity. Three sets of provisions in CEQA and the CEQA Guidelines address the requisite analysis.

CEQA GUIDELINES SECTION 15183

Pursuant to CEQA Guidelines Section 15183, a public agency need not prepare an EIR or negative declaration for a project consistent with a community plan or zoning for which an environmental document has been certified. CEQA Guidelines Section 15183 specifically states:

- (a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.
- (b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
 - (1) Are peculiar to the project or the parcel on which the project would be located,
 - (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,
 - (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action or,
 - (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.
- (c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for the project solely on the basis of that impact.
- (d) This section shall apply only to projects which meet the following conditions:
 - (1) The project is consistent with:
 - (a) A community plan adopted as part of a general plan,
 - (b) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or
 - (c) A general plan of a local agency, and an EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

CEQA GUIDELINES SECTIONS 15162 AND 15163

CEQA Guidelines Sections 15162 and 15163 provide that the agency shall not prepare a subsequent or supplemental EIR unless the agency determines, on the basis of substantial evidence, that certain conditions exist that will lead to a new significant impact or substantial increase in the severity of a previously identified impact, or that a new or previously rejected mitigation measure or alternative would substantially reduce significant effects. (See also Public Resources Code Section 21166.)

CONSISTENCY ANALYSIS

The project area is zoned Industrial Transition (IT) District, and the General Plan land use designation is Light/General Industrial. The IT District is intended to provide and protect industrial lands for the development of emerging technologies, artisanal production, and light manufacturing

methods, while preserving existing businesses and allowing additional commercial uses under specified limitations (San Leandro 2016c).

Per Zoning Code Section 2-710.B.38, Warehouse Storage Facilities, and Section 2-710.B.39, Warehouse Wholesale/Retail Distribution Facilities, the project would require a Conditional Use Permit. The project would also be subject to site plan review approval from the City. Both applications would be combined and would be subject to the review of the Board of Zoning Adjustments at a public hearing. With project approval, the project would be consistent with the San Leandro Zoning Code.

Table 2 outlines the project's consistency with applicable regulations.

Table 2: Allowed vs. Proposed Uses			
	Applicable Regulations	Proposed Development/Site	Consistent
General Plan Land Use Designation	Light/General Industrial Permitted uses include manufacturing, transportation, food and beverage processing, technology, warehousing, vehicle storage, office-flex, and distribution uses.	Industrial warehouse	Yes
Zoning	Industrial Transition District Permitted uses include accessory uses, business services, food processing, medical supply stores, nurseries, offices, restaurants, retail services, minor utilities, and vehicle/heavy equipment dealers.	Industrial Transition District	Yes, contingent on Conditional Use Permit approval
Minimum Lot Area	5,000 square feet	563,756 square feet	Yes
Height	50 feet maximum	39 feet	Yes
Minimum Lot Width	50 feet	808 feet	Yes
Minimum Front Yard	20 feet (must be landscaped)	24.5 feet (landscaped)	Yes
Minimum Side Yard (east)	0 feet	4.5 feet	Yes
Minimum Side Yard (west)	0 feet	15.75 feet	Yes
Minimum Rear Yard	0 feet	0 feet	Yes
Maximum Floor Area Ratio	1.0	0.52	Yes
Landscape	5 percent	Approximately 7 percent	Yes
Parking	247 spaces	294 spaces	Yes
Lot Coverage	75%	52%	Yes

Source: San Leandro 2016b, 2016c, 2017

Table 3 lists the General Plan policies and General Plan EIR mitigation measures that would be applicable to the project. The project would implement the policies and mitigation measures included to reduce potential project impacts.

Table 3: Relevant Project Impacts and General Plan EIR Mitigation Measures		
Impact	Policies/Mitigation Measures*	Compliance
Air Quality		
Warehousing operations could generate a substantial amount of diesel particulate matter (DPM) emissions from off-road equipment use and truck idling. In addition, some warehousing and industrial facilities may include use of transport refrigeration units (TRUs) for cold storage that could expose sensitive receptors to substantial pollutant concentrations. Mitigation is needed to ensure that new projects are evaluated in accordance with the Bay Area Air Quality Management District's (BAAQMD) CEQA Guidelines. Therefore, impacts would be significant.	<p>Mitigation Measure AQ-3: Applicants for future non-residential land uses within the city that:</p> <ol style="list-style-type: none"> 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units <p>The Health Risk Assessment (HRA) shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the BAAQMD. If the HRA shows that the incremental cancer risk exceeds 10 in one million, PM_{2.5} concentrations exceed 0.3 microgram per cubic meter, or the appropriate non-cancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level, including appropriate enforcement mechanisms.</p> <p>Mitigation measures may include but are not limited to:</p> <ul style="list-style-type: none"> • Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. • Electrifying warehousing docks. • Requiring use of newer equipment and/or vehicles. • Restricting off-site truck travel through the creation of truck routes. 	The project would implement Mitigation Measure AQ-3 as a condition of approval. Therefore, the project would be required to prepare an HRA in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the BAAQMD. See the Air Quality discussion below.

Table 3: Relevant Project Impacts and General Plan EIR Mitigation Measures		
Impact	Policies/Mitigation Measures*	Compliance
	Mitigation measures identified in the project-specific HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project.	
	Policy EH-3.1: Cooperate with the appropriate regional, state, and federal agencies to implement the regional Clean Air Plan and enforce air quality standards.	The project would comply with appropriate regional, state, and federal agencies to reduce project impacts. See the Air Quality discussion below.
	Policy EH-3.4: Require new development to be designed and constructed in a way that reduces the potential for future air quality problems, such as odors and the emission of any and all air pollutants. This should be done by: <ul style="list-style-type: none"> (a) Requiring construction and grading practices that minimize airborne dust and particulate matter; (b) Ensuring that best available control technology is used for operations that could generate air pollutants; (c) Encouraging energy conservation and low-polluting energy sources; (d) Promoting landscaping and tree planting to absorb carbon monoxide and other pollutants; and (e) Implementing the complementary strategies to reduce greenhouse gases identified in the Climate Action Plan. 	The project is subject to site plan review. As such, the City would ensure that proposed site plans would comply with Policy EH-3.4.
Cultural Resources		

Table 3: Relevant Project Impacts and General Plan EIR Mitigation Measures

Impact	Policies/Mitigation Measures*	Compliance
Construction and buildout under the General Plan would include minor grading and excavation that could disturb archaeological resources.	<p>Policy CD-1.12: Recognize the potential for paleontological, prehistoric, historic, archaeological, and tribal cultural resources and ensure that future development takes the measures necessary to identify and preserve such resources.</p> <ul style="list-style-type: none"> • Action CD-1.12.A: Maintain standard conditions of approval for new development which require consultation with a professional archaeologist in the event that any subsurface paleontological, prehistoric, archaeological, or tribal cultural resource remains are discovered during any construction or preconstruction activities on a development site. This includes consultation with Native American organizations prior to continued site work in the event such remains are discovered. 	<p>The project would implement the following to comply with Policy CD-1.12:</p> <p>Should archaeological or paleontological resources or human remains be accidentally discovered during construction, work shall be halted within 50 feet of the discovery until it can be evaluated by a qualified professional archaeologist. If the discovery is determined to be significant, appropriate mitigation measures shall be formulated and implemented (per California Health and Safety Code Section 7050.5).</p> <p>If human remains are found at any time, work shall be stopped and the county coroner shall be notified immediately. If the coroner determines that the remains are Native American, the Native American Heritage Commission shall be notified as required by law.</p>
Geology and Soils		
Implementation of the proposed General Plan would result in significant impacts if it would result in unstable geologic units and soils or result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction, or collapse.	<p>Policy EH-1: Minimize risks from geologic, seismic, flood, and climate change-related hazards by ensuring the appropriate location, site planning, and design of new development. The City's development review process, and its engineering and building standards, should ensure that new construction is designed to minimize the potential for damage.</p> <ul style="list-style-type: none"> • Action EH-1.1.A: Require soils and/or geologic reports for development in areas where potentially serious geologic risks exist. These reports should address the degree of hazard, design parameters for the 	<p>Earth Systems Pacific prepared a geotechnical engineering study for the project in 2016 (Appendix B). The study analyzes potentially serious geologic risks and includes design parameters for the project to minimize risks based on hazards. The project would be required to comply with the recommendations outlined in the geotechnical report, as a condition of approval, for general site preparation, demolition and building pad preparation, basement demolition, compaction, fill, foundations, interior slab-on-grade construction, exterior flatwork,</p>

Table 3: Relevant Project Impacts and General Plan EIR Mitigation Measures		
Impact	Policies/Mitigation Measures*	Compliance
	project based on the hazard, and appropriate mitigation measures	asphalt pavement sections, concrete pavement, lime treatment, utility trenches, site drainage and finish improvements, and geotechnical observation and testing.
Hazards and Hazardous Resources		
General Plan implementation could expose local residents and workers to the risks associated with hazardous materials.	Policy EH-5.1: Work with the appropriate county, regional, state, and federal agencies to develop and implement programs for hazardous waste reduction, hazardous material facility siting, hazardous waste handling and disposal, public education, and regulatory compliance.	The project would comply with Policy EH-5.1 to reduce project impacts. See the Hazards and Hazardous Resources discussion below. The project would dispose of hazardous materials as required by all appropriate agencies.
	Policy EH-5.2: Ensure that the necessary steps are taken to clean up residual hazardous wastes on any contaminated sites proposed for redevelopment or reuse. Require soil evaluations as needed to ensure that risks are assessed and appropriate remediation is provided.	The project would comply with Policy EH-5.2 to reduce project impacts. See the Hazards and Hazardous Resources discussion below. The project would dispose of hazardous materials as required by all appropriate agencies.
	Policy EH-5.3: Require that all hazardous material storage and handling areas are designed to minimize the possibility of environmental contamination and adverse off-site impacts. Enforce and implement relevant state and federal codes regarding spill containment facilities around storage tanks.	The project would implement Policy EH-5.3 to reduce project impacts. See the Hazards and Hazardous Resources discussion below. The project would dispose of hazardous materials as required by all appropriate agencies.
	Policy EH-5.7: Ensure the safe and proper handling of hazardous building materials, such as friable asbestos and lead based paint. If such materials are disturbed during building renovation or demolition, they should be handled and disposed of in a manner that protects human health and the environment.	The project would implement Policy EH-5.7 to reduce project impacts. See the Hazards and Hazardous Resources discussion below. The project would dispose of hazardous materials as required by all appropriate agencies.
Hydrology and Water Quality		

Table 3: Relevant Project Impacts and General Plan EIR Mitigation Measures

Impact	Policies/Mitigation Measures*	Compliance
<p>General Plan implementation could degrade water quality and could substantially contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems.</p>	<p>Policy EH-4.1: Continue to implement water pollution control measures aimed at reducing pollution from urban runoff. These measures should emphasize best management practices (BMPs) by residents, businesses, contractors, and public agencies to ensure that surface water quality is maintained at levels that meet state and federal standards.</p> <ul style="list-style-type: none"> • Action EH-4.1.B: As required by Section C.3 of the Stormwater Municipal Regional Permit (also known as "C.3" requirements), ensure that the City's development review procedures continue to include water quality protection measures. These include measures related to water supply, flood control, habitat protection, groundwater recharge, Bay-friendly landscaping, and sustainable development. In addition, the City will continue to require Stormwater Pollution Prevention Plans (SWPPP) for qualifying projects and will ensure that such projects include appropriate measures to minimize the potential for water pollution. 	<p>The project would implement all C.3 requirements and implement a project-specific SWPPP. The SWPPP would include best management practices to reduce project impacts to hydrology and water quality. See the Hydrology and Water Quality discussion below.</p>
Noise		
<p>Construction activities under the future projects may lead to substantial temporary or periodic increases to ambient noise levels. This would be a potentially significant impact.</p>	<p>Mitigation Measure NOI-4: The City of San Leandro shall adopt the following measures as Standard Conditions of Approval or Construction Development Standards for new construction in the city. The Standard Conditions of Approval/ Construction Development Standards shall include an exception that states that the Engineering & Transportation Director or his/her designee may waive individual measures upon</p>	<p>The project would abide by the City's permitted construction hours and implement noise-related construction BMPs. See the Noise discussion below.</p>

Table 3: Relevant Project Impacts and General Plan EIR Mitigation Measures

Impact	Policies/Mitigation Measures*	Compliance
	<p>individual written request from an Applicant after City review.</p> <ul style="list-style-type: none"> • Construction activities shall be restricted to the daytime hours of between 7:00 a.m. and 7:00 p.m. on weekdays, or between 8:00 a.m. and 7:00 p.m. on Sunday and Saturday. • Prior to the start of construction activities, the construction contractor shall: • Maintain and tune all proposed equipment in accordance with the manufacturer's recommendations to minimize noise emission. • Inspect all proposed equipment and fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds that are no less effective than as originally equipped by the manufacturer. • Post a sign, clearly visible at the site, with a contact name and telephone number of the City of San Leandro's authorized representative to respond in the event of a noise complaint. • Place stationary construction equipment and material delivery in loading and unloading areas as far as practicable from the residences. • Limit unnecessary engine idling to the extent feasible. • Use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters. • Use low-noise emission equipment. 	

Table 3: Relevant Project Impacts and General Plan EIR Mitigation Measures		
Impact	Policies/Mitigation Measures*	Compliance
	<ul style="list-style-type: none"> Limit use of public address systems. 	
Utilities		
Implementation of the General Plan will increase demand for utilities including water, sewer, storm drain, and solid waste.	Policy CSF-6.2: Require future development to pay its fair share of the cost of improving the water, sewer, storm drainage, and other infrastructure systems needed to serve that development. Development impact fees, development agreements, and other appropriate forms of mitigation should be used to cover the costs of upgrading or expanding public infrastructure.	The project would comply with Policy CSF-6.2 to reduce project impacts. See the Utilities discussion below.
	Policy OSC-7.3 Drought-Tolerant Landscaping: Encourage the use of native vegetation and Bay-friendly landscaping and enforce the State Department of Water Resources Model Water Efficient Landscape Ordinance (WELO).	The project would comply with Policy OSC-7.3 to reduce project impacts. See the Utilities discussion below.

Source: San Leandro 2016a, 2016b

* Policies are from the City of San Leandro 2035 General Plan and mitigation measures are from the City of San Leandro General Plan EIR.

ENVIRONMENTAL IMPACTS

The General Plan EIR analyzed potentially significant impacts from future development projects in San Leandro. The General Plan EIR is a program EIR in that it studied a plan for the future development of the city, rather than, for example, a specific development on a particular parcel for which a developer sought land use entitlements. However, as explained in Section 2.2 of the General Plan EIR, "The EIR is not project-specific, and does not evaluate the impacts of individual projects that may be proposed in the future under the General Plan...however, if the program EIR addresses the project's effects as specifically and comprehensively as is reasonably possible, and later activities are within scope of the effects examined in the EIR, then additional environmental review may not be required for those future projects." In accordance with CEQA Guidelines Section 15168(c)(3), when a program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the program EIR into the subsequent activities. The applicable General Plan policies and General Plan EIR mitigation measures are outlined above in **Table 3**.

Upon review of the project's Air Quality/Greenhouse Gas (GHG) Report, Geotechnical Investigation, Phase I Report, Stormwater Requirements Checklist, and Traffic Impact Study,

included as **Appendices A** through **E**, it was determined that the project's impacts would be mitigated to a less than significant level through implementation of the General Plan policies and General Plan EIR mitigation measures outlined in **Table 3**, as well as City conditions of approval. The following is a brief analysis of the project's potential impacts on several resource areas and its consistency with the General Plan.

AIR QUALITY/GREENHOUSE GAS EMISSIONS

The following air quality/greenhouse gas analysis is based on an air quality/GHG study prepared for the project by PlaceWorks (2017), included as **Appendix A**.

Construction Impacts

Construction activities would produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Site preparation activities would produce fugitive dust emissions (PM₁₀ and PM_{2.5}) from demolition and soil-disturbing activities, such as grading and excavation. Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. Construction activities associated with the proposed project would result in emissions of reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), and PM₁₀ and PM_{2.5}.

To determine potential construction-related air quality impacts, criteria air pollutants generated by project-related construction activities are compared to the BAAQMD significance thresholds. Average daily emissions are based on the annual construction emissions divided by the total number of active construction days. As outlined in **Appendix A**, criteria air pollutant emissions from construction equipment exhaust would not exceed the BAAQMD average daily thresholds. The project would not exceed the buildout proposed in the General Plan and analyzed in the General Plan EIR. The General Plan EIR found that construction-related criteria pollutant emissions from exhaust associated with General Plan buildout would be less than significant. Thus, no further analysis is needed, and the project is consistent with the City's General Plan EIR.

Fugitive Dust

Ground-disturbing activities would generate fugitive dust. Fugitive dust emissions are considered to be significant unless the project implements the BAAQMD best management practices for fugitive dust control during construction. PM₁₀ is typically the most significant source of air pollution from construction-generated dust. The amount of dust generated during construction would be highly variable and is dependent on the amount of material being demolished, the type of material, moisture content, and meteorological conditions. According to the project-specific air quality study, uncontrolled PM₁₀ and PM_{2.5} levels downwind of actively disturbed areas could possibly exceed state standards and impacts would be potentially significant in the absence of BAAQMD best management practices for fugitive dust control (**Appendix A**). Implementation of General Plan policies and General Plan EIR mitigation measures, as outlined in **Table 3**, would require adherence to the BAAQMD's current basic control measures for reducing construction emissions of particulate matter and would ensure impacts from fugitive dust generated during construction activities are less than significant. As

such, no further analysis is needed and the project is consistent with the General Plan EIR findings.

Operational Impacts

Long-term air pollutant emissions generated by a warehouse development are typically associated with the burning of fossil fuels in cars and trucks (mobile sources); energy use for cooling, heating, and manufacturing (energy); and landscape equipment (area sources). The primary source of long-term criteria air pollutant emissions generated by the proposed project would be emissions produced from project-generated vehicle trips. The proposed project would generate a total of 1,125 average daily weekday trips (754 passenger vehicle trips and 371 truck trips). The net increase in operational emissions generated by the project would not exceed the BAAQMD daily or annual thresholds (PlaceWorks 2017; **Appendix A**). The project would implement General Plan EIR Mitigation Measure AQ-3 as a condition of approval, which requires the project to prepare a Health Risk Assessment (HRA) in accordance with the policies and procedures of the California Office of Environmental Health Hazard Assessment and the BAAQMD. Therefore, the project would not cumulatively contribute to the nonattainment designations of the air basin, and regional operational phase air quality impacts would be less than significant. Additionally, the project would not exceed the buildout proposed in the General Plan and analyzed in the General Plan EIR. The General Plan EIR found that operational-related impacts for General Plan buildout would be less than significant. No further analysis is needed, and the project would be consistent with the City's General Plan EIR.

GEOLOGY AND SOILS

Based on the geotechnical report completed for the project by Earth Systems Pacific (2016; **Appendix B**), expansive soils and potentially liquefiable materials were found on the project site. The demolition of the warehouse structures, basements, and pavements on the project site and construction of the proposed project would excavate undisturbed ground. Earth Systems Pacific found that potentially liquefiable materials at the project site could cause liquefaction-related settlement between 1.2 and 4.4 inches. The project would comply with existing state and local regulations, such as the California Building Code, and would implement General Plan Action EH-1.1.A as a condition of approval. General Plan Action EH-1.1.A requires the submittal and review of detailed soils and/or geologic reports prior to construction. Implementation of local regulations, General Plan Action EH-1.1.A, and compliance with the recommendations outlined in the geotechnical report (**Appendix B**) would reduce project impacts to less than significant. The General Plan EIR found that geology and soil related impacts for General Plan buildout would be less than significant, and the project would not have greater impacts on geology and soils. No further analysis is needed, and the project would be consistent with the City's General Plan EIR.

HAZARDS AND HAZARDOUS MATERIALS

Based on the results of the project's Phase I Environmental Site Assessment completed by Ardent Environmental Group, Inc. (2016; **Appendix C**), the site has historically been used to manufacture paper for use in gypsum drywall.¹ Due to the surrounding industrial land use, a local volatile organic compound (VOC) groundwater issue was identified in the site vicinity.

¹ The project site is referred to as 1998 Marina Blvd. in the Phase I Environmental Assessment.

Laboratory results of soil and soil gas samples indicated no detectable to low concentrations of VOCs and/or petroleum hydrocarbons, and the levels were below regulatory guidelines for the protection of human health through dermal contact and possible vapor intrusion and for the protection of groundwater. Based on these results, no “hot spots” indicative of an on-site release were found. Therefore, there is a low likelihood that the site has contributed to the local VOC groundwater issues or that off-gassing contaminants pose a human health risk to future occupants through vapor intrusion.

Project construction could include refueling and minor maintenance of construction equipment on-site, which could lead to minor fuel and oil spills. Demolition would involve the transport, use, and disposal of hazardous materials on the project site and could lead to the accidental release of such materials. In accordance with Policies EH-5.1 through EH-5.3 and EH-5.7 outlined in **Table 3**, the use and handling of hazardous materials during construction would occur in accordance with applicable federal, state, and local laws, including Cal/OSHA requirements.

If hazardous materials are encountered during construction or accidentally released as a result of construction activities, the contractor is required to implement the following best management practices (BMPs):

- Stop all work within 25 feet of any discovered contamination or release.
- Identify the scope and immediacy of the problem.
- Coordinate with responsible agencies (Department of Toxic Substances Control, San Francisco Bay Regional Water Quality Control Board, or Environmental Protection Agency).
- Conduct the necessary investigation and remediation activities to resolve the situation before continuing construction work.

The General Plan EIR found that the use, transport, and disposal of hazardous materials for General Plan buildout would be less than significant, and the project would be consistent with this finding. As such, the project would be consistent with the City’s General Plan EIR. Implementation of General Plan policies would reduce the project’s impact to less than significant, and no further evaluation is required.

HYDROLOGY AND WATER QUALITY

Storm flows on the project site during the previous use were captured and directed to an on-site reservoir. The water was used (together with groundwater from a deep well) for the processing of paper and gypsum. The wastewater from previous operations was discharged to the City’s sanitary sewer system for treatment at the City’s wastewater treatment plant.

The proposed project would not capture flows in site and pre-treat them. Surface water runoff on the project site would flow via the roof, parking lot, and sidewalks/walkways to vegetated areas located to the west and south of the proposed warehouse. Bioswales would be located on the west and south sides of the proposed warehouse. The project would increase the amount of

pervious surface at the project site from 0 to approximately 7 percent. The design of the future storm drain system for the project would be based on analysis to demonstrate that capacity exists in the Line F storm network to accept 10-year design flows from the site to the satisfaction of the Alameda County Flood Control and Water Conservation District (ACFC&WCD) and the City of San Leandro. Said design would include, but is not limited to, on-site detention facilities to store the storm water until water flushes from the system after each storm together with various robust C.3 facilities best practices (**Appendix D**). All storm drains would be marked with "No Dumping! Flows to Bay" or equivalent signs to reduce potential point sources of contamination on-site.

Demolition/Construction Water Quality Impacts

Demolition and construction activities would disturb and expose soils to erosion, increasing the amount of silt and debris entering downstream waterways. In addition, refueling and parking of construction equipment and other vehicles on-site during construction could result in oil, grease, or related pollutant leaks and spills that may discharge into storm drains. Improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery close to on-site drainages could cause water quality degradation.

The project would be designed to comply with San Leandro Municipal Code Title 3, Chapter 3-15, Storm Water Management and Discharge Control, which is intended to protect the water quality of water bodies in the city. The ordinance implements the legal requirements of the National Pollutant Discharge Elimination System (NPDES) permit issued to the City of San Leandro by the San Francisco Bay Regional Water Quality Control Board (Permit No. CA0029831). The ordinance requires the implementation of BMPs during construction, such as site preparation and management, erosion control, runoff control, and sediment retention, which would prevent unwanted material from entering storm drains in the project vicinity. As outlined on page 2 of **Appendix D**, the project would also be required to obtain coverage under the state's Construction General Permit and Stormwater Pollution Prevention Plan (SWPPP). The SWPPP best management practices to be implemented during the project's demolition and construction phases are listed on page 5 of **Appendix D**. The effectiveness of BMPs has been recognized in the California Stormwater Quality Association's Stormwater Best Management Practice Handbooks.

The General Plan EIR found that impacts related to construction water quality for General Plan buildout would be less than significant, and the project would be consistent with this finding. As such, no further analysis is needed, and the project would be consistent with the City's General Plan EIR.

Operational Water Quality Impacts

Project operation could result in direct surface water quality impacts from landscaping activities associated with the use of fertilizers, herbicides, and pesticides, as well as from motor vehicle/truck operation or the use/disposal of industrial materials on the project site. The project would replace 509,381 square feet of impervious surface and would therefore be required to comply with the San Francisco Bay Municipal Regional Stormwater Permit (MRP) (Permit No. CAS612008) administered by the San Francisco Bay Regional Water Quality Control Board. Provision C.3 of the MRP requires new and redevelopment projects that create or replace 10,000

square feet or more of impervious surface to implement certain measures to protect water quality and prevent erosion by minimizing sediment and other pollutants in site runoff and so that post-project runoff will not exceed pre-project rates and durations (**Appendix D**).

As stated above, the project would increase the amount of stormwater entering the City's stormwater and sewer system. Therefore, the project would be required to comply with General Plan Policy CSF-6.2 that requires the project to pay its fair share of the cost of improving the water, sewer, storm drainage, and other infrastructure systems needed to serve the project.

Additional stormwater drainage could also result in an increase of urban runoff pollutants and other chemicals from industrial operations and landscaped areas. These pollutants could result in water quality impacts to on- and off-site drainage flows to area waterways. The goal of Provision C.3 is to include appropriate source control, site design, and stormwater treatment measures in new development and adaptive reuse projects to address both soluble and insoluble stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and adaptive reuse projects. Pursuant to Chapter 3-15 of the San Leandro Municipal Code, all development and redevelopment projects are required to filter materials at the catch basin to retain debris and dirt flowing into the City's storm sewer system for the life of the project. Compliance with Provision C.3 and the San Leandro Municipal Code would reduce potential water quality impacts associated with the proposed project.

The project would comply with the NPDES General Permit for Waste Discharge Requirements issued to the City of San Leandro (Permit No. CA0029831), which would reduce potential impacts on water quality from operational activities. The MRP ensures attainment of applicable water quality objectives and protection of the beneficial uses of receiving waters and associated habitat. The permit also requires that discharges not cause exceedances of water quality objectives or cause certain conditions to occur that create a condition of nuisance or water quality impairment in receiving waters.

Compliance with the NPDES and SWPPP, the City's Municipal Code regulations pertaining to stormwater management and discharge control, and General Plan Policy CSF-6.2 would reduce surface water quality impacts associated with the project. The General Plan EIR found that the impacts associated with hydrology and water quality for General Plan buildout would be less than significant, and project impacts are similar in scope. As such, no further analysis is needed and the project would be consistent with the City's General Plan EIR.

NOISE

The General Plan EIR analyzed potentially significant impacts related to noise levels and the placement of sensitive receptors near noise sources that could expose residential populations to significant ambient noise levels. The project includes the demolition of the existing building on the project site and the construction of the proposed warehouse. The nearest residential community is located 0.3 mile to the west of the project site. The project would comply with Mitigation Measure NOI-4, outlined in **Table 3**, which restricts construction activities to the daytime hours of between 7:00 a.m. and 7:00 p.m. on weekdays, or between 8:00 a.m. and 7:00 p.m. on Sunday and Saturday, and requires noise-reduction BMPs.

The General Plan EIR found that the impacts associated with noise for General Plan buildout would be less than significant, and project impacts are similar in scope. As such, the project would be consistent with the City's General Plan EIR and no further evaluation is needed.

TRAFFIC AND TRANSPORTATION

Kittelson & Associates, Inc. (2017) completed a traffic impact study to analyze project impacts on intersections and traffic in the project vicinity. The study is attached as **Appendix E**.

Site Access and On-Site Circulation

Access to the project site would be via two driveways on Marina Boulevard. Analysis of truck turns at the driveways demonstrated that both driveways can accommodate Single Unit (SU)-40, Wheel Base (WB)-40 trucks, and WB-65 trucks. Analysis of on-site truck maneuvers demonstrated that the drive aisles can accommodate circulation of SU-40 and WB-40 cargo trucks, including maneuvering to back a trailer to a dock.

Vehicle Miles Traveled

The project vehicle miles traveled (VMT) is computed as the total daily project trips multiplied by an average trip length for cars and trucks. Kittelson & Associates estimated the project would have 545 daily project trips. The number of daily trips was multiplied by an average trip length of 7.58 miles for cars and 5.3 miles for trucks. Based on 68 percent cars and 32 percent trucks, the total daily VMT for the project would be approximately 3,721.

Level of Service

Level of service (LOS) D or better is considered a less than significant impact.² The traffic study found that with the addition of project-generated traffic, all study intersections would operate acceptably at LOS D or better during each peak hour.

- The northbound left turn pocket at the Merced Street and Marina Boulevard intersection would experience an increase in queue length during the AM peak hour such that the queue could occasionally exceed available storage by 15 feet, which corresponds to less than one car length. The traffic study found that the impact was less than significant.
- The eastbound left turn queue at the Merced Street and Marina Boulevard intersection would increase during the PM peak hour such that the queue could occasionally increase by 10 feet, or less than one car length, to exceed available storage by 30 feet, or less than two car lengths. The traffic study found that the impact was less than significant.
- During the AM peak hour at the intersection of Merced Street and Marina Boulevard, the northbound left-turn queue would have an increase in queue length that could occasionally exceed available storage by an additional 30 feet, less than two car lengths. The traffic study found that the impact was less than significant.

² Level of service measures the quality of traffic flow at a signalized intersection.

- In the PM peak hour, the same movement would have an increase in queue length that could occasionally exceed available storage by an additional 10 feet, the equivalent of less than one car length. The traffic study found that the impact was less than significant.

Project Contribution to Cumulative Traffic Growth

Under cumulative conditions, the intersection of Doolittle Drive and Davis Street would operate at LOS F in the AM and PM peak hours. The intersection of Doolittle Drive and Marina Boulevard would operate at LOS F in the AM only. The intersections at Merced Street and Marina Boulevard and at Kaiser Access Road and Marina Boulevard would operate at LOS F in the PM peak hour only. All other study intersections would operate acceptably at LOS D or better during both peak hours.

With the addition of project-generated traffic, all study intersections would continue to operate within the standard or would experience less than a 0.05 change in volume-to-capacity ratios between cumulative and cumulative plus project conditions. The project would only incrementally increase traffic under cumulative conditions; therefore, the impact would be less than significant (Kittelson & Associates 2017; **Appendix E**).

The City plans to upgrade the traffic signal controls systems at three study intersections with a Synchro Green Adaptive Traffic Signal Control System. While the project does not result in any traffic impacts, the project does contribute to cumulative traffic growth. The City estimated the cost of design, installation, and equipment for upgrading with the Synchro Green Adaptive Traffic Signal Control System at the three intersections to be \$200,000. The project applicant would contribute \$17,530 for the signal control system upgrade. This would reduce project impacts to less than significant.

The General Plan EIR found that impacts related to transportation and circulation for General Plan buildout would be less than significant. As outlined above, project impacts are similar in scope, and no further analysis is needed. The project would be consistent with the City's General Plan EIR.

UTILITIES AND SERVICE SYSTEMS

Water Supply

The General Plan EIR determined that the East Bay Municipal Utility District would be able to meet water demand for the General Plan buildout scenario. To ensure that the project does not significantly affect the water conveyance system, the project would abide by General Plan Policy CSF-6.2. As stated in **Table 3**, the policy requires future development to pay its fair share of the cost of improving the water, sewer, storm drainage, and other infrastructure systems needed to serve that development. Implementation of the policy would reduce the project impacts to less than significant. As such, the project would be consistent with the General Plan and General Plan EIR, and no further evaluation is needed.

Wastewater

Wastewater would be collected from the project site by the City of San Leandro Wastewater Treatment Division, which provides wastewater services for the northern two-thirds of the city.

The General Plan EIR determined that the Wastewater Treatment Division would be able to meet wastewater demand for the General Plan buildout scenario. The General Plan EIR found the impact would be less than significant; as such, no further evaluation is needed, and the project would be consistent with the General Plan and the General Plan EIR.

Solid Waste

The project would comply with the California Green (CALGreen) Building Standards Code (Part 11 of Title 24, California Code of Regulations) and the San Leandro Construction and Demolition (C&D) ordinance regarding recycling and waste diversion. The CALGreen Building Standards Code requires the project to have a 65 percent waste diversion during construction. The C&D ordinance requires contractors to recycle all asphalt/concrete and 50 percent of all other C&D debris. Project demolition and construction debris would be hauled to the Davis Street Transfer Station in San Leandro. The transfer station processes and diverts over 7 million pounds of material per day. The project would incrementally add to processed material and would not exceed the transfer station's capacity (Waste Management 2017).

Waste Management, Inc., would provide refuse and recycling collection services for the project site. Waste produced at the project site would be diverted to the Altamont Landfill. The General Plan EIR determined that implementation of General Plan policies (see **Table 3**) would reduce residential and commercial waste streams in the city to a less than significant level. The project would comply with waste diversion policies in the city. As such, the project would have impacts consistent with those in the General Plan and the General Plan EIR, and no further evaluation is needed.

CONCLUSION

The City complied with the provisions and is implementing the steps outlined in the General Plan EIR and Municipal Code Chapters 18.04 and 18.06. Pursuant to CEQA Guidelines Section 15168(c)(4), the City used a written checklist to determine whether the environmental effects of the project's site-specific operations were evaluated in the General Plan EIR. Pursuant to CEQA Guidelines Section 15168(c)(2), the City evaluated whether further environmental review was required per the provisions of Section 15162(a). The City considered various technical studies prepared by environmental consultants hired by the City and the applicant (including an Air Quality/GHG Report, Geotechnical Investigation, Phase I report, and Traffic Impact Study).

The proposed project would be consistent with the assumptions for the project site as presented in the City's General Plan and Zoning Code, and the project would not result in any new significant impacts or increase the severity of any significant impacts identified in the General Plan EIR. Therefore, no further environmental analysis is required.

REFERENCES

Appendices A-E are available upon request from the City of San Leandro Community Development, 835 East 14th Street, San Leandro, California. The San Leandro 2035 General Plan Draft Environmental Impact Report can be accessed at:
<http://www.sanleandro.org/depts/cd/plan/genplan/default.asp>

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