



## Alco Iron & Metal Company Facility Expansion Project

Final Initial Study-Mitigated Negative Declaration  
PLN21-0027

*prepared by*

**City of San Leandro**

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**January 2026**

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# Initial Study

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The City of San Leandro (City), as the Lead Agency, prepared this Initial Study for the Alco Iron & Metal Company (Alco) Facility Expansion Project (hereinafter referred to as proposed project or project) in compliance with the California Environmental Quality Act (CEQA), the *CEQA Guidelines* (California Code of Regulations [CCR] Section 15000 et seq.), and the regulations and policies of the City of San Leandro, California. The proposed project would involve an increase in the size and a reconfiguration of the project applicant's recycling facility.

This document is the Final Initial Study – Mitigated Negative Declaration (IS-MND) for the proposed project. The Draft IS-MND circulated for a 30-day public review period that began on October 24, 2025, and concluded on November 24, 2025. Responses to comments on the Draft IS-MND are provided in Appendix H. In certain instances, the text of the Final IS-MND has been modified in response to comments received. In addition, minor grammar/spelling corrections have been made. In no case did any of the changes made identify new significant impacts or significant impacts of increased severity compared to the impacts identified in the Draft IS-MND. Because none of the changes to the IS-MND are considered substantial in accordance with *CEQA Guidelines* Section 15073.5(b) and the information added merely clarifies and amplifies the information previously provided in the analysis, recirculation of the MND is not required. Substantive changes made in the Final IS-MND are shown in strikethrough for deleted text and underline for added text. Minor grammar, typographical, or spelling corrections are not shown in strikeout/underline.

## 1. Project Title

Alco Iron & Metal Company Facility Expansion Project

## 2. Lead Agency Name and Address

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

## 3. Contact Person and Phone Number

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Office: 510-577-3348  
Email: clemaire@sanleandro.org

## 4. Project Sponsor's Name and Address

Michael Bercovich  
Alco Iron & Metal Company  
2120 Davis Street  
San Leandro, California 94577



## 5. Project Location

Alco's San Leandro facility is located at 1091 Doolittle Drive in San Leandro. The entire Alco facility at this location is 9.28 acres bounded by Davis Street to the south, Doolittle Drive to the east, Eden Road to the north, and other industrial properties to the west. The project site consists of a portion of the existing Alco facility and two additional parcels. Figure 1 shows the regional location of the project site, and Figure 2 provides an aerial image of the project site in its immediate context.

The project site includes a portion of the existing Alco facility and an expansion area, as shown on Figure 2 and explained below:

- A 4.2-acre portion of the existing Alco facility (shown as the "Existing Alco Operations" area on Figure 2) that includes the northern portion of the larger 9.28-acre existing Alco facility. This area consists of Assessor's Parcel Number (APN) 77A-649-7-4 (approximately 1.73 acres, with frontage on Doolittle Drive) and APN 77A-649-6-5 (approximately 2.38 acres at the southwest corner of Doolittle Drive and Eden Road, with frontage on both streets).
- A 2-acre expansion area (shown as the "Proposed Expansion Area" on Figure 2) comprised of two parcels (APNs 42-4530-1-1 and 42-4530-1-2), each 1 acre in size, adjacent to the west of the 4.2-acre area described above, both with frontage on Eden Road.

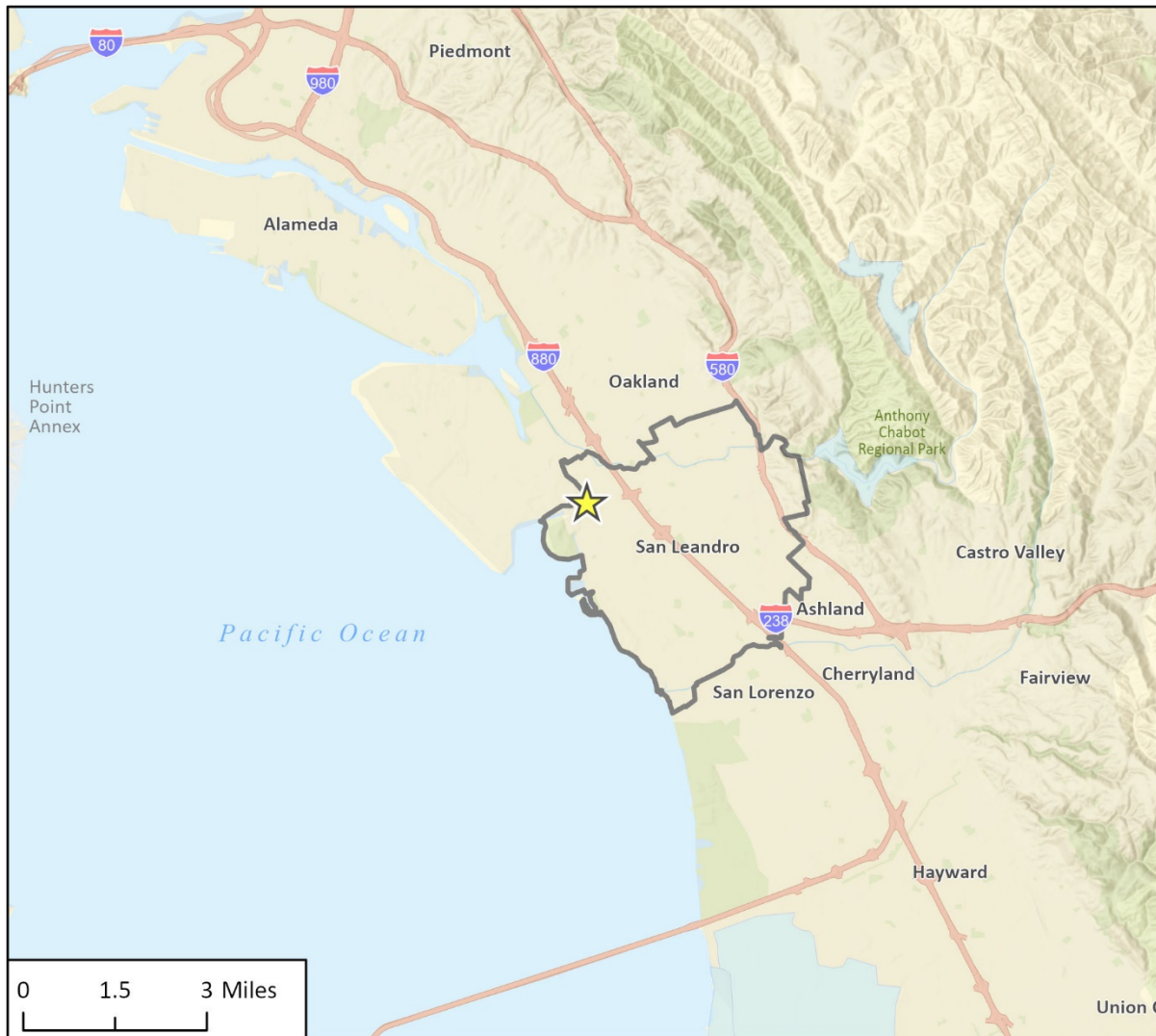
## 6. General Plan Designation

The City's *2035 General Plan* designates the project site as General Industrial (IG). As described in the General Plan, "General Industrial areas may contain a wide range of manufacturing, transportation, food and beverage processing, technology, warehousing, vehicle storage, office-flex, and distribution uses. Such uses are subject to performance standards to avoid adverse offsite effects. A limited range of commercial uses also is permitted in these areas. A maximum floor area ratio of 1.0 applies, although this area contains multiple zoning districts and this maximum may not be attainable in all districts."

## 7. Zoning

The project site is zoned as Industrial General (IG). The San Leandro Zoning Code (SLZC) Section 2.12.100 defines the IG Zone as intended to "provide and protect existing industrial sites and allow for continued operation of existing general industry, subject to performance standards and buffering requirements to minimize potential environmental impacts." As set forth in Section 2.12.200, recycling facilities, heavy processing facilities and transfer/storage/treatment facilities for hazardous waste are among the conditionally permitted uses for this zone.

**Figure 1 Regional Location**



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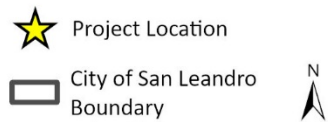


Figure 2 Project Site





## 8. Surrounding Land Uses and Setting

### Surrounding Land Uses

The project site is located within a developed commercial and light industrial area; surrounding properties to the east, south and north are also designated and zoned IG and are occupied by a range of primarily industrial, truck service and salvage, and warehouse uses. Adjacent to the north is Eden Road, with the City boundary and a publicly owned property zoned by the City of Oakland for Heavy Industrial beyond. This property is largely vacant, with the northern portion used as a driving range for golfers. The nearest residential areas are located approximately 0.4 mile east of the site on Walden Avenue.

Additionally, the entire site lies within Zone 2 (Inner Approach/Departure Zone) for Oakland International ~~San Francisco Bay~~ Airport's North Field. This portion of the airport handles primarily air freight and general aviation flights.

Eden Road is unpaved, with an irregular surface and poor stormwater control. Work on a separate project to pave Eden Way and install stormwater control features is expected to be completed prior to commencement of the proposed project.

Regional access is available to the site from Interstate 880, located 0.6 mile east of the site, via State Route 112 (Davis Street). Local access to the site is also available from State Route 61 (Doolittle Drive).

### Existing Site Conditions Overview

The project site is generally level and is characterized by industrial activities and materials storage. There is virtually no vegetation on the project site. Surfaces on the portion of the project site where Alco's existing operations are located are generally paved, built-on, or compacted dirt and gravel. Many surfaces are covered with large steel plates. The proposed expansion area portion of the project site is compacted soil and gravel. No structures are located on the proposed expansion area; all structures on the project site are located on the portion of the project site where Alco's existing operations are located. A diagram showing the existing site conditions and operations is included on Figure 3. Photographs of existing conditions on the project site are shown in Figure 4a through Figure 4c.

The portion of the project site occupied by Alco's existing business has been in operation since 1953 and has a history of use and storage of petroleum products from at least 1959 until the early 1980s. Storage of liquid hazardous materials, petroleum products, and raw materials has been part of Alco's daily operations since the 1980s.

The proposed expansion area was used as an auto-wrecking facility from approximately 1955 until at least 2016, during which time hazardous materials, including polychlorinated biphenyls (PCBs) and petroleum products were likely stored on-site. From 2016 until recently, the proposed expansion area was used as a storage yard for an auto dismantler. The stored vehicles have been removed from the site, and currently, the site is vacant, although used for car and truck parking and to store empty overseas shipping containers.

### Existing Development and Operations

The existing structures on the portion of the project site with Alco's current facility are illustrated on Figure 2 and Figure 3 and consist of:

**Alco Iron & Metal Company Facility Expansion Project**

- Building A: a 7,000-square-foot, two-story building for purchasing (paying customers for) non-ferrous metal
- Building B: a 7,560-square-foot, open-sided building for scrap metal processing
- Building C: a 14,660-square-foot scrap metal storage building
- Building D: a 10,000-square-foot equipment maintenance building
- Building E: a 1,792-square-foot, open-sided equipment maintenance and truck washing building with an adjacent hazardous materials storage shed
- Building F: a 1,692-square-foot office building for purchasing ferrous metal, with an adjacent truck scale

The facility consists of two distinct, separate areas: 1) ferrous metal processing and maintenance, and 2) non-ferrous metal processing. The non-ferrous processing mostly occurs in the area with frontage on Davis Street. Ferrous metal processing mostly occurs in the area fronting on Doolittle and Eden Road.

Alco receives scrap metal from a variety of sources, including large industrial accounts, other recyclers, utility companies, contractors, and the general public. Once this material is received, it is sheared or baled and then packaged for shipment. Alco does not conduct industrial processes, such as smelting, on-site.

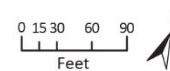
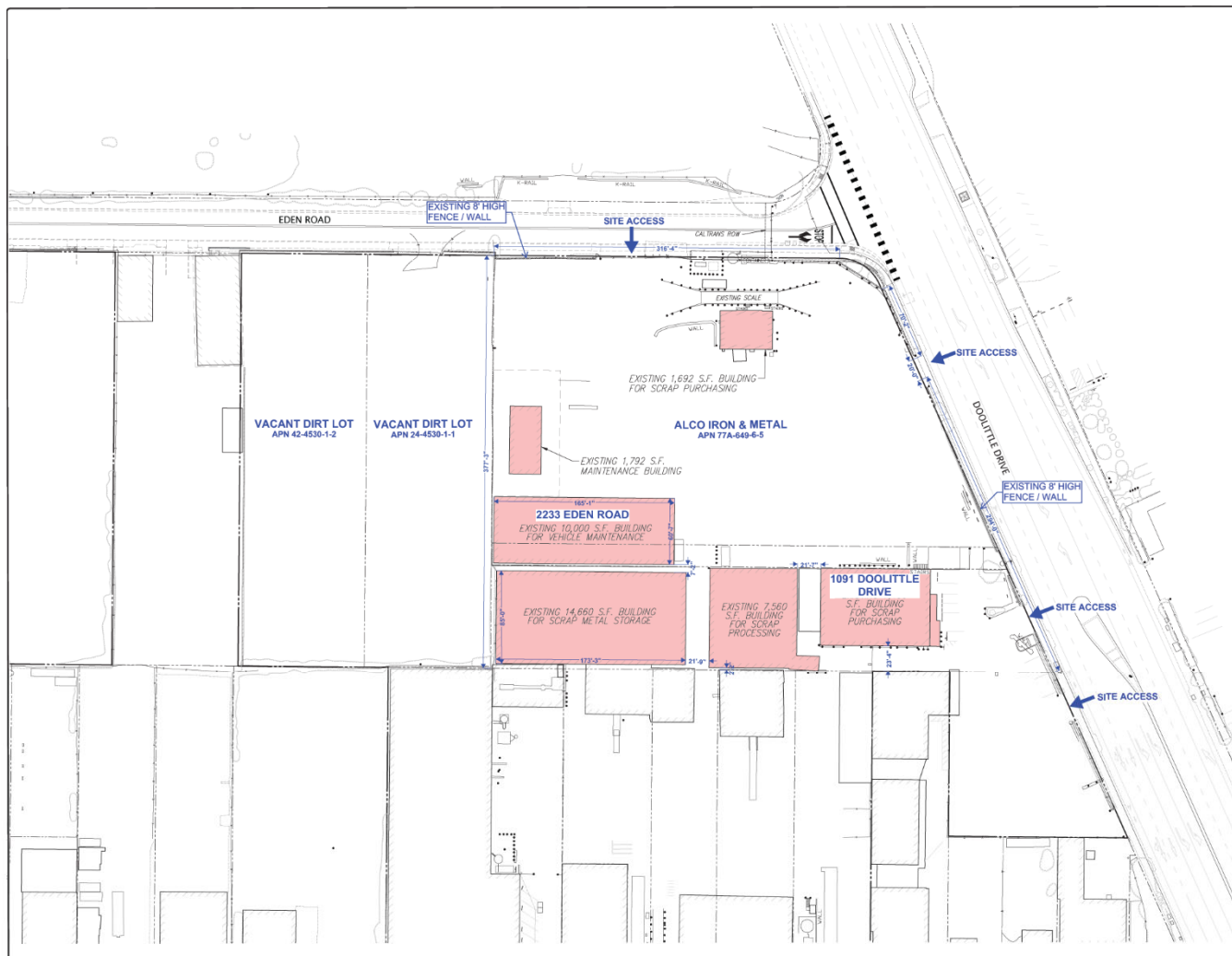
Existing operations include the following:

- Weighing incoming and outgoing loads of scrap metal on the truck scale
- Purchasing scrap metal from customers
- Unloading scrap metal from Alco and customer trucks
- Storing scrap metal (ferrous materials and non-ferrous materials)
- Processing metal to prepare for shipment, including cutting with large excavator-mounted shears
- Loading processed metal into either overseas export containers or large end-dump trailers
- Maintaining equipment, including excavators, forklifts and trucks
- Repairing and maintaining, including welding, equipment, trucks, and boxes
- Truck washing

Alco's four main scrap metal piles are located on the project site and include:

- The heavy steel pile is located in the northwest corner of the active portion of the project site. Material in this pile is processed with a shear attachment on an excavator and is mechanically cut into small pieces and loaded into overseas containers using a container loader.
- The unprepared heavy steel pile is located in the center of the active portion of the project site surrounding the ferrous metal purchasing building. The material is moved to the heavy steel pile when ready to be processed.
- The light tin steel pile is in the southern part of the active portion of the project site scrap metal processing building and non-ferrous metal purchasing building. The material is sorted and loaded into containers and shipped to other facilities in the Bay Area for further processing and export.

Figure 3 Existing Site Configuration



Source: Kier + Wright, 2025.

**Figure 4a Site Photographs**



**Photograph 1.** Interior of the portion of the site where Alco operations are active, looking west toward scrap metal pile adjacent to purchasing office.



**Photograph 2.** Interior of the portion of the site where Alco operations are active, looking southwest and showing existing truck circulation.



**Figure 4b Site Photographs**



**Photograph 3.** Interior of the proposed expansion area, looking north.



**Photograph 4.** Interior of the proposed expansion area, looking west.



**Figure 4c Site Photographs**



**Photograph 5.** View east on Eden Road from Eden Road adjacent to the driveway to the proposed expansion area.



**Photograph 6.** View from the main Doolittle Drive driveway to the portion of the site where Alco operations are active, looking south on Doolittle drive showing truck queuing.

- The torch cut pile is located on the east side of the ferrous scrap purchasing building. This pile contains thick heavy steel that cannot be mechanically cut. Torches are used to cut the metal into smaller pieces and then brought to the heavy steel pile for export.

Trucks access the project site via a two driveways on Doolittle Drive and a driveway on Eden Road. Due to the location of the truck scale, the majority of trucks utilize the Doolittle Drive driveway. Under existing conditions, truck movement through the property is highly congested, and trucks routinely queue for a substantial distance on Doolittle Drive awaiting access. The San Leandro Police Department (SLPD) has requested that trucks queue on Eden Road, when possible, rather than on Doolittle Drive to reduce traffic congestion. Eden Road adjacent to the site is currently used for truck and container staging.

Alco employs approximately 135 to 145 people at the project site and surrounding Alco operations and approximately 45 subcontractor drivers and contractors who are predominantly truck drivers. Alco currently operates between 4:00 a.m. and 12:00 a.m., Monday through Friday, and 5:00 a.m. to 12:00 p.m. on Saturday. Alco is open to the public from 6:00 a.m. to 5:00 p.m., Monday through Friday, and 6:00 a.m. to 12:00 p.m. on Saturdays. The facility does not have outdoor lighting which limits operations of most outdoor activities to daytime hours.

## 9. Project Description

The proposed project involves a Conditional Use Permit (CUP) to allow metal recycling to expand onto two lots adjacent to and west of the existing Alco facility along Eden Road. Further expansion of the use or site, specifically by the addition of new structures, the addition of new product lines, or the addition of additional property, would require modification of the CUP.

The proposed project would reconfigure the ferrous metal operations on the portion of the project site with Alco's existing operations and expand those operations to the proposed expansion area. The primary purposes of the project are to:

- Relocate the existing large scrap metal piles farther from Doolittle Drive
- Allow for better circulation on-site, thereby reducing traffic operations on Doolittle Drive
- Improve fire safety
- Improve stormwater control and treatment

Project details are described below, and the proposed site plan is shown in Figure 5.

Figure 5 Proposed Site Plan

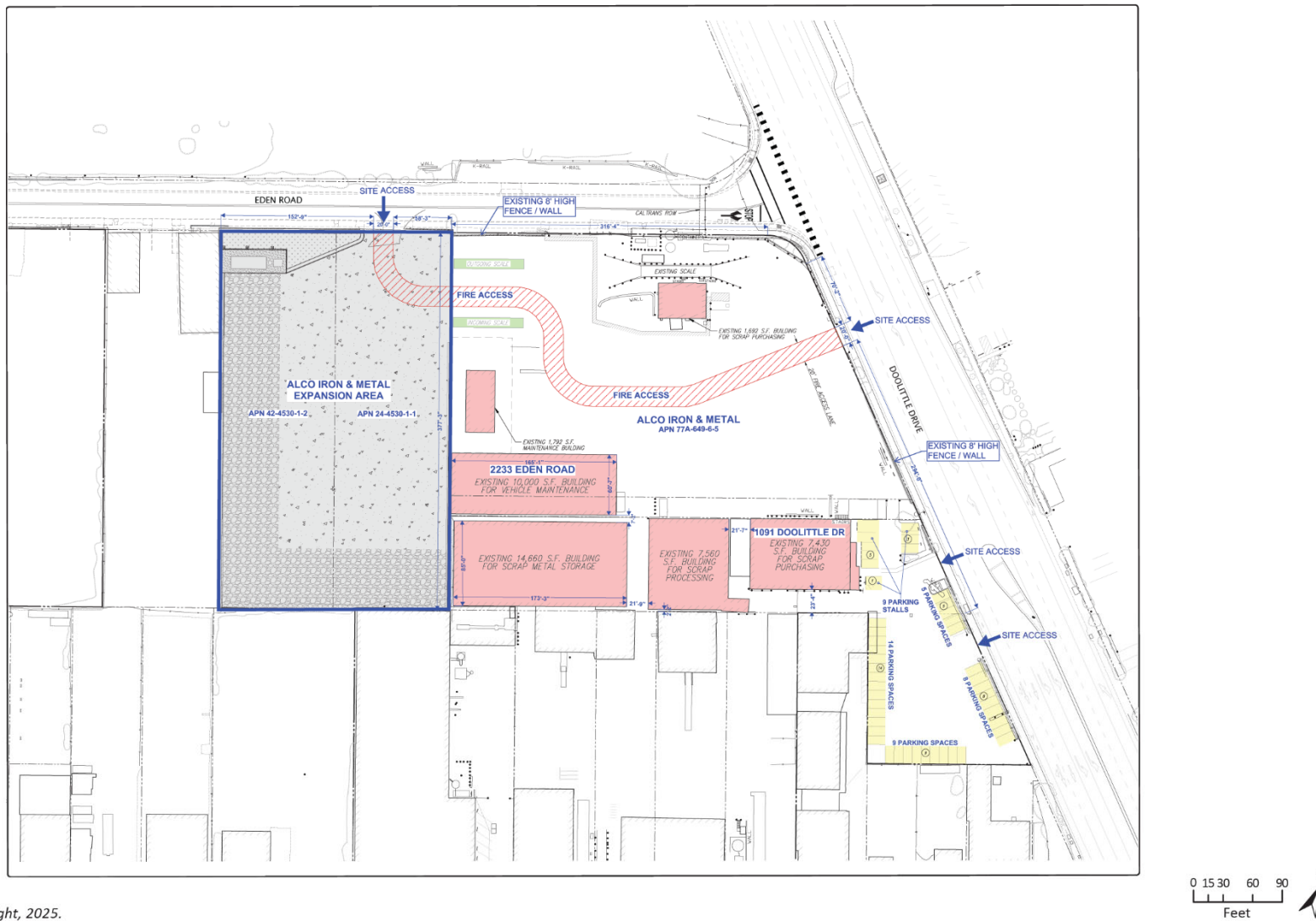
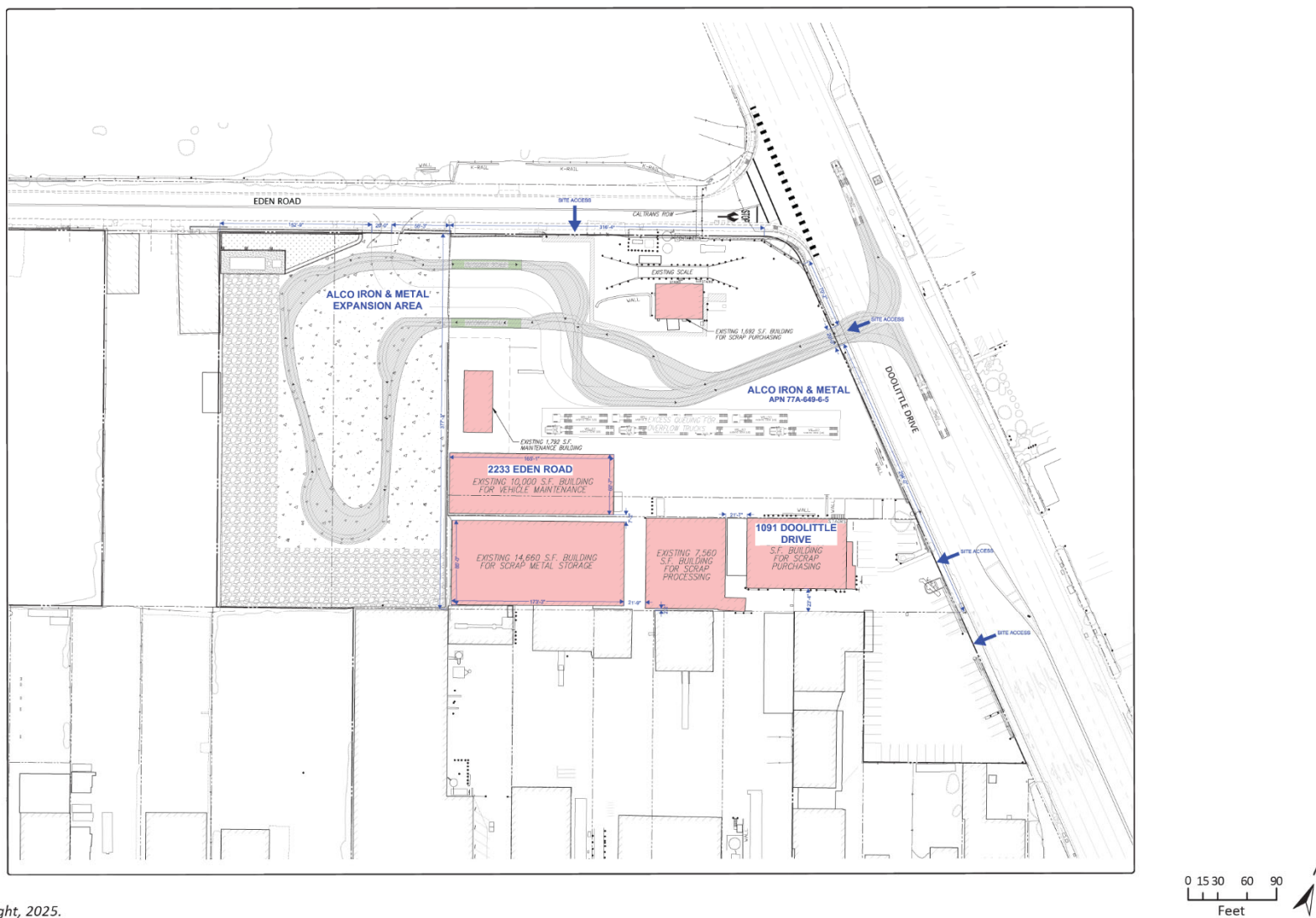


Figure 6 Proposed Truck Circulation Pattern



Source: Kier + Wright, 2025.



## **Proposed Physical Changes to the Project Site**

The project would involve new equipment and changes to the ground surface of the project site, as follows:

- The proposed expansion area would be paved and configured to drain to stormwater treatment facilities.
- A site access point would be added from Eden Road to the expansion area.
- An additional outgoing scale and incoming scale would be constructed east of the location of the existing scale.
- Damaged and missing pavement in the location of the existing scrap metal piles on the portion of the project site with Alco's existing operations would be repaired/replaced, and striping would be added for vehicle parking in the southern portion of the site.
- Demolition of frontage wall and construction of new frontage wall
- Landscaping and stormwater treatment facilities would be installed, primarily along Eden Road.
- Addition of 45 parking spaces near Buildings A and B and near the Doolittle Drive entrances

## **Proposed Operational Changes at the Project Site**

The following operational changes are proposed:

- A circulation pattern would be established wherein trucks would enter the site from Doolittle Drive, circulate through the site to the proposed expansion area, and then exit back onto Doolittle Drive. The Eden Road Access Gate would be used for overflow traffic to reduce traffic build-up on Doolittle Drive. The proposed circulation pattern is illustrated on Figure 6.
- Alco would relocate the existing scrap piles, which are located in the open area in the middle of the existing site plan, to the proposed expansion area. The larger size of the area allocated for scrap piles would allow for further segregation of materials and also reduced pile heights.
- The portion of the project site with Alco's existing operations would be used for truck queuing to reduce truck queuing on Doolittle Drive and Eden Road.
- The portion of the project site with Alco's existing operations would be used for container storage, rather than Eden Road.
- Installation of landscaping and stormwater treatment facilities, primarily along Eden Road

Operations at the site vary substantially by season, day of week, and time of day, making it difficult to quantify the amount of material being delivered to the site. However, according to the project proponent, the proposed project is not intended to increase the amount of materials received or processed at the facility but to improve handling of materials. Overall, the proposed project would not increase equipment use, employee count, hours of operation, or amount of material processed on-site.

## **Site Access and Circulation**

Truck access to the project site is currently provided via driveways on Doolittle Drive and the western portion of Eden Road, as shown on Figure 3. Eden Road was acquired by the City with the intention of improving it to City standards. This improvement was expected to be funded by Redevelopment funds. However, the elimination of Redevelopment activity by the State of

California resulted in the City being unable to fund this project. Instead, the City has transferred the property to a private firm, the parent company of Alco Metal, which will improve and maintain Eden Road as a private street. Improvements to Eden Road would occur independently from the proposed project and are not part of this project. The project includes a Condition of Approval from the City that Eden Road be paved and improved prior to the implementation of the Conditional Use Permit. Upon completion of these improvements, an access gate would be added to the eastern portion of Eden Road to provide secondary access to the project site, prevent traffic buildup, and eliminate truck queuing on Doolittle Drive. However, if Doolittle Drive becomes congested, Alco would utilize Eden Road for in-process truck queuing.

## **Hazardous Materials Handling and Disposal and Fire Safety**

Alco currently stores materials both indoors and outdoors. Indoor storage includes copper, brass, lead, zinc, and finished metal products, such as pipes, sheets, plates, and structural items. Outdoor storage includes all ferrous metals, including steel and iron, as well as aluminum and stainless steel.

Alco has developed and submitted a Hazardous Materials Business Plan (HMBP) to San Leandro Environmental Services, a Certified Unified Program Agency (CUPA).<sup>1</sup> This plan outlines procedures for handling, transporting, and disposing hazardous materials and is reviewed annually by the City.

Additionally, Alco has established a Quality Control Plan and a Housekeeping Plan to ensure that accepted materials are free of contaminants and other hazards and to maintain cleanliness and proper handling within the facility.

The proposed project would not introduce substantial amounts of additional hazardous materials on-site, nor would it involve the storage of hazardous materials in the proposed expansion area.

Alco has also prepared a Fire Protection Plan to ensure fire safety which includes:

- Procedures for promptly contacting the Alameda County Fire Department (ACFD) for immediate support during incidents and ensuring clear access for their vehicles and personnel
- Procedures for contacting the airport and other relevant entities during a fire event
- Installation of on-site firefighting equipment, including fire suppression water tanks and a truck-mounted foam system
- A contract with AP Triton or another third-party fire company to conduct annual inspections of the site and equipment
- Re-training all employees on the Fire Protection Plan

## **Stormwater and Drainage**

The proposed expansion area would be ~~fully paved~~ covered in metal plates and would include a stormwater pre-treatment and filtration system in the northwestern corner, along with storm drain catch basins distributed throughout the area.

## **Utilities and Public Services**

Water would be provided to the project site by the East Bay Municipal Utility District (EBMUD). Wastewater treatment for the project site would be served by the Oro Loma Sanitary District (OLSD). The City of San Leandro Department of Public Works owns and maintains 175 miles of storm

<sup>1</sup> A Certified Unified Program Agency is a local agency certified by the California Environmental Protection Agency to implement and enforce state hazardous waste and hazardous materials regulatory management programs.

drain conduits throughout the city. The project would continue to connect to the existing storm drain system operated and maintained by the City. Electricity would be provided to the project site by Ava Community Energy (ACE) via Pacific Gas and Electric Company (PG&E) infrastructure. Infrastructure capable of supporting electric and telecommunications is present at the project site and in the project vicinity. The project site would be served by existing public services within the city. The ACFD would provide fire protection and emergency medical service to the project site. SLPD would provide law enforcement services to the project site.

## 10. Site Preparation and Construction

Construction activities on the existing site would encompass the removal of fencing between the current site and the proposed expansion area, striping of parking areas, repair of damaged pavement, installation of an additional truck scale, and installation of on-site firefighting equipment, including a truck-mounted foam system. Construction activities in the proposed expansion area would include grading, installation of catch basins and a stormwater management system, paving, and enhancements to the frontage, such as fencing, landscaping, and stormwater treatment facilities.

Pursuant to Section 4-1.1115 of the San Leandro Municipal Code (SLMC), construction would occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 7:00 p.m. on Saturday and Sunday. Construction is anticipated to last approximately 30 days. Construction would require the following equipment:

- 10 excavator cranes
- 40 forklifts
- 35 trucks, trailers, and pickup trucks
- Grapple, shear, thumb-claw buckets, and magnet attachments
- Recycling equipment, such as balers, container loaders, skid steers, and wire choppers

Approximately 16 round haul truck trips would be required for bringing construction materials (paving materials and new scale) to the project site, and approximately eight haul truck round trips would be required for hauling the demolished frontage wall. Construction would not require the import or export of soil material from grading.

## 11. City of San Leandro Permits and Approvals Required

The proposed project would require approval of a CUP from the City of San Leandro.

## 12. Other Public Agencies Whose Approval is Required

It is anticipated that the Airport Land Use Commission (ALUC) will review this project at a public hearing. ALUC will either approve the project, approve it with conditions, or recommend denial. Therefore, ALUC is considered a responsible agency.

Should the project require work within the California Department of Transportation (Caltrans) right-of-way along Doolittle Drive, an Encroachment Permit may be required. The City of San Leandro will include the following Condition of Approval for the project:

“The applicant is responsible for obtaining the approval of all participating regulatory and non-City agencies. The applicant shall obtain an Encroachment Permit from the State of California Department of Transportation (Caltrans) for all work within the state right-of-way.”

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

No California Native American tribes have requested notification of new development within San Leandro. Additional information regarding consultation is included in Environmental Checklist Section 18, *Tribal Cultural Resources*.



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## Environmental Factors Potentially Affected

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

- |                                                          |                                                             |                                                                        |
|----------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Energy                                        |
| <input type="checkbox"/> Geology and Soils               | <input type="checkbox"/> Greenhouse Gas Emissions           | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality     | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                           | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                      | <input type="checkbox"/> Transportation                     | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems   | <input type="checkbox"/> Wildfire                           | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## Determination

Based on this initial evaluation:

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

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

*Cynthia Lemaire*

January 12, 2026

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Signature

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Date

Cynthia Lemaire

Senior Planner

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Printed Name

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Title

# Environmental Checklist

## 1 Aesthetics

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

### Setting

The visual character of the site is dominated by industrial equipment and structures, truck circulation, and bins and piles of scrap metal. Surrounding land uses are also industrial. Landscaping is sparse or nonexistent on the site and immediately surrounding parcels.

The nearest officially designated or eligible State Scenic Highway is Interstate 580 (I-580), which is officially designated as a State Scenic Highway north of San Leandro Creek and eligible for designation south of San Leandro Creek (Caltrans 2018). The project site is approximately 1.75 miles southeast of this segment of I-580.

### Regulatory Setting

*San Leandro 2035 General Plan*

The following Land Use Element policy of the *2035 General Plan* describes the intended aesthetic vision for the project area.

## LAND USE ELEMENT

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

**Action LU-7.6.D Eden Road.** Improve the Eden Road/ West Davis area in a manner that attracts higher value industrial land uses and improves the appearance and image of this area. This should include paving of Eden Road and frontage improvements on adjacent properties.

### *San Leandro Zoning Code*

The project site is zoned as Industrial General. The SLZC establishes use and development regulations for industrial districts. These regulations are summarized below in Table 1.

**Table 1 Industrial General Development Regulations**

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

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

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

## Impact Analysis

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

A scenic vista is a panoramic view from an elevated position or a long-range view from a public vantage point. This can include views of natural features or of the built environment, when architecture and landscaped boulevards offer high-value views of an area considered important to the sense of place.

The *2035 General Plan* does not formally recognize specific scenic vistas in the city. However, the *2035 General Plan* does designate scenic views, which the City has identified as aesthetic priorities that contribute to a sense of place. These scenic views include long-range views of the San Francisco



Bay to the west and views of hills above I-580 to the east. Due to topography, intervening development and distance, there are no views of the San Francisco Bay to the west or hillsides to the east through the project site from public viewpoints. The proposed expansion and reconfiguration would not introduce substantially taller structures or equipment and would not alter views through the site. The project would not result in an adverse effect on a scenic vista, and there would be no impact.

**NO IMPACT**

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

I-580 is a designated State Scenic Highway north of San Leandro Creek and eligible for designation south of San Leandro Creek (Caltrans 2018). There are no scenic resources, including trees, rock outcroppings, or historic buildings on the site, and the site is not clearly visible from I-580. Implementation of the project would have no effect on scenic resources in view of a State Scenic Highway. There would be no impact.

**NO IMPACT**

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

The project is located in an urbanized, developed, industrially zoned part of San Leandro surrounded by existing industrial and warehouse uses. The proposed operational changes at the facility and the construction of the additional truck scale and reconstruction of the frontage wall would be located on already disturbed, paved, and developed areas of the existing lots. The operational changes would have little effect on the site's overall visual character and would be consistent with the surrounding visual character. However, the Expansion Area would be ~~paved~~ covered in metal plates to accommodate the relocation of existing scrap piles and improvement of circulation, which would change the existing visual character of the site. Table 2 below shows policies and standards from the City's 2035 General Plan that govern scenic quality and demonstrates the project's consistency with both.

**Table 2 Project Consistency with General Plan and Municipal Code**

| Policy/Standard                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Project Consistency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>City of San Leandro 2035 General Plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Policy CD-6.8. Commercial and Industrial Standards.</b> Improve the visual appearance of the City's commercial and industrial areas by applying high standards of architectural design and landscaping for new commercial and industrial development and the re-use or remodeling of existing commercial and industrial buildings.                                                                                                                                                                                                                | <b>Consistent.</b> Surfaces on the portion of the site where Alco's existing operations are located are generally paved, built-on, or compacted dirt and gravel. Many surfaces are covered with large steel plates. The proposed expansion area is compacted soil and gravel and currently used for car and truck parking and to store empty overseas shipping containers. No structures are located or proposed to be located in the expansion area. The existing buildings on the site would remain, but damaged and missing pavement in the location of the existing scrap metal piles on the portion of the project site with Alco's existing operations would be repaired or replaced, improving the visual appearance of the site. The proposed expansion area would be <u>paved-covered in metal plates</u> and landscaping would be installed along Eden Road, further enhancing the overall appearance of the proposed expansion area. |
| <b>Policy LU-8.5. Commercial Uses With An Industrial Character.</b> Maintain areas in the City that are appropriate for lumberyards, construction suppliers, automotive repair shops, and other commercial uses that are industrial in character or that are typically located in industrial areas. While development standards in these areas should respect the operational characteristics of these uses, they should still promote aesthetic improvements, adequate buffering for nearby uses, traffic safety, and a more positive visual image. | <b>Consistent.</b> The project would allow the expansion of operations onto the two parcels west of the existing facility and improving circulation within the site and along Eden Road and Doolittle Drive. Existing land uses surrounding the project site include industrial and commercial uses. Therefore, the proposed warehouse would be consistent with the existing commercial and industrial character of the project site surroundings. Additionally, the proposed project would include repairing/replacing damaged and missing pavement on the existing site and paving and adding landscaping to the proposed expansion area, which would result in aesthetic improvements compared to existing conditions. Therefore, the project would be consistent with this policy.                                                                                                                                                          |
| Source: City of San Leandro 2016                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

As shown in Table 2, the proposed project would be consistent with the City's *2035 General Plan* policies related to scenic quality. Approval of the CUP would not result in the construction of new buildings. The proposed expansion area would be consistent with the SLZC's IG zoning designation with City approval of the CUP to allow for the transport and storage of hazardous wastes on-site. Therefore, this impact would be less than significant.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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

The project site is in an industrial area with moderate levels of existing lighting. Lighting sources around the project site include lights in structures, several tall light standards to illuminate on-site operations, streetlights on Doolittle Drive, and lights from vehicles on Doolittle Drive and Eden Road. The primary source of glare in the area is sunlight reflected off light-colored and reflective building materials and finishes, metal materials awaiting processing or sale, and metallic and glass surfaces of vehicles on-site and on surrounding streets.

The proposed project would continue existing operations and would not add substantial new sources of light or glare at the project site. The nearest residences to the project site (approximately 0.4 mile to the east) would not be substantially affected by site lighting due to distance and

intervening development. The project would not substantially alter light or glare conditions in the vicinity.

As further discussed in Section 8, *Hazards and Hazardous Materials*, and Section 11, *Land Use and Planning*, the project site is within the Airport Influence Area (AIA) and within Airport Safety Zone 2 (Inner Approach/Departure Zone) for the Oakland San Francisco Bay Airport. According to Section 3.3.3.3.7 of the *Oakland International Airport Land Use Compatibility Plan (ALUCP)*, land uses that may cause visual, electronic, navigational, or bird strike hazards to aircraft in flight shall be allowed within the AIA only if the uses are consistent with Federal Aviation Administration (FAA) rules and regulations. According to this policy, specific characteristics to be avoided include glare or distracting lights that could be mistaken for airport lights. The project would continue existing operations and would not add substantial new sources of light or glare at the project site that would cause glare in the eyes of pilots or would be mistaken for airport lighting.

Impacts related to project light and glare would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**

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## 2 Agriculture and Forestry Resources

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

### Setting

The project site is located within an urban area of San Leandro and is zoned for industrial uses, as are surrounding parcels.

The California Department of Conservation (DOC) manages the Farmland Mapping and Monitoring Program to assess and record suitability of land for agricultural purposes. In each county, the land is analyzed for soil and irrigation quality. The highest quality land is designated as Prime Farmland. According to the Alameda County Important Farmland Map prepared by the DOC, the project site and vicinity are designated as Urban and Built-Up Land, and the site does not have any identified agriculture or forest land (DOC 2016).

## Impact Analysis

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

The project site is not designated as, is not adjacent to, and is not proximate to lands classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown by maps prepared by the DOC's Farmland Mapping and Monitoring Program maps (DOC 2016a). The reconfiguration and expansion of the existing use would not result in the rezone of an agricultural use to a non-agricultural use. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by project implementation and no impact would occur.

### NO IMPACT

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

The project site and surrounding areas are not subject to Williamson Act contracts (DOC 2016b). No Williamson Act contracts would be affected by project implementation and no impact would occur.

### NO IMPACT

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

The project site is developed with existing industrial uses and does not currently provide forest or timber resources and would not be used for forest and timber resources. The project would not convert forest or timberland uses, and no impact would occur.

### NO IMPACT



### 3 Air Quality

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

Information in this section is based on the *Air Quality and Greenhouse Gas Emissions Technical Report* prepared for the project by RCH Group in September 2024. This report was peer reviewed by Rincon Consultants, Inc. (Rincon). The *Air Quality and Greenhouse Gas Emissions Technical Report* is included as Appendix A.

#### Setting

The project site is in the San Francisco Bay Area Air Basin (the Basin), which is under the jurisdiction of the Bay Area Air District (BAAD), the local air quality management agency.<sup>2</sup> BAAD is required to monitor air pollutant levels to ensure that applicable federal and state air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The Basin is in nonattainment for the federal and state standards for ozone, as well as state standards for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and the federal standard for 24-hour PM<sub>2.5</sub> (BAAD 2014). As a result, local jurisdictions in the Basin are required to implement strategies to reduce pollutant levels to recognized acceptable standards or avoid or mitigate new development projects that would contribute to air pollution.

The 2017 Clean Air Plan (2017 Plan) is the most recently approved regional air quality management plan, adopted in April 2017 by BAAD. This plan provides an integrated, multipollutant strategy to improve air quality, protect public health, and protect the climate. The 2017 Plan is designed to provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases (GHG) in a single, integrated plan. The 2017 Plan relies on population and employment forecasts

<sup>2</sup> Formerly known as the Bay Area Air Quality Management District. The name was changed after the preparation of the *Air Quality and Greenhouse Gas Emissions Technical Report*.

from the Association of Bay Area Governments (ABAG) to inform its management strategies (BAAD 2017).

The City of San Leandro has a Climate Action Plan (CAP) that includes goals related to improving air quality and promoting sustainable growth and operations (City of San Leandro 2009). Additional information about the City's CAP and an evaluation of the proposed project's consistency with the CAP are provided in Section 7, *Greenhouse Gas Emissions*.

The California Environmental Protection Agency (CalEPA) identifies "Disadvantaged Communities," which are areas disproportionately affected by environmental pollution, economic factors, and other hazards that can lead to negative health effects. According to the CalEnviroScreen scores included in the *Air Quality and Greenhouse Gas Emissions Technical Report* (Appendix A to this IS-MND), the project site has a CalEnviroScreen score of 87. A high score (greater than 50) indicates a higher pollution burden compared to other census tracts in the state. According to the *2035 General Plan* Environmental Justice Element Figure 12-1, the project site is also within a San Leandro Environmental Justice Community, which is an area with a CalEnviroScreen score greater than 75. The project site is also located near the boundary of the East Oakland Community Emissions Reduction Plan (Air District 2025).

## **Regulatory Setting**

### *California Clean Air Act*

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

### *California Low-Emission Vehicle Program*

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

### *California On-Road Heavy-Duty Vehicle Program*

CARB has adopted standards for emissions from various types of new on-road heavy-duty vehicles. Section 1956.8, Title 13, CCR contains California's emission standards for on-road heavy-duty

engines and vehicles and test procedures. CARB has also adopted programs to reduce emissions from in-use heavy-duty vehicles, including the Heavy-Duty Diesel Vehicle Idling Reduction Program, Heavy-Duty Diesel In-Use Compliance Program, Public Bus Fleet Rule and Engine Standards, and School Bus Program and others.

#### *Verified Diesel Emission Control Strategies*

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

#### *California Diesel Risk Reduction Plan*

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

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

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

#### *City of San Leandro General Plan*

The current City's *2035 General Plan* contains objectives and policies that minimize air pollutant emissions and reduce population exposed to significant health risk. The following objectives and policies from the City's *2035 General Plan* are relevant to air quality and apply to the project:

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

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

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

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

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

#### *San Leandro 2021 Climate Action Plan*

The City adopted its 2021 CAP in July 2021. The 2021 CAP is the City's comprehensive strategy to reduce GHG emissions and to adapt to changing climate conditions. The CAP allows City decision-makers, staff, and the community to understand the sources and magnitude of local GHG emissions and the impacts of climate change on the community, reduce GHG emissions, prioritize steps to achieve GHG emission-reduction targets, and increase resilience. None of the GHG reduction strategies in the 2021 CAP are applicable to the project.

### **Significance Thresholds**

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

Table 3 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions used for the purposes of this analysis. These represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin existing air quality conditions. For the purposes of this analysis, the project would result in a significant impact if construction or operational emissions would exceed any of the thresholds shown in Table 3.

**Table 3 Criteria Air Pollutant Significance Thresholds**

| Pollutant         | Construction Thresholds                                        | Operational Thresholds            |                                      |
|-------------------|----------------------------------------------------------------|-----------------------------------|--------------------------------------|
|                   | Average Daily Emissions (lbs/day)                              | Average Daily Emissions (lbs/day) | Maximum Annual Emissions (tons/year) |
| ROG               | 54                                                             | 54                                | 10                                   |
| NO <sub>x</sub>   | 54                                                             | 54                                | 10                                   |
| PM <sub>10</sub>  | 82 (exhaust)                                                   | 82                                | 15                                   |
| PM <sub>2.5</sub> | 54 (exhaust)                                                   | 54                                | 10                                   |
| Fugitive Dust     | Construction Dust Ordinance or other Best Management Practices |                                   | Not Applicable                       |

ROG = reactive organic gases, NO<sub>x</sub> = nitrogen oxides, PM<sub>10</sub> = particulate matter 10 microns in diameter or less, PM<sub>2.5</sub> = particulate matter 2.5 microns in diameter or less; lbs/day = pounds per day, BAAD = Bay Area Air District

Source: BAAD 2022

BAAD maintains rules and regulations to regulate sources of air pollution. Applicable rules and regulations are listed below. Additionally, BAAD does not have quantitative thresholds for fugitive dust emissions during construction. Instead, BAAD recommends that best management practices (BMPs) be implemented to reduce fugitive dust emissions, which are also listed below.

## Impact Analysis

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

As discussed previously, BAAD's 2017 Clean Air Plan is the applicable air quality plan to the Project (see Regulatory Setting for the primary goals and key highlights of the plan). BAAD guidance for project-level analysis focuses on the attainment of criteria air pollutant emissions thresholds. As presented in the subsequent impact discussions, the project would not exceed BAAD's thresholds of significance for criteria pollutant emissions. Furthermore, there are no applicable control measures that are applicable to the project, nor would the project hinder the implementation of the control measures. Approval of the CUP would allow for site improvements at an existing industrial facility that would result in a reduction in air pollution emissions over the lifetime of the project. The overall purpose of BAAD's 2017 Clean Air Plan is to reduce air pollution emissions. Therefore, the project would not conflict with or obstruct implementation of the 2017 Clean Air Plan and would result in a less-than-significant impact.

### **LESS-THAN-SIGNIFICANT IMPACT**

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

## Construction Emissions

Project construction would require site grading, paving, demolition of unpermitted walls, broken pavement repair, and installation of the new truck scale. Construction would be limited, and the project site does not include features that would require unusually high energy usage. Construction would be short term (approximately 31 working days) and would require various pieces of equipment, such as a backhoe, grader, forklift, paving equipment, and concrete trucks. Approval of the CUP would not require the import or export of soil material from grading. Approximately 16

round haul truck trips would be required for bringing construction materials (paving materials and new scale) to the project site, and approximately eight haul truck round trips would be required for removing the demolished wall.

Construction emissions were calculated in the California Emissions Estimator Model (CalEEMod), a statewide land use emissions computer model developed for the California Air Pollution Officers Association in collaboration with the California air districts. The model inputs assumed construction would occur eight hours per day over approximately 31 working days. Table 4 displays the maximum daily construction emissions for the project (assuming a construction year of 2025). Maximum daily construction emissions were compared to average daily thresholds to be conservative due to the short duration of construction activities. Detailed modeling assumptions and results are provided in Attachment A.

**Table 4 Project Maximum Daily Construction Emissions**

| Condition                                         | Estimated Maximum Daily Emissions (lbs/day) |                 |                          |                           |
|---------------------------------------------------|---------------------------------------------|-----------------|--------------------------|---------------------------|
|                                                   | ROG                                         | NO <sub>x</sub> | Exhaust PM <sub>10</sub> | Exhaust PM <sub>2.5</sub> |
| Maximum Daily Construction Emissions <sup>1</sup> | 0.87                                        | 7.78            | 0.29                     | 0.27                      |
| <b>BAAD Thresholds</b>                            | <b>54</b>                                   | <b>54</b>       | <b>82</b>                | <b>54</b>                 |
| Threshold Exceeded?                               | No                                          | No              | No                       | No                        |

ROG = reactive organic gases, NO<sub>x</sub> = nitrogen oxides, PM<sub>10</sub> = particulate matter 10 microns in diameter or less, PM<sub>2.5</sub> = particulate matter 2.5 microns in diameter or less; lbs/day = pounds per day, BAAD = Bay Area Air Quality Management District

<sup>1</sup> PM10 and PM2.5 construction thresholds of significance apply to exhaust emission only. Fugitive PM10 and PM2.5 (fugitive dust) are considered to be less than significant if best management practices are implemented.

Source: California Air Pollution Officers Association 2022; RCH Group 2024

Construction-related fugitive dust emissions would vary from day-to-day, depending on the level and type of activity, silt content of the soil, and weather. In the absence of mitigation, construction activities may result in significant quantities of dust, and as a result, local visibility and PM<sub>10</sub> concentrations may be adversely affected on a temporary and intermittent basis during construction. In addition, the fugitive dust generated by construction would include not only PM<sub>10</sub>, but also larger particles, which would settle out of the atmosphere within several hundred feet of the project site and could result in nuisance-type impacts. The BAAD considers fugitive dust impacts to be significant unless BMPs are implemented. Furthermore, dust emissions could affect visibility for aircraft in proximity to the Oakland San Francisco Bay Airport. Therefore, this impact is potentially significant and Mitigation Measure AQ-1 is required.

### Operational Emissions

Once the project is operational, approximately 1,000 kilowatt hours (kWh) of electricity would be required annually to power the additional truck scale during project operations. This electricity usage is considered minor, since in 2020, the average annual electricity consumption for a United States residential utility customer was approximately 11,000 kWh per year. This electricity consumption would not generate criteria pollutant emissions.

The project would also decrease criteria air pollutant emissions during project operations by reducing truck idling through improved truck circulation. It is estimated that on average approximately 90 vehicles queue at the scale per day and that each vehicle idles for approximately 10 minutes while on-site. Project implementation would not be expected to increase throughput or vehicles at the site but would result in an estimated 50 percent reduction in truck idling through

improved truck circulation and reduced queueing time. According to the United States Department of Energy, a heavy-duty truck consumes approximately 0.8 gallon of fuel per hour of idling (Appendix A). Thus, the project would result in a reduction of 6 gallons of diesel fuel per day or 1,872 gallons of diesel fuel per year, assuming six days per week of operation. The reduction in fuel usage would also result in a reduction in criteria air pollutant emissions from engine combustion. Therefore, project operation would result in a less-than-significant impact.

### **Mitigation Measure**

The following mitigation measure is required.

#### *AQ-1 BAAD Best Management Practices for Construction-Related Fugitive Dust Emissions*

The Applicant shall implement the following Bay Area Air District (Air District) recommended basic construction mitigation measures during project construction (Air District 2022):

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

### **Significance After Mitigation**

Implementation of Mitigation Measure AQ-1 would reduce the potential for project construction activities to result in fugitive dust impacts. By minimizing dust generation, Mitigation Measure AQ-1 would also reduce the potential for fugitive dust to impair visibility for aircraft during ascent and descent near Oakland San Francisco Bay Airport. Implementation of these practices ensures compliance with air quality standards and addresses visual safety concerns by preventing dust plumes that could interfere with pilots' line of sight. Implementation of this measure would reduce project impacts related to air quality to a less-than-significant level.

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**



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

Land uses such as residences, schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive than the general public to poor air quality, because the population groups associated with these uses have increased susceptibility to respiratory distress. According to BAAD, workers are not considered sensitive receptors, because all employers must follow regulations set forth by the Occupation Safety and Health Administration to ensure the health and well-being of their employees. BAAD considers the relevant zone of influence for an assessment of air quality health impacts to be within 1,000 feet of a project site. The nearest sensitive receptors are residences approximately 0.4 mile east of the project site.

Project construction would generate negligible TAC emissions based upon the short duration (approximately 30 days of construction) and low intensity of construction operations. According to the Office of Environmental Health Hazard Assessment, health risks need not be assessed for less than two months of activity, as TAC emissions during such brief periods are considered less than significant. Furthermore, the nearest sensitive receptors are 0.4 mile east of the project site.

Project operation would result in a decrease in TAC emissions by reducing truck idling through improved truck circulation. Because the project would decrease TAC emissions from existing trucks and the project would not add new sources of TACs, a health risk assessment is not required. Furthermore, because the project would reduce idling from existing trucks and would not generate new vehicle trips, carbon monoxide hotspots would also be decreased. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**

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

The project would not generate substantial new odors, and the nearest sensitive receptors are approximately 0.4 mile east of the project site. The project does not propose operational changes at the existing facility and would only include site improvements. Construction activities are not a significant source of odors. Therefore, the project would have no impact.

**NO IMPACT**

## 4 Biological Resources

|                                                                                                                                                                                                                                                                                                                      | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less-than-<br>Significant<br>Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| Would the project:                                                                                                                                                                                                                                                                                                   |                                      |                                                                |                                     |                                     |
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/>             | <input checked="" type="checkbox"/>                            | <input type="checkbox"/>            | <input type="checkbox"/>            |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?                                                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The analysis in this section is based in part on a biological constraints analysis prepared by Coast Ridge Ecology in September 2024 and included in Appendix B. This report was peer reviewed by Rincon.

## Setting

The current facility consists of industrial warehouses and storage areas for various large-scale industrial recycling operations. The 2-acre proposed expansion area consists of two lots adjacent to (northwest of) the existing facility. These lots have been heavily disturbed by industrial land uses such as warehousing and dismantling automobiles for at least 10 years as shown in historical imagery from Google Earth. The majority of soils on-site have been heavily disturbed by regular vehicle traffic or are covered with gravel, sand or asphalt.

The site is relatively flat, approximately 10 feet above mean sea level. Saline emergent wetland, annual grassland, lacustrine, and urban habitat cover types all occur within 1 mile of the site.

The existing facility occupies the majority of the site and consists of existing storage warehouses, open-sided and enclosed buildings, and large areas occupied with storage of recyclable materials and heavy equipment. The borders of this facility contain a few landscaped areas with predominantly non-native vegetation along Doolittle Drive, including cherry plum (*Prunus cerasifera*), heavenly bamboo (*Nandina domestica*), cultivated azalea (*Rhododendron* sp.), and other ornamental shrubs. Native coast redwood (*Sequoia sempervirens*) trees were planted at the corner of Doolittle Drive and Davis Street (Appendix B).

Eden Road is an unpaved access road connecting properties along Eden Road to Doolittle Drive to the east. Tall vegetation growing along the northside of the access road consists of predominately of invasive non-native shrubs and grasses, including large pampas grasses (*Cortaderia* sp.), panic veldt grass (*Ehrharta erecta*), Bermuda buttercup (*Oxalis pes-caprae*), bristly ox-tongue (*Helminthotheca echinoides*), and English plantain (*Plantago lanceolata*). Other invasive species occurring along the access road include periwinkle (*Vinca* sp.), English ivy (*Hedera helix*), and fennel (*Foeniculum vulgare*). Also present were a handful of native willowherb (*Epilobium* sp.) and California poppy (*Eschscholzia californica*) plants. One large eucalyptus tree (*Eucalyptus* sp.) is located at the intersection of Eden Road with Doolittle Drive. Visible portions of the drainage did not appear to be holding water or supporting hydrophytic or brackish vegetation. This drainage does not appear to be influenced by tidal activity (Appendix B).

A small number of large native shrubs are located along the property boundary with Eden Road/the golf course, namely, a coast silk tassel (*Garrya elliptica*) and several tall coyote brush (*Baccharis pilularis*). The shrubs appear to reach 10 feet tall on average. Together, this loosely formed stand of native plants forms a *Garrya elliptica* Provisional Shrubland Alliance, also known as coastal silk tassel scrub. It does not qualify as a sensitive natural community (Appendix B).

The proposed expansion area in the northwest portion of the site consists of heavily disturbed and mostly bare leveled ground substantially covered with gravel or sand. A few piles of metal, rock, asphalt or other materials are accumulated in heaps that were small relative to the expanse of bare ground.

Wildlife observed during the site visit included primarily nonnative and native bird species adapted to urban areas. Species included birds that were either utilizing the vegetation along the edges of the site, or were spilling over from the neighboring water treatment plant which supported high levels of bird activity. Species observed included European starling (*Sturnus vulgaris*), brown-headed

cowbird (*Molothrus ater*), and California towhee (*Melospiza crissalis*). No bird nests were observed in vegetation or crevices formed by buildings and fencing.

## **Regulatory Setting**

### *Federal and State*

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

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

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

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

### *Local*

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

### **SAN LEANDRO MUNICIPAL CODE SECTION 5-2-220**

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

- (d) There may be imposed a Condition of Approval for all parcel and subdivision maps that the subdivider plant street trees at such locations and in such manner as may be determined by the Director.

## **Impact Analysis**

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

As described in the *Setting* section above, the project site is in a heavily disturbed industrialized area of San Leandro and has been previously developed with industrial warehouses, storage and limited perimeter landscaping, including trees (Appendix B). The Doolittle Drive frontage of the existing facility is landscaped with predominantly non-native vegetation, including cherry plum (*Prunus cerasifera*), heavenly bamboo (*Nandina domestica*), cultivated azalea (*Rhododendron* sp.), and other ornamental shrubs, and native coast redwood (*Sequoia sempervirens*) trees (Appendix B).

Within 3 miles of the site, there are occurrences of northern coastal salt marsh and valley needlegrass grassland sensitive natural communities (California Natural Diversity Database 2019), as well as other habitat cover types (2035 *General Plan*). The lack of intact grassland areas, tidally influenced areas and water sources means that site conditions do not provide habitat for these communities. Coastal silk tassel scrub was observed near Eden Road, but this vegetation alliance is not indicated “sensitive” on a list of California’s sensitive natural communities (CDFW 2018). Sensitive natural communities were not observed and are not expected on the project site.

Four invertebrate special-status species have documented occurrences within 1 mile of the project site: California brackish water snail, San Francisco fork-tailed damselfly, western bumble bee, and western monarch butterfly. The eucalyptus tree on Eden Road likely is insufficient overwintering habitat for monarch butterfly (The Xerces Society 2018). Lack of flowing water or permanent standing water sources on the project site mean that site conditions do not provide the types of habitat that are likely to support the other three insect species. No invertebrate special-status species were observed during the site visit.

Four plant special-status species have documented occurrences approximately 1 mile from the project site: California seablite, Congdon’s tarplant, alkali milk-vetch, and woodland woollythreads. A few small pockets of vegetation were observed on the edges of the project site, and these were composed predominantly of non-native and invasive plant species. The project site has very little potential for special-status plant species due to the extensively disturbed conditions of the site. These four plant species were not observed and are not expected to occur based on the lack of suitable habitat to support them.

Four special-status wildlife species have documented occurrences within 1 mile of the project site: longfin smelt, Alameda song sparrow, western snowy plover, and salt-marsh wandering shrew. These species require habitats not present on-site (i.e., marine, wetland, salt-marsh, or sandy shore habitats). The project site does not support habitat for special-status mammals, birds, reptiles, amphibians or fish. Based on the activity on-site within the existing structures and lack of suitable bat roosting habitat, bat species, including special-status bats are not expected to occur. Special-status wildlife was not seen during the site visit and is not expected to occur.

The project site does not support viable habitat for special-status wildlife or plant species, or sensitive natural communities. The site does not contain riparian habitat and is not located within a known regional wildlife movement corridor or other sensitive biological area as indicated by the USFWS Critical Habitat portal (USFWS 2025; Appendix B). Based on the developed nature of the area and surroundings and lack of native or riparian habitat located on or adjacent to the site, no federal- or state-listed endangered, threatened, rare, or otherwise sensitive flora or fauna are anticipated to be located within the project site. The proposed project would not involve impacts to trees.

Native and non-native birds adapted to urban areas were observed utilizing the vegetation along the northern and western boundaries of the project site and at the adjacent golf course and water treatment plant. There is some potential for common bird species protected under the Migratory Bird Treaty Act to nest on-site. Though there is not much vegetative cover on-site for nesting birds, and no bird nests were observed in vegetation or crevices formed by buildings and fencing, some birds could nest in building crevices, isolated trees, smaller shrubs or on the ground. Therefore, this impact is potentially significant and mitigation is required.

### **Mitigation Measures**

The following mitigation measure is required.

#### *BIO-1 Nesting Bird Avoidance and Minimization Measures*

A preconstruction nesting bird survey for bird species protected under the Migratory Bird Treaty Act should be conducted by a qualified biologist within two weeks prior to the initiation of project construction, if the project is initiated during the nesting bird season (February 15 to August 31). If any active bird nests are identified, a buffer zone of 50 feet will be established by the qualified biologist to protect any active nests. The buffer zone may be adjusted based upon the assessment and recommendation of the qualified biologist, taking into account factors such as the level of disturbance in the immediate area and the level of acclimation of the birds to human activity.

### **Significance After Mitigation**

Implementation of Mitigation Measure BIO-1 would reduce the potential for project construction activities to result in the loss of active bird nests through a preconstruction nesting bird survey and establishment of avoidance buffers around active nests, if present. Implementation of this measure would reduce project impacts to special-status plant and wildlife species to a less-than-significant level.

#### **LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

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

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

#### **NO IMPACT**

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Jurisdictional waters, including wetlands, are absent from the overall project site. Jurisdictional waters may be present in the form of a drainage located along the north side of Eden Road. This drainage may carry ephemeral flows, but due to the disturbance of the topography and the vegetation, it's unlikely this drainage would be considered United States Army Corps of Engineers jurisdictional waters. The drainage does not appear contiguous with the San Francisco Bay or San Leandro Creek (or tributaries) though may connect elsewhere via artificial culverts. The project site is located in the Oyster Bay Watershed.

The San Francisco Bay Conservation and Development Commission (BCDC) has jurisdiction over bay lands and waters subject to tidal action as clarified specifically by BCDC regulations. The project site does not overlap with areas under jurisdiction of the BCDC. Construction and operation of the proposed project would not involve or require the direct removal, filling, hydrological interruption, or other means to the bed, bank, channel, or adjacent upland area of a creek or wetland. Although, construction activities may result in runoff into nearby tributaries, the proposed project would be required to follow applicable California Building Code (CBC) and SLMC requirements to reduce soil erosion, including SLMC Section 7-12-230, which requires erosion and sedimentation control measures and drainage plans to be prepared by a civil engineer and submitted to the City for approval prior to issuance of a grading permit. Where appropriate, the control measures must include measures, including, but not limited to, short-term erosion control planting, waterproof slope covers, stormwater retention basins, and devices to trap, store, and filter sediment during project construction and operation. Therefore, the proposed project would not have a substantial adverse effect on state or federally protected wetlands, and this impact would be less than significant.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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

The project site does not contain hydrologically connected waters that would support native resident or migratory fish. In addition, the project site is not located in a migratory wildlife corridor and most of the site is fenced, which currently limits wildlife movement. Because the project site does not include sensitive biological resources or movement corridors, project implementation would not interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Additionally, while the project would include installation of landscaping, primarily along Eden Road, it would not be sufficient to attract enough wildlife that would create a hazardous environment for airport operations. There would be no impact.

#### **NO IMPACT**

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

In San Leandro, trees planted within the public right-of-way are City Trees, and right-of-way area locations vary throughout the city. The City only regulates City Trees and does not have a tree ordinance at this time. The proposed project does not involve impacts to trees, and therefore, no City Trees would be impacted by the proposed project. Therefore, the project would not conflict with policies regarding tree preservation in the SLMC. There would be no impact.

**NO IMPACT**

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

The project site is not located in an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (City of San Leandro 2016b). Therefore, the project would not conflict with such a plan and no impact would occur.

**NO IMPACT**



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## 5 Cultural Resources

|                                                                                                               | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less-than-Significant Impact        | No Impact                           |
|---------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| Would the project:                                                                                            |                                |                                                    |                                     |                                     |
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?      | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries?                       | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

ESA prepared a Cultural Resources Assessment for the proposed project in October 2021, which was peer reviewed by Rincon. An updated Cultural Resources Study was prepared by ESA in September 2024. The following analysis is based on these reports. These reports are confidential and are on file with the City.

### Existing Setting

Cultural resources are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance. Under CEQA, public agencies must consider the effects of their actions on “historical resources.” CEQA defines a *historical resource* as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR). The CRHR includes resources listed in or formally determined eligible for listing in the National Register of Historic Places. Pursuant to Public Resources Code (PRC) Section 21084.1, a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” Demolition, replacement, substantial alteration, and relocation of historic properties are actions that would change the significance of an historic resource (CCR, Title 14, 15064.5).

The project site contains industrial buildings typical of the late twentieth century. The project site is flat and covered in various surfaces, including crushed asphalt, paving and steel plates. The project site has been extensively disturbed. No evidence of historic buildings, sites, structures or objects is present on the project site or in the project vicinity.

### Regulatory Setting

#### California Public Resources Code

In addition to the definition of “unique archaeological resources” in PRC Section 21083.2, sections of the PRC that are applicable include:

- PRC Section 5097.5: any unauthorized removal or destruction of archaeological, paleontological resources on sites located on public lands is a misdemeanor.
- PRC Section 5097.99 prohibits obtaining or possessing Native American artifacts or human remains taken from a grave or cairn; sets penalties.

### *California Health and Safety Code*

The project is also subject to the provisions of the California Health and Safety Code with respect to the discovery of human remains. Health and Safety Code Section 7050.5 states that “Every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in Section 5097.99 of the Public Resources Code.”

The measures outlined in Section 7050.5 of the Health and Safety Code and PRC Section 5097.98 are considered standard mitigation measures implemented in the event of an accidental discovery of human remains during excavation activities.

## **Impact Analysis**

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

ESA completed archival research and conducted field survey of the project site in December 2018. The project site is not located in an area of known historical resources. The project site is developed with facilities related to industrial activities and materials storage. As shown in site photographs in Figure 4a, on-site buildings are typical industrial buildings with no architectural interest or known historical associations. No historic resources are present on the project site. The proposed project would not have an impact or result in a change to historical resources. There would be no impact.

### **NO IMPACT**

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

ESA staff conducted a records search at the Northwest Information Center of the California Historical Resources Information System at Sonoma State University on December 19, 2018 (File No. 18-1154). The records search was updated on September 10, 2024 (File No. 24-0373). No previously recorded cultural resources have been identified within the project site, and four cultural resources have been documented within 0.5 mile of the project site. The only archaeological site recorded within 0.5 mile of the project site, CA-ALA-7, was a prehistoric mound containing 15 burials that was destroyed in 1917. The cultural resources survey and archival review did not result in the identification of potentially significant prehistoric or historic-period archaeological resources within the project site. As a result of archival review, field survey, distribution of nearby archaeological sites, and the geologic and environmental setting, the archaeological sensitivity of the project site is considered low.

The proposed project would involve ground-disturbing activity. Although unlikely due to previous site grading and the relatively low depth of proposed excavation, during earthwork, the subsurface materials would be uncovered, and there is the possibility that archaeological resources located in the soil could be unearthed. Excavation and ground-disturbing activities necessary to construct the

project could potentially expose, damage, or destroy these previously undiscovered archaeological resources. Therefore, mitigation is required.

## **Mitigation Measures**

The following mitigation measure is required:

### *CR-1 Unanticipated Discovery of Cultural Resources*

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

## **Significance After Mitigation**

Mitigation Measure CR-1 includes procedures for the appropriate handling of unanticipated discoveries of cultural resources. Implementation of Mitigation Measure CR-1 would reduce potential impacts to archeological resources to a less-than-significant level.

### **LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

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

The cultural resources records search did not identify cemeteries or archaeological resources containing human remains within the project site. However, the discovery of human remains is always a possibility during ground-disturbing activities. Human burials outside dedicated cemeteries often occur in prehistoric archaeological contexts. In addition to being potential archaeological resources, human burials have specific provisions for treatment in California PRC Section 5097. Additionally, the California Health and Safety Code (Sections 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains and protects them from disturbance, vandalism, or destruction. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and establishes the Native American Heritage Commission as the entity to resolve related disputes.

**Alco Iron & Metal Company Facility Expansion Project**

If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance may occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant. The most likely descendant must complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Compliance with PRC Section 5097.98 and State of California Health and Safety Code Section 7050.5 would ensure that impacts to human remains are less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**

6 Energy

|                                                                                                                                                                                     | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less-than-<br>Significant<br>Impact | No Impact                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| Would the project:                                                                                                                                                                  |                                      |                                                                |                                     |                                     |
| a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

Information in this section is based on the Energy Technical Report prepared for the project by RCH Group in October 2024, included in Appendix C. This report was peer reviewed by Rincon.

Setting

Electricity is primarily consumed for lighting, appliances, heating and cooling systems, and other uses such as industrial processes in addition to being consumed by alternative fuel vehicles. Most of California’s electricity is generated in-state, with approximately 30 percent imported from the northwest and southwest regions of the United States in 2020 (California Energy Commission [CEC] 2021). In addition, approximately 33 percent of California’s electricity supply in 2020 came from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2021). In 2018, Senate Bill (SB) 100 accelerated the state’s Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

The smallest scale at which energy consumption information is readily available is the county level. Therefore, energy consumption in Alameda County is used herein to characterize the city’s existing consumption of electricity and natural gas. According to the CEC, Alameda County consumed approximately 10,395 gigawatt hours of electricity in 2022 from residential and non-residential uses (CEC 2025b). San Leandro is served by ACE, which supplies electricity to all accounts (residential, business, and municipal) and is delivered through PG&E infrastructure. ACE buys power mainly from clean sources like wind, solar, and hydropower. ACE’s Board of Directors established the goal of purchasing 100 percent clean power for all customers by 2030 (ACE 2025). Alameda County consumed approximately 377 millions of therms of natural gas in 2022 in both residential and non-residential uses (CEC 2025c).

Petroleum fuels are primarily consumed by on-road vehicles and trucks and off-road equipment in addition to some industrial processes, with California being one of the top petroleum-producing states in the nation (CEC 2025a). Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most used transportation fuel in California with 11.6 billion gallons sold in 2023 (CEC 2025d). Diesel, which is used primarily by heavy duty-trucks, delivery vehicles, buses,

trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 2 billion gallons sold in 2023 (CEC 2025d).

The project would consume energy in two primary forms:

- Petroleum-based fuels (gasoline and diesel) and possibly electricity to power construction equipment, haul trucks, and worker vehicles during project construction
- Electricity to power the additional truck scale during project operations

The project would also decrease petroleum-based fuel consumption during project operations by reducing truck idling through improved truck circulation.

The project proponent is not in the business of developing these energy supplies. The project is not involved in the extraction and refining of petroleum and does not build or operate power plants. It is reasonably assumed that the companies and public utilities involved in these activities have previously undergone the appropriate environmental review pursuant to CEQA. Therefore, the analysis presented in this report is focused solely on the consumption of existing energy supplies by the project, and whether that consumption could be considered wasteful, inefficient, or unnecessary.

## **Regulatory Setting**

### *Title 24, California Code of Regulations*

CCR, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods. In 2019, the CEC updated Title 24 standards with more stringent requirements effective January 1, 2020. All buildings for which an application for a building permit is submitted on or after January 1, 2020, must follow the 2019 standards. The 2022 update was adopted August 11, 2021, and goes into effect January 1, 2023. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in Title 24.

### *Part 6 (Building Energy Efficiency Standards)*

Part 6 of Title 24 contains the 2025 Building Energy Efficiency Standards for new residential, and CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The most current standards are the 2025 Title 24 standards. ~~The 2025 Standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated (CEC 2025e). The CEC adopted the 2022 Energy Code on August 11, 2021, and applies starting January 1, 2023. The 2022 Energy Code~~

~~encourages efficient electric heat pumps, establishes electric-ready requirements, expands solar and battery storage standards, and other stricter requirements.~~

#### *California Green Building Standards Code (2019), CCR Title 24, Part 11*

California's Green Building Code, referred to as CALGreen, was developed to provide a consistent approach to green building within the state. CALGreen lays out the minimum requirements for newly constructed residential and nonresidential buildings to reduce GHG emissions through improved efficiency and process improvements. The requirements pertain to energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. It also includes voluntary tiers to further encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

#### *Plan Bay Area 2050*

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

#### *San Leandro Municipal Code*

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

#### *San Leandro 2021 Climate Action Plan*

In July 2021, the City adopted an update to its CAP, a citywide strategy to reduce GHGs. Chapter 4 of the CAP includes strategies that target energy reduction through energy efficiency and conservation, including prioritizing increasing and installing renewable energy generation systems and energy storage systems on rental homes, multifamily buildings, and affordable housing, thereby reducing automobile dependency and increasing transit-oriented development (City of San Leandro 2021).

#### *2035 General Plan*

There are several energy-related policies of the *2035 General Plan* in the Open Space and Conservation, Environmental Hazards, Land Use, and Transportation elements. Policies include using best practices for energy conservation in building and construction, using renewable energy sources



where possible, utilizing energy-reducing transportation strategies and alternative fuel vehicles, reducing vehicle miles traveled (VMT) and increasing active transportation options, and reducing emissions.

## **Impact Analysis**

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

### **Construction Energy Usage**

Project construction would require site grading, paving, old wall demolition, new wall construction, broken pavement repair, and installation of the new truck scale. Construction would be limited, and the project site does not include unusual challenges that would require unusually high energy usage. Construction would be short term (approximately 30 working days) and would require various pieces of equipment such as a backhoe, grader, forklift, and concrete trucks. The project would not require the import/export of soil material from grading. Approximately 14 round trip haul truck trips would be required for bringing construction materials to the project site, and approximately eight haul truck round trips would be required for hauling the demolished frontage wall, as indicated in the CalEEMod modeling estimates in Attachment A.

Fuel consumption during construction was calculated by CalEEMod, a statewide land use emissions computer model developed for the California Air Pollution Officers Association in collaboration with California air districts. The model inputs assumed project construction would occur eight hours per day over approximately 30 working days. CalEEMod calculated the emissions and related fuel use for each construction phase including site grading, paving, old wall demolition, new wall construction, broken pavement repair, and installation of the new truck scale.

Based on CalEEMod results for project construction and standard fuel consumption conversion factors, construction would require approximately 277 gallons of gasoline and 2,743 gallons of diesel fuel. This includes all off-road construction equipment, hauling, vendor, and worker trips over the construction period. For the finishing phase of construction, some electricity may be used (e.g., for power tools and work lighting). While this electricity usage cannot be quantified at this time, it is anticipated to be relatively minor compared to normal business operations. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. Natural gas would not be used during construction.

### **Operational Energy Usage**

Once the project is operational, approximately 1,000 kWh of electricity would be required annually to power the additional truck scale during project operations. This electricity is considered very minor, since in 2020, the average annual electricity consumption for a United States residential utility customer was approximately 11,000 kWh per year.

The project would also decrease petroleum-based fuel consumption (assumed to be primarily diesel) during project operations by reducing truck idling through improved truck circulation. It is estimated that on average approximately 90 vehicles queue at the scale per day and that each vehicle idles for approximately 10 minutes while on-site. The project would not increase throughput or vehicles at the site but would result in an estimated 50 percent reduction in truck idling through improved truck circulation and reduced queueing time. According to the United States Department

of Energy, a heavy-duty truck consumes approximately 0.8 gallon of fuel per hour of idling (Appendix A). Thus, the project would result in a reduction of 6 gallons of diesel fuel per day or 1,872 gallons of diesel fuel per year assuming six days per week of operation.

## **Conclusion**

As noted previously, electricity usage during short-term construction activities and long-term operations would be insignificant. While the project would consume petroleum-based fuels (primarily diesel) during short-term construction activities (277 gallons of gasoline and 2,743 gallons of diesel fuel), the project would provide an energy benefit during long-term operations, reducing diesel fuel usage at the site by approximately 1,872 gallons per year. Therefore, after approximately 16 months of operation under the proposed project, the petroleum-based fuels consumed during construction activities would be completely offset and project would continue reducing fuel usage onsite for the lifetime of the project. Project energy consumption would not be considered wasteful, inefficient, or unnecessary. Therefore, the consumption of fuel and other energy during project construction and operations would have a less-than-significant impact on energy resources

### **LESS-THAN-SIGNIFICANT IMPACT**

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

Applicable energy related policies in the City's 2035 General Plan and 2021 CAP are described above under *Regulatory Setting*. The project would not conflict with or obstruct either of these plans because there are no measures applicable to the project. Furthermore, as indicated under Checklist Question (a), after approximately 17 months of operation under the proposed project, the petroleum-based fuels consumed during construction activities would be offset, and the project would continue reducing fuel usage on-site for the lifetime of the project. Therefore, the project would not conflict with or obstruct a state or local plan, and the project would have no impact.

### **NO IMPACT**

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## 7 Geology and Soils

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

Analysis in this section is based in part on the geotechnical investigation prepared for the project by Friar Associates, Incorporated in July 2018. An updated report was provided in October 2021. The geotechnical investigations are included as Appendix D.

## **Setting**

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

The Bay Area contains both active and potentially active faults. Major active faults in the area are the San Andreas, San Gregorio, Hayward, and Calaveras faults. The project site itself is not located within an Earthquake Fault Zone (California Geological Survey [CGS] 2025).

Expansive soils are soils that swell in density and volume as they absorb water and contract as they lose water. Associated problems include cracking and deterioration of roadway surface, as they expand and contract during seasonal wet and dry cycles. The ground surface at the project site is paved asphalt concrete or unpaved fill. The subsurface fill consists of crushed rock and brown silty clay with brick pieces, asphalt concrete and some crushed rock. Tests shows the clay is moderately to highly plastic indicating a moderate to high potential for expansion.

## **Regulatory Setting**

### *Alquist-Priolo Earthquake Fault Zoning Act*

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

### *Seismic Hazards Mapping Act*

The SHMA of 1990 was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under the Alquist-Priolo Act, the State Geologist is responsible for identifying and mapping seismic hazards. *CGS Special Publication 117*, adopted in 1997 by the State Mining and Geology Board, constitutes guidelines for evaluating seismic hazards other than surface faulting and for recommending mitigation measures as required by PRC Section 2695(a). In accordance with the mapping criteria, the CGS seismic hazard zone maps identifies areas with the potential for a ground shaking event that corresponds to 10 percent probability of exceedance in 50 years.

The purpose of the SHMA is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning

and permitting processes. The SHMA requires site-specific geotechnical investigations prior to permitting most urban development projects in seismic hazard zones.

#### *California Building Code*

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

The CBC is updated every three years by order of the State Legislature, with supplements published in intervening years. State law mandates that local governments enforce the CBC. In addition, a City and/or County may establish more restrictive building standards reasonably necessary because of local climatic, geological, or topographical conditions. The 2022 CBC is based on the International Building Code.

#### *City of San Leandro 2035 General Plan*

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

### **Impact Analysis**

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

The project site is not within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site (CGS 2025). The nearest known Alquist-Priolo Earthquake Fault Zone is the Hayward Fault zone located approximately 3 miles east of the site. Direct ground rupture of a known earthquake fault would be unlikely, and impacts would be less than significant.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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

The nearest mapped active fault, the Hayward Fault, is approximately 3 miles east of the project site (CGS 2025). The United States Geological Survey has stated that there is a 72 percent chance of at least one magnitude 6.7 or greater earthquake striking the San Francisco Bay region between 2014 and 2043 (United States Geological Survey 2016). Therefore, the site could be subjected to at least one moderate to severe earthquake that would cause strong ground shaking. Project construction would be required to comply with the seismic safety requirements in the International Building Code, CBC, and City Building Code. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering methods. In addition, no habitable structures are proposed as part of the project. Therefore, impacts related to strong seismic ground shaking would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**

*a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

*c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that lie close to the ground surface. The project site is identified as having black silty clay with gravel pieces, sand, and sand with gravel. The project site is located in an identified liquefaction zone, according to maps prepared by CGS (2025).

Most land in San Leandro is underlain by materials that have moderate to very high liquefaction potential. In addition, according to CGS the project site is in an area that experiences moderate liquefaction susceptibility (CGS 2025). However, the proposed structure would be required to be constructed in compliance with the CBC, which requires structures to be designed and constructed to resist liquefaction potential from seismic-related ground failure.

The geotechnical investigation prepared for the project (Appendix D) analyzed the potential for liquefaction induced settlements and provided recommendations for the design of the proposed structure's foundation. Recommendations for the proposed structure's foundation include the removal of existing fill and replacement with structural fill and compacted. During foundation construction, care should be taken to minimize evaporation of water from foundation and floor subgrades, and drainage gradients should be planned and subsurface drains installed to prevent ponding.

Pursuant to SLMC Section 7-5-100, the City adopted the CBC; Section 1803.1.1.3 of the CBC states that the building department of each locality (in this case the San Leandro Building and Safety Division) would need to approve the soil investigation or geotechnical investigation if it determines that the recommended action is likely to prevent structural damage. As a condition of the building permit, the approved recommended action would be incorporated into project construction. Therefore, pursuant to the SLMC and CBC, the recommendations included in the geotechnical investigation (Appendix D) would be incorporated into the design of the project and verified by the City prior to issuance of a building permit.

With adherence to the SLMC, CBC, and implementation of recommendations in the design-level geotechnical investigation, impacts would be less than significant. In addition, no habitable structures are proposed as part of the project.

**LESS-THAN-SIGNIFICANT IMPACT**

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

Earthquakes can trigger landslides that may cause injuries and damage many types of structures. Landslides are typically a hazard on or near slopes or hillside areas, rather than on generally level areas, like the project site. The project site is not within an area mapped as having landslides (CGS 2025). Therefore, the project has a low potential for slope instability occurring at the site and impacts would be less than significant. In addition, no habitable structures are proposed as part of the project.

**LESS-THAN-SIGNIFICANT IMPACT**

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

Project construction, particularly grading and site preparation, could result in erosion and loss of topsoil from the project site. The project developer would be required to follow applicable CBC and SLMC requirements to reduce soil erosion, including SLMC Section 7-12-230, which requires erosion and sedimentation control measures and drainage plans to be prepared by a civil engineer and submitted to the City for approval prior to issuance of a grading permit. Where appropriate, the control measures must include measures, including, but not limited to, short-term erosion control planting, waterproof slope covers, stormwater retention basins, and devices to trap, store, and filter sediment during project construction and operation. Compliance with federal, state, and City regulations would reduce impacts related to soil erosion and the loss of topsoil to less than significant levels.

**LESS-THAN-SIGNIFICANT IMPACT**

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

Expansive soils are those that have a potential to undergo significant changes in volume, either shrinking or swelling, due to their composition and moisture content. Periodic shrinking and swelling of expansive soils can cause extensive damage to other structures and roads. Atterberg Limits tests performed on a sample of the near-surface clay show that the clay is moderately to highly plastic, indicating a moderate-to-high potential for expansion. The alternating shrink/swell cycles of expansive soils tend to have detrimental effects on foundation elements, particularly, slabs-on-grade. As discussed under checklist items a.3. and c above, pursuant to the SLMC and CBC, the recommendations included in the geotechnical investigation (Appendix D) must be incorporated into the design of the project and verified by the City prior to issuance of a building permit. In addition, the project includes only warehouse and office uses and does not include habitable space. With incorporation of these recommendations and adherence to applicable regulations, such as the CBC, impacts would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**



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

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

**NO IMPACT**

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

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows). Paleontological resources are not found in “soil” but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources, if they are discovered during construction of a development project.

Rincon evaluated the paleontological sensitivity of the geologic units that underlie the project site to assess the project’s potential for significant impacts to scientifically important paleontological resources. The analysis was based on a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the project site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

The project site is located in the Coast Ranges geomorphic province, one of the eleven geomorphic provinces of California (CGS 2002). The Coast Ranges extend along the majority of California’s coast from the California-Oregon border to Point Arguello in Santa Barbara County in the south and consist of northwest-trending mountain ranges and valleys. The Coast Ranges are composed of Mesozoic and Cenozoic sedimentary, igneous, and metamorphic strata. The eastern side is characterized by strike-ridges and valleys in the Upper Mesozoic strata. The Coast Ranges province runs parallel to and overlaps the San Andreas Fault in some areas (CGS 2002). Locally, the project site is on the East Bay Plain, which is a coastal plain containing many creeks and streams draining the Diablo Range, Berkeley Hills, and San Lorenzo Hills to the east into San Francisco Bay to the west. The East Bay Plain has been almost entirely developed with urban uses.

The project is located in the *San Leandro, California* United States Geological Survey 7.5-minute topographic quadrangle. The geology of the region surrounding the project site was mapped by

Graymer (2000) who identified a single geologic unit, Holocene basin deposits, underlying the project site.

Holocene basin deposits underlie the entire project site. Holocene basin deposits primarily consist of very fine silty clay to clay deposits (Graymer 2000). Given the age of the sediment, Holocene basin deposits have low paleontological sensitivity (SVP 2010). However, Holocene-aged alluvial sediments increase in age with depth to a point where they are old enough to preserve paleontological resources. Pleistocene-aged sediments in Alameda County and the East Bay Plain are known to preserve paleontological resources and should be considered to have high paleontological sensitivity (Jefferson 2010, Paleobiology Database 2025, University of California Museum of Paleontology 2025). The depth of this transition is unknown, but given the relatively high rate of sedimentation near the shore of San Francisco Bay, it could be as deep as 10 feet. However, this transition depth is an estimate, so sediments within the project site should be considered to have low paleontological sensitivity from 0 to 10 feet and undetermined paleontological sensitivity greater than 10 feet below the surface.

Ground-disturbing activities within previously undisturbed sediments with high paleontological sensitivity could result in significant impacts to paleontological resources. Impacts would be significant if construction activities result in the destruction, damage, or loss of scientifically important paleontological resources and associated stratigraphic and paleontological data. The project would require an excavation of up to 4 feet to construct a new truck scale. This would only affect low paleontologically sensitive geologic units; therefore, it is not expected to significantly impact paleontological resources. Impacts would be less than significant.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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# 8 Greenhouse Gas Emissions

|                                                                                                                                   | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less-than-<br>Significant<br>Impact | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|--------------------------|
| Would the project:                                                                                                                |                                      |                                                                |                                     |                          |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?       | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Information in this section is based on the *Air Quality and Greenhouse Gas Emissions Technical Report* prepared for the project by RCH Group in September 2024. This report was peer reviewed by Rincon and is included in Appendix A.

## Overview of Climate Change and Greenhouse Gases

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

GHG emissions occur both naturally and as a result of human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO<sub>2</sub>), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO<sub>2</sub>) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as “carbon dioxide equivalent” (CO<sub>2</sub>e), which is the amount of GHG emitted multiplied by its GWP. CO<sub>2</sub> has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO<sub>2</sub> on a molecule-per-molecule basis (Intergovernmental Panel on Climate Change 2022).<sup>3</sup>

<sup>3</sup> The Intergovernmental Panel on Climate Change’s (2022) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by CARB uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change’s (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

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

- **Carbon Dioxide.** CO<sub>2</sub> enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and chemical reactions (e.g., the manufacture of cement). CO<sub>2</sub> is also removed from the atmosphere (or “sequestered”) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane.** CH<sub>4</sub> is emitted during the production and transport of coal, natural gas, and oil. CH<sub>4</sub> emissions also result from livestock and agricultural practices and the decay of organic waste in municipal solid waste landfills.
- **Nitrous Oxide.** N<sub>2</sub>O is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.
- **Hydrofluorocarbons (HFC).** HFCs are one of several high GWP gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- **Perfluorocarbons (PFC).** PFCs are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes.
- **Sulfur Hexafluoride (SF<sub>6</sub>).** SF<sub>6</sub> is another high GWP gas that is not naturally occurring and is generated in a variety of industrial processes.

There are uncertainties as to the degree and type of climate change that will occur at any given place and time on earth. There are also uncertainties associated with the magnitude and timing of other consequences of a warmer planet: sea level rise, spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, increased air pollution episodes, and the consequence of these effects on the economy.

## **Regulatory Setting**

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

The California Global Warming Solutions Act of 2006 (AB 32), outlines California’s major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 million metric tons of CO<sub>2</sub>e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2009). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan’s approval.

The CARB approved the 2013 Scoping Plan update in May 2014 (CARB 2014). The update defined the CARB’s climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California’s progress toward meeting the “near-term” 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the

State's longer term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed SB 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On November 16, 2022, the CARB adopted the 2022 Scoping Plan, which provides a framework for achieving the 2030 target. The 2022 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed later). The 2022 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2017 Scoping Plan update, the 2022 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six metric tons CO<sub>2</sub>e by 2030 and two metric tons CO<sub>2</sub>e by 2050 (CARB 2022). As stated in the 2022 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2022).

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

#### *City of San Leandro 2035 General Plan*

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

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

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

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

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

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

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

### *City of San Leandro Municipal Code*

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

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

## **Impact Analysis**

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

Project construction would generate approximately 40.4 metric tons of CO<sub>2</sub>e over the 31-day construction period (Appendix A). BAAD does not have an adopted threshold of significance for construction GHG emissions. This amount of GHG emissions is negligible and project construction would result in improved truck circulation which would reduce GHG emissions during operations (see discussion below).

Once the project is operational, approximately 1,000 kWh of electricity would be required annually to power the additional truck scale during project operations, which would generate less than one metric ton of CO<sub>2</sub>e per year.

The project would also decrease GHG emissions during project operations by reducing truck idling through improved truck circulation. It is estimated that on average approximately 90 vehicles queue at the scale per day and that each vehicle idles for approximately 10 minutes while on-site. The project would not increase throughput or vehicles at the site but would result in an estimated 50 percent reduction in truck idling through improved truck circulation and reduced queueing time. According to the United States Department of Energy, a heavy-duty truck consumes approximately 0.8 gallon of fuel per hour of idling (Appendix A). Thus, the project would result in a reduction fuel

usage and an associated reduction in GHG emissions from engine combustion (approximately 22 metric tons of CO<sub>2</sub>e per year).

Applicable GHG-related policies in the City's *2035 General Plan* and 2021 CAP are described above under *Regulatory Setting*. The project would not conflict with or obstruct either of these plans because there are no measures applicable to the project. Furthermore, the project would offset its construction GHG emissions (40.4 metric tons of CO<sub>2</sub>e) after approximately 22 months of operation and the project would continue to reduce GHG emissions over the lifetime of the project. The project would result in a reduction in GHG emissions over the lifetime of the project and would support the intent of the 2021 CAP, which is to reduce GHG emissions in San Leandro. Based on the scale of the project and the fact that the project would reduce GHG emissions over the lifetime of the project, the project could not possibly hinder the implementation of GHG reduction measures within the *2035 General Plan* and 2021 CAP. Furthermore, the project would not conflict with CARB's 2022 Scoping Plan, as there are no measures that are applicable to the project and the overall goal of the plan is to reduce GHG emissions, which the project would achieve after 22 months of operation and would continue doing so over the project's lifetime. Therefore, the project would result in a less-than-significant impact.

#### **LESS-THAN-SIGNIFICANT IMPACT**



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## 9 Hazards and Hazardous Materials

|                                                                                                                                                                                                                                                                                 | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less-than-<br>Significant<br>Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| Would the project:                                                                                                                                                                                                                                                              |                                      |                                                                |                                     |                                     |
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                                    | <input type="checkbox"/>             | <input checked="" type="checkbox"/>                            | <input type="checkbox"/>            | <input type="checkbox"/>            |
| e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?                                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The following analysis is based on the Phase I Environmental Site Assessment prepared for 1091 Doolittle Drive by Almar Environmental (Almar) in June 2018 and a Phase I Environmental Site Assessment prepared for 2620 Eden Road (the proposed expansion area) in January 2019.

## **Hazards and Hazardous Materials Setting**

During the Phase I records review, 1091 Doolittle Drive was found to have historical use and storage of petroleum products from at least 1959 until the early 1980s, and historical use and storage of significant amounts of liquid hazardous materials, petroleum products, and raw materials as part of Alco's daily operations since the 1980s. In addition, Almar also noted an Historical Recognized Environmental Condition (HREC) associated with 1091 Doolittle Drive. A leaking underground storage tank (LUST) case was opened in 1987 and was subsequently granted case closure in 1998. 2620 Eden Road was used as an auto wrecking facility from approximately 1955 until at least 2016. During which time hazardous materials, including PCBs and/or petroleum products, are known to have been stored, or potentially stored, and used on-site. The site never appears to have been paved and has always had an exposed soil surface. The site is currently being used as overflow metals storage with large quantities of raw metal materials sorted and stored on exposed soil surface from the neighboring metals sorting and processing yard associated with Alco.

Environmental Investigation Services, Inc. (EIS) performed a Phase 2 soil investigation for both 1091 Doolittle and 2620 Eden Road in January 2019. The soil was tested for various contaminants, including petroleum hydrocarbons, VOCs, PCBs, and metals. Most contaminants were below the safety levels, except for diesel-range organics (DRO), arsenic, nickel, and cobalt in some samples. DRO was found at 3,400 mg/kg, which is above the safety levels for construction workers and commercial/industrial use. Arsenic, nickel, and cobalt were also above safety levels in some samples.

EIS prepared an updated letter in November 2021 and found that no changes were required to the previous Phase I Environmental Site Assessments or Phase 2 soil investigation.<sup>4</sup>

The project site is located adjacent to the boundaries of Oakland San Francisco Bay Airport. It is approximately 5,100 feet southeast of airport runways 27L and 27R and is within the ALUCP Safety Compatibility Zone 2. Zone 2 is the Inner Approach/Departure Zone, which has a higher risk of departure and arrival accidents.

## **Regulatory Setting**

### *Department of Toxic Substances Control*

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

DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While HWCL is generally more stringent than RCRA, until the USEPA approves the California program, both state and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit

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<sup>4</sup> Copies of the environmental site assessments and soil investigations are available from the City upon request.

requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

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

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

#### *Regional Water Quality Control Board*

The RWQCB regulates discharges and releases to surface and groundwater in the project area. The RWQCB generally oversees cases involving groundwater contamination. The County of Alameda Department of Environmental Health handles most LUST cases, so the RWQCB may oversee cases involving other groundwater contaminants (i.e., Spills, Leaks, Incidents, and Clean-up cases). In the case of spills at a project site, the responsible party would notify the County of Alameda, RWQCB, or DTSC and a lead would be determined.

RWQCB has established guidelines used to evaluate the potential risk associated with chemicals found in soil or groundwater where a release of hazardous materials has occurred called Environmental Screening Levels (ESLs). ESLs were developed to expedite the identification and evaluation of potential environmental concerns at contaminated sites. ESLs address soil, groundwater, soil gas, and indoor air and cover a range of concerns (e.g., impacts to drinking water, aquatic habitat, and vapor intrusion).

#### *San Leandro Environmental Services*

The City's Environmental Services Section is designated as the City's CUPA, which is overseen by CalEPA and coordinates the regulation of hazardous materials and hazardous wastes in San Leandro. CUPA ensures the consistent application of statewide standards during administrative, permitting, inspection, and enforcement activities associated with hazardous materials and hazardous wastes. If a business operated at the project site would use and store hazardous materials and generate hazardous wastes, CUPA would require the electronic submittal of chemical and facility information, an HMBP, and hazardous waste generator permits to the California Environmental Reporting System online database. If operations at the project site would include the treatment, storage, and/or disposal of hazardous waste, the City Environmental Services Section would regulate these activities under a tiered permitting system.

CUPA, through the Hazardous Materials Office, regulates underground storage tanks (USTs) containing hazardous materials, including installation, operation and maintenance, temporary closure, and removal and disposal of USTs. Additionally, CUPA holds the responsibility and authority

**Alco Iron & Metal Company Facility Expansion Project**

to implement the Aboveground Petroleum Storage Act, which regulates aboveground petroleum storage tanks through administrative requirements, permitting, inspections, and enforcement. Aboveground or underground storage tanks present at the project site would be managed by the City Environmental Services Section.

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

Federal Aviation Administration

The FAA is the primary federal agency responsible for regulating and overseeing civil aviation in the United States. Under Title 49 of the United States Code and the Federal Aviation Regulations (14 CFR), the FAA establishes standards for airport design, airspace management, and operational safety. The agency's authority includes certification of airports, approval of airspace changes, and review of projects that may affect navigable airspace pursuant to 14 CFR Part 77 (Safe, Efficient Use, and Preservation of the Navigable Airspace). Additionally, the FAA administers the National Environmental Policy Act for actions under its jurisdiction and coordinates with state and local agencies to ensure compliance with federal aviation safety and environmental requirements. For projects at or near airports, FAA determinations may be required to assess potential impacts on airspace and flight operations.

Division of Aeronautics

Caltrans' Division of Aeronautics (DOA) is charged with granting permits for construction of airports and heliports in California. DOA ensures that facilities meet state design standards prior to licensing and continues to meet them during annual inspections. Oakland San Francisco Bay Airport holds an Airport Permit issued by DOA. Caltrans' DOA also publishes the *California Airport Land Use Planning Handbook*, which establishes statewide guidelines for airport land use compatible planning based on the State Aeronautics Act.

Airport Land Use Commission

In California, ALUCs are established under the State Aeronautics Act and related statutes (Public Utilities Code Article 3.5, Sections 21661.5 and 21670 et seq., and Government Code Section 65302.3 et seq.). Pursuant to Section 21674(b) of the Public Utilities Code, ALUCs coordinate planning at state, regional, and local levels to ensure the orderly development of air transportation while protecting public health, safety, and welfare. Their responsibilities include preparing and adopting ALUCPs, reviewing plans for new airports or heliports, and making recommendations on local agency actions affecting airport land use. ALUCs serve four primary functions: (1) develop land use standards to minimize exposure to safety hazards and excessive noise; (2) prevent encroachment of incompatible land uses within each airport's AIA; (3) define compatible land uses for safety, noise, airspace protection, and overflight in the ALUCP; and (4) perform land use consistency determinations for proposed projects within the AIA. The Oakland San Francisco Bay Airport is governed by the Alameda County ALUC.

### Oakland International Airport Land Use Compatibility Plan<sup>5</sup>

The Oakland International ALUCP, adopted by the Alameda County ALUC pursuant to the California State Aeronautics Act (Public Utilities Code Sections 21670 et seq.), establishes land use compatibility policies for areas surrounding Oakland San Francisco Bay Airport. The ALUCP defines the AIA, which includes portions of Oakland, Alameda, San Leandro, Hayward, and unincorporated areas of Alameda County. Within the AIA, the ALUC reviews local land use actions, plans, and development proposals for consistency with compatibility criteria addressing Safety, Noise, Airspace Protection, and Overflight. Local jurisdictions are required under Government Code Section 65302.3 to ensure their general and specific plans are consistent with the ALUCP or formally overrule it. The ALUCP serves as a tool to prevent encroachment of incompatible land uses, minimize public exposure to aircraft noise and safety hazards, and preserve the operational integrity of the airport. Compatibility zones and noise contours established in the ALUCP guide land use decisions and disclosure requirements for properties within the AIA.

#### **SAFETY ZONES**

The ALUCP defined seven “safety zones” surrounding the airport that are designed to provide a method of assessing the compatibility of various types of land uses with respect to aircraft operations. The zones are Zone 1: Runway Protection Zone, Zone 2: Inner Approach/Departure Zone, Zone 3: Inner Turning Zone, Zone 4: Outer Approach/Departure Zone, Zone 5: Sideline Zone, Zone 6: Traffic Pattern Zone, and Zone 7: Other Airport Environs. The project site is within Zone 2, the Inner Approach/Departure Zone.

Zone 2 encompasses areas near the ends of runways where aircraft accident risk is relatively high. The primary objective in this zone is to limit land uses that concentrate people and to reduce hazards to aviation. Residential development is prohibited, and non-residential uses are restricted to low-intensity activities that minimize occupancy. Uses such as schools, hospitals, theaters, and other high-assembly facilities are not permitted. Additionally, the storage of hazardous, flammable, or explosive materials is prohibited. All structures must comply with FAA Part 77 airspace protection standards, and proposed construction may require filing Form 7460-1 for obstruction evaluation. Real estate transactions within Zone 2 must include airport proximity and noise disclosure. These restrictions are intended to protect public safety, reduce noise exposure, and maintain the operational integrity of the airport.

#### **HEIGHT RESTRICTED ZONE**

Height limitations in the ALUCP are based on the guidelines in the Federal Aviation Regulations Title 14 Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace. These standards are used by the FAA in determining whether objects may obstruct safe air navigation. Part 77 defines a variety of “imaginary surfaces” at specific altitudes and specific distances from the runway that are utilized by the FAA as a preemptive measure to identify potential flight hazards prior to their construction. The “horizontal surface” is established at 150 feet above the official airport elevation level. The “transitional surfaces” extend up and out from the primary approach surface edges and rise at a 7:1 slope (7 feet horizontal to 1 foot vertical) until reaching the horizontal surface at 195 above mean sea level. Any penetrations of these surfaces are subject to review by the FAA. If a safety problem is found, the FAA issues a determination of a hazard to air navigation. The FAA

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<sup>5</sup> In July 2025, the name of the airport was changed from Oakland International Airport to Oakland San Francisco Bay Airport. However, the name change has not yet been reflected in the ALUCP, which calls the airport the Oakland International Airport.

cannot prevent development; rather, it is up to the local authorities to implement FAA recommendations.

### *San Leandro 2035 General Plan*

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

## **ENVIRONMENTAL HAZARDS ELEMENT**

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

**Policy EH-5.1 Regulatory Compliance.** Work with the appropriate county, regional, state, and federal agencies to develop and implement programs for hazardous waste reduction, hazardous material facility siting, hazardous waste handling and disposal, public education, and regulatory compliance.

**Policy EH-5.2 Clean-Up of Contaminated Sites.** Ensure that the necessary steps are taken to clean up residual hazardous wastes on any contaminated sites proposed for redevelopment or reuse. Require soil evaluations as needed to ensure that risks are assessed and appropriate remediation is provided.

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

## **Impact Analysis**

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

## **Construction**

Project construction may include the temporary transport, storage, use, or disposal of potentially hazardous materials including fuels, lubricating fluids, cleaners, solvents, or contaminated soils. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, state, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under United States Department of Transportation (USDOT) regulations (USDOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the RCRA. DTSC is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this

primarily under the authority of RCRA and in accordance with HWCL (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, CCR, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and state requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction. Impacts would be less than significant.

## **Operation**

The proposed project would not introduce substantial amounts of additional hazardous materials on site, nor would it involve the storage of hazardous materials in the proposed expansion area. As described in the *Project Description* under “Hazardous Materials Handling and Disposal and Fire Safety,” the facility has an HMBP in place. The HMBP depicts the inventory of hazardous materials used in the operation (types, quantities, and locations), such as vehicle fuel, lubricants, and solvents used for maintenance of collection and processing equipment and it includes provisions for disposing of hazardous materials that may be accidentally brought to the facility. The HMBP includes requirements for storage/containment, notification, and contingency measures in the event of a spill, fire, or other incident.

The use, storage, and disposal of hazardous materials is regulated through the RCRA, which is implemented by DTSC. Transport of hazardous materials, during the operation of the proposed project, would be required to be transported under USDOT regulations (USDOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In the case of spills at a project site, the responsible party would notify the County of Alameda, RWQCB, or DTSC, and a lead would be determined. Therefore, project operation would not involve the use, storage, transportation, or disposal of substantial additional quantities of hazardous materials and would not result in the release of such materials into the environment.

Furthermore, the project has a Fire Protection Plan (Appendix G to this Initial Study) in place to ensure fire safety. The plan outlines procedures for promptly contacting ACFD for immediate assistance during incidents and maintaining clear access for emergency vehicles and personnel. It also establishes protocols for notifying the airport and other relevant entities in the event of a fire. On-site firefighting measures include the installation of fire suppression water tanks and a truck-mounted foam system. The plan further requires a contract with AP Triton or another qualified third-party fire company to conduct annual inspections of the site and equipment. Finally, all employees would undergo re-training on the Fire Protection Plan to ensure preparedness and compliance. Impacts would be less than significant.

### **LESS-THAN-SIGNIFICANT IMPACT**

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

There are no schools within 0.25 mile of the project site; the closest school is Garfield Elementary School, approximately 1.2 miles south of the site. The project would have a less-than-significant impact on hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.



## LESS-THAN-SIGNIFICANT IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

A review of the online Cortese List of Hazardous Waste and Substances Sites determined that the proposed expansion area is not listed as a hazardous waste and substances site (Almar 2019). A LUST case formerly associated with 1091 Doolittle Drive and identified as Alco is present on the current Alco facility. The LUST case was opened for this site in 1987 and subsequently granted case closure in 1998. According to the Phase I Environmental Site Assessment, because this facility is located directly in the assumed upgradient (i.e., eastern) direction of the project site and the lack of information regarding this release (specifically the exact location, size, and extent of the plume, if any), this release is considered an Historical Recognized Environmental Condition. As described in the Setting section above, EIS performed a Phase 2 soil investigation for both 1091 Doolittle Road and 2620 Eden Road in January 2019. The soil was tested for various contaminants. Most contaminants were below the safety levels, except for DRO, arsenic, nickel, and cobalt in some samples. DRO was found at 3,400 mg/kg, which is above the safety levels for construction workers and commercial/industrial use. Arsenic, nickel, and cobalt were also above safety levels in some samples. The report concluded that the high levels of DRO, nickel, and cobalt should be managed before construction starts. The arsenic levels, except for one sample, were typical for the region and not considered a cleanup priority. In addition, the project area is near the Oakland San Francisco Bay Airport, and aerially deposited lead from airport operations could be present. Disturbance of soil that may contain materials, such as those discussed above, has the potential to cause human health hazards, as it would create dust that could transport contaminants through the air affecting project area workers or adjacent receptors through contact or ingestion. A Soil Management Plan (SMP) was recommended to address the health risks from these contaminants during construction and to manage excess soil that needs to be disposed of. Therefore, this impact is potentially significant and mitigation is required.

In addition, one site is under evaluation is within 1,000 feet of the project site at 2506 Davis Street; however, no further cleanup action has been required since 1994. The proposed project pertains to industrial operations in an industrial area. No residences or other sensitive land uses are proposed on-site or are located near to the project site.

Nonetheless, because the project involves ground disturbance on a site with known contamination, this impact is potentially significant and Mitigation Measure HAZ-1 is required.

## Mitigation Measure

The following mitigation measure is required.

### HAZ-1 Soil Management Plan

The project applicant shall retain a qualified environmental professional to prepare a Soil Management Plan (SMP) prior to construction. The SMP, or equivalent document, shall be prepared to address on-site handling and management of impacted soils or other impacted wastes and reduce hazards to construction workers and off-site receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of BMPs
- Guidance regarding proper disposal procedures of contaminated materials
- Guidance regarding monitoring, reporting, and regulatory agency notification
- A Health and Safety Plan (HASP) for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection
- The HASP shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The City of San Leandro shall ensure that a written SMP, HASP, and remedial measures for impacted soils have been prepared and approved prior to issuance of a grading permit.

### **Significance After Mitigation**

Implementation of Mitigation Measure HAZ-1 would minimize impacts related to contamination encountered during project construction. Impacts would be less than significant with mitigation incorporated.

#### **LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

- e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

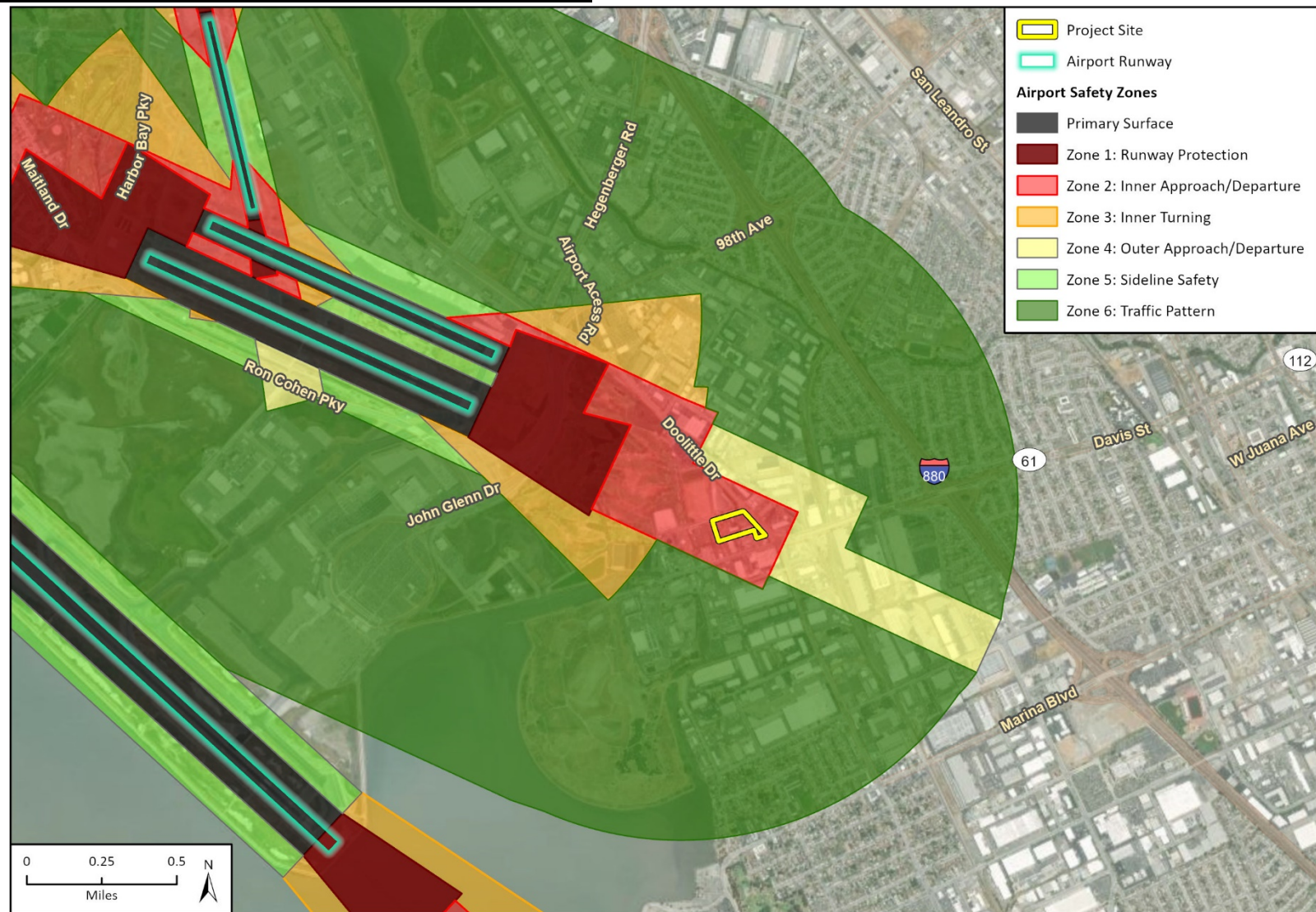
The project site is approximately one mile east of Oakland International Airport and 5.8 miles north of the Hayward Executive Airport. The project site is not within the noise or safety compatibility zones of Oakland International Airport or Hayward Executive Airport (Alameda County Community Development Agency 2010; Alameda County Airport Land Use Commission 2010). Therefore, the project would not result in a safety hazard or excessive noise for people working in the project area. Impacts would be less than significant. The project site is located within the AIA for the Oakland San Francisco Bay Airport and is approximately 5,100 feet southeast of airport runways 27L and 27R. As shown on Figure 7, the entire project site lies within Safety Zone 2 (Inner Approach/Departure Zone) for Oakland San Francisco Bay Airport's North Field. This portion of the airport handles primarily air freight and general aviation flights. North Field has its own Air Traffic Control Tower and is also the location for all of the airport's fixed based operators, including Kaiser Air and Business Jet Center, and general aviation hangars.

The project is subject to the regulations of Safety Zone 2. Table 2-3 in the ALUCP contains basic compatibility criteria for the Inner Approach/Departure Zone. The proposed project is industrial and does not fall within the list of prohibited land uses. The project would involve reconfiguring and expanding the existing Alco facility but would not substantially change facility operations in terms of the amount of material processed, number of employees, or hours of operation. No changes to the height of structures are proposed. The tallest structure on the project site is 40 feet in height, and the proposed project would not add new buildings or increase the height of existing structures. Proposed physical changes to the site (i.e., new truck scale, new parking areas) would be at or close to the ground surface and would not exceed 40 feet in height. The proposed project would relocate the existing scrap piles, which are located in the open area in the middle of the existing site plan, to the proposed expansion area. The larger size of the area allocated for scrap piles could allow for reduced pile heights. There are no new buildings or activities that would penetrate FAA Part 77

airspace surfaces or otherwise create hazards for aircraft. The proposed project would not exceed Part 77 height limits of 150 feet above the official airport elevation level. There would be no substantial changes to surfaces in the existing operations portion of the site and the number of employees would remain the same. Therefore, the project complies with the regulations in the ALUCP. The project would not result in safety hazards or excessive noise for people residing or working in the project area. This impact would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**

**Figure 7 Oakland San Francisco Bay Airport Safety Zones**



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Additional data provided by Alameda County, 2025.

23-14367 EIS  
Fig X Airport Safety Zones

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

Project construction would not require the closure of nearby roads and would not result in the need for detours. Construction activities would be limited to the project site, and equipment and vehicles would be stationed within the site. The proposed project would not obstruct existing roadways or require the construction of new roadways or access points. In addition, improved truck circulation on the site may incrementally decrease truck queuing on public streets and related congestion. Therefore, the proposed project would not block emergency response or evacuation routes or interfere with adopted emergency response and emergency evacuation plans. No impact would occur.

**NO IMPACT**

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

The project site is in a developed, urbanized area surrounded on three sides by industrial development and roadways and on the fourth side by a golf course. No wildlands or densely vegetated areas are located nearby that would represent a significant fire hazard. The project site is not within a Fire Hazard Severity Zone and is located approximately 4.1 miles west from the nearest High Fire Hazard Severity Zone and 4.8 miles from the nearest Very High Fire Hazard Severity Zone (California Department of Forestry and Fire Protection [CAL FIRE] 2024). As discussed further in Section 20, *Wildfire*, the project would not expose people or structures to significant hazards related to wildland fires and there would be no impact.

**NO IMPACT**

# 10 Hydrology and Water Quality

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

## **Setting**

The project site is approximately 9.28 acres and generally flat, with an elevation of 13 feet above sea level (Google Earth 2025). There is an existing storm drain system on Davis Street. The site is approximately 0.8 mile east of the San Francisco Bay, 3.4 miles north of San Lorenzo Creek, and 0.7 mile southwest of San Leandro Creek. Both creeks flow generally west into San Francisco Bay. San Leandro receives approximately 21 inches of rain annually, with rainfall concentrated in the winter months (National Oceanic and Atmospheric Administration 2025).

## **Regulatory Setting**

### *Clean Water Act*

Congress enacted the CWA, formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. The National Pollutant Discharge Elimination System (NPDES) permit process regulates those discharges (CWA Section 402). NPDES permitting authority is administered by the SWRCB and its nine RWQCBs. The project site is in a watershed administered by the San Francisco Bay RWQCB (San Francisco Bay RWQCB 2025).

### *California Porter Cologne Water Quality Control Act*

The Porter Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect state waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for state waters in the region are contained in the *Water Quality Objectives* Chapter of the Basin Plan for the San Francisco Bay RWQCB (San Francisco Bay RWQCB 2021). The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of state waters through the issuance of Waste Discharge Requirements and through the development of total maximum daily loads. Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB, as appropriate, in compliance with the Porter-Cologne Water Quality Control Act.

### *Alameda County Clean Water Program*

The City is a member agency of the Alameda County Clean Water Program, which was established in response to federal stormwater NPDES regulations. Pursuant to the Alameda County Clean Water Program Stormwater C.3 Technical Guidance, projects that create or replace 5,000 square feet or more of impervious surface must comply with Provision C.3, which requires incorporation of appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows. The proposed project would be subject to this provision and would be required to implement appropriate measures.

### *Municipal Regional Permit Provision C.3*

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara counties. Under Provision C.3 of the MRP, new

and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and low impact development-based stormwater treatment controls to treat post-construction stormwater runoff. Low impact development-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained. In addition, the City would require a Stormwater Treatment Measures and Hydromodifications Management Controls Maintenance Agreement.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace 1 acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if they do not meet the minimized size threshold, drain into tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in sub-watersheds or catchment areas that are greater than or equal to 65 percent impervious. The project would be required to comply with all requirements in the MRP.

#### *City of San Leandro Municipal Code*

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

#### *City of San Leandro 2035 General Plan*

The following policies are applicable to the proposed project:

- OSC-7.2 Water Conservation.** Promote the efficient use of existing water supplies through a variety of water conservation measures, including the use of recycled water for landscaping.
- OSC-7.3 Drought Tolerant Landscaping.** Encourage the use of native vegetation and Bay-friendly landscaping and enforce the State Department of Water Resources Model Water Efficient Landscape Ordinance.



## **Impact Analysis**

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

## **Construction**

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

In addition, as the project would disturb more than 1 acre, the project applicant would be required to obtain coverage under the statewide NPDES General Permit for Discharges of Storm Water associated with Construction Activity, Construction General Permit Order 2009-0009 DWQ (Construction General Permit), administered by the SWRCB pursuant to Section 402 of the CWA. Coverage under the NPDES Permit would require implementation of a Stormwater Pollution Prevention Program and various site-specific BMPs to reduce erosion and loss of topsoil during project construction. Compliance with the NPDES permit and BMPs during construction, such as straw wattles, silt fencing, concrete washouts, and inlet protection during construction, would reduce impacts resulting from loss of topsoil. Construction would require water for dust suppression, but water use would be temporary and would cease upon the completion of construction. Approval of the CUP would not result in the extraction of groundwater or interference with the groundwater table through construction activities on the site, as ground disturbance would not occur below the water table. Compliance with state and local requirements would reduce impacts to surface and ground water quality to less-than-significant levels.

## **Operation**

San Leandro overlies the Santa Clara Valley (East Bay Plain) Groundwater Subbasin, which is bounded by San Pablo Bay to the north, the Diablo Range to the east, San Francisco Bay to the west, and a groundwater divide near the City of Hayward to the south (California's Groundwater 2004). Currently, the project site is almost completely developed with hardscaped surfaces. The proposed expansion area would be fully paved and would include a stormwater pretreatment and filtration system in the northwestern corner, along with storm drain catch basins distributed throughout the area. Landscaping would be installed primarily along Eden Road. Water that would not recharge into the groundwater would be released into the City's existing storm drain system via the storm drain on Davis Street, which outfalls into San Francisco Bay. The project would be required to comply with SLMC Chapter 3-15, which requires development to implement permanent stormwater pollution prevention measures that are consistent with the City's NPDES permit. The project applicant would be required to submit a stormwater management plan that would be subject to City approval prior to issuance of a grading permit. The project would also be required to comply with the City's C.3

Stormwater Guidelines, which outline acceptable stormwater controls under the NPDES permit issued by RWQCB. Therefore, project operation would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

EBMUD would supply water to the project site. Approximately 90 percent of the EBMUD water supply originates from the melting snowpack of the Sierra Nevada. The principal water source is the Mokelumne River watershed, a 575-square-mile area located in Alpine, Amador, and Calaveras counties. Water is stored in reservoirs in the Sierra foothills and is transported by aqueduct to filter plants and reservoirs in the East Bay Hills. The other 10 percent of EBMUD's water comes from runoff on protected East Bay Area watershed lands. EBMUD also has a contract for water supply intake from the Central Valley Project on the Sacramento River. EBMUD relies on Central Valley Project deliveries during dry and critically dry periods (EBMUD 2021). The project would not extract groundwater or directly interfere with the groundwater table through operational activities on the site. The proposed project would not involve groundwater extraction or operational activities that would directly affect the groundwater table. Additionally, because the project would not increase equipment usage or the volume of materials processed on-site, overall water demand would remain substantially consistent with existing conditions.

As discussed in the *Project Description*, the proposed project would include a stormwater pretreatment and filtration system in the northwestern corner, along with storm drain catch basins distributed throughout the area. These features would enhance the potential for groundwater recharge by promoting the infiltration of precipitation and stormwater runoff. Therefore, the project would not substantially deplete groundwater supplies or interfere with groundwater recharge in a manner that would impede sustainable groundwater management of the basin. Operational impacts would be less than significant.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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

The nearest creeks to the project site, San Lorenzo Creek and San Leandro Creek, are 3.4 miles and 0.7 mile away from the site, respectively. Existing development between the project site and San Lorenzo and San Leandro Creeks include roadways, as well as residential, commercial, and industrial

developments. Neither project construction nor operation would alter the course of these creeks or other creeks, streams, or rivers.

The project site is currently developed and largely paved. According to the proposed site plan, the project would include 18 storm drains and a drainage easement that would direct stormwater flows to stormwater drains. There would be no substantial changes to surfaces in the existing operations portion of the site. However, approval of the CUP would result in the paving of the proposed expansion area which could alter the drainage pattern. Nonetheless, the expansion area would be configured to drain to stormwater treatment facilities and would require incorporation of stormwater control measures and NPDES permit requirements to minimize and control the amount of runoff that would enter the storm drain system. Specifically, the project would include a stormwater pretreatment and filtration system located in the northwestern corner of the expansion area, along with catch basins distributed throughout the site to facilitate proper drainage and treatment and prevent flooding off-site. The drainage pattern would remain substantially as it is under current conditions, although better controlled. Accordingly, impacts would be less than significant.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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

According to the Federal Emergency Management Agency Flood Insurance Rate Map, a portion of the project site's expansion area is located in Zone AE, which is defined as a high-risk area for flooding. There is a 1 percent annual chance to be inundated by flood waters as a result of a storm event (Map #06001C0254H, December 21, 2018; Federal Emergency Management Agency 2023). The project site is located approximately 0.8 mile east of the San Francisco Bay and is located in a tsunami hazard area, as shown in the Alameda County Tsunami Hazard Areas maps produced by the DOC (2021). Approval of the CUP would expand operations into the proposed expansion area but would not substantially increase the amount of hazardous waste on-site, since existing scrap piles on the existing operations portion of the site would be relocated to the proposed expansion area. As described under Section 9, *Hazards and Hazardous Materials*, and above under checklist items a and b, the project is subject to multiple state and local regulations for the regulation of hazardous materials and runoff. With compliance with existing regulations, the project would not increase the risk of release of pollutants in the event of a flood.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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

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

#### **LESS-THAN-SIGNIFICANT IMPACT**

# 11 Land Use and Planning

|                                                                                                                                                                                        | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less-than-<br>Significant<br>Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| Would the project:                                                                                                                                                                     |                                      |                                                                |                                     |                                     |
| a. Physically divide an established community?                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

## Setting

As stated in the *Project Description*, the project site has a 2035 *General Plan* land use designation of General Industrial and is zoned as Industrial General (IG). The General Industrial designation corresponds to areas that contain a wide range of manufacturing, transportation, food and beverage processing, technology, warehousing, vehicle storage, office-flex, and distribution uses (City of San Leandro 2016a). Industrial General zones allow a variety of industrial and commercial uses. Allowable building intensity on the project site is a floor to area ratio of up to 1:1, and maximum building height is up to 35 feet, or 50 feet with City approval.

The project site is within the planning area, or AIA, of the Oakland San Francisco Bay Airport. The ALUCP includes policies related to surrounding land uses and exposure to airport noise and hazards. Various regulations of the FAA also apply to land use and structural development in proximity to active airports.

## Impact Analysis

a. *Would the project physically divide an established community?*

Approval of the CUP would involve reconfiguring Alco's existing operations within the current site and expanding certain activities into the proposed expansion area. No new roads, linear infrastructure, or other development features are proposed that would divide an established community or limit movement, travel, or social interaction between established land uses. Project construction would not physically divide an established community; there would be no impact to established communities.

**NO IMPACT**

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

*San Leandro 2035 General Plan*

The project site has a *2035 General Plan* land use designation of IG. Vehicle storage, warehousing, and distribution uses are among the uses envisioned for the General Industrial designation; the project would therefore be consistent with the *2035 General Plan* land use designation for the site.

The City's *2035 General Plan* contains several land use policies and actions with the purpose of avoiding or mitigating an environmental effect. Table 5 shows applicable *2035 General Plan* land use policies that aim to avoid or mitigate environmental effects and the project's consistency with those policies.

**Table 5 Project Consistency with San Leandro 2035 General Plan Land Use Policies and Actions**

| General Plan Policy                                                                                                                                                                                                                                                                 | Project Consistency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy LU-1.14. Construction Impacts.</b> Ensure that construction activities are regulated and monitored in a manner that minimizes the potential for adverse off-site impacts such as noise, dust, erosion, exposure to hazardous materials, and truck traffic.                | <b>Consistent.</b> The project would be required to comply with existing applicable regulations that would minimize impacts to noise, dust, erosion, and exposure to hazardous materials. As discussed in Section 13, <i>Noise</i> , project construction and operation would not exceed noise limits established by the City and would not result in a significant impact. As discussed in Section 3, <i>Air Quality</i> , the project would not exceed applicable thresholds for particulate matter and would not result in a significant impact related to dust or air quality. As discussed in Section 10, <i>Hydrology and Water Quality</i> , the project would be required to comply with Section 3-15 and Section 7-12 of the SLMC, which outline construction erosion and stormwater best management practices and require the preparation of an erosion and sedimentation control plan. As concluded therein, approval of the CUP would not result in substantial erosion or runoff. Finally, as discussed in Section 9, <i>Hazards and Hazardous Materials</i> , the project would not result in the release of hazardous materials to the environment and would not expose project occupants to substantial hazards and hazardous materials.<br><br>As discussed in Section 17, <i>Transportation</i> , trips generated by the project would be consistent with existing commercial and light industrial uses in the project area and would not result in significant impacts related to VMT. |
| <b>Action LU-7.6.D: Eden Road.</b> Improve the Eden Road/ West Davis area in a manner that attracts higher value industrial land uses and improves the appearance and image of this area. This should include paving of Eden Road and frontage improvements on adjacent properties. | <b>Consistent.</b> Approval of the CUP would involve relocating existing large scrap metal piles away from view from Doolittle Drive and allow for better traffic circulation on site. The scrap metal piles would be relocated onto the proposed expansion area parcels and an additional truck scale would be installed. The proposed project also involves site improvements such as landscaping, fencing removal and repairs, paving, and access improvements including for driveways on Eden Road.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Policy LU-2.14. Emergency Access.</b> Ensure that all new development is designed for adequate access by emergency vehicles.                                                                                                                                                     | <b>Consistent.</b> Approval of the CUP would improve circulation on the project site. The site would utilize the existing driveway on Doolittle Drive and on Eden Road and add an additional driveway. The project would create more efficient circulation, allowing additional access for emergency vehicles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

Source: City of San Leandro 2016a

As shown in the table, the project would be generally consistent with applicable City's *2035 General Plan* policies that aim to avoid or mitigate environmental effects.

### San Leandro Municipal Code

The SLMC contains several regulations that intend to avoid or mitigate environmental effects in the city. Table 6 shows policies that aim to avoid or mitigate environmental effects and the project's consistency with those regulations.

**Table 6 Project Consistency with the San Leandro Municipal Code**

| San Leandro Municipal Code                                                                                                                                                                                                                                                                                | Project Consistency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section 7-5-600.</b> SLMC Section 7-5-600 adopts the California Green Building Standards Code (CALGreen) as the Green Building Code of San Leandro.                                                                                                                                                    | <b>Consistent.</b> As described in Section 6, <i>Energy</i> , the project would be required to implement the California Green Building Standards Code.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Chapter 5-2.</b> Chapter 5-2 establishes that street trees in San Leandro are property of the City, and outlines requirements for removal and planting of street trees.                                                                                                                                | <b>Consistent.</b> Approval of the CUP would not require removal of street trees. The project would be consistent with this chapter of SLMC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Chapter 3-15.</b> Chapter 3-15 of SLMC contains standards and requirements for development projects to avoid non-stormwater discharges into the municipal separate storm sewer.                                                                                                                        | <b>Consistent.</b> As described in Section 10, <i>Hydrology and Water Quality</i> , the project would be required to comply with NPDES permit requirements, C.3 Stormwater Guidelines, and would be subject to a site-specific Storm Water Pollution Prevention Plan to control stormwater runoff. Scrap metal storage and processing would be moved from areas where surfaces are currently variable to the proposed expansion area which would be paved and designed for stormwater control and treatment. The project applicant would also be required to comply with grading and excavation regulations established by the City and obtain appropriate permits prior to project approval. The project would be consistent with these chapters of the SLMC. |
| <b>Chapter 7-12.</b> Chapter 7-12 contains standards and permit requirements for grading and excavation, and requires preparation of an erosion and sedimentation control plan and drainage plan in order to reduce water quality impacts of stormwater runoff from the site for the life of the project. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

Source: SLMC 2022

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

### Airport Land Use Plan

The *Oakland International Airport ALUCP* (Alameda County ALUC 2012) contains policies and guidelines to prevent hazardous conditions and other environmental effects. Table 2-3, *Basic Compatibility Criteria and Supporting Information*, of the ALUCP sets forth criteria for development in each Safety Zone, including Safety Zone 2 the Inner Approach/Departure Zone. Table 7 shows the criteria from the ALUCP that aim to avoid or mitigate safety hazards and land use conflicts, and the project's consistency with those criteria for Zone 2.

**Table 7 Project Consistency with the Airport Land Use Compatibility Plan**

| Table 2-3 Basic Compatibility Criteria and Supporting Information – Inner Departure Zones/ Approach Surface                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>Prohibit schools, day care centers, libraries, hospitals, nursing homes, and places of worship</u>                        | <b>Consistent.</b> No schools, day care centers, libraries, hospitals, nursing homes, or places of worship uses are proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <u>Limit nonresidential development to low-intensity uses</u>                                                                | <b>Consistent.</b> The project would involve reconfiguration and expansion of an existing facility. The proposed project is not intended to increase the volume of materials received or processed at the facility, but to improve handling of materials. The project would not involve high-intensity land uses that attract a large number of people. There are six existing structures on the project site. The proposed project would not involve construction of additional structures, nor would there be an increase in the number of employees. The occupancy of the site would remain the same.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <u>Prohibit above ground storage, hazardous materials or other hazards to flight/objects exceeding Part 77 height limits</u> | <b>Consistent.</b> As described in Section 9, <i>Hazards and Hazardous Materials</i> , the proposed project would not introduce substantial amounts of additional hazardous materials on site, nor would it involve the storage of hazardous materials in the proposed expansion area. The project site is an existing Nonconforming Use due to the storage of hazardous materials on-site which is prohibited in Safety Zone 2. According to Section 2.7.5.7, Special Conditions, of the Oakland Airport ALUCP, where development not in conformance with the ALUCP already exists, additional infill development of similar land uses may be allowed to occur even if such land uses are prohibited elsewhere in the AIA. Section 2.7.5.7 states that Nonconforming Uses may be expanded if the development qualifies as “infill.” Policy 2.7.5.7 also includes criteria for qualifying as “infill.” For non-residential development, the site must be less than 10 acres and the number of people per acre shall be no greater than the average intensity of existing uses within 300 feet of the project site. The project would meet these conditions as it is less than 10 acres and would not further increase the density or intensity of the existing use. As a result, the project would meet the criteria for an allowed expansion of a Nonconforming Use. Further, the project has a Hazardous Materials Business Plan (HMBP) in place. The HMBP depicts the inventory of hazardous materials used in the operation. The HMBP includes requirements for storage/containment, notification, and contingency measures in the event of a spill, fire, or other incident. The proposed project would not increase the number or volume of hazardous materials used in project operation. While the project is an existing Nonconforming Use because the facility involves storage of hazardous materials, the proposed project would not change or expand this existing condition. Additionally, the project would not exceed Part 77, as no new habitable buildings or increases in building height are proposed. All existing structures are within the 150-foot height limit. |
| <u>Allow only low density (e.g., rural residential) residential development</u>                                              | <b>Consistent.</b> No residential uses are proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

Avigation easement  
dedication

**Consistent.** Pursuant to ALUCP Section 3.3.3.8, Avigation Easement Dedication, the proposed project is required to dedicate an avigation easement to the Port of Oakland. Avigation easements transfer certain property rights from the owner of a property to the owner of the airport. According to the ALUCP, avigation easements should be dedicated to the airport owner as a condition for any discretionary local approval of any development within airport Safety Zones that include obstructions or other flight hazards. The City of San Leandro will include a Condition of Approval for the project to grant an avigation easement to the Port of Oakland to mitigate the risks associated with the facility's storage of scrap metal piles. The Condition of Approval states:

Pursuant to ALUCP §3.3.3.8 Avigation Easement Dedication, the applicant shall dedicate an avigation easement to the Port of Oakland and shall:

1. Identify the potential airspace hazards associated with the project and its location within protected airspace;
2. Grant the airport owner the right to clear or maintain airspace free of obstructions;
3. Grant the right to mark potential obstructions and notify aviators of such hazards; and
4. Provide the right for aircraft to pass within the affected airspace.

As demonstrated in the above table, the project would be consistent with the ALUCP policies intended to avoid or mitigate environmental effects. Impacts would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**



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## 12 Mineral Resources

|                                                                                                                                                                        | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less-than-<br>Significant<br>Impact | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| Would the project:                                                                                                                                                     |                                      |                                                                |                                     |                                     |
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

### Setting

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

### Regulatory Setting

#### *Surface Mining and Reclamation Act of 1975*

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

### Impact Analysis

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

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

### NO IMPACT

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# 13 Noise

|                                                                                                                                                                                                                                                                                                           | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less-than-<br>Significant<br>Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|-------------------------------------|-------------------------------------|
| Would the project result in:                                                                                                                                                                                                                                                                              |                                      |                                                                |                                     |                                     |
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

Analysis in this section is based in part on a Noise Impact Analysis Report prepared by CDSA Design Group in October 2024 and included in Appendix E. This report was peer-reviewed by Rincon.

## Setting

Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be perceived as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1- to 2 dBA changes generally are imperceptible. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while arterial streets are in the 50-to-60-plus dBA range. Normal conversational levels are in the 60 to 65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA for each doubling of reference distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA for each doubling of reference distance. Noise from heavily traveled roads typically attenuates at about 3 dBA for each doubling of reference distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm that interrupts the line-of-sight reduces noise levels by 5 to 10 dBA. The

construction style for dwelling units in California generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows.

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses. The nearest residences to the project site are located approximately 0.4 mile to the east of the property line. The nearest outdoor recreation area is the Metropolitan Golf Links land approximately 600 feet west of the property line.

The project site is located in proximity to the Oakland San Francisco Bay Airport. It is approximately 5,100 feet southeast of airport runways 27L and 27R and the northern portion of the project site is within the ALUCP 60 Community Noise Equivalent Level (CNEL) noise contour.

The noise environment on the project site is dominated by the industrial uses on and surrounding the site, vehicle noise from Davis Street and Doolittle Drive Avenue, and rail vehicle noise from the adjacent Union Pacific Railroad tracks.

## **Regulatory Setting**

### *California Code of Regulations*

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

### *City of San Leandro 2035 General Plan*

The Environmental Hazards Element of the *2035 General Plan* provides goals, policies, and program to assure the appropriateness of new development with the noise environment of San Leandro. Table 8 shows the *2035 General Plan* land use compatibility chart. Applicable goals and policies are as follows:

- |                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Goal NOI-1</b> | Ensure that noise associated with the day-to-day activities of San Leandro residents and businesses does not impede the peace and quiet of the community.                                                                                                                                                                                                                                                                                                                                     |
| <b>EH-7.1</b>     | <b>Noise Compatibility Table.</b> Ensure that potential noise impacts are considered when new development is proposed. Projects that could significantly increase noise levels should incorporate mitigation measures to reduce such impacts. Apply the standards shown in Chart 7-2 when evaluating applications for future development. Chart 7-2 specifies the maximum noise levels that are normally acceptable, conditionally acceptable, and normally unacceptable for new development. |

**Table 8 City of San Leandro Noise and Land use Compatibility Guidelines**

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

CNEL = Community Noise Equivalent Level; dBA = A-weighted decibel  
Source: City of San Leandro 2016a

### *City of San Leandro Municipal Code*

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

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

Section 4-1-115 prohibits certain acts related to noise, such as construction-related noise near residential uses outside the hours of 7:00 a.m. to 7:00 p.m. on weekdays and 8:00 a.m. to 7:00 p.m. on weekends. Noise within public parks and noise that conflicts with residential uses is also prohibited.

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

## Impact Analysis

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

## Construction Noise

The primary source of construction noise would be the operation of heavy equipment on the project site. Intermittent noise impacts would also result from trucks arriving to and departing from the site. Construction activities associated with the project would be limited to grading/paving. Equipment typically used in these activities includes excavators, loaders, heavy-duty trucks, pavers, and other similar sized equipment. Most of the heavy construction equipment would not be running at full capacity throughout each construction period.

Table 9 lists typical construction equipment noise levels, based on a distance of 50 feet between the equipment and a noise receptor.

**Table 9 Typical Construction Equipment Maximum Noise Levels**

| Type of Equipment                                                       | Noise Level at 50 Feet (dBA) |
|-------------------------------------------------------------------------|------------------------------|
| Excavator                                                               | 81                           |
| Dump Truck                                                              | 80                           |
| Concrete Pump Truck                                                     | 75                           |
| Front End Loader                                                        | 76                           |
| Paver                                                                   | 85                           |
| dBA = A-weight decibels                                                 |                              |
| Source: Federal Highway Administration Roadway Construction Noise Model |                              |

Although there could be intermittent periods of high noise levels, impacts to ambient construction noise at an hourly or daily level would be less than significant. The City's Municipal Code does not specify allowable noise levels due to construction activities, but rather restricts the allowable hours of construction (7:00 a.m. to 7:00 p.m. on weekdays, 8:00 a.m. to 7:00 p.m. on weekends). Noise reduction measures would be implemented to reduce the potential impact of construction activity on nearby properties. These include:

- Maintain cConstruction equipment should be well maintained and used and use equipment judiciously to be as quiet as practical.
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Utilize "quiet" models of stationary noise sources where technology exists. Select hydraulically or electrically powered equipment and avoid pneumatically powered equipment where feasible.
- Locate stationary noise-generating equipment as far as possible from sensitive receptors when adjoining construction sites. Construct temporary noise barriers or partial enclosures to acoustically shield such equipment where feasible.
- Prohibit unnecessary idling of internal combustion engines.
- Route construction related traffic along major roadways and away from sensitive receptors where feasible.

Therefore, since the closest sensitive receptors are approximately 0.4 mile east of the project site, construction noise levels would not result in a substantial temporary increase in ambient noise levels in excess of standards established in the City's *2035 General Plan* or noise ordinance. Construction impacts would be less than significant.

## **Operational Noise**

The operational activities would remain the same as under current conditions, although expanded onto the additional proposed operations area. These include the following:

- Weighing of incoming and outgoing loads of material on the new truck scales
- A dispatch and Weighmaster's Office
- Unloading of steel from Alco and customer trucks
- Processing of steel to prepare for shipment including, cutting with large excavator mounted shears
- Loading of processed steel into either overseas export containers or large end dump trailers
- Storage of ferrous materials
- Maintenance of the fleet of excavators, forklifts, trucks, and other industrial equipment
- Repair and maintenance of our equipment, trucks, and boxes, including welding
- A truck wash area
- A Purchasing Office where payments are made to customers for both non-ferrous and ferrous materials

It has been reported that current operations sometimes involve loud noises associated with truck operations and moving piles and materials; these operational noises would not substantially change with implementation of the proposed project. The project would continue to operate between 4:00 a.m. and 12:00 a.m. on Monday through Friday, and between 5:00 a.m. and 12:00 p.m. on Saturday. Additionally, the facility is open to the public from 6:00 a.m. to 5:00 p.m., Monday through Friday. The facility does not operate on Sunday. Approval of the CUP would not change the facility's hours of operation. The project would include construction of new inbound and outbound truck scales to facilitate more efficient truck circulation and help eliminate queuing. The nearest sensitive receptors to the proposed truck loading areas are single-family residences located approximately 0.4 mile east of the project site. Although noise from existing operations may occasionally exceed thresholds, as mentioned above, noise generated from operational activities would remain generally the same as under current conditions and the project would not introduce substantial new sources of noise. The project would expand operations onto the proposed expansion area, and this space would be mainly used to store existing scrap piles and to improve the circulation pattern of the site. Therefore, project operations would not generate a substantial temporary or permanent increase in ambient noise levels. Noise from the proposed project would not exceed standards established by the City's *2035 General Plan* or municipal code, and impacts would be less than significant.

## **LESS-THAN-SIGNIFICANT IMPACT**



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

## Construction Vibration

The primary construction vibration generation would occur from the operation of heavy equipment on the project site. The construction vibration analysis for building damage is consistent with the methods presented in the *Transit Noise and Vibration Impact Assessment Manual* (Federal Transit Administration 2018). Table 10 presents the assumed equipment mix for the construction phase and reference vibration levels at 25 feet (from the Federal Transit Administration).

**Table 10 Typical Vibration Levels from Construction Equipment**

| Assumed Equipment   | Equipment (Equivalent Federal Highway Administration Reference) | Reference Vibration Level at 25 feet (PPV, inches/second) |
|---------------------|-----------------------------------------------------------------|-----------------------------------------------------------|
| Excavator           | Large Bulldozer                                                 | 0.089                                                     |
| Dump Truck          | Loaded Trucks                                                   | 0.076                                                     |
| Concrete Pump Truck | Loaded Trucks                                                   | 0.076                                                     |
| Front End Loader    | Small Bulldozer                                                 | 0.003                                                     |
| Paver               | Large Bulldozer                                                 | 0.089                                                     |

PPV = peak particle velocity

Source: Federal Highway Administration Roadway Construction Noise Model Noise Emission Reference Level Database (Appendix E)

The vibration-generating equipment shown in the table above is not anticipated to result in damage to nearby buildings, as none of the assumed construction equipment would exceed Federal Transit Administration vibration damage thresholds, including 0.12 peak particle velocity (PPV) inches/second for buildings extremely susceptible to vibration damage and 0.2 PPV inches/second for non-engineered timber and masonry structures. Impacts related to construction vibration would be less than significant.

## Operational Vibration

Approval of the CUP would expand operations into the proposed expansion area, which could introduce new sources of vibration. However, this area would primarily be used to scrap pile storage and to improve internal circulation, activities that are not expected to generate substantial vibration. Temporary sources of vibration, such as trucks, are not considered sources of groundborne vibration levels as vibration from trucks would not be substantially perceptible at sensitive receivers (Appendix E). Additionally, there are no active sources of groundborne vibration in the project vicinity that would produce perceptible levels of vibration. Therefore, the project would not generate groundborne vibration or groundborne noise levels in excess of established standards, and there would be no impact related to operational groundborne vibration.

## LESS-THAN-SIGNIFICANT IMPACT

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

The project site is located in proximity to the boundaries of the Oakland San Francisco Bay Airport. It is approximately 5,100 feet southeast of airport runways 27L and 27R, and the northern portion of the project site is within the ALUCP 60 CNEL noise contour. ~~The nearest public airport to the project site is the Oakland International Airport, located approximately one mile northwest of the project site. According to the airport's noise exposure map, the project site is located just outside of the 60 dBA CNEL airport noise contours (Appendix E).~~ According to the ALUCP, industrial land uses are compatible within the 60 CNEL noise contour. While flying aircraft noise is occasionally audible on the project site, aircraft noise associated with nearby airport activity would not expose people residing or working near the project site to excessive noise levels. Therefore, implementation of the project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur.

**~~NO IMPACT~~ LESS-THAN-SIGNIFICANT IMPACT**

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# 14 Population and Housing

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

## Setting

There are no dwelling units or people living at the project site.

## Impact Analysis

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

Approval of the CUP would allow the project proponent to relocate scrap metal piles to the proposed expansion area and install an additional scale to facilitate more efficient truck circulation but would not require additional employees. No dwelling units are proposed. The project would not induce substantial or unplanned growth and there would be no impact.

### NO IMPACT

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

There are no dwelling units or people living at the project site. Therefore, no impact would occur.

### NO IMPACT

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# 15 Public Services

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

## Setting

ACFD provides fire protection and emergency medical service to San Leandro. ACFD is divided into four branches: Operations, Special Operations, Fire Prevention, and Administrative Support Services (ACFD 2025a). ACFD operates six fire stations in San Leandro (Station Nos. 9 through 13 and 24) (ACFD 2025b). The closest fire station to the project site is ACFD Station No. 10, located 3,450 feet south of the project site at 2194 Williams Street (ACFD 2025b).

SLPD provides law enforcement services for the city. SLPD has one police station located at San Leandro City Hall at 835 East 14th Street, approximately 1.6 miles north of the project site. As of March 2025, SLPD is staffed by 91 sworn officer positions and 45 civilian employees, ranging from Police Chief to Police Officer. The department was operating at approximately 75 percent of its authorized sworn staffing levels, with ongoing efforts to recruit and train new officers to reach full staffing capacity (SLPD 2025).

The San Leandro Unified School District (SLUSD) and San Lorenzo Unified School District provide public educational services to San Leandro. SLUSD serves approximately 8,741 students across eight elementary schools, two middle schools, two high schools, and one adult education school (California Department of Education 2025). According to SLUSD’s 2024 Developer Fee Justification Study, the district is over capacity by 336 students. Broken down by grade level, kindergarten through 6th grade facilities are over capacity by 817 students; 7th through 8th grades have an available capacity for 594 students; 9th through 12th grade facilities are over capacity by 107

students, and special education is over capacity by six students (SLUSD 2024). San Lorenzo Unified School District, specifically Dayton Elementary School and Corvalis Elementary School, serve a small portion of southwestern San Leandro.

The City's Public Works Department maintains neighborhood parks, special use recreation areas, community parks, and golf courses in the city, totaling 382.8 acres of improved parkland. The City's 2035 *General Plan* Open Space, Parks, and Conservation Element outlines a goal to provide at least 5 acres of improved parkland for every 1,000 residents (City of San Leandro 2016a). As discussed in Section 14, *Population and Housing*, the population of San Leandro is currently estimated at 87,497 people; therefore, the City has approximately 4.37 acres of improved parkland per 1,000 residents.<sup>6</sup>

## **Regulatory Setting**

### *San Leandro 2035 General Plan*

The City's 2035 *General Plan* Community Services and Facilities Element addresses the provision of community services, including fire protection and police protection. Additionally, the element emphasizes the importance of reducing risk and the effects of disaster prevention and/or preparedness (City of San Leandro 2016a). The following policies found within the element are applicable to fire and police protection services within the city:

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

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

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

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

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<sup>6</sup> Improved parkland totaling 382.8 acres divided by 87,497 thousand residents in San Leandro is approximately 4.37 acres.

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

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

As defined in this Policy, this standard shall include community, neighborhood, mini-parks, and linear parks and trails, as well as school athletic fields and play areas for which joint use agreements exist. Pursuant to the Quimby Act, the standard also includes the Monarch Bay Golf Course and Oyster Bay Regional Shoreline in the baseline acreage. The standard does not include private property, wetlands and open spaces where the primary purpose is resource conservation rather than recreation. When evaluating the City's progress toward meeting this standard, it should be recognized that school facilities covered by joint use agreements may be unavailable during school hours, and therefore may not meet recreational needs to the same extent as City parks.

### *San Leandro Municipal Code*

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

Article 8 of Title 7 of the SLMC enables the City Council to require dedication of lands deemed necessary for the purpose of constructing schools necessary to assure the residents of a subdivision have adequate elementary school service as a condition of final map approval for a subdivision.

SLMC Chapter 7-13 establishes the City's park facilities development impact fee which, pursuant to Government Code Section 66001, allows the City to apply fees to new development to pay for new or renovated park facilities. Development in San Leandro is required to pay appropriate park development fees. Furthermore, SLMC Section 7-1-810 requires that as a Condition of Approval of a tentative map or parcel map, subdivisions are required to offer to dedicate parkland, pay a fee in lieu, or a combination of both (at the option of the City).

## **Impact Analysis**

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

- 1 *Fire protection?*
- 2 *Police Protection?*
- 3 *Schools?*
- 4 *Parks?*
- 5 *Other public facilities?*



ACFD Fire Station No. 10 is located approximately 0.8 mile southeast of the project site at 2194 Williams Street. The project site is located within a developed area already served by ACFD, and the project would not require new or expanded fire facilities. The project would be required to comply with California Fire Code regulations for construction and operation and would be subject to review by ACFD. Additionally, the project has a Fire Protection Plan in place to ensure fire safety (Appendix G). The plan outlines procedures for promptly contacting ACFD for immediate assistance during incidents and maintaining clear access for emergency vehicles and personnel. It also establishes protocols for notifying the Oakland San Francisco Bay Airport and other relevant entities in the event of a fire. Furthermore, the Fire Protection Plan calls for the installation of on-site firefighting equipment, such as water tanks and a foam system, annual inspections by a qualified third-party fire company, and regular employee re-training to maintain preparedness and compliance. Although the project would expand the project site, the expansion area would primarily be used to improve internal circulation and would not result in an increased demand for fire protection services. Overall, the proposed project would not result in the need for new or physically altered fire department facilities or require the need for new or physically altered fire department facilities. Therefore, impacts to fire protection services would be less than significant.

The SLPD station is located at San Leandro City Hall at 835 East 14th Street, approximately 2.1 miles northeast of the project site. Although the project would expand the project site, the expansion area would primarily be used to improve internal circulation and would not result in an increased demand for police protection services. The existing site is currently served by SLPD, and the project would not result in the need for new or physically altered government facilities or require the need for new or physically altered government facilities. Impacts to police services would be less than significant.

The project site is located in the SLUSD. The nearest school to the project site is Garfield Elementary School, which is located approximately 1.2 miles to the south. As discussed in Section 13, *Population and Housing*, the project does not include residential development and would not directly or indirectly add substantial population to San Leandro. Therefore, the project would not generate substantial numbers of new students, thus impacting school resources. There would be no impact.

The San Leandro Recreation and Human Services Department manages the recreational and park uses in the city. The nearest recreational facility to the project site is located at Oyster Bay Regional Shoreline, which is located approximately 0.5 mile to the west. As discussed in Section 13, *Population and Housing*, the project would not add substantial population to San Leandro. Therefore, the project would not substantially increase demand for recreational resources. There would be no impact.

**NO IMPACT**

# 16 Recreation

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

## Impact Analysis

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

Approval of the CUP would allow the project proponent to relocate scrap metal piles to the proposed expansion area and install an additional scale to facilitate more efficient truck circulation but would not require additional employees. No dwelling units are proposed. The project would not induce population growth in San Leandro or introduce new employees or residents that would use parks. The project does not include recreational facilities or park land. There would be no impact.

## NO IMPACT

*This page intentionally left blank.*

# 17 Transportation

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

The information and analysis included in this section is based primarily upon the Traffic Study prepared by Kimley-Horn and Associates in February of 2025. The study is included as Appendix F to this Initial Study.

## Setting

The project site has frontage on Doolittle Drive and Eden Road. Regional access is available to the site from Interstate 880, located 1.8 miles east of the site, via State Route 112 (Davis Street). Local access to the site is also available from State Route 61 (Doolittle Drive). The following descriptions are provided for roadways that would provide access to the site and are most likely to serve most of the project's generated vehicle, bicycle, pedestrian and transit traffic.

### Existing Roadway Network

- **Doolittle Drive.** Doolittle Drive, also known as State Route 61 north of the intersection with Davis Street, is a north-south arterial. It provides the primary surface street connection between Oakland International San Francisco Bay Airport and Alameda to San Leandro and terminates at Belvedere Avenue, just north of the Estudillo Canal in southern San Leandro. The roadway within the study area is two lanes in each direction and has a center, two-way, left-turn lane. It serves mainly industrial uses along the corridor. Within the study area, the speed limit on Doolittle Drive is 45 miles per hour north of Eden Road and 40 miles per hour south of Eden Road. The project has one unsignalized driveway on Doolittle Drive.
- **Davis Street.** Davis Street, also known as State Route 112 east of Doolittle Drive, is a four-lane, east-west arterial, which runs between Business Center Drive near the bayfront and East 14th Street. In the project vicinity, the roadway serves industrial uses, and the speed limit on Davis Street is 35 miles per hour.

- **Eden Road.** Eden Road is an unimproved gravel and dirt, east-west road that extends approximately 1,080 feet west of Doolittle Drive/State Route 61 with gates that restrict access after hours. The roadway is currently a public road but is not constructed to modern legally acceptable road standards. The City has deeded the roadway to Alco to become a private road, which will be constructed and maintained to City standards. The transfer and development of Eden Road are not part of this project.

#### *Existing Pedestrian, Bicycle and Transit Facilities*

Pedestrian access to the office is available via continuous sidewalks located on both sides of Doolittle Drive adjacent to the project site. Bicyclists are able to access the site via the existing Class II bicycle lanes along Doolittle Drive. Currently, Alameda Contra Costa Transit District does not provide transit service within the study area.

### **Regulatory Setting**

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

#### *State Regulations*

### **SENATE BILL 743**

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

In November 2017, LCI released a technical advisory containing recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in SB 743. Also in November 2017, LCI released the proposed text for Section 15064.3, "Determining the Significance of Transportation Impacts," which summarized the criteria for analyzing transportation impacts for land use projects and transportation projects and directs lead agencies to "choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure." LCI recommends that for most instances, a per service population threshold should be adopted and that a 15 percent reduction below that of existing development would be a reasonable threshold.

### **CALIFORNIA ASSEMBLY BILL 32, SENATE BILL 32, AND SENATE BILL 375**

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

emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).

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

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

### *Local Regulations*

#### **SAN LEANDRO 2035 GENERAL PLAN TRANSPORTATION ELEMENT**

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

- |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy T-1.3</b>  | <b>Mitigation of Development Impacts.</b> Require developers to address the impacts that their projects will have on the City's transportation system. A variety of mitigation measures, including impact fees, street improvements, traffic signal and Intelligent Transportation Systems (ITS) improvements, transportation demand management (TDM) measures, and improvement of non-automobile transportation modes, should be considered.                                                                                          |
| <b>Policy T-1.10</b> | <b>Reduced Trip Generation.</b> Encourage local employers to develop programs that promote ridesharing, flextime and telecommuting, bicycle use, and other modes of transportation that reduce the number and distance of vehicle trips generated.                                                                                                                                                                                                                                                                                     |
| <b>Policy T-2.6</b>  | <b>Building Design and Site Planning.</b> Ensure that the site planning and design of new development promotes the use of non-auto modes of transportation by including amenities such as sidewalks, bike lockers, and bus shelters.                                                                                                                                                                                                                                                                                                   |
| <b>Policy T-3.5</b>  | <b>Accommodation of Bicycles and Pedestrians.</b> Require new development to incorporate design features that make walking, bicycling, and other forms of nonmotorized transportation more convenient and attractive. Facilities for bicycles and pedestrians, including secured bicycle parking, clearly marked crosswalks, well-lit streets and sidewalks, landscaping, and street furniture should be provided within new employment areas, shopping destinations, multi-modal transportation facilities, and community facilities. |

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

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

### **THRESHOLDS OF SIGNIFICANCE**

The *City of San Leandro Proposed Guidelines for Analyzing VMT* provide guidance on when a project may be exempt from performing VMT analysis if the project meets at least one screening criteria based on:

- CEQA Exemption
- Small Project
- Local Serving
- Affordable Housing
- Transit Priority Area
- Low-VMT Area
- Infill Residential Developments

Project information was evaluated to determine if the project would be exempt from a VMT analysis. Projects defined as generating 110 or fewer daily vehicle trips, absent substantial evidence indicating that a project would generate a potentially significant level of VMT. As this project generates a total of 76 new daily vehicle trips, the project can be considered a Small Project. As such, a VMT analysis is not required for the project.

The City uses the Alameda County Traffic Impact Study Guidelines and endeavors to maintain a target LOS at signalized intersections at LOS D, in compliance with the Alameda County Standards. Therefore, the proposed project would create a significant impact at a signalized intersection if it would cause the LOS levels to drop below LOS D.

### **Impact Analysis**

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

#### *Roadway Facilities*

Approval of the CUP would allow the expansion and internal reconfiguration of an existing metal collection facility to improve on-site circulation and reduce off-site vehicle queueing. The project does not involve changes to the existing public roadway network, transit routes, or bicycle and pedestrian facilities in the area. By improving internal site access and circulation, the project is expected to reduce potential traffic conflicts on adjacent roadways and enhance overall site

efficiency. As such, the project would not conflict with applicable plans, programs, ordinances, or policies related to the circulation system and would not result in significant impacts to roadway, transit, bicycle, or pedestrian facilities.

#### *Bicycle, Pedestrian, and Transit Facilities*

An impact would occur to bicycle and pedestrian facilities if the proposed project were to disrupt existing bicycle and pedestrian facilities or be inconsistent with adopted City standards. There are bike and pedestrian facilities in the vicinity of the project site, as described under *Existing Bicycle and Pedestrian Facilities*. Because the project would not be anticipated to substantially increase vehicle traffic or vehicle speed in the existing roadway network around the project site, the bicycle level of traffic stress would not substantially change as a result of the project. Approval of the CUP would not include features that would be hazardous to pedestrians or bicycles, nor would it generate additional bicyclists or pedestrians. Due to the project's proposed use, it would be expected to generate negligible transit trips. The project would not conflict with City or regional plans, policies or ordinances pertaining to transit, pedestrian, or bicycle facilities or travel (Appendix F). No significant impacts would occur.

#### **LESS-THAN-SIGNIFICANT IMPACT**

*b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?*

As discussed in the Traffic Study (Appendix F), the project would meet the City's criteria for a "Small Project," because it would generate fewer than 110 average daily trips. It would also meet criteria for a "Local Serving" project, defined as retail/public facilities not exceeding 50,000 square feet in size. A detailed VMT analysis is not required, and the project would have less-than-significant impacts related to VMT.

#### **LESS-THAN-SIGNIFICANT IMPACT**

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

Existing project site operations include trucks of various sizes entering and leaving the project site. This condition would not change with the proposed project, which is designed to improve truck access to and movement through the site. No changes to Doolittle Drive or Davis Street are proposed. As discussed in the Traffic Study (Appendix F), Kimley-Horn and Associates reviewed the proposed site plan for access and circulation and found that the design was adequate to accommodate the proposed operations and natural growth in activity at the site. For site circulation, a queuing analysis for the existing and proposed truck scales showed adequate spacing for queue lengths during peak hours. The project would not involve geometric design features or incompatible uses that would substantially increase hazards at the project site. Impacts would be less than significant.

#### **LESS-THAN-SIGNIFICANT IMPACT**

*e. Would the project result in inadequate emergency access?*

Approval of the CUP would allow improving access to the site and circulation within the site, which would reduce the potential for truck queuing off-site that could slow emergency vehicles on Doolittle Drive (see Appendix F). No changes to Doolittle Drive or Davis Street are proposed. The project would provide adequate emergency access to the site and would not result in substantial



additional congestion on surrounding roads. Additionally, the project would not impact access to the Oakland San Francisco Bay Airport property during an emergency or block evacuation corridors or airport access roads. Impacts would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**

# 18 Tribal Cultural Resources

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

## Setting

*Tribal cultural resources* are defined, under PRC Section 21084(a)(1), as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: 1) included or determined to be eligible for inclusion in the CRHR; or 2) included in a local register of historical resources. Tribal cultural resources are also resources determined by the lead agency (i.e., City), in its discretion and supported by substantial evidence, to be significant. In making this determination, the lead agency is required to consider the significance of the resource to a California Native American tribe.

The CRHR includes resources listed in or formally determined eligible for listing in the National Register of Historic Places. Pursuant to PRC Section 21084.1, a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” Demolition, replacement, substantial alteration, and relocation of historic properties are actions that would change the significance of an historic resource (CCR, Title 14, 15064.5).

The project site contains industrial buildings typical of the late twentieth century. The parcels are paved or covered compacted dirt or with existing buildings. No evidence of historic buildings, sites, structures, or objects is present on the project site or in the project vicinity.

## Regulatory Setting

### *Assembly Bill 52*

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

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

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

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

## Impact Analysis

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

No California Native American tribes have requested notification of new development within San Leandro. Therefore, no tribal cultural resources have been identified on the project site. As described in Section 5, *Cultural Resources*, neither the cultural resources records search nor Sacred Lands File search identified cultural resources listed on or eligible for listing on the CRHR or a local register within the project site. However, there is always potential to uncover buried archaeological and tribal cultural resources during ground disturbing activities, which could potentially be considered tribal cultural resources eligible for listing in the CRHR or a local register or be considered tribal cultural resources. Should project construction activities encounter and damage or destroy a tribal cultural resource or resources, impacts would be potentially significant. Implementation of Mitigation Measure TCR-1 would be required.

## **Mitigation Measure**

The following mitigation measure is required:

### *TCR-1 Unanticipated Discovery of Tribal Cultural Resources*

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

## **Significance After Mitigation**

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

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

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## 19 Utilities and Service Systems

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

### Setting

#### *Potable Water*

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

**Alco Iron & Metal Company Facility Expansion Project**

Each water district adopts an UWMP, which is a long-range planning document used to assess current and projected water usage, water supply planning and conservation and recycling efforts. The EBMUD adopted a 2020 UWMP and a 2020 Water Shortage Contingency Plan that determined that under base condition assumptions, EBMUD can meet customer demand out to 2050 during normal years and single dry years; however, during multiple year droughts, even with customer demand reduction measures in place, EBMUD will need to obtain supplemental supplies to meet customer demands (EBMUD 2021). Projections are summarized across the different water supply scenarios through the year 2050 in Table 11.

**Table 11 EBMUD Normal and Dry Year Supply and Demand Comparison 2020–2050**

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

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

Source: EBMUD 2021

EBMUD distributes its water through a system of pipelines, storage reservoirs, water treatment plants, and pumping plants. Within the EBMUD service area, the water distribution network includes 4,200 miles of pipe, 167 water distribution reservoirs, and 131 water pumping plants. EBMUD's

water supply system delivers 325 million gallons per day (mgd) to its 1.4 million customers and has a capacity of 830 million gallons (EBMUD 2021, City of San Leandro 2016b).

There are currently no major water storage facilities in San Leandro. Rather, the San Leandro is served by nearby facilities in Castro Valley and Oakland, including the Dunsmuir Reservoir just outside the northeastern city limits. Pipelines in San Leandro range from 4 to 36 inches in diameter. EBMUD operates and maintains all water distribution lines within the city and is responsible for all facilities up to the location of the water meter (City of San Leandro 2016b).

### *Wastewater*

The City's sewer system consists of approximately 130 miles of pipe, ranging from 6 inches to 42 inches in diameter, and 13 remote lift stations. The City maintains roughly two thirds of the sewers within the city limits, primarily serving the northern portion of the city. The remainder of the city, including the project site, is served by OLSD. The San Francisco Bay RWQCB established wastewater treatment requirements for OLSD wastewater treatment plant and the East Bay Dischargers Authority outfall in an NPDES Permit (Order No. R2-2012-0004), adopted in 2012. The NPDES Order sets a framework for operation of the plant and effluent from the plant (City of San Leandro 2016b).

OLSD serves a population of approximately 141,000, which includes residents and businesses. OLSD and Castro Valley Sanitary District jointly own OLSD's treatment plant, which has a permitted capacity of 20 mgd and treats an average dry weather flow of 12 mgd (OLSD 2022).

### *Stormwater*

The City's Department of Public Works owns and maintains 175 miles of storm drain conduits throughout the city. The City's storm drain system feeds into a larger system owned and operated by the Alameda County Flood Control and Water Conservation District. Stormwater from the project site drains west to Washington Avenue, where it is collected by storm drains into the City's stormwater system. Stormwater runoff is collected and disposed of by an integrated system of storm drains, inlets, curbside gutters, catch basins, drainage ditches, and man-made channels. Ultimately, stormwater that enters the City's system drains to the San Francisco Bay (City of San Leandro 2025).

### *Solid Waste*

San Leandro has two distinct service areas for refuse and recycling services: San Leandro Sanitary District and OLSD. The two service providers that serve these areas are Alameda County Industries (City's franchisee) and Waste Management of Alameda County (OLSD's franchisee). As of 2019, the City's solid waste was sent to seven landfills, as summarized below in Table 12. About 81 percent of San Leandro's solid waste was sent to the Altamont Landfill Resource Recovery Facility and the Vasco Road Sanitary Landfill (CalRecycle 2019).

**Table 12 Estimated Landfill Capacities and Closure Date**

| Landfill Facility                            | Permitted Capacity (cubic yards) | Remaining Capacity (cubic yards) | Maximum Permitted Throughput (tons per day) | Anticipated Closure Date |
|----------------------------------------------|----------------------------------|----------------------------------|---------------------------------------------|--------------------------|
| Altamont Landfill Resource Recovery Facility | 124,400,000                      | 52,300,000                       | 11,150                                      | 2060                     |
| Fink Road Landfill                           | 28,289,900                       | 18,993,322                       | 2,400                                       | 2050                     |
| North County Landfill and Recycling Center   | 41,200,000                       | 35,400,000                       | 825                                         | 2048                     |



| <b>Landfill Facility</b>     | <b>Permitted Capacity (cubic yards)</b> | <b>Remaining Capacity (cubic yards)</b> | <b>Maximum Permitted Throughput (tons per day)</b> | <b>Anticipated Closure Date</b> |
|------------------------------|-----------------------------------------|-----------------------------------------|----------------------------------------------------|---------------------------------|
| Potrero Hills Landfill       | 83,100,000                              | 13,872,000                              | 4,330                                              | 2048                            |
| Recology Hay Road Landfill   | 37,000,000                              | 30,433,000                              | 2,400                                              | 2077                            |
| Redwood Landfill             | 26,077,000                              | 26,000,000                              | 2,300                                              | 2036                            |
| Vasco Road Sanitary Landfill | 40,207,100                              | 11,560,000                              | 2,518                                              | 2051                            |

CalRecycle identifies Maximum Permitted Throughput only in tons/day, while Maximum Permitted Capacity and Remaining Capacity are only provided in cubic yards; therefore, standard conversion factors provided by the USEPA (2016) are used to provide all figures in both tons and cubic yards. USEPA identifies a standard conversion factor for Municipal Solid Waste compacted to “Landfill Density” of 1,700 pounds per cubic yard, equating to approximately 0.8 ton per cubic yard of compacted Municipal Solid Waste.

Source: United States Environmental Protection Agency 2016

Source: CalRecycle, Solid Waste Information System, 2025

### *Other Utilities*

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

## **Regulatory Setting**

### *State*

#### **CALIFORNIA GREEN BUILDING STANDARDS CODE**

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

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

#### **ASSEMBLY BILL 939**

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

City of San Leandro

**SAN LEANDRO 2035 GENERAL PLAN**

The following policies of the City's *2035 General Plan* are related to the provision of utilities and service systems in San Leandro:

- Policy CSF-6.2 Fair Share Costs.** Require future development to pay its fair share of the cost of improving the water, sewer, storm drainage, and other infrastructure systems needed to serve that development. Development impact fees, development agreements, and other appropriate forms of mitigation should be used to cover the costs of upgrading or expanding public infrastructure.
- Policy CSF-6.4 Wastewater Collection and Treatment.** Maintain efficient, environmentally sound, and cost-effective wastewater collection and treatment services in San Leandro.
- Policy CSF-6.5 Capacity.** Maintain adequate capacity at the San Leandro wastewater treatment plant to accommodate projected levels of growth within the service area and encourage the Oro Loma Sanitary District to do the same. Support efforts to maintain and/or improve the high quality of treated effluent at both plants and increase the feasibility and cost-effectiveness of using recycled wastewater for non-potable purposes.

**SAN LEANDRO STORMWATER MANAGEMENT AND DISCHARGE CONTROL ORDINANCE**

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

**Impact Analysis**

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

**Water and Wastewater**

Project implementation would not change the amount or type of materials received on-site, equipment use, employee count, or hours of operation. The project does not include additional restrooms or water consumption processes and would not use/generate measurable additional water or wastewater. Therefore, operation of the project would not substantially increase water use or generate wastewater. The project would not require or result in the relocation or construction of

new or expanded water facilities, and the project would have sufficient water supplies available to serve the project during normal, dry, and multiple dry years. Impacts would be less than significant.

Approval of the CUP would not substantially increase wastewater generation beyond existing conditions. Therefore, the proposed project would not exceed wastewater treatment requirements of the RWQCB, result in the need for new or expanded wastewater facilities, or be served by a treatment provider with inadequate capacity. Impacts would be less than significant.

## **Stormwater**

The project would continue to connect to the existing storm drain system operated and maintained by the City. As discussed in Section 10, *Hydrology and Water Quality*, the project would include 18 storm drains and a drainage easement that would direct stormwater flows to stormwater drains. There would be no changes to surfaces in the existing operations portion of the site, but the project would include paving of the proposed expansion area which could potentially increase stormwater runoff. However, the expansion area would be configured to drain to stormwater treatment facilities and would require incorporation of stormwater control measures and NPDES permit requirements to minimize and control the amount of runoff that would enter the storm drain system. Specifically, the project would include a stormwater pretreatment and filtration system located in the northwestern corner of the expansion area, along with catch basins distributed throughout the site to facilitate proper drainage and treatment. Stormwater facilities in the vicinity, including those as part of proposed improvements to Eden Road, would be adequate without the need for construction of additional facilities. Impacts would be less than significant.

## **Electricity, Natural Gas, and Telecommunications**

As discussed in Section 6, *Energy*, approval of the CUP would not result in the wasteful, inefficient, or unnecessary consumption of energy. In addition, the project would not require the construction of new electric power, natural gas, or telecommunications facilities, because it is located in an urban area already served by those utilities and would not require additional capacity.

Therefore, the project would not result in significant environmental impacts due to the construction of new utility facilities. Impacts would be less than significant.

### **LESS-THAN-SIGNIFICANT IMPACT**

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

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

Approval of the CUP would involve reconfiguring the operations on the portion of the project site with Alco's existing operations and expanding those operations to the proposed expansion area. The proposed project is intended to improve on-site operations and increase efficiencies. Operation of the project would not generate additional solid waste beyond existing conditions.

Solid waste from the project site would continue to be collected by Waste Management of Alameda County and likely sent to the Altamont Landfill Resource Recovery Facility. The project would be required to comply with City and State plans and policies to reduce solid waste generation, including a requirement to divert at least 50 percent of solid waste and recyclables as required by AB 939. The project's incremental increase in solid waste would not adversely affect solid waste facilities. Impacts would be less than significant.

**LESS-THAN-SIGNIFICANT IMPACT**

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20 Wildfire

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

Setting

According to maps prepared by CAL FIRE, most of San Leandro is within a Local Responsibility Area and is not located within a Fire Hazard Severity Zone. However, small portions of the city along its eastern border are classified as High or Moderate Fire Hazard Severity Zones within Local Responsibility Areas (CAL FIRE 2024). The project site is not within a Fire Hazard Severity Zone and is located approximately 4.1 miles west from the nearest High Fire Hazard Severity Zone and 4.8 miles from the nearest Very High Fire Hazard Severity Zone.

## Impact Analysis

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

The project site is not in a CAL FIRE-designated Fire Hazard Severity Zone and is located 4.7 miles west of the nearest Very High Fire Hazard Severity Zone (CAL FIRE 2024). The project site is separated from the nearest Very High Fire Hazard Severity Zone by urban development, which does not facilitate the spread of wildfire. Approval of the CUP would not impair an adopted emergency response plan or emergency evacuation plan, as discussed in Section 9, *Hazards and Hazardous Materials*, or exacerbate wildfire risks. Furthermore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post fire slope instability, or drainage changes in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones. No impact would occur.

### NO IMPACT

## 21 Mandatory Findings of Significance

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

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

As discussed in Section 4, *Biological Resources*, the proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The project could result in potentially significant impacts to nesting birds during construction. Implementation of Mitigation Measure BIO-1 would reduce impacts to protected birds to less-than-significant levels that would not reduce habitat or adversely affect wildlife or plant populations.



As discussed in Section 5, *Cultural Resources*, and Section 7, *Geology and Soils*, no historical, archaeological, or paleontological resources were identified on-site. Additionally, as discussed in Section 18, *Tribal Cultural Resources*, there are no known tribal cultural resources within the project site. Nevertheless, it is always possible to encounter cultural or tribal cultural resources during ground-disturbing activities. Implementation of mitigation measures CR-1 and TCR-1 would reduce impacts to previously undiscovered cultural and tribal cultural resources to less-than-significant levels by providing a process for evaluating and, as necessary, avoiding impacts to resources found during construction. Important examples of California history or prehistory would not be eliminated.

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

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

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

Cumulatively considerable impacts could occur if the construction of other projects occurs at the same time as the project and in the same vicinity, such that the effects of similar impacts of multiple projects combine to expose adjacent sensitive receptors to greater levels of impact than would occur under the project. For example, if the construction of other projects in the area occurs at the same time as construction of the project, potential impacts associated with noise and traffic to residents in the Project area may be more substantial.

As described in Sections 1 through 20, approval of the CUP would not result in significant and unmitigable impacts to the environment, or impacts that would be cumulatively considerable, with respect to all environmental issues. This is largely because project construction activities would be temporary (approximately 30 days), and construction and operational activities would not significantly alter the environmental baseline condition.

Implementation of the project would result in less-than-significant environmental impacts with implementation of the identified mitigation measures. The impacts associated with the project are anticipated to be localized at the project site and would not be expected to combine with other projects to cause cumulatively considerable environmental impacts. Given the limited impacts anticipated with project implementation, the project would not cause considerable contributions to significant cumulative impacts. This impact is less than significant with mitigation incorporated.

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

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

In general, impacts to human beings are associated with such issues as air quality, seismic hazards, traffic hazards, hazards and hazardous materials, noise, and wildfire impacts.

As discussed in Section 3, *Air Quality*, the project would not conflict with an air quality plan, expose sensitive receptors to pollutant concentrations, or result in emissions affecting a substantial amount of people, but the project could result in fugitive dust impacts during construction. Implementation of mitigation measure AQ-1 would reduce fugitive dust impacts during construction.

As discussed in Section 7, *Geology and Soils*, the project would not result in seismic shaking, landslides, or other ground failures, located on unstable soil, or have soils that are incapable of adequate wastewater disposal. Although the project is located on expansive soil, adherence to existing SLMC regulations would reduce impacts to a less-than-significant level and would ensure that the project would not create a substantial adverse effect on human beings.

As discussed in Section 9, *Hazards and Hazardous Materials*, impacts related to exposure to on-site contamination would be reduced with implementation of Mitigation Measure HAZ-1. With implementation of this measure, this impact would be less than significant, and the project would not create a substantial adverse effect on human beings with respect to hazardous materials.

As discussed in Section 9, *Hazards and Hazardous Materials*, and Section 11, *Land Use and Planning*, the project would not conflict with the *Oakland International Airport ALUCP* and therefore would not cause a hazard to human beings related to airport operations.

As discussed in Section 13, *Noise*, impacts related to exposure to excessive noise or groundborne vibration would not be significant, and the project would not create a substantial adverse effect on human beings with respect to noise.

As discussed in Section 17, *Transportation*, the project would not conflict with a plan addressing the circulation system, increase hazards due to geometric design feature, or result in inadequate emergency access, and the project would not create a substantial adverse effect on human beings with respect to transportation hazards.

As discussed in Section 20, *Wildfire*, the project site is not located in a Very High Fire Hazard Severity Zone, and there would be no impacts related to wildfire.

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