



Whitecotton Cottage Demolition Project

Initial Study

prepared by

County of Alameda

General Services Agency

1401 Lakeside Drive, Suite 800

Oakland, California 94612

Contact: Jason B. Garrison, Environmental Project Manager

prepared with the assistance of

Rincon Consultants, Inc.

449 15th Street, Suite 303

Oakland, California 94612

April 2019



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Initial Study

1. Project Title

Whitecotton Cottage Demolition Project

2. Lead Agency Name and Address

Alameda County
General Services Agency
1401 Lakeside Drive, Suite 800
Oakland, California 94612

3. Contact Person and Phone Number

Jason B. Garrison, Environmental Project Manager
Office: (510) 208-9520

4. Project Location

The project site is an approximately 2,000 square-foot portion of a larger, approximately 82-acre parcel (APN 80A-238-10) in unincorporated Alameda County. The parcel is one of eight parcels on which the Alameda County Fairmont Hospital campus is located. The campus is bounded by Fairmont Drive to the northwest and Foothill Boulevard to the southeast. The project site occurs towards the southeastern portion of the campus and is bounded by Meadow Drive to the west, a parking lot to the south, a medical building to the northeast, and landscaped area to the north. Figure 1 shows the location of the site in the region, Figure 2 shows the project site in its neighborhood context, and Figure 3 depicts the project site and its immediate surroundings.

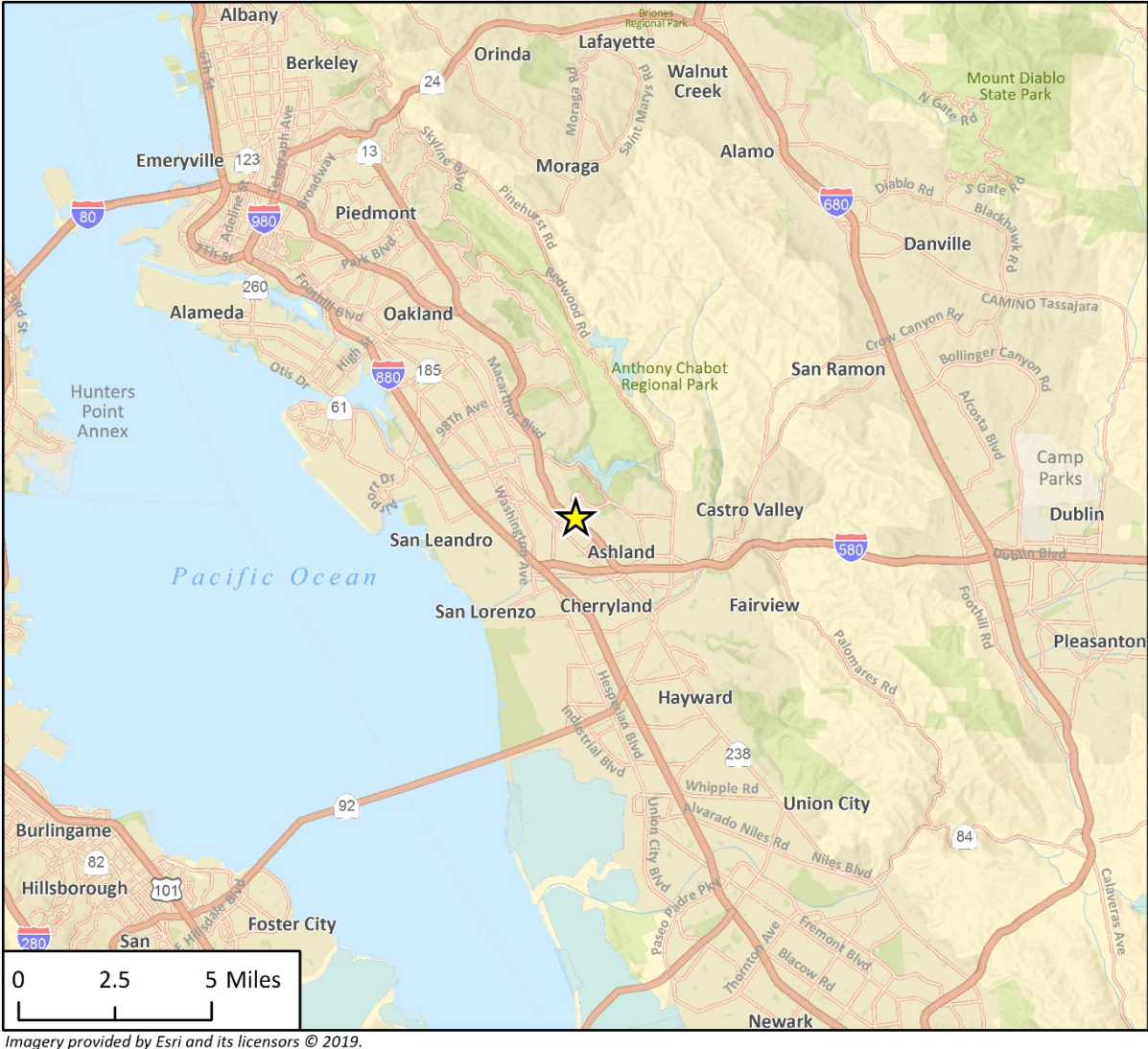
5. General Plan Designation

The project site is designated Public Facilities (PF) in the Castro Valley General Plan (Alameda County 2014).

6. Zoning

The project site is zoned Planned Development (PD) according to the Castro Valley General Plan.

Figure 1 Regional Location



★ Project Location

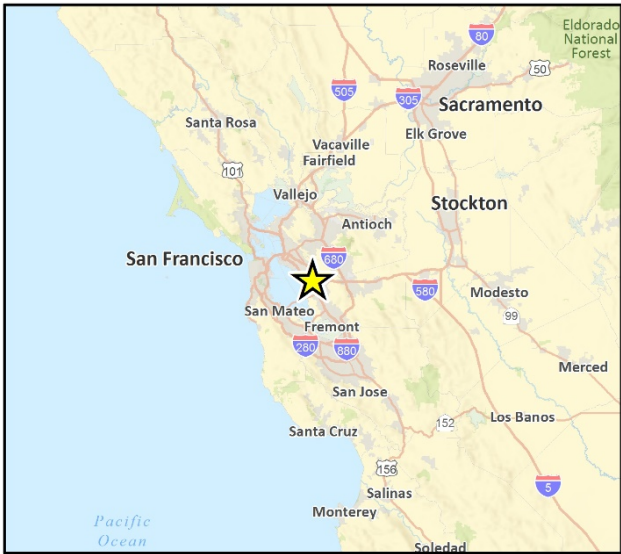
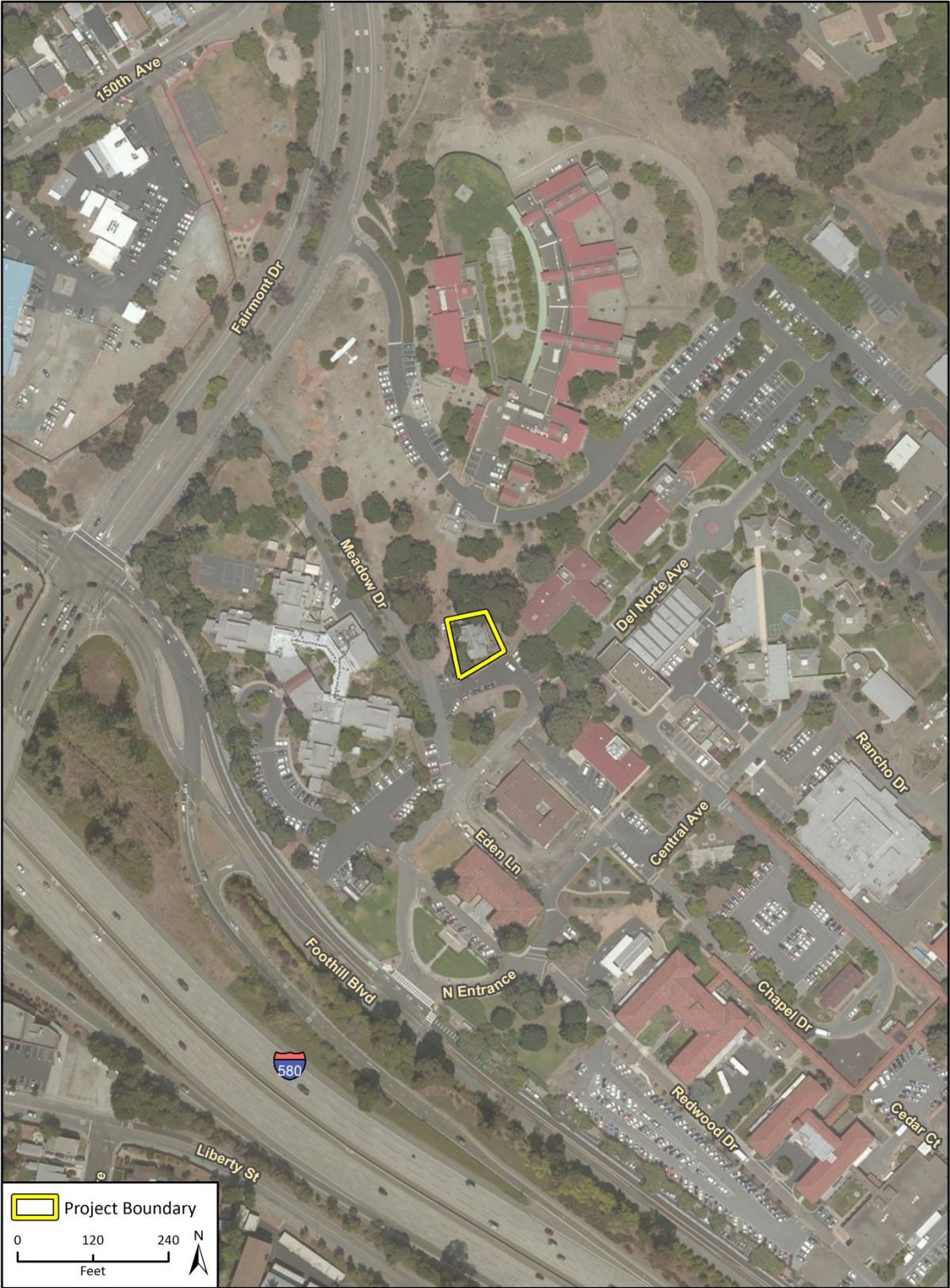


Fig 1 Regional Location

Figure 2 Project Site in its Neighborhood Context



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Fig. 2 Project Location Surrounding Area

Figure 3 Project Site and Immediate Surroundings



7. Surrounding Land Uses and Environmental Setting

The project site is situated in the foothills of the Diablo Range, approximately one mile west of Lake Chabot in unincorporated Alameda County. The project area occurs on the Alameda County Fairmont Hospital campus, which comprises medical and office buildings, the Alameda County Superior Court, a Juvenile Justice Center and other uses associated to the institutional uses, including recreational facilities and a cafeteria. Lake Chabot occurs further north on the other side of Fairmont Drive and residential neighborhoods occur to the east, south and west of the campus. Figure 2 shows the project site in its neighborhood context. The project site occurs at relatively flat topography and at the southern edge of a hilly landscaped area at the east portion of the campus. The project site occurs towards the southeastern portion of the campus and is bounded by a roadway (Meadow Drive) to the west, a parking lot to the south/southeast, a medical building to the northeast (Cherry Hill Detox Center), and landscaped area to the north. Across Meadow Drive to the southwest is the Villa Fairmont Mental Health Rehabilitation Center. Other medical offices associated with the hospital campus are located approximately 300 feet to the southeast. Figure 3 shows the project site and its immediate surroundings.

8. Existing Conditions and Background

The site occurs within the Fairmont Hospital Campus (originally called the Alameda County Infirmary), which was established in its current location in 1869 to meet state law that required provision of care to the indigent sick. The County continued to develop the campus over the next several decades and established several new buildings, including a hospital building and other medical offices, staff residences, administrative buildings, dining halls, a chapel, and farming structures. Following World War II, several new medical buildings were constructed at the campus, and the County shifted its focus to convalescent, rehabilitation, and long-term mental health care (Preservation Architecture 2018, Appendix B).

The project site contains one existing building, a dwelling known as Whitecotton cottage, which was built in 1903. The building was also known as the Superintendent's House because it was originally built to house the Superintendent of the Alameda County Infirmary. It was adapted for other uses in the 1970s, including a community-based organization for research and treatment of addiction, and has been vacant since 2000. The building is approximately 3,942 square feet in size and two stories in height. It is a wood-frame structure with a brick foundation and partial basement. It is encompassed by a small grove of mature trees and a variety of shrubs around the base of the building.

While the building remains in its historic location, it has not been maintained for approximately 20 years and is in an advanced state of disrepair. Several holes are present on the roof and the interior of the building has extensive water damage and mold contamination. In addition, the exterior of the structure is covered with a high concentration of peeling lead-based paint that has contaminated surrounding soil, which in turn has the potential to impact downgradient properties and storm drains. There is also asbestos present in the roofing materials, which could cause environmental and health impacts. Asbestos was also present in other locations in the building, but these asbestos-containing materials were abated and removed in 2018.

9. Description of Project

The proposed project would involve the demolition of the existing Whitecotton cottage, an existing vacant 3,942 square-foot building with two stories above grade and a basement. Demolition of the structure would involve:

- The removal of asbestos-containing materials
- Stabilization of loose and peeling lead-based paint
- Removal and proper disposal of components coated with lead-based paint
- Excavation and disposal of approximately 222 cubic yards of soil, including lead contaminated soil around the structure
- Rough grading of the site

The County of Alameda General Services Agency would manage the demolition project and ensure compliance with appropriate regulatory guidelines associated with hazardous materials abatement and demolition. All project activities, including demolition, excavation, remediation, and grading would be expected to take approximately eight weeks, including approximately two weeks for demolition, one week for excavation, four weeks for soil and waste testing, and one week for rough grading. There are no current redevelopment plans for the site. Once the structure is demolished and grading has occurred, the site would be covered in gravel.

10. Other Public Agencies Whose Approval is Required

The County of Alameda is the lead agency with responsibility for approving the project. Discretionary approval from other public agencies is not required.

11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun and is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No California Native American Tribes have requested consultation pursuant to Public Resources Code Section 21080.3.1.

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 type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/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/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

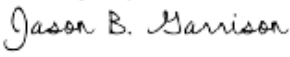
Determination

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.

County of Alameda
Whitecotton Cottage Demolition Project

- ☐ 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.

DocuSigned by:

AF4C34DE737843E

Signature

Jason B. Garrison

Printed Name

4/8/2019

Date

Environmental Project Manager

Title

Environmental Checklist

1 Aesthetics	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<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. In non-urbanized areas, 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 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

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

The grade at Fairmont Hospital campus generally slopes downwards from northeast to southwest, and views of the city of San Leandro to the west and the San Francisco Bay beyond are available from Fairmont Drive and Foothill Boulevard. However, because the project site occurs at a relatively topographically flat area of the campus and is surrounded by other one- and two-story buildings and mature vegetation, substantial views are not available from or through the site. Moreover, the project area is not within a designated scenic vista.

In addition, the proposed project does not involve construction of new uses that would adversely affect scenic vistas. The project would remove a 2-story building and not involve new structures that would add bulk or adversely affect available views. Thus, no impact would occur and further analysis of this issue in an EIR is not warranted.

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?*

Interstate 580 (I-580), which occurs to the southwest of the project site, is an eligible but not officially designated State Scenic Highway. However, intervening topography currently obstructs views of the project site from I-580. Although the proposed project would involve removal of a historic building, the building is not visible from a state scenic highway. The project does not involve tree removal. Cultural resources impacts related to the demolition of the historic building are discussed in Section 5. *Cultural Resources* of this report. Therefore, no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

- c. *Would the project, in non-urbanized areas, 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 publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The project site is in an urbanized area in the Castro Valley unincorporated area of Alameda County. It is on the southeastern portion of the Fairmont Hospital campus. Since the project would involve demolition of an existing building, no new structures would be introduced to add visual bulk at the project site, and neither Alameda County Design Guidelines nor zoning regulations controlling design of new construction would apply. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO 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 would involve the demolition of an existing building and not the construction of new structures. Thus, there would be no new sources of light or glare. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, 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"/>

- a. *Would the project convert Prime Farmland, Unique Farmland, 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 does not occur within or near an area designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance. The California Department of Conservation defines the project site as Urban and Built Up Land (2016). Moreover, the project involves the demolition of a building and not the construction of new structures or the conversion of existing farmland. Thus, no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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

The project site abuts the Agriculture (A) zoning district to the east. However, the site is not currently in active agricultural use and is surrounded by development associated with the Fairmont Hospital campus. The project site is not on land under a Williamson Act contract. Since the project would involve the demolition of an existing dwelling in a developed area that is not in agricultural production, it would not involve the construction of new uses or the conversion of existing farmland. No impact would occur and further analysis of this issue in an EIR is not warranted.

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. Result in the loss of forest land or conversion of forest land to non-forest use?*

The project area is not in an area containing forest land, nor would it convert existing forest land. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

- 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 would involve the demolition of an existing building and not the construction of new structures or the establishment of new uses that would result in the conversion of nearby farmland. Thus, the project would not result in the conversion of existing Farmland or forest land and no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Air Quality Standards and Attainment

The project site is located within the San Francisco Bay Area Air Basin (the Basin), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). As the local air quality management agency, the BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met, and, if they are not met, to develop strategies to meet standards.

Depending on whether or not the standards are met or exceeded, the Basin is classified as being in "attainment" or "nonattainment." Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The BAAQMD is in non-attainment for the state and federal ozone standards, the state and federal PM_{2.5} (particulate matter up to 2.5 microns in size) standards and the state PM₁₀ (particulate matter up to 10 microns in size) standards and is required to prepare a plan for improvement (BAAQMD 2017a).

The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 1.

Table 1 Health Effects Associated with Non-Attainment Criteria Pollutants

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

^a More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: U.S. EPA 2018

Clean Air Plan

The Bay Area 2017 Clean Air Plan provides a plan to improve Bay Area air quality and protect public health as well as the climate. The legal impetus for the Plan is to update the most recent ozone plan, the 2010 Clean Air Plan, to comply with state air quality planning requirements as codified in the California Health & Safety Code. Although steady progress has been made to reduce ozone levels in the Bay Area, the region continues to be designated as non-attainment for both the one-hour and eight-hour state ozone standards as noted previously. In addition, emissions of ozone precursors in the Bay Area contribute to air quality problems in neighboring air basins. Under these circumstances, state law requires the Clean Air Plan to include all feasible measures to reduce emissions of ozone precursors and reduce transport of ozone precursors to neighboring air basins (BAAQMD 2017b).

Air Emission Thresholds

BAAQMD recommends that lead agencies determine appropriate air quality and greenhouse gas (GHG) emissions thresholds of significance based on substantial evidence in the record. As the lead agency for this project, the County of Alameda has determined that the BAAQMD's significance thresholds in the updated May 2017 CEQA Guidelines for project operations within the Basin are the most appropriate thresholds for use in determining air quality impacts of the proposed project. The BAAQMD 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. If all of the screening criteria are met by a project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. For projects that only involve demolition,

such as the project, emissions would be less than the greenfield-type project on which the screening criteria are based (BAAQMD 2017c).

Table 2 presents the significant thresholds for construction, demolition, and operational-related criteria air pollutant and precursor emissions being 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's existing air quality conditions. For the purposes of this analysis, the proposed project would result in a significant impact if construction or operational emissions would exceed any of the thresholds shown in Table 2.¹

Table 2 Air Quality Thresholds of Significance

Pollutant/ Precursor	Maximum Annual Emissions (tpy)	Average Daily Emissions (lbs/day)
ROG	10	54
NO _x	10	54
PM ₁₀	15	82
PM _{2.5}	10	54

Notes: tpy = tons per year; lbs/day = pounds per day; NO_x = oxides of nitrogen; PM_{2.5} = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM₁₀ = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases; tpy = tons per year.

Source: Table 2-2, Bay Area Air Quality Management District, CEQA Air Quality Guidelines, May 2011.

Impact Analysis

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

Vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. A project would generally conflict with or potentially obstruct implementation of an air quality management plan if it would contribute to population growth in excess of that forecast in the plan. The proposed project would involve demolition of an existing building and not additional construction of new structures. Therefore, the proposed project would not generate new population or employment growth. Consequently, the project would not contribute to an exceedance of the projected population growth forecast in the 2017 BAAQMD Clean Air Plan. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO 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?

Long-term operational emissions generated by a project would result from area source emissions or mobile emissions. Area sources include the use of natural gas, electricity, and landscaping maintenance equipment. Mobile emissions include emissions from vehicles associated with a project. Since the proposed project would involve demolition activities during a limited period and

¹ Note the thresholds for PM₁₀ and PM_{2.5} apply to construction exhaust emissions only.

not construction of new uses, no new area source or mobile emissions would occur. Moreover, while the project site and surrounding area would undergo ongoing landscape maintenance activities, these activities are not specifically associated with the proposed demolition project. Further, maintenance activities would be intermittent and infrequent and would not generate emissions such that an exceedance of an air quality standard or a cumulatively considerable net increase of a criteria pollutant would occur.

The major source of emissions associated with the project result from emissions during the proposed building demolition. Demolition activities would include operation of construction vehicles and equipment over unpaved areas and soil disturbance which has the potential to generate fugitive dust (PM₁₀) through the exposure of soil to wind erosion and dust entrainment. In addition, exhaust emissions associated with heavy construction equipment would potentially degrade regional air quality. Temporary demolition emissions were estimated using the California Emissions Estimator Model (CalEEMod) v.2016.3.2 and are shown in Table 3.

Table 3 Construction Emissions (pounds/day)

Pollutant	Maximum Daily Emissions	Significance Threshold	Significant Impact?
ROG	0.9	54	No
NO _x	8.7	54	No
CO	8.0	82	No
PM ₁₀ (exhaust)	0.5	82	No
PM _{2.5} (exhaust)	0.5	54	No

See Appendix A for CalEEMod worksheets.

As shown in Table 3, the proposed project would not exceed the BAAQMD short-term construction thresholds shown in Table 2. Impacts from demolition emissions would therefore be less than significant and further analysis of this issue in an EIR is not warranted.

LESS THAN SIGNIFICANT IMPACT

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

The California Air Resources Board (CARB) has identified diesel particulate matter as the primary airborne carcinogen in the state (CARB 2014). In addition, Toxic Air Contaminants (TACs) are a defined set of air pollutants that may pose a present or potential hazard to human health. Common sources of TACs and PM_{2.5} include gasoline stations, dry cleaners, diesel backup generators, truck distribution centers, freeways, and other major roadways (BAAQMD 2017c). The project does not include construction of new gas stations, dry cleaners, highways, roadways, or other sources that could be considered new permitted or non-permitted source of TAC or PM_{2.5} in proximity to receptors. In addition, the project would not introduce a new stationary source of emissions and would not result in particulate matter greater than BAAQMD thresholds (see response under questions a, b, and c). Therefore, a Health Risk Assessment was not performed for this project. Moreover, as described above in Table 3, temporary demolition emissions were estimated using the CalEEMod v.2016.3.2 computer model, and the proposed project would not exceed emissions

thresholds during demolition activities. Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

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?*

Table 3-3 in the BAAQMD's 2017 *CEQA Guidelines* provides odor screening distances for land uses that have the potential to generate substantial odor complaints. The uses in the table include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants (BAAQMD 2017c). None of the uses identified in the table would occur within the project site. The proposed project would not generate objectionable odors affecting a substantial number of people during operation.

During demolition activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and would cease upon completion. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people. This impact would be less than significant and further analysis of this issue in an EIR is not warranted.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

- 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?*
- 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?*
- 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?*

According to the Biological Resources Chapter of the Castro Valley Area Plan (Figure 7-2, Alameda County 2012), the site occurs at the southern edge of a Moderate Priority Biological Resources Area, which includes the undeveloped area north of the portion of the Fairmont Hospital campus that is developed with buildings. However, according to Figure 7-2, no special-status species, riparian habitat, or other sensitive habitats occur within the project site. According to the Castro Valley Area Plan, the project site is not located within a migration route. Therefore, the project would not result in interference with the movement of a native resident, migratory fish or wildlife species. In addition, the project site does not occur on a native wildlife nursery site, and the project would not involve removal of existing trees.

The project site is developed with one structure, a driveway, and a trash collection area and has been continually disturbed through on- and off-site activities including nearby traffic, landscaping activities, and the presence of humans. Therefore, the site includes minimal native vegetation that might provide habitat for any sensitive or special status. Moreover, the project only involves the demolition of the existing building; no existing trees would be removed and no new structures or uses would be established that could adversely affect native species.

However, it is possible that mature trees within the project site could be indirectly disturbed during demolition activities. Surrounding trees could contain bird nests and birds which are protected under the Migratory Bird Treaty Act. Implementation of Mitigation Measure BIO-1 would reduce impacts to nesting birds to a less than significant level and further analysis of this issue in an EIR is not warranted.

Further, bats may be present in the existing vacant building. Therefore, the proposed project has the potential to result in direct impacts to special-status bats if bat roosts are destroyed during demolition. Implementation of Mitigation Measure BIO-2 would reduce impacts to special-status bat species to a less than significant level and further analysis of this issue in an EIR is not warranted. These measures will be included in the EIR's executive summary and mitigation monitoring and reporting program.

Mitigation Measures

The following mitigation measures are required:

BIO-1 Nesting/Breeding Native Bird Protection

To avoid impacts to nesting birds, including birds protected under the Migratory Bird Treaty Act, ground disturbing activities should be limited to the time period between September 1 and January 1 (i.e., outside the nesting season) if feasible. If initial site disturbance, grading, and vegetation

removal cannot be conducted during this time period, a pre-construction survey for active nests within and around the project site shall be conducted by a qualified biologist at the site no more than two weeks prior to any construction activities. The survey shall include the project site and other such habitat within 500 feet of the project site.

If active nests are identified, species specific exclusion buffers shall be determined by the biologist (i.e., 500 feet for raptor nests), and construction timing and location adjusted accordingly. The buffer shall be adhered to until the adults and young are no longer reliant on the nest site, as determined by the biologist. Limits of construction to avoid a nest should be established in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area.

The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities.

BIO-2 Special-status Bat Species Avoidance and Minimization

Focused surveys to determine the presence/absence of roosting bats shall be conducted prior to the initiation of demolition activities. If active maternity roosts are identified, at a minimum, no demolition, clearing, or grading shall occur within 500 feet of the roost until the young are able to fly from the roost. If active day or night roosts are found on the project site, measures shall be implemented to safely flush bats from the roosts prior to the onset of demolition activities. Such measures may include removal of roosting site during the time of day the roost is unoccupied or the installation of one-way doors, allowing the bats to leave the roost but not to re-enter.

Significance After Mitigation

Implementation of mitigation measures BIO-1 and BIO-2 would ensure that nesting birds and bats are not directly or indirectly affected by demolition activities. These measures will be included in the EIR's executive summary and mitigation monitoring and reporting program.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The project is not located on or in the vicinity of state or federally protected wetlands (US Fish and Wildlife Wetlands Mapper, accessed February 2019). No impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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

As noted above, the project site occurs within Moderate Priority Biological Resources Area. However, the project would involve the removal of an existing building and not tree removal or the establishment of new uses that would conflict with local policies or ordinances protecting biological resources. Moreover, compliance with the above mitigation measures BIO-1 and BIO-2 would ensure that potential resources in the existing building and nearby existing trees would be protected

during demolition activities. No impact would occur and further analysis of this issue in an EIR is not warranted.

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?*

No adopted conservation plan covers an area that includes the project site. Therefore, no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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"/>
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	■	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

Cultural Resources Background

The California Environmental Quality Act (CEQA) requires a lead agency determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is a resource listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (State CEQA Guidelines, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b]).

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

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

Impact Analysis

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

A Historical and Architectural Assessment of the existing building proposed for demolition was prepared by Preservation Architecture in 2018 (Appendix B). The assessment concludes that the Whitecotton Cottage is eligible for the California Register of Historical Resources because of its association with historic events. Therefore, the proposed project may result in a substantial adverse change in the significance of a historical resource. Impacts related to historic resources are potentially significant and will be analyzed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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

A California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) did not result in the identification of known archaeological resources within the project site or within a 0.5-mile radius of the project site. The project site has been disturbed by the construction of the Whitecotton Cottage. Thus, the project site is not considered archaeologically sensitive. Nevertheless, the following mitigation measure is required to reduce impacts to less than significant in the case of unanticipated discoveries. This measure will be included in the EIR's executive summary and mitigation monitoring and reporting program. Further analysis of this issue in an EIR is not warranted.

CUL-1 Unanticipated Discovery of Cultural Resources.

If cultural resources are encountered during ground disturbing activities, work in the immediate area shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (NPS 1983) shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and testing for the California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for listing in the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be required to mitigate potentially significant impacts to historical resources.

Significance After Mitigation

Implementation of Mitigation Measure CUL-1 would ensure that impacts would be reduced to a less than significant level. This measure will be included in the EIR's executive summary and mitigation monitoring and reporting program.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The discovery of human remains is always a possibility during ground disturbing activities. 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 Public Resources Code 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 (MLD). The MLD would complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. With adherence to these existing regulations, impacts to human remains will be less than significant and further analysis of this issue in an EIR is not warranted.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in 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"/>

Energy Setting

CEQA Guidelines appendix F (Energy Conservation) and the updated Appendix G guidelines published in December of 2018, require that environmental analysis include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

Energy consumption accounts for energy consumed during construction and operation of a proposed project, such as fuel consumed by vehicles, natural gas consumed for heating and/or power, and electricity consumed for power. In this case, energy consumption would only occur during the proposed demolition activities.

Impact Analysis

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

Pacific Gas and Electric supplies electricity and natural gas to the project site. Demolition of the existing building would result in short-term consumption of energy from the use of equipment and vehicles associated with demolition and grading activities and transportation of waste and debris during demolition. Energy use would primarily be from fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may be provided to construction trailers or electric construction equipment. Energy use during demolition would be temporary and would be used for the purpose of completing demolition and grading activities. Construction equipment used would be typical of construction projects in the region. No additional energy would be used after demolition is completed. Therefore, the project would no result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of

energy resources. This impact would be less than significant and further analysis of this issue in an EIR is not warranted.

LESS THAN SIGNIFICANT IMPACT

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

The project involves energy use associated with demolition and grading activities only and no additional energy would be used after the demolition of the existing building because no new buildings or uses would be established at the project site. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential 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 type="checkbox"/>	<input checked="" type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

- a.1. Directly or indirectly cause potential 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?*
- a.2. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*
- a.3. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- a.4. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*
- c. Would the project be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?*

According to the Castro Valley Area Plan (March 2012), the project site occurs within approximately 0.1 miles of the Alquist-Priolo Earthquake Fault Zone and 0.5 miles of the Earthquake-Induced Landslide Zone and Liquefaction Zone. However, the project would involve demolition of an existing building, and no new buildings, structures, or uses which could cause risk of loss, injury, or death involving rupture, seismic activity, ground failure, landslides, or unstable soil would be introduced. Thus, the project would not cause potential adverse effects related to geologic or seismic hazards. No impact would occur and further analysis of these issues in an EIR is not warranted.

NO IMPACT

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

The project site is developed and located on sloping topography. Removal of the existing structure and grading activities associated with the proposed project would increase exposure of soils to direct rainfall and significant wind events, which could increase the potential for erosion. Per Section 15.36.050(C) of the Alameda General Ordinance Code, grading done under the supervision or construction control of the County is exempt from needing a grading permit. Nonetheless, according to the Code, the County must assume full responsibility for the work in conformance with the design and documentation provisions of Chapter 15.36, Grading Erosion and Sediment Control. Compliance with the standards in that chapter would ensure that grading would not result in substantial erosion and would reduce potential impacts associated with soil erosion to a less than significant level. Further analysis of this issue in an EIR is not warranted.

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?*

The proposed project involves demolition of an existing structure and would not involve construction of new structures or the establishment of new uses. Therefore, no life or property would be exposed to construction on expansive soils. Moreover, demolition of the project would be required to comply with the Alameda County Grading Ordinance, which includes required safety protections during demolition and grading activities. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO 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 would involve the demolition of an existing building and not the construction of new structures; it would not involve the use of septic tanks or other alternative waste water disposal systems. No impact would occur and further analysis of this issue in an EIR is not warranted

NO IMPACT

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

The project would involve demolition of the existing building and excavation of approximately 222 cubic yards of material to remove the existing foundation and lead-contaminated soils. No additional soil disturbance would occur, and the material to be excavated would consist primarily of soils disturbed during original site preparation for and construction of the existing building. Therefore, it is not anticipated that the project would destroy a unique paleontological resource or geologic feature. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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8 Greenhouse Gas Emissions

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

Greenhouse Gas Emissions Setting

Project implementation would generate greenhouse gas (GHG) emissions through the burning of fossil fuels or other emissions of GHGs during demolition, thus potentially contributing to cumulative impacts related to climate change. In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented AB 32, the “California Global Warming Solutions Act of 2006.” AB 32 codifies the Statewide goal of reducing emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels) and the adoption of regulations to require reporting and verification of statewide GHG emissions. Furthermore, on September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, which requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 extends AB 32, directing the California Air Resources Board (CARB) to ensure that GHGs are reduced to 40 percent below the 1990 level by 2030.

On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State.

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

For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan).

For the purposes of this analysis, the County of Alameda has determined the GHG emissions thresholds contained in the BAAQMD's May 2017 *CEQA Air Quality Guidelines* are the appropriate thresholds to use. The BAAQMD has developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant GHG emissions. If all of the screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed GHG assessment of their project's GHG emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. For projects that involve only demolition and not the construction of new buildings or uses, such as the proposed project, emissions would be less than the greenfield type project that the screening criteria are based on (BAAQMD 2017b).

Impact Analysis

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

Since the project would not involve the construction of new structures or the establishment of new uses, there would be no operational emissions (stationary or mobile sources) associated with the project. However, there would be temporary emissions related to the operation of vehicles and equipment used in the demolition process.

Based on the CalEEMod results (Appendix A), the demolition of the existing building and re-grading associated with the proposed project would generate an estimated 24 metric tons of CO₂E. Emissions would cease after demolition and grading completes. Since emissions would be below 1,200 metric tons CO₂e, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

- 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?*

The project site contains one residential building that would be demolished with the proposed project. According to an Asbestos and Lead Survey Report prepared for the project site by RGA Environmental, Inc. in January 2001, and the soil sampling and analysis conducted by Terracon in November 2018 (both reports included in Appendix C), this structure contains asbestos and lead-based paint. The lead-based paint coating exterior wood components (i.e., siding, windows) has been damaged due to weathering, has flaked off, and impacted soils on the project site. Soils at the project site have also been impacted by pesticides. Demolition of this structure could expose and/or release these contaminants which could result in health hazard impacts to workers if not remediated prior to construction activities. However, existing regulatory requirements would ensure that if such materials are disturbed during demolition, they would be handled and disposed in a manner that protects public and environmental health and safety. The project would be required to adhere to BAAQMD Regulation 11, Rule 2, which governs the proper handling and disposal of asbestos-containing materials for demolition, renovation, and manufacturing activities in the Bay Area, and California Occupational Safety and Health Administration (CalOSHA) regulations regarding asbestos and lead-containing materials. The California Code of Regulations Section 1532.1 requires testing, monitoring, containment, and proper disposal of lead-based paint. With adherence to BAAQMD and CalOSHA policies and regulations regarding asbestos-containing material and lead-based paint, impacts associated with the disturbance of hazardous materials would be less than significant.

Demolition activities associated with the proposed project may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. The proposed project involves the removal of contaminated soil, asbestos, and lead-based paint components. Completing this work would result in the transport and disposal of these materials as they are abated and removed from the site. However, the transport, storage, use, or disposal of hazardous materials would be subject to federal, state, and local regulations pertaining to the transport, use, storage, and disposal of hazardous materials, which would assure that risks associated with hazardous materials are minimized. In addition, construction activities that transport hazardous materials would be required to transport such materials along designated roadways in the city and county, thereby limiting risk of upset. Impacts would be less than significant and further analysis of these issues in an EIR is not warranted.

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?*

While school facilities occur in the greater project vicinity, including Quest Academy, James Baldwin Academy, and the Alameda County Juvenile Justice Center, no existing or proposed schools are located within 0.25 mile of the project site. As outlined above under items (a) and (b), demolition of the existing structure would require removal and movement of materials contaminated by asbestos and lead-based paint. Hauling of such materials may occur within 0.25 mile of the project site. However, given the site's distance from existing educational facilities and required compliance with

the rules and regulations described above under items (a) and (b), impacts to schools would be less than significant, and further analysis of this issue in an EIR is not warranted.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on a site 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?*

The following databases were checked, pursuant to Government Code Section 95962.5, on January 30, 2019 for known hazardous materials contamination at the project site:

- **United States Environmental Protection Agency**
 - Comprehensive Environmental Response, Compensation, and Liability Information System/ Superfund Enterprise Management System / Envirofacts database search
- **State Water Resources Control Board (SWRCB)**
 - GeoTracker search for leaking underground storage tanks and other cleanup sites
- **California Department of Toxic Substances Control**
 - EnviroStor search for hazardous facilities or known contamination sites
 - Cortese List of Hazardous Waste and Substances Sites
 - Cleanup Site and Hazardous Waste Facilities Database

The project site is not included on a list compiled pursuant to Section 65962.5 of the Government Code. Therefore, the project would not create a significant hazard to the public or the environment; no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

- 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 for people residing or working in the project area?*

The project site is not located near a public or private airstrip or airport, and the site is not located in an airport hazard area. No impact would occur.

NO IMPACT

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

The proposal would involve demolition of an existing building and not the construction of new structures that could block emergency response or evacuation routes or the introduction of new uses that would interfere with adopted emergency response and emergency evacuation plans. No impact would occur and further analysis of this issue in an EIR is not warranted.

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?*

While the project site does not occur within a fire hazard zone, the project site occurs approximately 1.5 miles south of a very high fire severity zone (CalFire 2007). However, the project would involve the demolition of an existing building and not the construction of new structures that would increase exposure of people or structures to risk involving wildland fires. In addition, the project would involve rough grading at the site, not new landscaping requiring maintenance, which would also reduce existing risk of wildland fires. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The project would not involve the establishment of new uses that would create new wastewater or discharge. Moreover, the project would replace impermeable surfaces with permeable surfaces, which would result in a decrease in runoff. As noted in Section 7, *Geology and Soils*, ground disturbing activities associated with the proposal would be required to meet the design and documentation provisions in Alameda County Code Chapter 15.36, *Grading Erosion and Sediment Control*. Compliance with these standards would reduce potential impacts to water quality and discharge. Thus, with adherence to existing regulations, no impacts to water quality would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

- 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?*

Regional water demand is primarily a function of population growth. The project would not increase the region's population and, in turn, the regional demand for potable water. (Please refer to Section 19, *Utilities and Service Systems*, for further discussion of this impact.) The proposed project also would not interfere with groundwater recharge because it would not increase the amount of impermeable surface at the site or involve the establishment of new uses that would increase water demand. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO 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 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 that would impede or redirect flood flows?*

The proposed project would not involve new construction that would substantially alter drainage patterns. The proposed project would not involve the alternation of a stream or river or the addition of impervious surfaces that would result in runoff, flooding, erosion, or siltation on or off-site. The project would involve demolition of an existing building and rough grading carried out in a manner

that would avoid erosion. No impacts would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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

The project site is not within a 100-year flood hazard area (1% chance annually) (FEMA 2009). The project is also outside of ABAG's mapped dam failure inundation area (ABAG 1995), and there is not a body of water near the site that is capable of seiche. The nearest body of water is Lake Chabot, which is approximately 1.5 miles north of the project site. There would be no impact and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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

The project would involve the demolition of an existing building and not the introduction of new structures or uses that would obstruct water quality controls or groundwater management plans. Moreover, as outlined above in item (a), the proposed grading would be required to comply with applicable provisions of Alameda County Code Chapter 15.36, which ensures protection of watercourses and drainage. Thus, no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<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 type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project physically divide an established community?

The project would involve the demolition of an existing building and not the construction of structures or other elements that would physically divide an established community. No impact would occur and further analysis of this issue in an EIR is not warranted.

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?

The project site is designated as Public Facilities in the Castro Valley Area Plan (Alameda County 2012) and zoned Agriculture. The project would involve demolition of an existing building and would not introduce new structures or uses that would conflict with the site's designation or applicable policies. Therefore, no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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"/>

- a. *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?*
- b. *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 is not used for mining and is not zoned for mining uses. Further, the demolition of the existing vacant residence would not affect mineral resources. Thus, no impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Noise and Vibration Setting

Ambient Noise

Noise is defined as unwanted sound. 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). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the ambient noise level to be judged as twice as loud. In general, a 3 dBA change in the ambient noise level is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while areas adjacent to arterial streets are typically in the 50-60+ dBA range. Normal conversational levels are usually in the 60-65 dBA range and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels from point sources, such as those from individual pieces of machinery, typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from the noise source. Noise levels from lightly traveled roads typically attenuate at a rate of about 4.5 dBA per doubling of distance. Noise levels from heavily traveled roads typically attenuate at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source can reduce noise levels by about 5 dBA, while a solid wall or berm can reduce noise levels by 5 to 10 dBA (Federal Transit Administration [FTA] 2018). The manner in which homes in California are constructed generally provides a reduction of exterior-to-interior noise levels of approximately 20 to 25 dBA with closed windows (FTA 2018).

The duration of noise is important because sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. Lmax is the highest RMS (root mean squared) sound pressure level within the measurement period, and Lmin is the lowest RMS sound pressure level within the measurement period.

The time period in which noise occurs is also important since nighttime noise tends to disturb people more than daytime noise. Community noise is usually measured using the Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10 PM to 7 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 PM to 10 PM and a 10 dBA penalty for noise occurring from 10 PM to 7 AM. The Ldn and CNEL typically do not differ by more than 1 dBA. In practice, CNEL and Ldn are often used interchangeably.

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 closest noise-sensitive receptors to the project site are the Cherry Hill Detox Center approximately 50 feet northeast of the project site, the Villa Fairmont Mental Health Rehabilitation Center approximately 100 feet to the southwest, and other buildings associated with Fairmont Hospital approximately 300 feet to the southeast.

Noise regulations and ordinances typically establish allowable noise levels for different land uses and define exempt noise activities. Chapter 6.60 of the Alameda County General Ordinance Code provides provision for restrictions and regulations for noise in the County of Alameda. Table 4 provides a summary of the exterior noise standards for different receiving land uses based on times of day. However, per Section 6.60.070, such restrictions do not apply to construction activities, provided that such activities occur between 7 AM and 7 PM on weekdays and between 8 AM and 5 PM on weekends.

Table 4 County of Alameda Noise and Land Use Compatibility Guidelines

Receiving Land Use Category	Time	Noise Level Standards (dBA)				
		Cumulative Number of Minutes in Any One Hour				
		30	15	5	1	0
Residential uses, schools, hospitals, churches, and libraries	7AM – 10 PM	50	55	60	65	70
	10 PM – 7AM	45	50	55	60	65
Commercial uses	7AM – 10 PM	65	70	75	80	85
	10 PM – 7AM	60	65	70	75	80

Source: County of Alameda General Ordinance Code Section 6.60.040

Vibration

Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas sound is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise (e.g., the rattling of windows from passing trucks). This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. The ground motion caused by vibration is measured as particle velocity in inches per second and is measured in vibration decibels (VdB).

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources inside buildings such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads.

The County of Alameda does not have adopted thresholds for levels at which vibration would cause significant effects. Therefore, thresholds provided by the Federal Transit Administration were used for this analysis. Vibration impacts would be significant if they would exceed the thresholds shown in Table 5.

Table 5 Indoor Groundborne Vibration Impact Criteria

Land Use Category	VdB Impact Levels		
	Frequent Events (more than 70 events per day)	Occasional Events (30-70 events per day)	Infrequent Events (fewer than 30 events per day)
Category 1: Buildings where vibration would interfere with interior operations	65 Vdb	65 Vdb	65 Vdb
Category 2: Residences and places where people normally sleep	72 Vdb	75 Vdb	80 Vdb
Category 3: Institutional land uses with primarily daytime use	75 Vdb	78 Vdb	83 VdB

Source: Table 6-3, FTA 2018

Impact Analysis

- a. *Would the project result 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?*

Demolition and grading activities associated with the proposed project could result in the temporary elevation of noise levels at the project site and surrounding areas. Construction-related noise impacts typically occur when construction activities take place during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), when construction activities occur immediately adjacent to noise sensitive land uses, or when construction durations last over extended periods of time. The closest noise-sensitive receptors to the project site are the Cherry Hill Detox Center approximately 50 feet northeast of the project site, the Villa Fairmont Mental Health Rehabilitation Center approximately 100 feet to the southwest, and other buildings associated with Fairmont Hospital approximately 300 feet to the southeast.

Noise levels associated with demolition and grading for the proposed project were estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Because a specific construction equipment list is not yet available for the project, the construction equipment list used in RCNM was generated using the CalEEMod output for the air quality and GHG analysis (see Appendix A). Noise was modeled based on the project's construction equipment list for each phase and distance to nearby receptors. Table 6 identifies the maximum expected noise levels at the nearest sensitive receptors based on the combined use of equipment anticipated to be used concurrently during the demolition and grading phases.

Table 6 Construction Noise Levels by Phase

Construction Phase	Equipment	Approximate Noise Level at Nearest Sensitive Receptors (dBA Leq)		
		50 feet	100 feet	300 feet
Demolition	Dozer, Backhoe, Saw, Tractor	86	80	70
Grading	Dozer, Backhoe, Saw, Tractor	86	80	70

Source: Roadway Construction Noise Model (RCNM) version 1.1, Appendix D

As Table 6 indicates, the proposed demolition and grading activities would temporarily elevate ambient noise levels at the nearby sensitive receptors. The Alameda County Code exempts construction noise between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. through 5:00 p.m. Saturday and Sunday. Although demolition noise would be perceptible at adjacent sensitive receptors, the additional noise would not be louder than typical urban construction as no major excavation or non-standard construction methods such as pile driving are proposed. Therefore, project construction would be within the range of typical construction noise for an urban area. In addition, demolition and grading activities would occur over the course of a short period (approximately two weeks for demolition, one week for excavation, four weeks for soil and waste testing, and one week for grading) and noise associated with the project would cease after that period. Mitigation Measure N-1 would ensure that construction noise occurs within the hours specified in the County Code and would reduce construction noise to the extent feasible. Impacts would be less than significant with mitigation incorporated, and further analysis in an EIR is not warranted. This measure will be included in the EIR's executive summary and mitigation monitoring and reporting program.

Mitigation Measure

The following mitigation measure would be required to reduce construction noise impacts to a less than significant level.

N-1 Demolition Noise Reduction

The following measures shall be implemented during project construction and demolition.

- **Construction Hours.** Construction activity shall not occur between 7:00 p.m. and 7:00 a.m. Monday through Friday and 5:00 p.m. through 8:00 a.m. Saturday and Sunday.
- **Mufflers.** During all project site demolition and grading, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
- **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.
- **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels.

Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.

Significance After Mitigation

With implementation of Mitigation Measure N-1, temporary noise associated with demolition and grading would be reduced to the extent feasible and would be limited to daytime hours.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Table 7 identifies various vibration velocity levels for the types of equipment that would operate at the project site during demolition.

Table 7 Vibration Levels During Demolition

Equipment	Approximate VdB at 25 feet (reference distance)	Approximate VdB at 50 feet	Approximate VdB at 100 feet	Approximate VdB at 300 feet
Bulldozer	87	81	75	65
Jackhammer	79	73	67	57
Loaded Trucks	86	80	74	64

Source: Table 7-4, FTA 2018, assuming vibration attenuation of 6 VdB per doubling of distance

The closest vibration-sensitive receptors to the project site are the Cherry Hill Detox Center approximately 50 feet to the northeast, the Villa Fairmont Mental Health Rehabilitation Center approximately 100 feet to the southwest, and the Fairmont Hospital, approximately 300 feet to the southeast. These uses meet the criteria for Category 2 and Category 3 as shown on Table 5 because they involve sleeping activities (overnight hospital stays) and daytime uses such as professional office and rehabilitation activities.

As shown in Table 6, vibration levels could temporarily and intermittently reach up to approximately 81 VdB at areas 50 feet from the project site, up to 75 VdB at areas within 100 feet of the project site, and up to approximately 65 VdB at areas 300 feet from the project site. It is assumed that demolition and grading activities would cause occasional vibration events, or no more than 70 vibration events during the day. Because the proposed project would not involve construction during evening or nighttime hours, per compliance with Alameda General Ordinance requirements and the provisions of Mitigation Measure N-1, the project would not exceed the FTA criteria of 75 VdB for occasional events where people sleep during normal sleep hours.

The proposed project would not exceed the FTA criteria of 78 VdB for occasional events during daytime hours for the noise-sensitive receptors 100 or more feet away. However, it may exceed the FTA criteria of 78 VdB for at the nearest sensitive receptor during demolition activities when bulldozers are in operation. The demolition phase is estimated to occur over approximately two weeks. The project does not involve major excavation or non-standard construction methods such as pile driving. Therefore, project construction would be within the range of typical construction noise for an urban area and vibration effects would be temporary.

Nonetheless, because vibration could exceed FTA criteria and could be perceptible for patients and staff at the adjacent Cherry Hill Detox Center, mitigation is required. Impacts would be less than significant with mitigation incorporated, and further analysis in an EIR is not warranted. This measure will be included in the EIR's executive summary and mitigation monitoring and reporting program.

Mitigation Measure

The following mitigation measure would be required to reduce construction vibration impacts to a less than significant level.

N-2 Demolition Vibration Reduction

The following vibration measures shall be applied during project demolition activity.

- Keep vibration-intensive equipment as far as possible from vibration-sensitive site boundaries. Machines and equipment shall not be left idling.
- Schedule vibration-intensive operations to minimize their duration. Notify adjacent noise sensitive receptors in advance of performing work creating unusual noise and schedule such work at times mutually agreeable.
- Whenever practical, the most vibration-intensive construction operations shall be scheduled to occur together in the construction program to avoid continuous periods of vibration.

Significance After Mitigation

Demolition activities would contribute intermittent vibration adjacent to the project site. Implementation of Mitigation Measure N-2 would ensure that vibration levels at sensitive receptors would be reduced to a level below the perceptibility threshold for vibration. This measure would reduce the potentially significant impact due to construction vibration to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The project site is not within two miles of a public or private airstrip or airport, and thus no impacts would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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14 Population and Housing

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

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

The proposed project involves the demolition of one residence. However, the residence is vacant and has not been maintained for at least 20 years; no displacement would occur. The proposed project does not include the construction of residential units. Because the project does not include the construction of residential units or any job-creating uses, no increase in the City's population would occur. The project would therefore have no impact related to inducing substantial population growth or require the construction of housing, and further analysis of these issues in an EIR is not warranted

NO IMPACT

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15 Public Services

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

- a.1. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection 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?*
- a.2. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*
- a.3. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*
- a.4. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Whitecotton Cottage Demolition Project

- a.5. 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 other public facilities?*

The project would not lead to an increase in population or jobs and thus would not create new demand for or increase the use of fire facilities, police facilities, schools, parks, or other public facilities, and further analysis of these issues in an EIR is not warranted.

NO IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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"/>

- 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?*

Since the project would involve the demolition of an existing vacant building and not the construction of new structures or the introduction of new uses, it would not increase the use of nearby recreational facilities. In addition, the project does not include recreational facilities. There would be no impact and further analysis of these issues in an EIR is not warranted.

NO IMPACT

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17 Transportation

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

- a. *Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

The project would involve the demolition of a vacant building and not the construction of new buildings or the establishment of new uses that would generate new traffic. Therefore, the proposed project would not affect traffic patterns or conflict with any applicable transportation plan.

During demolition, traffic near the project site would temporarily increase compared to existing conditions because construction workers and haul trucks would travel to and from the project site. Construction-related worker trips were calculated using CalEEMod and are shown below in Table 8.

Table 8 Construction-Related Trips

Trip Type	Number of One-Way Trips
Hauling Trips¹	
Demolition	9 total
Grading	28 total
Worker Trips²	
Demolition	10 daily
Grading	10 daily

¹Assumes 222 cubic yards of export and 16 cubic yards of earth material per truck trip

²Assumes 1.25 worker trips per equipment

Source: CalEEMod v.2016.3.2 (see Appendix A)

As described in the Project Description, demolition and grading activities would last approximately eight weeks, including two weeks for demolition, one week for excavation, four weeks for soil and waste testing, and one week for grading. Hauling would involve removal of building materials from the existing building during the demolition phase and removal of approximately 222 cubic yards of exported earth material and regrading at the project site during the grading phase. Assuming approximately 16 cubic yards of material per truck trip, the proposed project would result in approximately nine total one-way hauling trips to remove demolition materials and 28 one-way hauling truck trips to remove earth materials during grading. Assuming trips would be generally spread across the one week (5 working days) grading schedule, the average number of trips per day would be fewer than six trips per day. Conservatively assuming a more consolidated construction period of two days of demolition, the project would generate approximately five trips per day during the hauling. Given the low volume of trips expected throughout the day, hauling activities during any hourly period would not cause significant traffic impacts.

The proposed project would also generate an estimated 10 one-way worker trips per day during each phase. Unlike hauling trips and vendor trips which are spread across the day, worker trips are expected to occur primarily at the beginning of the construction day (7:00 AM) and at the end of the construction day (5:00 PM). This low number of additional trips would not cause significant congestion on surrounding roadways, and would be temporary.

Given the expected number of hauling and worker trips and that demolition and grading activities would only occur during a limited period, impacts to roadways and traffic would be less than significant and further analysis of this issue in an EIR is not warranted.

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)?*
- d. *Would the project result in inadequate emergency access?*

The project site is directly accessible from existing roadways and the project would not involve construction of new structures or roadways or the introduction of new uses. Therefore, it would not increase hazards due to a geometric design feature or incompatible use. No impact would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, 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 2024.1. 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"/>

Tribal Cultural Resources Setting

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

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

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

AB 52 also 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.

A contact list was requested from the Native American Heritage Commission (NAHC) for the purposes of initiating AB 52 consultation. The County of Alameda General Services Agency mailed notification letters to the six tribes listed by the NAHC on February 7, 2019. Under AB 52, tribes have 30 days to respond and request consultation. Over 30 days have elapsed since the notification letters were sent and no tribes requested AB 52 consultation with the County. Thus, the County assumes that no known tribal cultural resources are present on the project site.

AB 52 consultation correspondence between the County and tribes is included in Appendix E.

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 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 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 2024.1?*

Although no tribal cultural resources are expected to be present on-site, there is the possibility of encountering undisturbed subsurface tribal cultural resources. The proposed grading of the project site could potentially result in significant impacts on unanticipated tribal cultural resources. Mitigation Measure TCR-1 identified below would reduce impacts on unidentified tribal cultural resources to a less than significant level and further analysis of this issue in an EIR is not warranted. This measure will be included in the EIR’s executive summary and mitigation monitoring and reporting program.

Mitigation Measure

TCR-1 Unanticipated Discovery of Tribal Cultural Resources

In the event that cultural resources of Native American origin are identified during construction, all earth-disturbing work in the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the County, in consultation with local Native Americans, 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 Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist, if applicable, and the appropriate Native American tribal representative.

Significance After Mitigation

Mitigation Measure TCR-1 would ensure that tribal cultural resources are identified properly and preserved in the event they are uncovered during construction and would reduce impacts regarding disrupting tribal cultural resources to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

- 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?*
- 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?*

The proposed project would involve demolition of a vacant building and would not generate wastewater. No impact associated with additional wastewater generation and need for treatment would occur and further analysis of these issues in an EIR is not warranted.

NO IMPACT

- 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?*

The project would involve demolition of a vacant building and would not include water-consuming uses. The project does not involve the construction of new buildings or the establishment of new uses that would increase the region's population and, in turn, the regional demand for potable water. Therefore, no impact would occur.

NO IMPACT

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

The project would involve the demolition of an existing building. Once demolished, the demolition waste would be segregated into the following waste streams: hazardous waste, non-hazardous construction waste, and recyclable waste (i.e., metal, wood, and concrete). Non-recyclable waste would be transported to a landfill and properly disposed of. Thus, there would be a temporary increase in solid waste at area landfills. However, based on the size of the residence, the project would not generate a substantial increase in solid waste. Impacts would be less than significant and further analysis of these issues in an EIR is not warranted.

LESS THAN SIGNIFICANT IMPACT

20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<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"/>

- 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?*

As noted in Section 9, *Hazards and Hazardous Materials*, while the project site is not within a fire hazard zone, the project site occurs approximately 1.5 miles south of a very high fire severity zone (CalFire 2007). However, the project would involve the demolition of an existing building and not the construction of new structures that could impair an adopted emergency response or evacuation plan. Moreover, demolition activities would be temporary and there would be no project occupants

after demolition. No impact would occur and further analysis of these issues in an EIR is not warranted.

NO IMPACT

- 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?*

The project would involve the demolition of an existing building and not the construction of new buildings or the establishment of new uses that would require new infrastructure. No impact would occur.

NO IMPACT

- 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?*

As noted in Section 10, *Hydrology and Water Quality*, the proposed project would not involve new construction that would substantially alter drainage patterns. The project would involve demolition of an existing building and would also involve rough grading, which would be required to comply with Alameda County Code Chapter 15.36 *Grading, Erosion, and Sediment Control*, which include requirements to prevent future erosion and runoff. No impacts would occur and further analysis of this issue in an EIR is not warranted.

NO IMPACT

21 Mandatory Findings of Significance

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

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

As discussed in Section 4, *Biological Resources*, the 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 with compliance with mitigation measures BIO-1 and BIO-2.

As discussed in Section 5, *Cultural Resources*, the project could result in potentially significant impacts to existing historic resources. This impact is potentially significant and will be discussed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- 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)?*

The proposed project involves demolition of a new building and not construction of new buildings or establishment of new uses, which could contribute to cumulatively considerable impacts at or near the project area. Demolition activities would be temporary and would cease completely after approximately eight weeks. Moreover, as discussed throughout this Initial Study, impacts from these temporary activities, including impacts to air quality, noise, and greenhouse gases, would be less than significant or nonexistent. Therefore, impacts would not be cumulatively considerable and further analysis of this issue in an EIR is not warranted.

NO IMPACT

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

As discussed in Section 3, *Air Quality*, the project would not conflict with an air quality plan, result in cumulatively considerable net increase in pollutants, expose sensitive receptors to substantial concentrations of pollutants or odors. According to Section 9, *Hazards and Hazardous Materials*, the project would not create a significant hazard to the public, interfere with applicable emergency response and evacuation plans, or expose people or structures to risk of loss, injury, or death. Per Section 13, *Noise*, the project would not generate significant impacts to ambient noise or groundborne vibration with incorporation of mitigation measures N-1 and N-2. Therefore, the project would not cause substantial adverse effects on human beings with mitigation and further analysis of this issue in an EIR is not warranted.

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