



Whitecotton Cottage Demolition Project

Draft Environmental Impact Report

SCH# 2019049101

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

July 2019



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Whitecotton Cottage Demolition Project (proposed project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

Lead Agency and Contact Person

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

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

Project Description

This EIR has been prepared to examine the potential environmental effects of the Whitecotton Cottage Demolition Project. Whitecotton Cottage, built in 1903, was the former residence for the Superintendent of the Alameda County Infirmary and is recommended as eligible for the California Register of Historical Resources because of its association with historic events, specifically the original Alameda County Infirmary and the Fairmont Hospital. The following is a summary of the full project description, which can be found in Section 2, *Project Description*.

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 county-owned parcels on which the Alameda County Fairmont Hospital and other related medical and County institutional buildings occur, which are bounded by Fairmont Drive to the northwest and Foothill Boulevard to the southeast. The project 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. The site is designated Public Facilities (PF) in the Castro Valley General Plan and zoned Planned Development (PD).

Project Characteristics

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 remaining lead-based paint

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- Demolition of the structure
- Excavation and disposal of approximately 222 cubic yards of soil, including lead-contaminated soil around the structure
- Rough grading of the site

The Alameda County 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.

Project Objectives

- Eliminate hazards currently associated with the project site. The Whitecotton Cottage poses several safety concerns to the community:
 - Structural hazards – building is in a deteriorated state with several holes on the roof and extensive water damage and mold contamination within the interior of the building
 - Hazardous materials – Building contains peeling lead-based paint and asbestos in roofing materials. Previous peeling lead-based paint on the exterior of the building has also contaminated adjacent soils with lead.
 - Provides an attractive site for vandalism and other illicit activities
- Reduce the deferred maintenance burden (including cost and staff time) and overall costs to Alameda County

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives. Based on the alternatives analysis, Alternative 1 was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: Rehabilitation and Adaptive Reuse of Whitecotton Cottage

Alternative 1 (No Project) assumes that the project site would remain in its current state and condition indefinitely into the foreseeable future. The Whitecotton Cottage would not be demolished or altered and no soil removal or new grading would be completed on the project site. Under this alternative, significant impacts to potential historic resources would be avoided. In addition, no demolition activities would occur and mitigation measures associated with unanticipated discovery of cultural and tribal cultural resources, special-status species potentially affected during demolition, and demolition noise and vibration would not be required. However, this alternative would not fulfill the objectives of the proposed project because hazards associated with the existing building would not be eliminated and deferred maintenance of the building would continue to require County resources. In addition, degrading exterior paint conditions over time would likely further contaminate adjacent soils with lead.

Alternative 2 (Rehabilitation and Adaptive Reuse of Whitecotton Cottage) would involve evaluations of the Whitecotton Cottage to determine alterations necessary to address disrepair, structural issues, and abatement of hazardous materials, including in nearby soil. The structure would be rehabilitated for a 3,942 square-foot office use in conformance with the Secretary of the Interior Standards for Treatment of Historic Properties. The rehabilitation of the building would be conducted in accordance with the California Historic Building Code, which allows for more flexible application of building regulations when impacting a historic resource. It is assumed that all identified character-defining features of the building would be repaired and maintained in-situ to the highest degree feasible. Under this alternative, significant impacts to potential historic resources would be avoided. However, since construction activities and some excavation of contaminated soil would occur under this alternative, mitigation measures would still be required to reduce impacts during renovation activities, including measures to protect special-status species and unanticipated discovery of cultural and tribal cultural resources and to reduce noise and vibration. Moreover, additional operational impacts would occur from the use of the building as an office, though such impacts would be less than significant. Lastly, this alternative would be prohibitively expensive for the county. According to County estimates, the proposed project would cost approximately \$285,000, while rehabilitation of the structure would cost approximately \$1.6-2 million.

Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

Alameda County has not identified any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR and input received are summarized in Section 1, *Introduction*.

Issues to be Resolved

Alameda County has not identified issues to be resolved beyond the choice among alternatives.

Issues Not Studied in Detail in the EIR

Table 1 in Section 1.4 summarizes issues from the environmental checklist that were addressed in the Initial Study (Appendix B). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur to the following issue areas: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. The Initial Study also includes mitigation measures to reduce impacts to Biological Resources, Cultural Resources, Noise, and Tribal Cultural Resources to less than significant levels. Those mitigation measures are outlined below in Table 1 and will be incorporated in the Mitigation Monitoring and Reporting Plan for this project. Impacts to Cultural Resources, specifically historical resources, were found to be potentially significant and are addressed in this EIR.

Summary of Impacts and Mitigation Measures

Table 1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

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- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table 1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Biological Resources		
<p>Demolition activities from the project could indirectly disturb mature trees that could contain birds which are protected under the Migratory Bird Treaty Act. Furthermore, special-status bats may be in the existing building and could be disturbed during demolition of the building. Impacts associated with special-status species would be less than significant with mitigation implemented. (See Section 4, <i>Biological Resources</i>, of the Initial Study, Appendix 1 of this EIR.)</p>	<p>BIO-1 Nesting/Breeding Native Bird. 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.</p> <p>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.</p> <p>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.</p> <p>BIO-2 Special-status Bat Species Avoidance and Minimization. Focused surveys of the building to be demolished to determine the presence/absence of roosting bats shall be conducted by a qualified biologist 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.</p>	<p>Less than significant.</p>

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Impact	Mitigation Measure (s)	Residual Impact
Cultural Resources		
<p>Impact CR-1. The proposed project would demolish a historical resource that is recommended as eligible for listing in the California Register of Historical Resources. Therefore, impact to this historical resource would be significant and unavoidable.</p>	<p>CR-1 Historic Documentation Package. Prior to issuance of demolition, Alameda County shall undertake Historic American Building Survey (HABS) documentation of Whitecotton Cottage including its character defining features. The documentation should generally follow the HABS Level III requirements and include measured drawings that depict the size, scale, and dimensions of the subject property; digital photographic recordation of the interior and exterior of the subject property including all character-defining-features; a detailed historic narrative report; and compilation of historic research. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior’s Professional Qualification Standards (36 CFR, Part 61). The original archival-quality documentation shall be offered as donated material to the Alameda County Historical Society Archives where it would be available for current and future generations. Archival copies of the documentation also shall be submitted to the Alameda County Library, where it would be available to local researchers. Completion of this mitigation measure shall be monitored and enforced by Alameda County. The County shall also make the HABS documentation available on a County of Alameda webpage. The webpage shall be maintained by the County for a minimum of five years.</p> <p>CR-2 Interpretive Plaque. The County of Alameda shall install an interpretive plaque at the site discussing the history of the building, its significance, important details and features, and its connection to the Fairmont Hospital Campus. The plaque shall be installed on a publically accessible location on or near the project site. The plaque shall include information from the HABS documentation and any collected research pertaining to the historic property. The content shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History (NPS 1983). Installation of the plaque shall be completed within one year of the date of completion of the proposed project. Completion of this mitigation measure shall be monitored and enforced by the County of Alameda.</p>	<p>Significant and Unavoidable.</p>

Impact	Mitigation Measure (s)	Residual Impact
<p>Impact CUL-2. The project site is not considered archaeologically sensitive. Nevertheless, implementation of mitigation measure would be required to reduce impacts to less than significant in the case of unanticipated discoveries. (See Section 5, <i>Cultural Resources</i>, of the Initial Study, Appendix 1 of this EIR.)</p>	<p>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.</p>	<p>Less than significant.</p>
<p>Noise</p>		
<p>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. Impacts from temporary noise would be reduced to less than significant with mitigation incorporated. (See Section 13, <i>Noise</i>, of the Initial Study, Appendix 1 of this EIR.)</p>	<p>N-1 Demolition Noise Reduction. The following measures shall be implemented during project construction and demolition.</p> <ul style="list-style-type: none"> ▪ 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. 	<p>Less than significant.</p>

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Impact	Mitigation Measure (s)	Residual Impact
<p>Demolition activities could result in generation of excessive groundborne vibration, which could affect nearby sensitive receptors. Impacts to those sensitive receptors would be less than significant with mitigation incorporated. (See Section 13, <i>Noise</i>, of the Initial Study, Appendix 1 of this EIR.)</p>	<p>N-2 Demolition Vibration Reduction. The following vibration measures shall be applied during project demolition activity.</p> <ul style="list-style-type: none"> ▪ 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. 	<p>Less than significant.</p>
<p>Tribal Cultural Resources</p>		
<p>Although no tribal cultural resources are expected to be present on-site, there is the possibility of encountering undisturbed subsurface tribal cultural resources. Impacts to tribal cultural resources would be less than significant with mitigation incorporated. (See Section 18, <i>Tribal Cultural Resources</i>, of the Initial Study, Appendix 1 of this EIR.)</p>	<p>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.</p>	<p>Less than significant.</p>

1 Introduction

This document is an Environmental Impact Report (EIR) for the proposed Whitecotton Cottage Demolition project (hereafter referred to as the “proposed project” or “project”) in Alameda County, California. The proposed project would involve demolition of an existing building, removal of asbestos-containing materials and lead-based paint, excavation of approximately 222 cubic yards of soil, and rough grading of the site.

This section discusses (1) the project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) issue areas found not to be significant in the Initial Study; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA). The proposed project is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

Alameda County distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on April 17, 2019 and ending on May 17, 2019. The County received two responses on the NOP: a confirmation letter from the State Clearinghouse that the NOP was received and circulated to state agencies and one letter from the Native American Heritage Commission (NAHC). The NAHC letter describes the process required by CEQA for determining environmental impacts to tribal cultural resources, including requirements of Assembly Bill 52. This comment is addressed in Section 18 of the Initial Study, *Tribal Cultural Resources*, which describes how the County complied with AB 52 requirements for the proposed project. The Initial Study, NOP, and NOP response letters are included in Appendix 1.

1.2 Purpose and Legal Authority

The proposed project is subject to the environmental review requirements of CEQA. In accordance with CEQA Guidelines §Section 15121 (California Code of Regulations [CCR], Title 14), the purpose of this EIR is to serve as an informational document that “...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

This EIR has been prepared as a Project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A Project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines*:

“This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.”

This EIR is to serve as an informational document for the public and Alameda County decision makers. The process will include public hearings before the Board of Supervisors to consider certification of a Final EIR and approval of the proposed project.

1.3 Scope and Content

This EIR addresses impacts identified in the Initial Study as potentially significant. The following issues were found to include potentially significant impacts and have been studied in the EIR:

- Cultural Resources

In preparing the EIR, use was made of pertinent County policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References*.

The alternatives section of the EIR (Section 6) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and one alternative development scenario for the project site.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *Guidelines* state:

“An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.”

1.4 Issues Not Studied in Detail in the EIR

Table 2 summarizes issues from the environmental checklist that were addressed in the Initial Study (Appendix 1). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur in any of these issue areas. Mitigation measures identified in the Initial Study have been carried over to Table 1 in the Executive Summary of this EIR.

Table 2 Issues Not Studied in the EIR

Issue Area	Initial Study Findings
Aesthetics	The project site would not substantially hinder views of the skyline from public areas, nor is it located on a State Scenic Highway. Moreover, the project would not substantially damage scenic resources or substantially degrade the existing visual character or quality of the site and its surroundings, nor would it create significant impacts with respect to increased lighting. Impacts to these resources would be less than significant.
Agricultural Resources	The project site does not occur within or near an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor is it in an area containing forest land. Moreover, the project would involve only demolition of an existing building and not the establishment of new buildings or uses that would contribute to the conversion of existing nearby farmland. No impact to these resources would occur.

Issue Area	Initial Study Findings
Air Quality	<p>Since the project would involve demolition of an existing building and would not generate new population or employment growth, it would not contribute to an exceedance of the projected population growth forecast in the 2017 Bay Area Air Quality Management District (BAAQMD) Clean Air Plan. The major source of emissions associated with the project result from emissions during proposed building demolition. Temporary demolition emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. Such emissions would not exceed BAAQMD short-term construction thresholds. Consequently, the project would not significantly affect regional air quality in the long term.</p> <p>The project would not generate objectionable odors affecting a substantial number of people during operation. Odors from demolition activities would be temporary and would cease upon completion. Impacts would be less than significant.</p>
Biological Resources	<p>Demolition activities from the project could indirectly disturb mature trees that could contain birds which are protected under the Migratory Bird Treaty Act. Furthermore, special-status bats may be in the existing building and could be disturbed during demolition of the building. Mitigation measures BIO-1 and BIO-2 would reduce potential impacts to special-status species and biological resources affected by the project to less than significant levels.</p> <p>Moreover, the project is not located on or in the vicinity of state or federally protected wetlands, nor does an adopted conservation plan cover an area that includes the project site. No impact would occur.</p>
Energy	<p>Demolition of the existing building would result in short-term consumption of energy. 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 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. Impacts to energy would be less than significant.</p>
Geology and Soils	<p>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. The project would involve excavation of soils disturbed during original site preparation for and construction of the existing building, and not unique paleontological resources. Therefore, no impacts related to seismic activity, landslides, liquefaction, or paleontological resources would occur.</p> <p>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 the Alameda General Ordinance Code, the County must ensure the work is in conformance with design and documentation provisions of Chapter 15.36, Grading Erosion and Sediment Control. Compliance with the standards in this 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.</p>
Greenhouse Gas Emissions	<p>Greenhouse gas (GHG) emissions associated with the proposed project were estimated using CalEEMod. Based on output results from CalEEMod, the proposed project would not generate GHG emissions that would exceed BAAQMD thresholds. Impacts would be less than significant.</p>

Issue Area	Initial Study Findings
<p>Hazards and Hazardous Materials</p>	<p>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, the existing 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, with required 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.</p> <p>The proposed project would involve 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. Therefore, impacts would be less than significant.</p> <p>The project site is not included on a list compiled pursuant to Government Code Section 65962.5, nor is the site located near a public or private airstrip or airport. Therefore, there would be no impacts from a proximity to airports or hazardous material sites compiled pursuant to Government Code Section 65962.5.</p> <p>The project would not involve 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. Therefore, no impacts to emergency response or evacuation plans would occur.</p>
<p>Hydrology and Water Quality</p>	<p>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. Compliance with Alameda County Code Chapter 15.36, <i>Grading Erosion and Sediment Control</i>, would ensure there would be no impacts to water quality and discharge.</p> <p>The project would not increase the region’s population and, in turn, the regional demand for potable water nor would it 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.</p> <p>The proposed project would not involve new construction that would substantially alter drainage patterns. The proposed project would not involve the alteration of a stream or river or the addition of impervious surfaces that would result in runoff, flooding, erosion, or siltation on or off-site and thus would result in no impacts to drainage or runoff.</p> <p>The project site is not within a 100-year flood hazard area. 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. Therefore, no impacts from inundation would occur.</p> <p>The project would not involve the introduction of new structures or uses that would obstruct water quality controls or groundwater management plans, and grading would be required to comply with applicable provisions of Alameda County Code Chapter 15.36. No impact would occur.</p>

Issue Area	Initial Study Findings
Land Use & Planning	The proposed project would involve the demolition of an existing structure and would thus not separate an established community, nor would it result in the introduction of new structures or uses that would conflict with the site's designation or applicable policies. Therefore, no impact would occur.
Mineral Resources	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.
Noise	Demolition and grading activities associated with the proposed project could result in the temporary elevation of noise and vibration levels at the project site and surrounding areas. Mitigation measures N-1 and N-2 would reduce impacts from noise and vibration to a less than significant level. Moreover, the project site is not located within two miles of a public airport or public use airport. No impact would occur.
Population and Housing	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.
Public Services	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. No impact would occur.
Recreation	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.
Transportation	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. The project would generate approximately five trips per day during hauling and 10 one-way worker trips per day. This low number of trips would be temporary and would not cause significant traffic impacts. Impacts would be less than significant. 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.
Tribal Cultural Resources	Although no tribal cultural resources are expected to be present on-site, there is the possibility of encountering undisturbed subsurface tribal cultural resources. Mitigation measure TCR-1 would reduce potential impacts to tribal cultural resources to a less than significant level.
Utilities	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. 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.

Issue Area	Initial Study Findings
	<p>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.</p>
Wildfire	<p>The project site occurs approximately 1.5 miles south of a very high fire severity zone. 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.</p> <p>The project would not involve the establishment of new uses that would require new infrastructure. In addition, grading after demolition would be required to comply with applicable county requirements regarding erosion and sediment control. Therefore, no impact would occur.</p>

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. Alameda County is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. There are no responsible agencies for the proposed project.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

1.6 Environmental Review Process

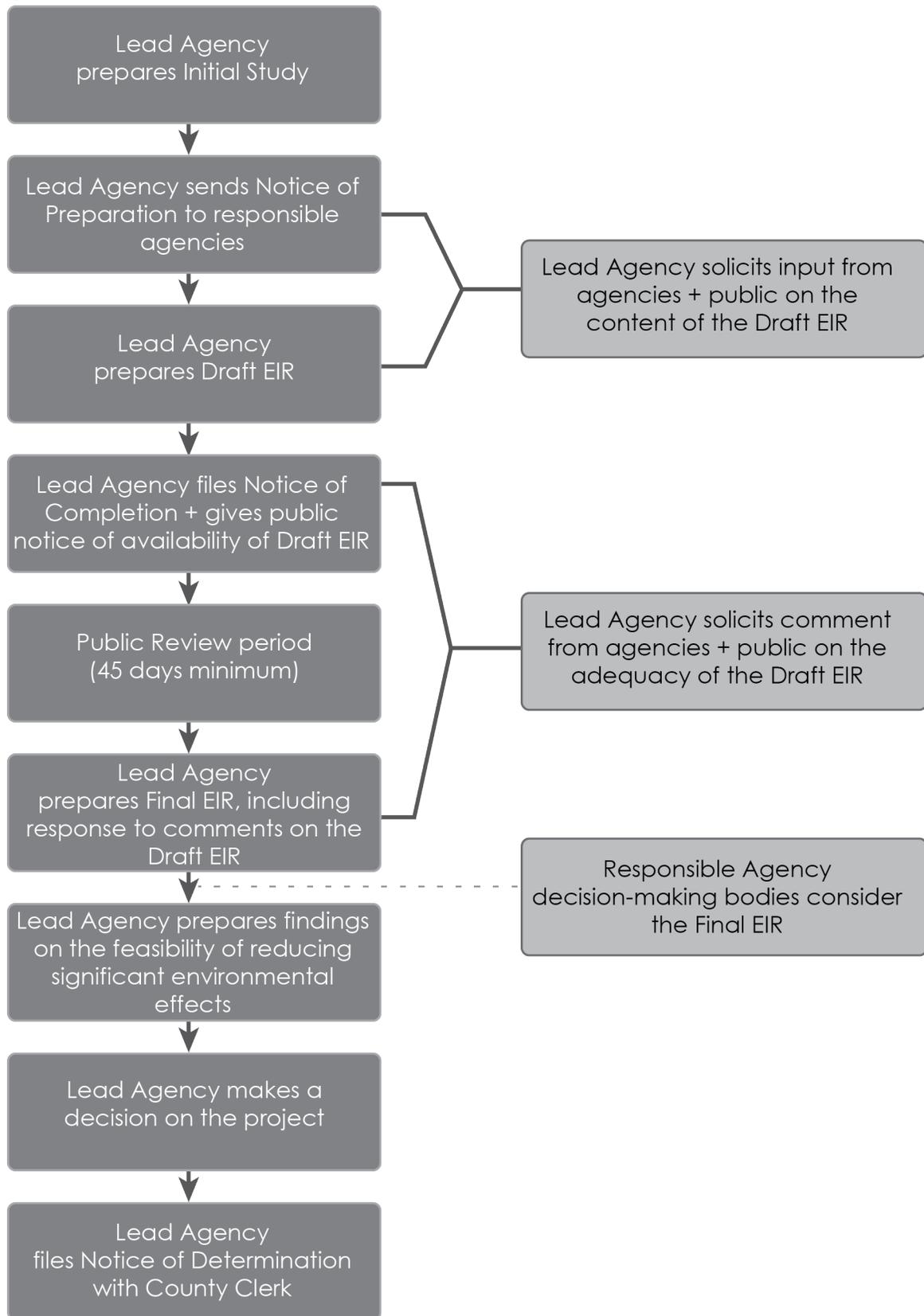
The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Initial Study.** After deciding that an EIR is required, the lead agency (Alameda County) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk’s office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk’s office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of

the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).

4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30 day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1 Environmental Review Process



2 Project Description

This section describes the proposed project, including the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Lead Agency Contact Person

Jason B. Garrison, Environmental Project Manager
Alameda County
General Services Agency
1401 Lakeside Drive, Suite 800
Oakland, California 94612
(510) 208-9520

2.2 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 county-owned parcels on which the Alameda County Fairmont Hospital and other related medical and County institutional buildings occur which are bounded by Fairmont Drive to the northwest and Foothill Boulevard to the southeast. The project site is bounded by Meadow Drive to the west, a parking lot to the south, a medical building (Cherry Hill Detox Center) to the northeast, and landscaped area to the north. Figure 2 shows the location of the site in the region, Figure 3 shows the project site in its neighborhood context, and Figure 4 depicts the project site and its immediate surroundings.

2.3 Existing Site Characteristics

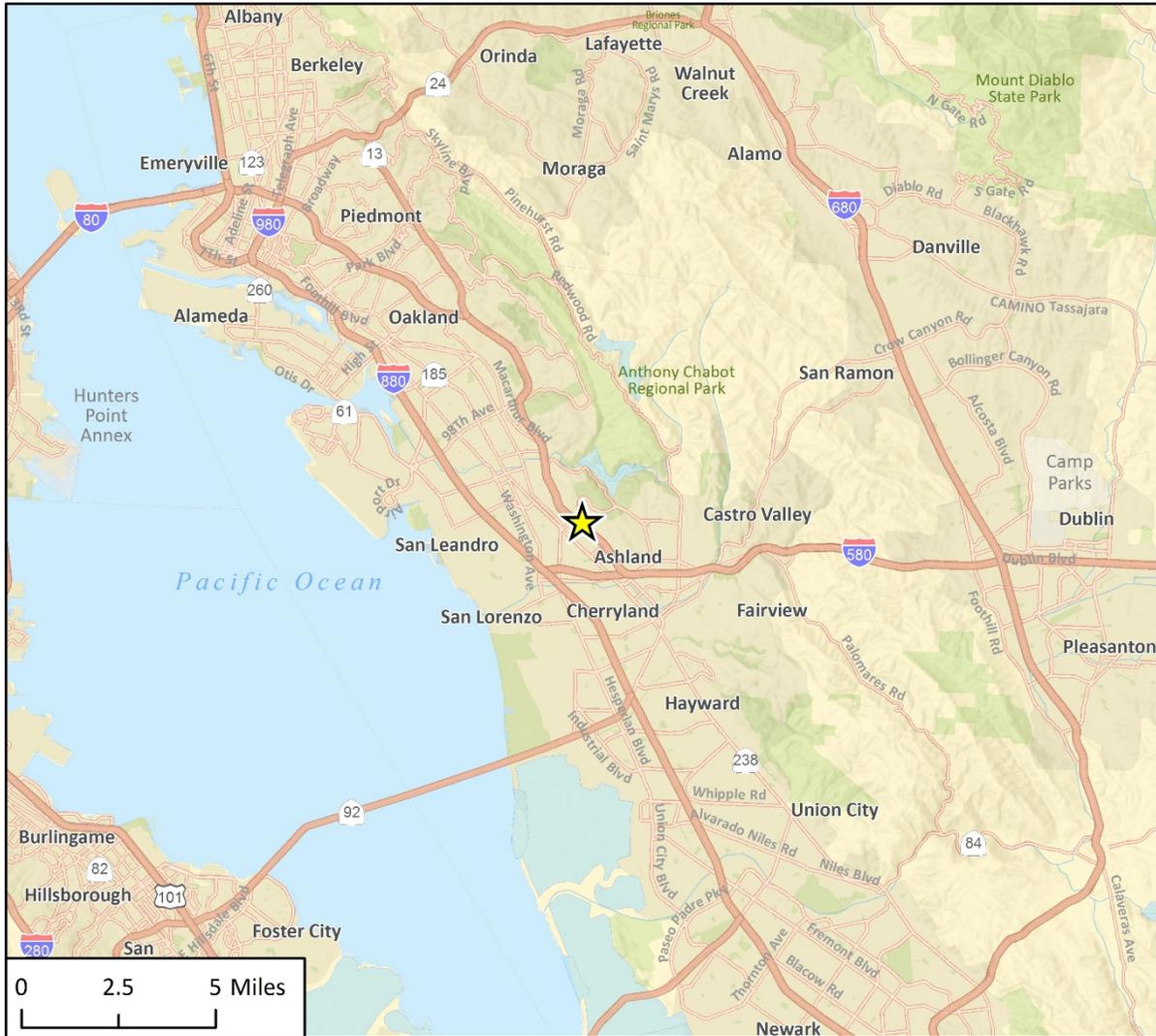
2.3.1 Current Land Use Designation and Zoning

The project site is designated Public Facilities (PF) in the Castro Valley General Plan (Alameda County 2014) and is zoned Planned Development (PD) according to the Castro Valley General Plan.

2.3.2 Existing Conditions and Background

The site is within a county-owned area that was originally called the Fairmont Hospital Campus (also 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 2).

Figure 2 Regional Location



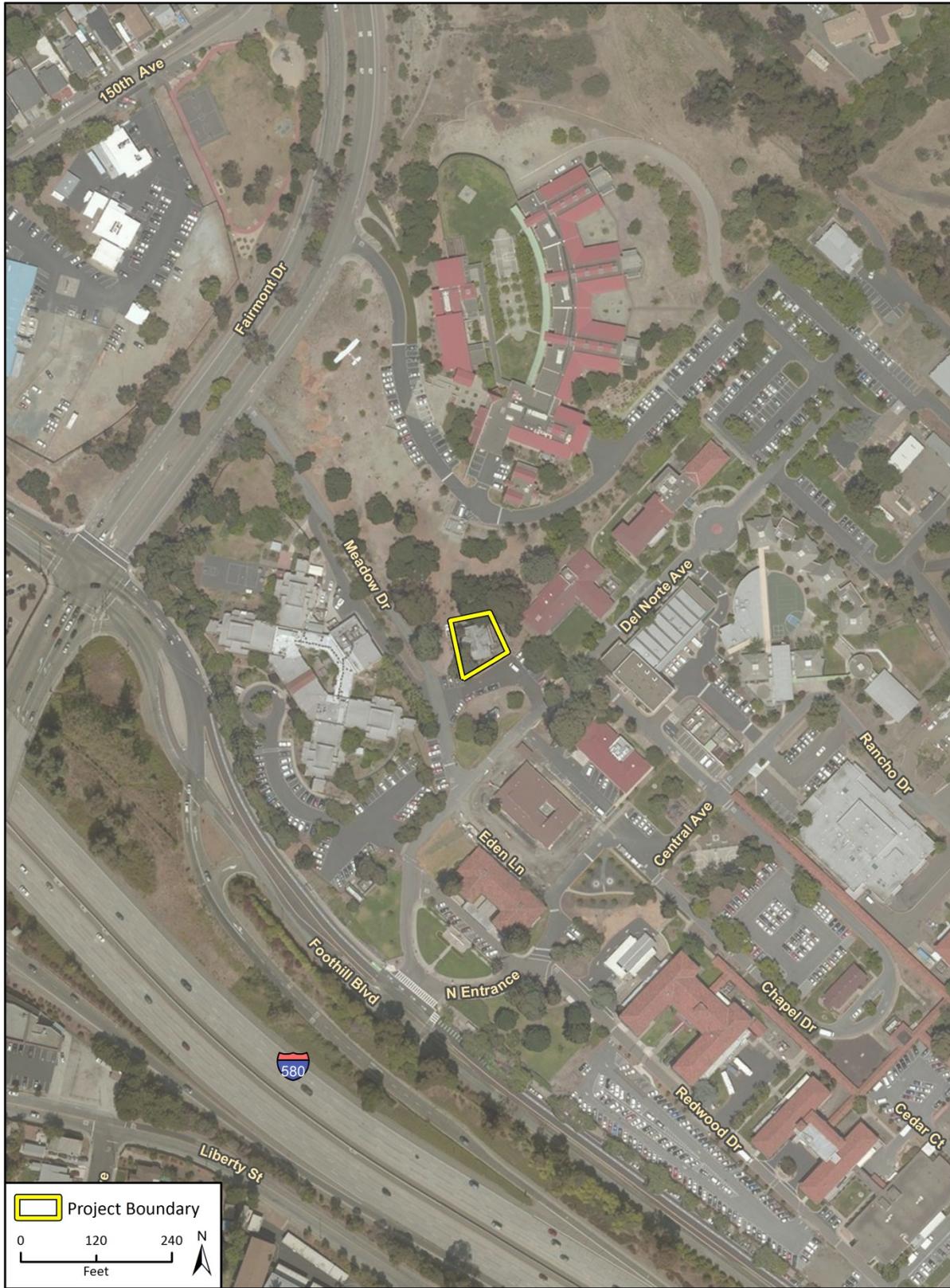
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★ Project Location



Fig 1 Regional Location

Figure 3 Project Site in its Neighborhood Context



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Fig. 2 Project Location - Surrounding Area

Figure 4 Project Site and Immediate Surroundings



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Fig 2 Project Location

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 Infirmity. 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 surrounded by several mature trees and a variety of shrubs grow around the base of the building. Figure 5a and Figure 5b shows photographs of the existing site conditions.

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.

2.3.3 Surrounding Land Uses

The project site is on a county-owned parcel that was originally part of the Alameda County Fairmont Hospital campus. The surrounding area comprises medical and office buildings, the Alameda County Superior Court, a Juvenile Justice Center and other structures associated with the institutional uses, including recreational facilities and a cafeteria. Lake Chabot is located further north on the other side of Fairmont Drive and residential neighborhoods are located to the east, south and west. Figure 2 shows the project site in its neighborhood context. The project site has relatively flat topography but is at the southern edge of a landscaped area with more varied and rolling topography towards the east. The project site is towards the southeastern portion of the original hospital 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 are located approximately 300 feet to the southeast. Figure 3 shows the project site and its immediate surroundings.

2.4 Project Characteristics

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

Figure 5a Site Photographs



Photograph 1. View of Whitecotton Cottage from abutting parking lot, looking northwest



Photograph 2. View of Whitecotton Cottage from abutting parking lot, looking northeast

Figure 5b Site Photographs



Photograph 3. West façade of Whitecotton Cottage , looking east



Photograph 4. View of Whitecotton Cottage towards abutting parking lot, looking east

The Alameda County 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.

2.4.1 Parking and Site Access

The project site is accessible from Meadow Drive, which extends along the western edge of the site. Meadow Drive connects to the existing southern abutting parking lot and to Fairmont Drive, a larger roadway that provides vehicle access to and from the Fairmont Hospital. An existing parking lot abuts the project site at its southeast boundary. This exiting site access and parking would remain during demolition activities and after the project has been completed.

2.4.2 Utilities

The East Bay Municipal Utility District (EBMUD) provides water service to the project site, and the Castro Valley Sanitary District provides wastewater collection and treatment services. The Alameda County Flood Control and Water Conservation District maintains drainage facilities in Castro Valley.

2.5 Project Objectives

- Eliminate hazards currently associated with the project site. The Whitecotton Cottage poses several safety concerns to the community:
 - Structural hazards – building is in a deteriorated state with several holes on the roof and extensive water damage and mold contamination within the interior of the building
 - Hazardous materials – building contains peeling lead-based paint and asbestos in roofing materials. Previous peeling lead-based paint on the exterior of the building has also contaminated adjacent soils with lead.
 - Provides an attractive site for vandalism and other illicit activities
- Reduce the deferred maintenance burden (including cost and staff time) and overall costs to Alameda County

2.6 Required Approvals

The proposed project would require review and approval by the Alameda County Board of Supervisors. No other permits or discretionary approvals from other agencies are required.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional 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 site is in the community of Castro Valley and on a county-owned parcel that was originally a part of the Alameda County Fairmont Hospital campus. The campus is bounded by Fairmont Drive to the northwest and Foothill Boulevard to the southeast, and 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. Figure 2 in Section 2, *Project Description*, shows the location of the project site in the region. Figure 3 shows the location of the project site in relationship to the surrounding neighborhood.

The project site is located at the western edge of the community of Castro Valley. Besides the hospital and other medical and county uses, this portion of the county primarily comprises open space, especially along Fairmont Drive, which provides access from the project site to Lake Chabot Regional Park. The more developed portion of Castro Valley occurs southwest of the project site and includes a grid system of east-west and north-south roadways, including arterials, collectors, and local streets, provide vehicular access throughout the County. Interstate-580 traverses the southern edge of Castro Valley and abuts Foothill Boulevard near the project site, providing vehicle access to and from the area.

The project site is located approximately four miles inland from the coastline of the San Francisco Bay. The County's semiarid climate is temperate year-round. Although air quality in the area has steadily improved in recent years, the San Francisco Bay Area remains a nonattainment area for ozone and particulate matter.

3.2 Project Site Setting

As shown in Figure 4 in Section 2, *Project Description*, the project site, which 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.

The project site contains one existing building, a dwelling known as Whitecotton Cottage, which was built in 1903 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 surrounded by several mature trees and a variety of shrubs grow around the base of the building. The project site is generally level but other portions of the campus have more varied and rolling topography.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

The project’s cumulative impact to historical resources is discussed in Section 4, *Environmental Impact Analysis*. Section 15130 of the *CEQA Guidelines* states that an adequate discussion of cumulative impacts should include either a list of past, present, and probable future projects producing related or cumulative impacts, or a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. For the purpose of this EIR, which focuses on consideration of the project’s potential impact to historical resources, a query was conducted of City of San Leandro staff, County of Alameda General Services Agency staff, the County of Alameda Community Development Agency’s list of current development projects (County of Alameda 2019), and CEQAnet (California Office of Planning and Research 2019) to identify planned or pending projects in the Castro Valley community of Alameda County and in the adjacent City of San Leandro that would potentially impact historical resources. CEQAnet was queried for projects with activity between January 2017 and April 2019. No projects were identified with potentially significant impacts to historical resources in the City of San Leandro. One project was identified in Alameda County with the potential to impact historical resources. The Alameda County General Services Agency is considering demolishing four structures at the former Nike Missile Site located at 2892 Fairmont Drive in Alameda County. Cumulative impacts of the proposed project in combination with this project are discussed in Section 4, *Environmental Impact Analysis*, of this EIR.

4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Whitecotton Cottage Demolition Project for the specific issue area (Cultural Resources) that was identified through the scoping process as having the potential to experience significant effects. “Significant effect” is defined by the *CEQA Guidelines* Section 15382 as:

“...a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant.”

The assessment of Cultural Resources impacts begins with a discussion of the environmental setting and is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the County and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes the impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the *CEQA Guidelines*.
- **Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following the environmental impact discussion is a list of mitigation measures and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*. The Executive Summary of this EIR summarizes impacts and mitigation measures that apply to the proposed project.

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4.1 Cultural Resources

The information and analysis presented in this section is partially based on the Historical and Architectural Assessments completed by Woodruff Minor in August 2001 and Preservation Architecture in August 2018. The full documents are provided in Appendix 2.

Regulatory Setting

Federal

Projects that involve federal funding or permitting (i.e., have a federal nexus) must comply with the provisions of the National Historic Preservation Act of 1966 (NHPA), as amended (16 United States Code [U.S.C.] 470f). The proposed project does not have a federal nexus and, therefore, compliance with reference to the NHPA and other federal laws is provided here for informational purposes only. Cultural resources are considered during federal undertakings chiefly under Section 106 of the NHPA through one of its implementing regulations, 36 Code of Federal Regulations (CFR) 800 (Protection of Historic Properties), as well as the National Environmental Policy Act (NEPA). Properties of traditional religious and cultural importance to Native Americans are considered under Section 101(d)(6)(A) of the NHPA. Other relevant federal laws include the Archaeological Data Preservation Act of 1974, American Indian Religious Freedom Act of 1978, Archaeological Resources Protection Act of 1979, and Native American Graves Protection and Repatriation Act of 1989.

National Register of Historic Places

The National Register of Historic Places was established by the NHPA of 1966 as “an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (CFR 36 CFR 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. Criteria are provided under Section 4.1.2, *Impact Analysis*.

State

California Register of Historic Resources

The California Register of Historical Resources (CRHR) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the CRHR through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the CRHR. Properties can also be nominated to the CRHR by local governments, private organizations, or citizens. The evaluative criteria used by the CRHR for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places. Criteria are provided under Section 4.1.2, *Impact Analysis*.

CEQA

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1). A *historical resource* is a resource listed, or determined to be eligible for listing, in the 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]).

Alameda County

The County of Alameda Historic Preservation Ordinance was adopted in 2012 and codified how the Alameda County Register of Historic Resources is defined and maintained, which alterations to historic properties, if any, are subject to review, and incentives that may apply to historic properties (County of Alameda 2012a).

Additionally, the Castro Valley Area Plan, which was adopted by the County 2012, includes a discussion and policies relating to cultural resources (County of Alameda 2012b). Per Section 5.6 of the document, *Cultural Resources*, Fairmont Hospital is noted on a list of “Castro Valley’s most notable sites and structures,” most notably because of William Corlett’s master plan and several ward buildings that were built by the Works Project Administration. The relevant goals and policies in the Area Plan include:

Goal 5.6-1 Protect historic sites and structures and other cultural resources that help to maintain the special character and identify of Castro Valley and represent important physical connections to the community’s past.

Policy 5.6-1 Preserve Designated Historic Sites. Protect and preserve Federal and State-designated historic sites, structures, and properties that are deemed eligible for designation to the maximum extent feasible. Enhance the maintenance of key historic structures such as the Stanton House, Strobridge House, and the Adobe Arts Center, and ensure that they remain, or are relocated, to attractive and prominent settings consistent with their character and history.

Policy 5.6-2 Establish Cultural Resources Protection Strategies. Establish appropriate strategies to protect local cultural resources that do not qualify for designation as historic resources but reflect Castro Valley’s history and traditions. Possible strategies include:

- Conservation districts for older neighborhoods with a unified distinctive character, such as the neighborhood of Eichler homes;
- Lower densities or conservation easements in environmentally sensitive areas that reflect Castro Valley’s agricultural history such as: Palomares Canyon and properties with barns and stables located along creek beds and Crow and Cull Canyon Roads.

Policy 5.6-3 Consider Cultural Resources in Development Review Process. Integrate consideration of historical and cultural resources into the development review process to promote early resolution of conflicts between cultural resources preservation and other community goals and objectives.

Policy 5.6-4 Balance Goals for Historic Preservation with Infill Development Goals. Balance preservation goals with goals for promoting infill development and for renovating and improving the appearance of commercial areas in Castro Valley. Strategies to consider include:

- Ensuring that project review requirements are based on a clear understanding of public and private responsibilities;
- Promoting and facilitating projects that incorporate new development while preserving the character of local cultural resources that contribute to the community.

Policy 5.6-5 Promote Cultural Resource Rehabilitation. Promote the maintenance, restoration, and rehabilitation of historic and cultural resources through a variety of financial and regulatory incentives.

4.1.1 Historical Setting

a. Fairmont Hospital

Fairmont Hospital was the first medical facility campus owned and operated by Alameda County. It was acquired in 1869 to offer state-mandated medical care for the county's poor. The first hospital building at the site opened in 1869, several buildings were built during the 1870s, and additional facilities were built through the early 1900s. Those buildings include an administration building, various wards, a dining hall, laundry facilities, a chapel, and staff residences. During this early period, the campus also functioned as a farm with barns, sheds, and large grazing areas; the animals kept on the campus provided meat and dairy to the infirmary.

In 1912, the Alameda County Board of Supervisors held an architectural competition for a new complex to replace the existing facilities. In 1916, work was completed on a portion of the winning scheme, including two ward buildings and an assembly hall. However, due to budgetary constraints, the rest of the plan was not completed. Moreover, a new county policy called for separate medical facilities with specialized functions rather than one general facility, and county leadership subsequently shifted the focus at the campus to long-term care for convalescent patients, seniors, and people with chronic diseases.

Between 1917 and 1922, the campus was rebuilt and remodeled. New ward buildings, dormitories, a cafeteria, laundry, powerhouse, corporation yard, greenhouse, and entrance gates were built. The campus was also developed with landscaping and connecting walkways. Several new buildings, including a rebuilt hospital, were constructed between 1946 and 1955. Most of those new structures were designed by Will G. Corlett, who created a master plan for the campus in 1935. Since the 1960s, after the major reconstruction effort was completed, a few additional buildings have been constructed, including Villa Fairmont (1981), which occurs west of the project site across Meadow drive.

b. Whitecotton Cottage

Whitecotton Cottage was originally known as the Superintendent's Residence, because it was built to house the superintendent of the Fairmont Hospital campus. The County Board of Supervisors approved plans to construct the building in 1903, and it was constructed shortly after. 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 surrounded by several mature trees and a variety of shrubs around the base of the building.

4.1.2 Impact Analysis

a. Significance Thresholds and Methodology

CEQA Guidelines

According to Appendix G of the *State CEQA Guidelines*, impacts related to cultural resources from the proposed project would be significant if the project would:

1. Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5
3. Disturb any human remains, including those interred outside of formal cemeteries

Impacts related to threshold 1 are analyzed below. Impacts related to thresholds 1 and 3 were evaluated in the Initial Study, which is provided as Appendix 1 to this EIR. As described therein, archaeological resources and human remains are unlikely to be encountered on site, and implementation of mitigation measures outlined in the Initial Study and Table 1 of this EIR would reduce impacts to less than significant levels in the unlikely event that these resources are encountered.

Methodology

Historical resources are “significantly” affected if there is demolition, destruction, relocation, or alteration of the resource or its surroundings. Generally, impacts to historical resources can be mitigated to below a level of significance by following the Secretary of the Interior’s Guidelines for the Treatment of Historic Properties with *Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* [13 PRC 15064.6 (b)]. In some circumstances, documentation of an historical resource by way of historic narrative photographs or architectural drawings will not mitigate the impact of demolition below the level of significance [13 PRC 15126.4 (b)(3)]. Preservation in place is the preferred form of mitigation for a “historical resource of an archaeological nature” as it retains the relationship between artifact and context and may avoid conflicts with groups associated with the site [PRC 15126.4 (b)(3)(A)]. Historic resources of an archaeological nature and “unique archaeological resources” can be mitigated to below a level of significance by:

- Relocating construction areas such that the site is avoided;
- Incorporation of sites within parks, greenspace, or other open space;
- “Capping” or covering the site with a layer of chemically stable soil before building; or
- Deeding the site into a permanent conservation easement. [PRC 15126.4 (b)(3)(B)].

If an archaeological resource does not meet either the historical resource or the more specific “unique archaeological resource” definition, impacts do not need to be mitigated [13 PRC 15064.5

(e)]. Where the significance of a site is unknown, it is presumed to be significant for the purpose of the EIR investigation.

Historical Listing Criteria

As stated above, the *State CEQA Guidelines* define a historical resource as a resource listed, or determined to be eligible for listing, in the 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)). Consequently, the Whitecotton Cottage is considered a historical resource because it is recommended as eligible for listing in the CRHR. For listing in the CRHR, a property must be eligible under one or more of the following criteria and retain sufficient integrity to convey its significance:

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.

The Historical and Architectural Assessment (Appendix 2) concludes that Whitecotton Cottage is eligible for listing on the CRHR under Criterion 1 (historical associations) and Criterion 3 (architectural quality).

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource Pursuant to §15064.5?

IMPACT CR -1 THE PROPOSED PROJECT WOULD DEMOLISH A HISTORICAL RESOURCE THAT IS RECOMMENDED AS ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES. THEREFORE, IMPACT TO THIS HISTORICAL RESOURCE WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Whitecotton Cottage is recommended as eligible for listing in the CRHR under Criterion 1 (historical associations), for its association with historic events, specifically the original Alameda County Infirmary and the Fairmont Hospital. The structure was built at the site in 1903 to provide housing for the Superintendent of the Alameda County Infirmary and later the Fairmont Hospital, the first county-run hospital in the County, which began operating under a statewide mandate to provide medical care for the poor and sick. It is the only intact building on the campus that is associated with the first phase of construction at the campus and is the oldest building in Alameda County associated with the hospital campus.

To be eligible under CRHR Criterion 3 (architectural quality), a property must embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values. According to the Historical and Architectural Assessment, Whitecotton Cottage is an illustrative local example of the Shingle Style, a national trend of the period when it was built. The assessment also notes that the building type – an early 20th century superintendent's residence on a hospital campus – is rare and therefore has further importance. However, extensive dilapidation of the exterior and interior of the building have resulted in

degradation of the existing materials and design and “a diminished state with respect to the workmanship that is embodied in its original/early design and materials.” The assessment therefore concludes that the building no longer embodies the necessary design or construction to meet Criterion 3.

Given that the structure is eligible for listing in the CRHR, the proposed demolition of Whitecotton Cottage would constitute a significant adverse impact. Mitigation measures CR-1 and CR-2, detailed below, have been identified to reduce the severity of the project’s impact on historic resources to the extent feasible.

Mitigation Measures

CR-1 Historic Documentation Package

Prior to issuance of demolition, the County of Alameda shall undertake Historic American Building Survey (HABS) documentation of Whitecotton Cottage including its character defining features. The documentation should generally follow the HABS Level III requirements and include measured drawings that depict the size, scale, and dimensions of the subject property; digital photographic recordation of the interior and exterior of the subject property including all character-defining-features; a detailed historic narrative report; and compilation of historic research. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior’s Professional Qualification Standards (36 CFR, Part 61). The original archival-quality documentation shall be offered as donated material to the Alameda County Historical Society Archives where it would be available for current and future generations. Archival copies of the documentation also shall be submitted to the Alameda County Library, where it would be available to local researchers. Completion of this mitigation measure shall be monitored and enforced by the County of Alameda. The County shall also make the HABS documentation available on a County of Alameda webpage. The webpage shall be maintained by the County for a minimum of five years.

CR-2 Interpretive Plaque

The County of Alameda shall install an interpretive plaque at the site discussing the history of the building, its significance, important details and features, and its connection to the Fairmont Hospital Campus. The plaque shall be installed on a publically accessible location on or near the project site. The plaque shall include information from the HABS documentation and any collected research pertaining to the historic property. The content shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History (NPS 1983). Installation of the plaque shall be completed within one year of the date of completion of the proposed project. Completion of this mitigation measure shall be monitored and enforced by the County of Alameda.

Significance After Mitigation

Mitigation measures CR-1 and CR-2 would document and archive materials related to the history of Whitecotton Cottage and provide the public with educational opportunities related to the building and its historical features. This would serve to preserve the history of the site such that it is available for future research and interested parties. However, the Whitecotton Cottage historical resource would be demolished and the impact would not be reduced to less-than-significant levels under CEQA. Demolition by its nature is complete and total material impairment of the historical resource,

and no feasible mitigation measures are available to mitigate the demolition of the CEQA historical resources to a less-than-significant level. As a result, demolition of the individually eligible resource would be considered a significant and unavoidable adverse impact even after implementation of the mitigation measures.

4.1.3 Cumulative Impacts

In terms of historical resources, the analysis of cumulative impacts relates to whether impacts of the project and future related projects, considered together, might substantially impact and/or diminish the number of similar historical resources, in terms of context or property type. As discussed in Section 3.3, *Cumulative Development*, there are no planned or pending projects in the adjacent City of San Leandro that would adversely impact any historical resources. One other planned project in Alameda County was identified that involves potential impacts to historical resources, the partial demolition of four structures associated with the Nike Missile Site. A Historic Resources Evaluation Report found that the five existing buildings at the site are eligible for listing on the CRHR as contributing resources to an eligible historic district under criterion 1. While both projects would involve the demolition of historical resources, the Nike Missile Site is a resource of a different property type and period than Whitecotton Cottage, and thus its demolition would not result in similar impacts to historical resources as the impacts from the proposed project. No other buildings associated with the Alameda County Infirmary or Fairmont Hospital campus are planned for demolition. In addition, the project site does not occur within a historic district and would involve the demolition of a single building eligible for listing on the CRHR; no additional eligible structures would be demolished. Therefore, there would be no cumulative impact to similar historical resources in the region and the project would have a less than significant cumulative impact.

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5 Other CEQA Required Discussions

This section discusses growth-inducing impacts, irreversible environmental impacts, and energy impacts that would be caused by the proposed project.

5.1 Growth Inducement

Section 15126(d) of the CEQA Guidelines requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

The proposed project would involve demolition of an existing vacant building. It would not provide new residences or work space and therefore would not contribute to an increase in population.

5.1.2 Economic Growth

The project would generate temporary employment opportunities during demolition and grading activities, which would be expected to draw workers from the existing regional work force. Therefore, demolition and related activities for the project would not be considered growth-inducing.

The proposed project would not involve development of new uses that would generate permanent employment opportunities. Operation and maintenance of the site would generally continue as under existing conditions. Therefore, the proposed project would not be growth-inducing with respect to jobs and the economy.

5.1.3 Removal of Obstacles to Growth

The project would involve demolition of a vacant building in a developed portion of Alameda County. It would not require the expansion of infrastructure to undeveloped areas or changes in allowed land uses or development intensities; therefore, project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

The CEQA Guidelines require that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

Whitecotton Cottage Demolition Project

Demolition activities for the project would involve an irreversible commitment of construction materials and non-renewable energy resources. The project would involve the use of building materials and energy, some of which are non-renewable resources, to demolish the existing Whitecotton Cottage and to subsequently regrade the project site. Consumption of these resources would occur with any development in the region and are not unique to the proposed project.

Since demolition activities would be temporary, the project would not require permanent grid connections. Energy impacts are discussed in detail in Section 5, *Energy*, in the Initial Study.

Demolition of Whitecotton Cottage would be an irreversible environmental effect on historic resources. Required implementation of mitigation measures CR-1 and CR-2, as described in Section 4.2, *Cultural Resources*, would require Alameda County to undertake a Historic American Building Survey (HABS) documentation of the structure including its character defining features prior to demolition. The original archival-quality documentation shall be offered as donated material to the HSU Archives where it would be available for current and future generations. Archival copies of the documentation also shall be submitted to the Alameda County Historical Society Archives, where it would be available to local researchers. Additionally, mitigation measure CR-2 would require the county to develop an online interpretive website that displays materials concerning the history and architectural features of the Whitecotton Cottage. While these mitigation measures would retain information on the historic significance of the structure, its demolition would be irreversible.

CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the proposed project would result in a significant and unavoidable impact to cultural resources because the project site contains a structure that could be eligible for listing as a historic resource in both the NRHP and CRHR. Although the proposed project would implement mitigation, as discussed in Section 4.2, *Cultural Resources*, impacts would remain significant and unavoidable due to this irreversible loss.

6 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives (stated in Section 2 of this EIR) but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2, *Project Description*, the objectives for the proposed project are as follows:

- Eliminate hazards currently associated with the project site. The Whitecotton Cottage poses several safety concerns to the community:
 - Structural hazards – building is in a deteriorated state with several holes on the roof and extensive water damage and mold contamination within the interior of the building
 - Hazardous materials – Building contains peeling lead-based paint and asbestos in roofing materials. Previous peeling lead-based paint on the exterior of the building has also contaminated adjacent soils with lead.
 - Provides an attractive site for vandalism and other illicit activities
- Reduce the deferred maintenance burden (including cost and staff time) and overall costs to Alameda County

Included in this analysis are two alternatives, including the CEQA-required “no project” alternative, that involve changes to the project that may reduce the project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: Rehabilitation and Adaptive Reuse

Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1 through 6.4.

6.1 Alternative 1: No Project Alternative

6.1.1 Description

The No Project Alternative assumes that the project site would remain in its current state and condition into the foreseeable future. The Whitecotton Cottage would not be demolished or altered and no soil removal or new grading would be completed on the project site. Except during general maintenance activities, which would be of short duration, the site would continue to operate under existing conditions and Whitecotton Cottage would remain vacant and boarded up. This alternative would not fulfill the objectives of the proposed project because hazards associated with the existing building would not be eliminated, the site would continue to be attractive for vandalism, and deferred maintenance of the building would continue to require County resources. In addition,

degrading exterior paint conditions over time would likely further contaminate adjacent soils with lead.

6.1.2 Impact Analysis

a. Cultural Resources

This alternative would retain the existing Whitecotton Cottage. However, this alternative would not involve rehabilitation efforts to preserve the structure's historic elements, and the existing materials and design would continue to degrade and would thus result in further exterior and interior dilapidation. Nonetheless, because this alternative does not involve demolition of a historic resource, this alternative would result in a less than significant impact to historic resources. Because no excavation or grading activities would occur under this alternative, mitigation measures to reduce impacts from unanticipated discovery of cultural resources would not be required.

b. Other Impact Areas

Under the No Project alternative, no impacts associated with demolition activities would occur. No noise impacts would occur because there would be no construction-related noise and vibration that would affect nearby receptors. No biological resources would occur because demolition activities would not affect special status species at or near the site. No impacts to tribal cultural resources would occur because no demolition or excavation activities would occur. Thus, mitigation measures identified in the Initial Study in these areas would not be required, and impacts would be less under this alternative than impacts under the proposed project.

As with the proposed project, no impact to Aesthetics, Agriculture and Forestry Resources, Hydrology and Water Quality, Land Use Planning, Mineral Resources, Recreation, and Transportation would occur under this alternative. Impacts to Energy, Geology and Soils, Population and Housing, Public Services, and Utilities and Service Systems would be less than significant.

6.2 Alternative 2: Rehabilitation and Adaptive Reuse of Whitecotton Cottage

6.2.1 Description

Under Alternative 2, the County would conduct evaluations of Whitecotton Cottage to determine alterations necessary to address disrepair, structural issues, and abatement of hazardous materials, including in nearby soil. The County would then rehabilitate the structure to accommodate 3,942 square-foot of office use (this assumes the square footage of the office space would be the same as the existing square footage of the structure). Rehabilitation would be completed in conformance with the Secretary of the Interior Standards for Treatment of Historic Properties and in accordance with the California Historic Building Code, which allows for more flexible application of building regulations when impacting a historic resource. It is assumed that all identified character-defining features of the building would be repaired and maintained in-situ to the highest degree feasible.

6.2.2 Impact Analysis

a. Air Quality

As described in the Air Quality section of the Initial Study (see Section 3, *Air Quality*, in Appendix 1 of this EIR), demolition activities of the proposed project would generate between 0.5 and 8.7 pounds per day of emissions, depending on the pollutant. Under Alternative 2, although Whitecotton Cottage would not be demolished, emissions would be generated from the rehabilitation of the existing structure and some excavation and grading at the project site. Table 3 shows the expected emissions that would result from construction activities under this alternative, which were estimated using the California Emissions Estimator Model (CalEEMod) v.2016.3.2. While emissions under this alternative would be greater than emissions produced by the proposed project, those emissions would not exceed the BAAQMD short-term construction thresholds.

Table 3 Alternative 2 Construction Emissions (pounds/day)

Pollutant	Maximum Daily Emissions	Significance Threshold	Significant Impact?
ROG	8.5	54	No
NO _x	21.4	54	No
CO	17.3	82	No
PM ₁₀ (exhaust)	1.0	82	No
PM _{2.5} (exhaust)	0.9	54	No

See Appendix 3 for CalEEMod worksheets.

Assume four weeks for construction, four weeks for grading (no more than 150 cubic yards), one week for architectural coating for this alternative.

While no operational emissions would be produced under the proposed project, Alternative 2 would generate emissions from the operation of the building as office space. As shown in Table 4, those operational emissions would also not exceed BAAQMD operational thresholds.

Table 4 Alternative 2 Operational Emissions (pounds/day)

Pollutant	Average Daily Emissions	Significance Threshold	Significant Impact?
ROG	0.2	54	No
NO _x	0.4	54	No
PM ₁₀ (exhaust)	< 0.1	82	No
PM _{2.5} (exhaust)	<0.1	54	No

Source: Appendix AQ

Alternative 2 would generate more emissions during construction activities than the proposed project would generate during demolition. Under this alternative, additional emissions would also

be generated from the operation of the building as an office. However, since those emissions would not exceed BAAQMD thresholds, impacts to air quality would be less than significant, the same as under the proposed project.

b. Biological Resources

As described in the Biological Resources section of the Initial Study (see Appendix A), demolition activities associated with the proposed project would have potentially significant, but mitigable, impacts to nesting migratory birds and special-status bat species. While alternative 2 would not involve demolition of the existing building, it would require other construction activities related to rehabilitation of the building, which would have similar potentially significant impacts to nesting migratory birds and special-status bat species. Mitigation Measures BIO-1 and BIO-2 would reduce those impacts to a less than significant level. Thus, impacts associated with Alternative 2 would be less than significant with mitigation incorporated, the same as under the proposed project.

c. Cultural Resources

Under this alternative, Whitecotton Cottage would be retained and the structure would be repaired and improved in a manner that would preserve its historic elements. Therefore, this alternative would result in a less than significant impact to historic resources, instead of the significant and unavoidable impacts that would result from the proposed project.

As with the proposed project, Alternative 2 would involve construction activities and excavation of soil at the project site. Therefore, mitigation measures CUL-1 and CUL-2 would still be required to reduce potential impacts to the unanticipated discovery of cultural and tribal cultural resources during such activities. Impacts related to archeological resources would be less than significant with mitigation incorporated, the same as the proposed project.

d. Greenhouse Gas Emissions

Alternative 2 would generate emissions from construction activities to rehabilitate the existing building. This alternative would also result in emissions from the operation of the building as an office. Based on CalEEMod results (Appendix 3), this alternative would result in an estimated 44 metric tons of CO₂E emissions from construction activities and 57 metric tons of CO₂E emissions from operation, for a total of 101 metric tons of CO₂E. GHG emissions associated with Alternative 2 would be greater than the emissions produced by the proposed project (24 metric tons of CO₂E). Nonetheless, like the proposed project, emissions would be below the BAAQMD threshold of 1,100 metric tons of CO₂E per year. Therefore, like the proposed project, impacts would be less than significant.

e. Noise

As described in the Noise section of the Initial Study, demolition activities of the proposed project would generate between 70 and 86 dBA at the three nearest sensitive receptors. As with the proposed project, Alternative 2 would require the use of similar heavy construction equipment on the project site for rehabilitation activities and removal of contaminated soil, including dozers, graders, and tractors, and thus noise impacts would be similar to impacts under the proposed project. In addition, vibration levels produced under this alternative would be similar to those under the proposed project because the same types of construction equipment would be required.

Noise levels associated with construction and rehabilitation activities under this alternative were estimated using the Roadway Construction Noise Model and are shown in Table 5. As shown in the table, construction activities under this alternative would temporarily elevate ambient noise levels at nearby sensitive receptors, and these levels would be higher than the noise produced from demolition activities under the proposed project. However, as with the proposed project, construction would be within the range of typical construction noise for an urban area and would be temporary. As with the proposed project, mitigation measures N-1 and N-2 would ensure that construction noise would occur within the hours specified in the County Code, reduce construction noise to the extent feasible, and ensure that vibration levels at sensitive receptors would be reduced to a level below the perceptibility threshold for vibration. Therefore, impacts would be less than significant with mitigation incorporated, the same as the proposed project.

Table 5 Alternative 2 Construction Noise Levels by Phase

Construction Phase	Equipment	Approximate Noise Level at Nearest Sensitive Receptors (dBA Leq)		
		50 feet	100 feet	300 feet
Construction/Rehabilitation	Dozer, Backhoe, Saw, Tractor, Air Compressor	90	83	74

Source: Roadway Construction Noise Model (RCNM) version 1.1, Appendix 4

f. Transportation and Traffic

As with the proposed project, Alternative 2 would require hauling trips to remove contaminated soil at the project site and worker trips for construction and rehabilitation activities. Table 6 shows the construction-related trips associated with Alternative 2. There would be fewer hauling trips and slightly more construction-related worker trips under Alternative 2 (19 total hauling trips and 11 daily worker trips, instead of the 37 total hauling trips and 10 daily worker trips under the proposed project). Moreover, construction and rehabilitation activities would occur over a longer period of time than demolition and grading activities under the proposed project. However, as with the proposed project, hauling trips would be spread across several weeks, and the number of worker trips would be relatively low and not cause significant congestion on surrounding roadways during temporary construction activities.

Table 6 Alternative 2 Construction-Related Trips

Trip Type	Number of One-Way Trips
Hauling Trips¹	19 total
Worker Trips²	
Site Preparation	11 daily
Grading	11 daily
Construction	11 daily
Architectural Coating	11 daily

¹Assumes 150 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 3)

In addition to trips related to construction activities, the operation of the building as an office would generate additional vehicle trips. As shown in Table 7, operation of the office use would generate 43 daily trips, with a maximum of 6 trips during peak hours. While this would increase traffic in the area, this number of additional trips would be relatively low and would not cause significant traffic impacts in the area. Thus, while traffic impacts under this alternative would be greater than those under the proposed projects, impacts would remain less than significant.

Table 7 Alternative 2 Estimated Operational Vehicle Trip Generation

Land Use	Square Feet	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
General Office ¹	3,942	43	5	1	6	1	5	6

¹ Trip generation rates from ITE *Trip General Manual, 9th Edition*, land use category 710 (General Office).

g. Tribal Cultural Resources

Similar to the proposed project, Alternative 2 would require removal of contaminated soil at the project site. Although no tribal cultural resources are expected to be present on-site, there is the possibility of encountering undisturbed subsurface tribal cultural resources during soil removal work. As with the proposed project, Mitigation Measure TCR-1 would reduce impacts on unidentified tribal cultural resources to a less than significant level, the same as under the proposed project.

h. Other Impact Areas

As with the proposed project and Alternative 1, no impact to Aesthetics, Agriculture and Forestry Resources, Hydrology and Water Quality, Land Use Planning, Mineral Resources, and Recreation under this alternative. Impacts to Energy, Geology and Soils, Population and Housing, Public Services, and Utilities and Service Systems would be less than significant.

6.3 Environmentally Superior Alternative

Table 8 indicates whether each alternative’s environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied. Based on the alternatives analysis provided above, Alternative 1 (No Project) would be the environmentally superior alternative. However, Alternative 1 would not achieve the basic project objectives as stated in Section 2, *Project Description*. Under this alternative, hazards associated with the existing building would not be eliminated and deferred maintenance of the building would continue to require County resources.

Alternative 2 (Rehabilitation and Adaptive Reuse of Whitecotton Cottage) would be environmentally superior to the project because it would not involve the demolition of a structure eligible for listing in the NRHP and the CRHR and would thus not result in significant and unavoidable impacts. However, this alternative would result in increased air quality and greenhouse gas emissions, traffic, and construction noise. Moreover, this alternative would be prohibitively expensive for the county. According to County estimates, the proposed project would cost approximately \$285,000, while rehabilitation of the structure would cost approximately \$1.6-2 million.

Table 8 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Rehabilitation and Adaptive Reuse of Whitecotton Cottage
Air Quality	Less than Significant	+	-
Biological Resources	Less than Significant with Mitigation Incorporated	+	=
Cultural Resources	Significant and Unavoidable	+	+
Greenhouse Gas Emissions	Less than Significant	+	-
Noise	Less than Significant with Mitigation Incorporated	+	-
Transportation and Traffic	Less than Significant with Mitigation Incorporated	+	-
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	+	=
+ Superior to the proposed project (reduced level of impact) - Inferior to the proposed project (increased level of impact) = Similar level of impact to the proposed project			

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7.2 List of Preparers

This EIR was prepared by the County of Alameda, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

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