CVSan Operations and Engineering Building Project

Initial Study – Mitigated Negative Declaration

prepared by

Castro Valley Sanitary District
21040 Marshall Street
Castro Valley, California 94546
Contact: Evan Choy, Engineering Technician

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

March 2020

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Environmental Scientists | Planners | Engineers
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Executive Summary

This document is an Initial Study – Mitigated Negative Declaration (IS-MND) serving as the California Environmental Quality Act (CEQA) documentation analyzing the environmental effects of Castro Valley Sanitary District's (CVSan) proposed Operations and Engineering Building Project (proposed project). This section summarizes the characteristics of the proposed project and the environmental impacts and mitigation measures identified in this IS-MND.

CEQA requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. This IS-MND is the public document designed to provide the public and applicable responsible/trustee agencies, special districts, and local and State governmental agency decision-makers with an analysis of the potential environmental consequences of project implementation to support informed decision-making. The IS-MND indicates that while the project could result in environmental impacts, modifications and/or mitigation has been incorporated into the project to reduce its adverse impacts, thereby enabling the project to qualify for an MND (State CEQA Guidelines Section 15070).

Pursuant to Section 15367 of the State CEQA Guidelines, the Lead Agency is the public agency that has the principal responsibility for carrying out or approving a project. CVSan is serving as the Lead Agency for the proposed project. As the Lead Agency, the CVSan has the authority for project approval and adoption of the accompanying environmental documentation.

Project Location

The project site located on two assessor's parcels (APN 84C-650-1-3 and 84C-650-2-4) in Castro Valley, in unincorporated Alameda County, totaling approximately two acres and is owned and operated by CVSan. The project also includes a portion of County-owned land at the corner of Castro Valley Boulevard and Center Street, which accounts for approximately 0.15 acres of the site. CVSan is currently in the process of acquiring the County-owned land and has submitted a survey, plat map and legal description to the County Surveyor for review. CVSan anticipates that the land acquisition will be completed in May or June of 2020. Interstate 580 (I-580) is located south of Castro Valley Boulevard approximately 200 feet south of the project site.

Project Summary

The proposed project includes the demolition of existing on-site structures and development of a new operations facility for use by CVSan. The project would include an approximately 19,795 square-foot, two-story building that would provide office space and other facilities such as equipment storage, conference rooms, amenities for employees (i.e.: kitchen, break room, shower, and lockers), and a public counter for the CVSan Engineering Department. The project would also include vehicle maintenance facilities, a workshop, and materials storage areas in, a separate hazardous material building to house chemical products, paint, and emergency fuel, and an associated surface parking lot.

Summary of Findings

The analysis included in this IS-MND shows that implementation of the proposed project would not result in impacts to the environment in the following environmental impact areas:

- Agriculture and Forestry Resources
- Land Use and Planning
- Mineral Resources
- Recreation

Additionally, less than significant impacts would continue to occur with implementation of the proposed project in the following environmental impact areas:

- Air Quality
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Population and Housing
- Public Services
- Transportation/Traffic
- Utilities and Service Systems

Table 1 summarizes the potentially significant environmental impacts associated with the proposed project as identified in the Initial Study and the proposed mitigation measures to reduce those impacts to a less than significant level.

Table 1 Summary of Impacts and Mitigation Measures

Potential Impact	Mitigation Measure(s)	Significance After Mitigation
Aesthetics		
Due to the potential for an increase in the intensity or height of lighting beyond what is currently at the site and in the area, the project could adversely affect nighttime views in the area. Impacts to nighttime views are potentially significant and mitigation is required.	**MM AES-1: Lighting Limitations.** Project light sources shall be shielded, directed downward when intended to illuminate walking or working surfaces, and focused on the project site, to prevent light spillover onto adjacent properties or roadways. Prior to issuance of a building permit by Alameda County, a photometric plan shall be developed for the project that demonstrates minimal light spillover would occur.	Less than significant
Biological Resources		
Because the proposed project involves tree removal and demolition and construction activities could impact nesting migratory bird species, impacts to protected nesting birds are potentially significant and mitigation is	**MM BIO-1: Nesting Bird Avoidance and Minimization Efforts**. If project construction activities occur between February 15 and August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds no more than 14 days prior to construction. The survey shall include the entire project site and a 300-foot buffer to account for nesting raptors. If nests are found the qualified biologist shall establish an appropriate species-specific avoidance buffer of sufficient size to prevent disturbance by project activity to the nest (up to 300 feet for raptors, up to 150 feet for all other birds). The qualified biologist shall perform at least two hours of pre-	Less than significant

Potential Impact	Mitigation Measure(s)	Significance After Mitigation
required.	construction monitoring of the nest to characterize "typical" bird behavior. During construction, if active nests are present, the qualified biologist shall monitor the nesting birds to determine if construction activities are causing any disturbance to the bird and shall increase the buffer if it is determined the birds are showing signs of unusual or distressed behavior associated with project activities. Atypical nesting behaviors that may cause reproductive harm include, but are not limited to, defensive flights, vocalizations directed towards project personnel/activities, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority, through the resident engineer, to order the cessation of all project activities if the nesting birds exhibit atypical behavior that may cause reproductive failure (nest abandonment and loss of eggs and/or young) until a refined appropriate buffer is established. To prevent encroachment, the established buffer(s) shall be clearly marked by high visibility material. The established buffer(s) shall remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist. Any sign of nest abandonment shall be reported to the County and California Department of Fish and Wildlife (CDFW) within 48 hours. The monitoring biologist, in consultation with the resident engineer and project manager shall determine the appropriate protection for active nests on a case by case basis using the criteria described above.	
Cultural Resources		
The project has the potential to impact archaeological resources that may be considered important examples of California history or prehistory. This impact is potentially significant and mitigation is required.	**MM CR-1: Worker's Environmental Awareness Program (WEAP)**. A qualified archaeologist shall be retained who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology to conduct WEAP training for archaeological sensitivity for all construction personnel prior to the commencement of any ground disturbing activities. Archaeological sensitivity training should include a description of the types of cultural resources that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find. **MM CR-2: Resource Recovery Procedures**. In the event that archaeological resources are unearthed during project construction, all earth-disturbing work near the find must be temporarily suspended or redirected until a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology has evaluated the nature and significance of the find. If the discovery proves to be significant under CEQA, additional work such as preservation in place or archaeological data recovery, shall occur as required by the archeologist in coordination with County staff and descendants and/or stakeholder groups, as warranted. After the find has been mitigated appropriately, work in the area may resume. A Native American representative shall be retained to monitor any mitigation work associated with Native American cultural material.	Less than significant

Potential Impact	Mitigation Measure(s)	Significance After Mitigation
Hazards and Hazardous Materials		
Construction activities could expose construction workers or nearby residents to potentially unacceptable health risks from contaminated media. This impact is potentially significant and mitigation is required.	**MM HAZ-1: Asbestos Containing Materials.** Prior to demolition, a qualified asbestos abatement consultant shall complete an ACM survey for the project site. If the results of the ACM survey indicate that ACM are present, then the materials shall be abated in compliance with BAAQMD Regulation 11, Rule 2, as well as all other State and federal rules and regulations. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement activities onsite. All ACMs removed from the onsite structures shall be hauled and disposed offsite by a transportation company certified to handle the transportation and disposal of asbestos. **MM HAZ-2: Lead-based Paint (LBP).** All project work with materials that could contain LBP shall be monitored under the direction of a Certified Industrial Hygienist (CIH) who is also a Certified Lead Project Designer. Oversight by the CIH shall ensure that onsite workers have received appropriate training and adhere to safety requirements during construction activities. All contractors working on the project shall be informed of policies for notifying the appropriate management personnel if previously unidentified suspect hazardous materials are discovered during demolition of the onsite buildings. Standard handling and disposal practices for LBP shall be implemented pursuant to OSHA regulations. **MM HAZ-3: Soil Management Plan.** Prior to ground disturbance, CVSan shall prepare a Soil Management Plan (SMP). The SMP shall be submitted to the ACDEH for approval. The SMP shall address known and unknown environmental issues that may be encountered during development. The plan shall identify appropriate measures to be followed if contaminants are encountered during excavation including health and safety measures to reduce exposure to potentially impacted soil for construction workers and dust control measures to reduce exposure to contaminated dust particles for nearby residents. Health and safety measures shall include the required personal protective equipment (PPE) to be used by site personnel, including action levels and decision criteria for upgrading the levels of PPE. The SMP shall also identify personnel to be notified, emergency contacts, and a sampling protocol if impacted media is encountered. The excavation and demolition contractors shall be made aware of the possibility of encountering known and unknown hazardous materials including impacted soil, soil vapor, and groundwater (if encountered), and shall be provided with appropriate contact and notification information. The plan shall include a provision stating at what point it is safe to continue with the excavation or demolition, and identify the person authorized to make that determination. Removal, transportation, and disposal of impacted soil or groundwater shall be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances. Based on the current project plans, groundwater is not anticipated to be encountered. However, if groundwater is encountered, then the SMP shall be revised and re-submitted to the ACDEH for approval. **HAZ-4 Site Assessment**. Prior to start of construction, CVSan shall coordinate with the ACDEH to determine whether the project should be enrolled in the ACDEH's Voluntary Remedial Action Program (VRAP) or if a site assessment can be conducted under the previous (historical LUST) case number. The soil and soil vapor assessment shall be completed under the supervision of a professional geologist or engineer. If soil sampling indicates the presence of contaminants in quantities not in compliance with applicable laws or regulations, CVSan	Less than significant

Potential Impact	Mitigation Measure(s)	Significance After Mitigation
	shall coordinate with the ACDEH to develop and implement a program to remediate or manage onsite contaminated soil and/or soil vapor. Remediation shall be conducted prior to site redevelopment. Remediation shall include, but not be limited to, actions such as soil matrix and soil vapor analysis, remedial excavations, and confirmation soil sampling. Disposal of waste generated as part of the site assessment shall occur at an appropriate facility licensed to handle such contaminants. All proper waste handling and disposal procedures shall be followed. Remedial excavation, if warranted, shall proceed under the supervision of an environmental consultant licensed to oversee such remediation. The remediation/disposal program shall be approved by the ACDEH. CVSan shall submit all correspondence, preliminary data, and said reports to the ACDEH, prior to issuance of grading permits. Upon completion of the remediation/waste disposal activities, a qualified environmental consultant shall prepare a report summarizing the project, the methods of remediation/disposal implemented, and all analytical results, including waste disposal or treatment manifests.	
Noise		
Construction noise would be perceptible at adjacent sensitive receptors, the additional noise would not be louder than typical urban construction as no major excavation or non-standard construction methods such as pile driving are proposed. Therefore, project construction would be within the range of typical construction noise for an urban area. However, Mitigation Measure N-1 would ensure that construction noise occurs within the hours specified in the Ordinance Code and would reduce construction noise to the extent feasible. Impacts would be less than significant with mitigation incorporated.	**MM N-1: Construction Noise Reduction.** The following measures shall be implemented during project construction and demolition. ▪ **Construction Hours.** Construction activity shall not occur between 7:00 p.m. and 7:00 a.m. Monday through Friday and 5:00 p.m. through 8:00 a.m. Saturday and Sunday. ▪ **Mufflers.** During all project site excavation 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 air compressors and similar 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. ▪ **Disturbance Coordinator.** CVSan shall designate a disturbance coordinator who shall be responsible for responding to any local complaints about construction noise. The noise disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler) and shall require that reasonable measures warranted to correct the problem be implemented. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site. ▪ **Additional Noise Attenuation Techniques.** During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and the residential noise sensitive receptors to the north, south, and southwest of	Less than significant

Potential Impact	Mitigation Measure(s)	Significance After Mitigation
	the project boundary. Temporary sound barriers shall consist of sound blankets, other equivalent materials, affixed to construction fencing along all sides of the construction site boundary facing residential sensitive receptors.	
Operational noise would exceed the County's noise standards. This impact is potentially significant and mitigation is required.	**MM N-2: Operational Noise Reduction.** One of the following operational noise reduction measures shall be implemented to reduce noise at adjacent noise-sensitive receptors: ▪ Equipment Silencers. Diesel and gasoline operated mechanical equipment that will be used outside of the maintenance building shall be equipped with silencers that reduce noise from between approximately 58 to 72 dBA at 4.5 feet. Silencers applied to equipment may include AA Series Silencers, ST Series Silencers, FA-51 Series Silencers, or other equivalent silencers; or, ▪ Sound Wall Plus Equipment Silencers. An eight-foot noise reduction barrier wall shall be constructed adjacent to noise-sensitive receptors along the northern, western, and southern property lines of the project site. The wall shall be made of any outdoor weather-resistant solid material. All gaps between barrier panels and between the barrier and ground shall be sealed. In addition, diesel and gasoline operated mechanical equipment that will be used outside of the maintenance building shall be equipped with silencers to reduce noise by at least 29 dBA Leq at 50 feet (silencers that reduce noise from 58 to 72 dBA at 4.5 feet). Silencers applied to equipment may include AA Series Silencers, ST Series Silencers, FA-51 Series Silencers, or other equivalent silencers.	Less than significant
Noise-sensitive receptors would experience vibration from project construction that would exceed 75 VdB, which is the dividing line between barely perceptible and distinctly perceptible. This impact is potentially significant and mitigation is required.	**MM N-3: Construction Vibration Mitigation.** The following vibration measures shall be applied during project construction activity. ▪ Operations: keep vibration-intensive equipment as far as possible from vibration-sensitive site boundaries. Machines and equipment should not be left idling. ▪ Schedule vibration-intensive operations to minimize their duration at any given location. 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.	Less than significant
Tribal Cultural Resources		
The proposed excavation of the project site could potentially result in significant impacts on unanticipated tribal cultural resources. This impact is potentially significant and mitigation is required.	**MM 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 as a cultural resource in accordance with Mitigation Measure CR-2 and an appropriate Native American representative, based on the nature of the find, is consulted. If CVSan, 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.	Less than significant

Initial Study

1. Project Title

Castro Valley Sanitary District (CVSan) Operations and Engineering Building Project

2. Lead Agency/Project Proponent Name and Contact

Castro Valley Sanitary District
21040 Marshall Street
Castro Valley, California 94546

3. Contact Person and Phone Number

Evan Choy, Engineering Technician
(510) 537-0757 ext. 131
evan@cvsan.org

4. Project Location

The project site is located at 21195 Center Street and 4096 Castro Valley Boulevard in Castro Valley, in unincorporated Alameda County, at the northwest corner of Center Street and Castro Valley Boulevard. The project site is located on two assessor's parcels (APN 84C-650-1-3 and 84C-650-2-4) totaling approximately two acres and is owned and operated by CVSan. The project also includes a portion of County-owned land at the corner of Castro Valley Boulevard and Center Street, which accounts for approximately 0.15 acres of the site. CVSan is currently in the process of acquiring the County-owned land, and has submitted a survey, plat map and legal description to the County Surveyor for review. CVSan anticipates that the land acquisition will be completed in May or June of 2020. Interstate 580 (I-580) is located south of Castro Valley Boulevard approximately 200 feet south of the project site.

Figure 1 shows the regional location of the project site and Figure 2 shows an aerial view of the project site and its immediate surroundings.

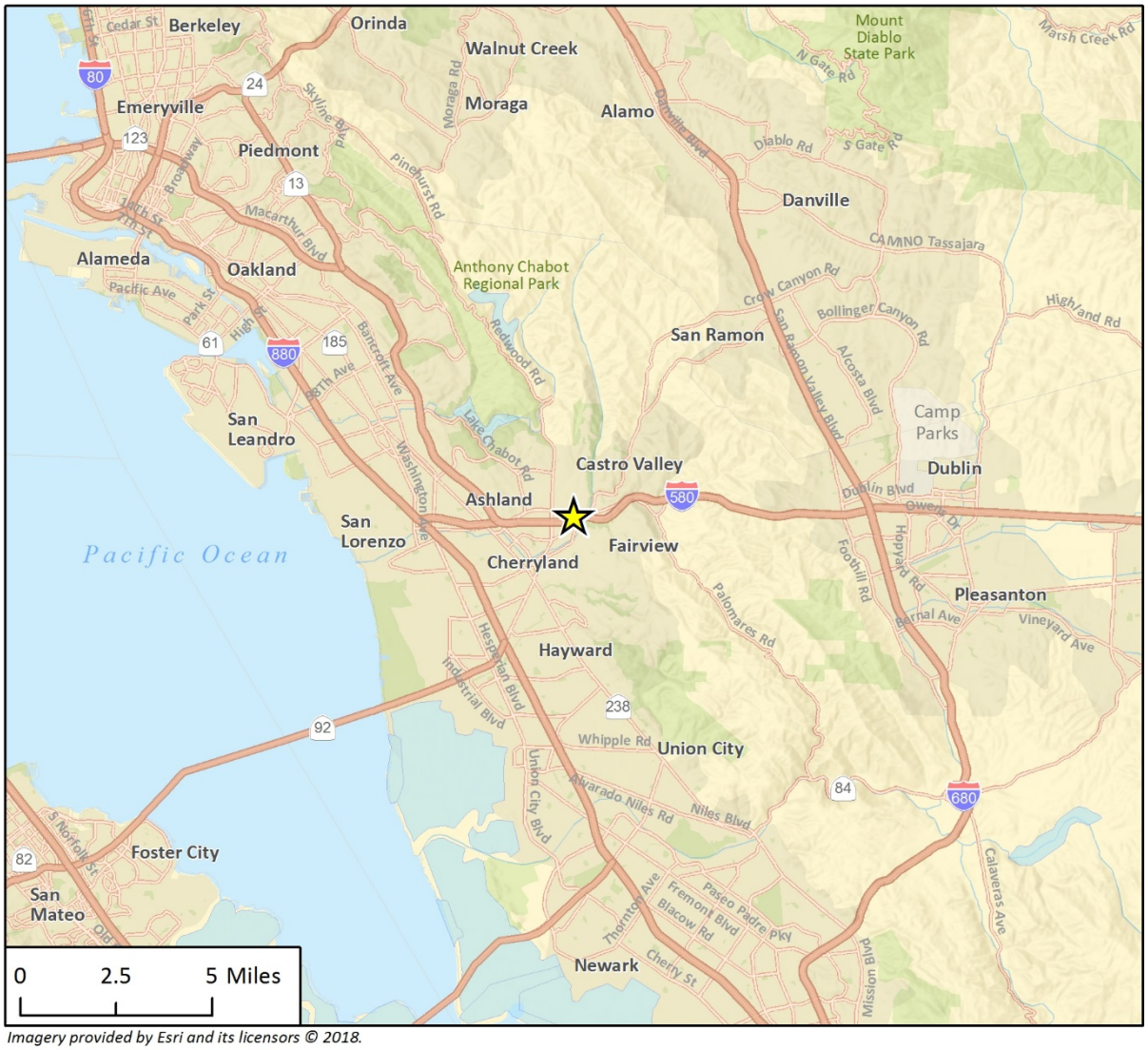
5. General Plan Designation

Castro Valley General Plan: PF (Public Facilities) designation (1.5 max floor area ratio)

6. Zoning

Castro Valley Central Business District, Subarea 10 (Land Use Groups A limited, B and D allowed)

Figure 1 Regional Location



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Project Location

N

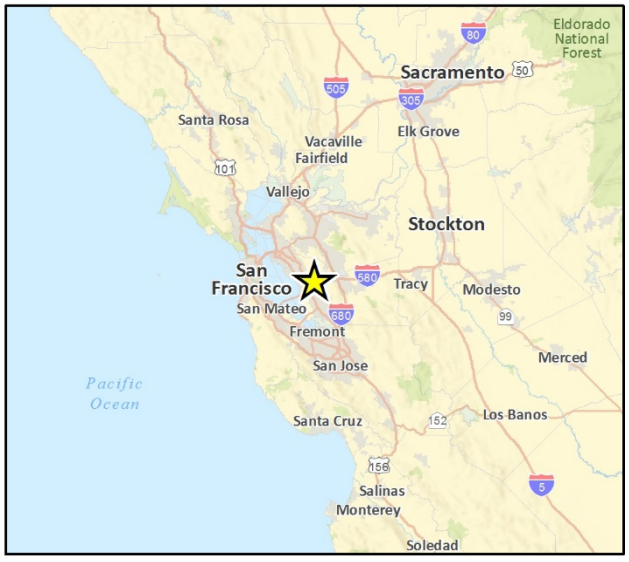


Figure 2 Project Site Location

Imagery provided by Microsoft Bing and its licensors © 2018.

7. Description of the Project

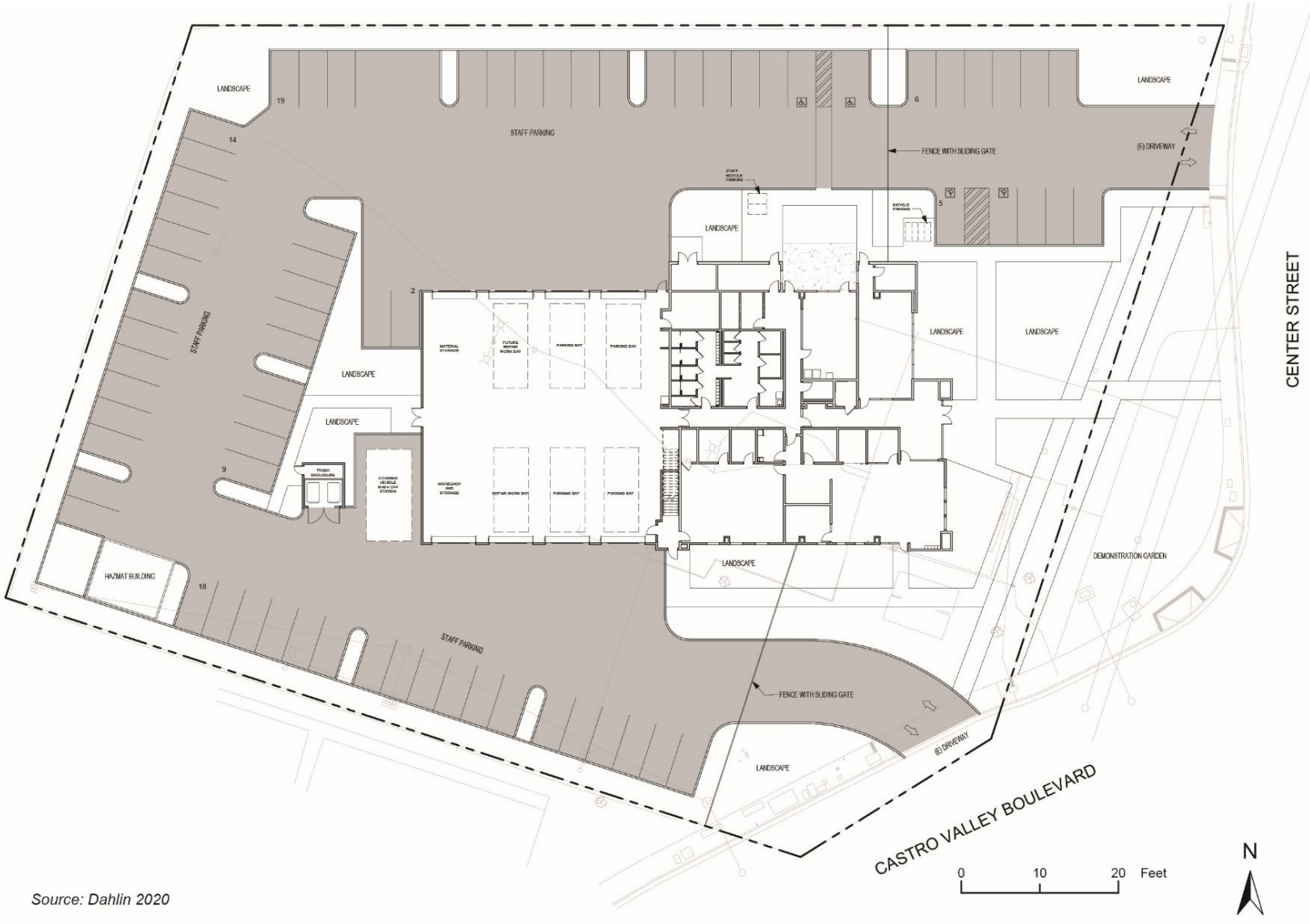
The proposed project involves the demolition of existing on-site structures and development of a new operations facility for use by CVSan. The project would include an approximately 19,795 square-foot, two-story building that would provide office space and other facilities such as equipment storage, conference and board rooms, amenities for employees (i.e.: kitchen, break room, shower, and lockers), and a public counter for the CVSan Engineering Department. The project would also include vehicle maintenance facilities, a workshop, and materials storage areas in the main operations and engineering building, a separate hazardous material building to house chemical products, paint, and emergency fuel, and an associated surface parking lot as shown in Figure 3.

Table 2 summarizes the characteristics of the project. Figure 4 and Figure 5 show the proposed site plan's first floor and second floor layouts.

Table 2 Project Summary

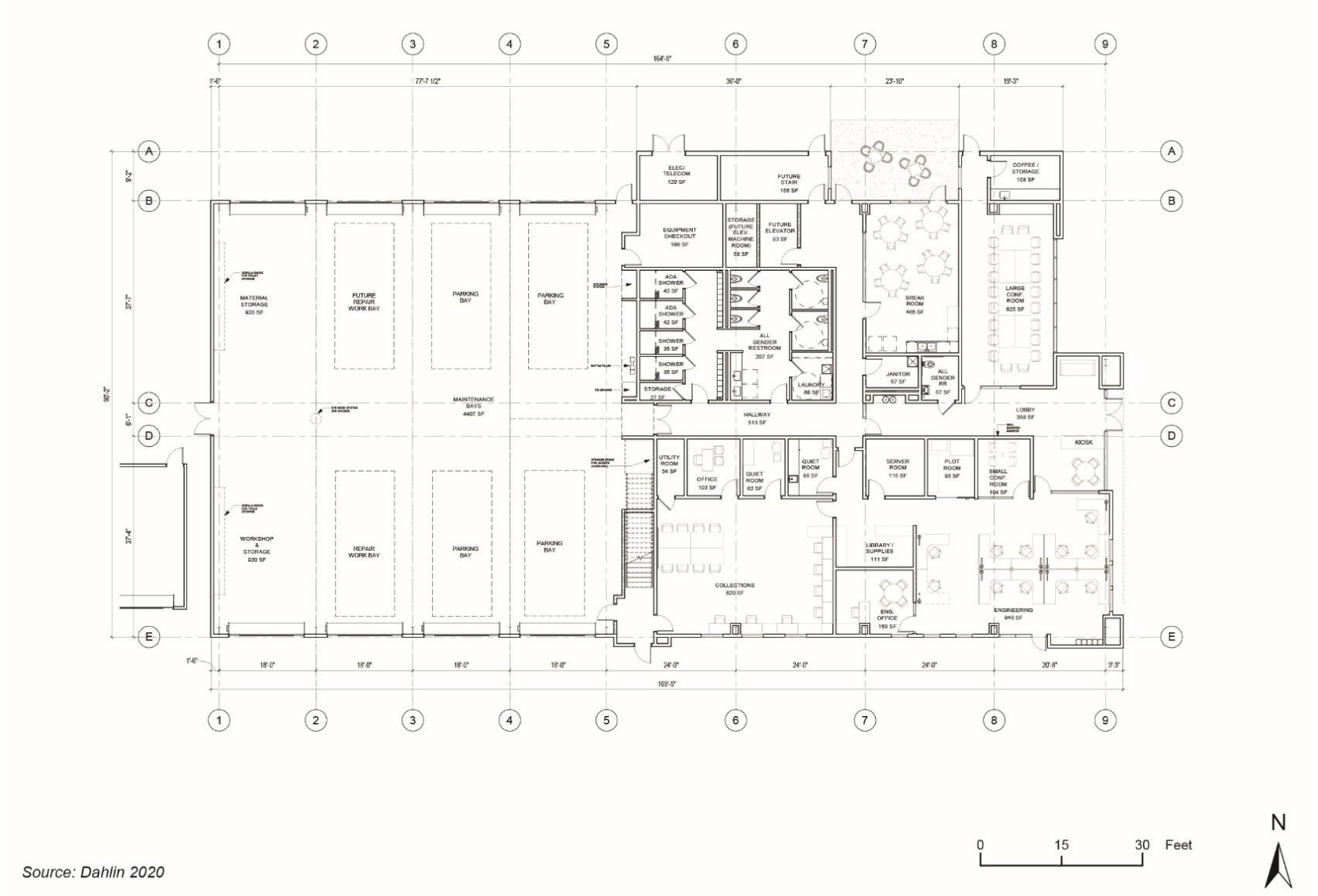
Project Size	
Site Acres	2 acres
Building Square Feet	19,795 square feet (sf)
Hazardous Materials Building	480 sf
Building Area	
First Floor	
Office	6,864 sf
Workshop	920 sf
Materials Storage	920 sf
Vehicle Maintenance Bay/Work Area/Lift (secured)	4,407 sf
Second Floor	
Storage and Future Office Space	6,058 sf
Vault	626 sf
Outdoor	
Trash Enclosure	194 sf
Covered Vehicle Wash Off Station	680 sf
Parking	
CVSan Vehicle Parking	14 spaces
Staff Parking	25 spaces
Public Parking	11 spaces
Future Staff Parking	21 spaces
Commercial Class Truck Parking (secured)	4 spaces (13'x24'x18'h)

Figure 3 Proposed Site Plan



Source: Dahlin 2020

Figure 4 Proposed First Floor Plan



Source: Dahlin 2020

Figure 5 Proposed Second Floor Plan

Source: Dahlin 2020

Site Access and Parking

The project site would be accessed via two existing driveways, one on Center Street and one on Castro Valley Boulevard. It is estimated that there would be approximately 70 vehicle trips to and from the site daily, plus or minus 10 trips, made by both CVSan staff and the public. The project site would accommodate a 73-stall parking lot used for staff and visitors and secured parking areas for CVSan vehicles and trucks. There would be 25 staff parking spaces, 16 parking spaces for CVSan vehicles and 11 additional guest parking spaces in the paved parking lot surrounding the proposed building. The project site would also include two staff bicycle parking spaces, four guest bike parking spaces, and spaces designated for low-emitting vehicles and electric vehicle (EV) charger ready spaces. Secured parking would be located within the building on the western side and would house four commercial class trucks. This secured vehicle storage would also include a vehicle maintenance bay, work area, materials storage and lift.

Building Design and Landscaping

The building would be designed to include "green building" features, including the installation of roof solar panels. As such, the proposed project would achieve Leadership in Energy and Environmental Design (LEED) Silver certification which is aligned with Alameda County's Community Climate Action Plan and Alameda County Municipal Code Requirement Section 460, the County's Green *Building Ordinance Program*.

Approximately six mature landscaping trees are located on the project site along its Center Street and Castro Valley Boulevard frontages. In addition, several trees located just outside the project site along the northern, western, and southern boundaries have canopies that extend onto the site. Some or all of the existing on-site trees may be removed to accommodate building construction. The project design includes approximately 22,000 square feet of landscaped area in a "demonstration garden," which would be in front of the building on the east side of the project site, and along Center Street. A portion of this landscaped area would be located on the County owned section of the project site. Although the County would retain ownership of this small piece of frontage land on the project site, CVSan would agree to provide ongoing maintenance to allow for development of the land into a demonstration garden. The sidewalk-adjacent demonstration garden would allow pedestrians to interact with the site and obtain information on the types of plants used in its construction. The demonstration garden area would include Bay-friendly landscaping, which would use plants known to need little to no chemical treatment, be drought tolerant, and to thrive in Bay Area landscapes. In addition, the project landscape design would include the placement of trees lining the perimeter of the site.

Operations

The proposed new building would consolidate CVSan wastewater services and operations, which currently occupy two separate facilities, into one location, including collection system maintenance, engineering, and permit services staff. The intention of consolidating these services is to improve conditions for staff and to improve efficiencies for customers. Up to 15 employees are anticipated to work on-site. These employees would be relocated to the site from the two existing CVSan facilities, including the engineering staff from the Capital Improvements Office at 20211 Patio Drive, Suite 200 and the collection system maintenance staff from the main office at 21040 Marshall Street.

In addition to serving as an improved office facility for CVSan, the new building would also be used for storage and maintenance of CVSan vehicles. Maintenance and storage operations would require the use of several chemical and synthetic materials for cleaning and routine service to CVSan equipment and vehicles. These materials would include substances such as auto-fluid, auto-motor oil and grease, lubricants, spray paint and other paint, solvents, cleaners and degreasers, disinfectants, and adhesives. The majority of these materials would be stored in the separate hazardous materials building located onsite. Some additional equipment and materials may be housed in the storage mezzanine on the second floor of the building.

Project operations would require the use of mechanical equipment and CVSan vehicles that would be stored on the project site. Mechanical equipment that would be used onsite includes pumps and a backup/standby generator to be used in the case of a power outage. The pumps would be located inside the proposed workshop/storage area and the generator would be stored in an enclosure attached to the building.

Typical hours of operation for the public counter would be from 7 a.m. to 12 p.m. and from 1 p.m. to 4 p.m. with a lunch break from noon to 1 p.m. Monday through Friday.

Construction

Project construction is expected to last over approximately 12 months and would occur in phases including site preparation and demolition, site improvement, site construction, site mechanical and electrical utilities installation, architectural coating, paving, and landscaping. Assuming a depth of excavation of approximately 3 feet for building foundations, grading would involve an estimated 9,556 cubic yards of cut and fill, although grading would be balanced on site.

8. Surrounding Land Uses and Setting

The project site is located in Castro Valley, which is characterized mainly by low density residential buildings, commercial uses, and overall suburban development. The project site is bordered by low density residential land use to the north and south, by a mobile home park to the west, and by a small shopping center to the east. The project site is relatively flat and is located near the intersection of Castro Valley Boulevard and Center Street, across from westbound I-580. The site is currently almost entirely paved. Approximately six landscaping trees are located at the project boundaries along Castro Valley Boulevard and Center Street. The portion of the site owned by the County at the corner of Castro Valley Boulevard and Center Street is undeveloped and includes some grasses and exposed dirt. The site was formerly occupied by a Caltrans facility, which included six one-story buildings and an associated parking lot. Caltrans utilized this property as a maintenance station. CVSan acquired the project site from Caltrans in 2014. Currently, the project is utilized by CVSan for vehicle, equipment, and materials storage. Occasionally, the site is used for temporary construction staging or for California Highway Patrol (CHP) training exercises. Three storage structures are located on the project site.

9. Required Permits and Agency Approval

CVSan is the lead agency with responsibility for approving the project. This Initial Study provides environmental information and analysis in compliance with the California Environmental Quality Act

(CEQA), which is necessary for CVSan decision makers to be able to adequately consider the effects of the proposed project.

Alameda County, as the responsible agency, also has approval authority over the project. Approvals are required from the Alameda County Planning Department and the Alameda County Building Department which issues the building permit. Additional deferred submittals that would require separate permits from the County would include: Metal Building, Fires Sprinkler System, Fire Alarm System, Fire Service Underground, Fire Hydrant and Fire Department Connections (if applicable), Solar Panels and Systems (if applicable), Building Signage, and monument and wayfinding (if applicable). The project is subject to County Site Development Review to determine if the use and physical improvements would be consistent with the development objectives of this Subarea 10 and with the general policies of the Castro Valley Central Business District Specific Plan.

Environmental Factors Potentially Affected

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

■	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
☐	Geology and Soils	☐	Greenhouse Gas Emissions	■	Hazards and Hazardous Materials
☐	Hydrology and Water Quality	☐	Land Use and Planning	☐	Mineral Resources
■	Noise	☐	Population and Housing	☐	Public Services
☐	Recreation	☐	Transportation	■	Tribal Cultural Resources
☐	Utilities and Service Systems	☐	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Evan Choy
Signature

03.04.2020
Date

EVAN CHOY
Printed Name

ENGINEERING TECHNICIAN
Title

Environmental Checklist

1 Aesthetics

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

Existing Setting

The project site is located in Castro Valley, an unincorporated area of Alameda County. Castro Valley features a generally flat to gently sloping valley floor surrounded by steep hills and canyons. The hills above Castro Valley are visible from various areas in the Central Business District (CBD). The project site is bordered by Center Street to the east, Castro Valley Boulevard and single-story multi-family residences to the south, a mobile home park to the west, and single-family residences to the north. Across Castro Valley Boulevard to the south is the I-580 freeway. The segment of I-580 that passes through Castro Valley by the project site is eligible as a California Scenic Highway, although it has not been officially designated (Caltrans 2011).

The project site is completely surrounded by chain link fencing, although it is partially visible from adjacent roadways and the nearby residential properties. The project site includes buildings that

were previously associated with a Caltrans maintenance facility including six one-story buildings and a parking lot. The visual quality of the site is generally low.

Impact Analysis

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

A scenic vista is generally defined as an expansive view of highly valued landscape observable from a publicly accessible vantage point. The County of Alameda's Castro Valley General Plan does not designate scenic vistas in Castro Valley. However, the General Plan does indicate that a key aesthetic resource within Castro Valley are the hillside open space areas, as viewable from various points in Castro Valley and from designated scenic routes.

Views of hills surrounding Castro Valley from the project site and from public vantage points surrounding the project site (such as Castro Valley Boulevard and Center Street) are largely blocked by existing landscaping, fencing, buildings, and structures on and around the project site. Therefore, construction of a two-story structure on the project site would not create additional view obstructions. Because there is not currently a scenic vista visible from or across the project site, the proposed project would not block or intrude into significant views or other scenic vistas. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The segment of I-580 that passes near the project site is eligible as a California Scenic Highway, although it has not been officially designated (California Department of Transportation 2011). Although the project site is near the I-580 freeway, it is not visible to motorists traveling on I-580 near the project site because the I-580 in that location is below grade. The project site is not visible from I-580 and therefore the proposed project would not damage scenic resources within view of a state scenic highway. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is located in a developed urbanized area within the CBD of Castro Valley. The project site is characterized by one-story, utilitarian structures used for vehicle, equipment, and material storage as well as surface parking. Some of the structures are vacant and unused while some are used for vehicle and equipment storage. All of the structures are in a state of disrepair. Limited landscaping and approximately six mature trees are present on the project site. The existing visual quality of the site is low.

Construction of the proposed project would involve demolition of the six existing structures, removal of chain-link fencing, and construction of a new building that would be 36 feet in height and a separate hazardous materials storage structure. The chain-link fence would be replaced with a different type of fencing or barrier along the northern, western, and southern boundaries of the

site. The proposed project would increase the massing and intensity of development on the project site and introduce a building with a different architectural style. As such, the proposed project would represent a substantial change in the visual character of the project site. However, the proposed project would introduce a building of higher visual quality with a contemporary design, reduce the prominence of fencing, and several landscaping elements along the project frontage and perimeter of the site. The additional landscaping would reduce the visual impact of the proposed project and soften the appearance of the new building. Overall, it would improve the visual quality of the site compared to the existing development.

In addition, the new building would comply with the maximum allowed building height for the CBD Subarea 10 land use zoning of 45 feet according to the Castro Valley Central Business District Specific Plan. For buildings above 30 feet, the Castro Valley Central Business District Specific Plan requires a Site Development Review process in which a project must demonstrate that it compliments, rather than blocks, view corridors and that it enhances rather than obscures, significant topographic features or adjacent development (Alameda County Community Development Agency 1993). As discussed in the response to question (a), the proposed project would not impact view corridors or background views of nearby hillsides as these views are blocked by existing intervening development. Nonetheless, a Site Development Review by Alameda County would be required. The County's Site Development Review would determine if the use and physical improvements would be consistent with the development objectives of this Subarea 10 and with the general policies of the Castro Valley Central Business District Specific Plan. This process would help ensure that the project is compatible with the intended development of the site under the applicable zoning and regulations governing scenic quality, and that the project would not substantially degrade the character of its urbanized surroundings.

The proposed project would be consistent with the General Plan and verified through the Site Development Review process and project design elements, the proposed project would be compatible with the visual character of the surrounding area. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project site is in an urbanized area with relatively high levels of existing light. The surrounding residential uses, along with the roadways and highway, generate light and glare adjacent to all sides of the project site. Primary sources of light in the surrounding area include interior and exterior lighting at residential buildings, vehicle headlights, and street lights. The primary source of glare adjacent to the project site is the sun's reflection from metallic, glass, and light-colored surfaces on buildings and on vehicles parked on adjacent streets and at parking areas.

Sources of light associated with the proposed project would include building security lighting, mounted lighting for evening and early morning operations, and lighting from headlights on vehicles and reflective building materials. Sources of glare associated with the proposed project include on-site equipment and vehicles and reflective building materials. The project site previously operated as a maintenance and storage facility for Caltrans that included similar sources of light and glare due to regular operations. The proposed project would include new trees and medium height vegetation around the perimeter of the site, and throughout the parking area to act as a light and glare buffer to the surrounding area. However, due to the potential for an increase in the intensity or height of lighting beyond what is currently at the site and in the area, the project could adversely affect

nighttime views in the area. Potential impacts to nighttime views would be reduced to a less than significant level with implementation of Mitigation Measure AES-1.

Mitigation Measure

AES-1 Lighting Limitations

Project light sources shall be shielded, directed downward when intended to illuminate walking or working surfaces, and focused on the project site, to prevent light spillover onto adjacent properties or roadways. Prior to issuance of a building permit by Alameda County, a photometric plan shall be developed for the project that demonstrates minimal light spillover would occur.

Significance After Mitigation

With implementation of Mitigation Measure AES-1, light spillover would not affect neighboring light-sensitive residences and this impact would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

2 Agriculture and Forestry Resources

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

Impact Analysis

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

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

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

The project site is located in Castro Valley, which is an urbanized area of unincorporated Alameda County. The site is designated as PF (Public Facilities) in the General Plan and zoned CBD (Central Business District) sub-area 10. Neither the project site nor adjacent properties are identified as one of the farmland types under the Farmland Mapping and Monitoring Program or enrolled in Williamson Act contracts, or support forest land or resources (California Department of Conservation 2016). The project site is not located on or adjacent to agricultural land or forest land and the project would not involve development that could result in the conversion of farmland to non-agricultural uses. For these reasons, the project would have no impact with respect to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; conflict with existing agricultural zoning or Williamson Act contract; result in the loss of forest land or conversion of forest land to non-forest use; or other conversion of farmland to non-agricultural use.

NO IMPACT

3 Air Quality

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

Air Quality Standards and Attainment

The project site is located in the San Francisco Bay Area Air Basin (the Basin), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). As the local air quality management agency, the BAAQMD is primarily responsible for assuring that the national and state ambient air quality standards are attained and maintained in the Bay Area. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities. The BAAQMD has jurisdiction over much of the nine-county Bay Area, including Marin County.

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

The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 3.

Table 3 Health Effects Associated with Non-Attainment Criteria Pollutants

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

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

Source: EPA, https://www.epa.gov/criteria-air-pollutants

Air Quality Management

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

In 2006, the U.S. Environmental Protection Agency (U.S. EPA) tightened the national 24-hour $PM_{2.5}$ standard regarding short-term exposure to fine particulate matter from 65 µg/m^3 (micro-grams per cubic meter) to 35 µg/m^3. Based on air quality monitoring data for years 2006-2008 showing that the region was slightly above the standard, the U.S. EPA designated the Bay Area as non-attainment for the 24-hour national standard in December 2008. This triggered the requirement for the Bay Area to prepare a State Implementation Plan (SIP) submittal to demonstrate how the region would attain the standard. However, data for both the 2008-2010 and the 2009-2011 cycles showed that Bay Area $PM_{2.5}$ levels currently meet the standard. On October 29, 2012, the U.S. EPA issued a proposed rule-making to determine that the Bay Area now attains the 24-hour $PM_{2.5}$ national standard. Based on this, the Bay Area is required to prepare an abbreviated SIP submittal that includes an emission inventory for primary (directly-emitted) $PM_{2.5}$, as well as precursor pollutants that contribute to formation of secondary PM in the atmosphere; and amendments to the BAAQMD

New Source Review (NSR) to address $PM_{2.5}$ (adopted December 2012).[1] However, key SIP requirements to demonstrate how a region will achieve the standard (i.e., the requirement to develop a plan to attain the standard) will be suspended as long as monitoring data continues to show that the Bay Area attains the standard.

In addition to preparing the "abbreviated" SIP submittal, the BAAQMD has prepared a report entitled *Understanding Particulate Matter: Protecting Public Health in the San Francisco Bay Area* (BAAQMD 2012). The report will help to guide the BAAQMD's on-going efforts to analyze and reduce PM in the Bay Area in order to better protect public health. The Bay Area will continue to be designated as "non-attainment" for the national 24-hour $PM_{2.5}$ standard until such time as the Air District elects to submit a "redesignation request" and a "maintenance plan" to the U.S. EPA, and the U.S. EPA approves the proposed redesignation.

Air Emission Thresholds

BAAQMD recommends that lead agencies determine appropriate air quality and greenhouse gas (GHG) emissions thresholds of significance based on substantial evidence in the record. As the lead agency for this project, CVSan has determined that the thresholds contained in BAAQMD's May 2017 CEQA Air Quality Guidelines, which are used by the Alameda County and by jurisdictions throughout the Bay Area, are the appropriate thresholds. The BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. If all of the screening criteria are met by a project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. For projects that are infill, such as the project, emissions would be less than the greenfield-type project on which the screening criteria are based (BAAQMD 2017c).

The BAAQMD's construction-related screening level for general light industry are 259,000 square feet of new buildings, an 11-acre construction footprint, or 540 new employees (BAAQMD 2017b). For operational emissions, screening levels for general light industry are 541,000 square feet of new buildings, a 72-acre construction footprint, or 1,249 new employees (BAAQMD 2017b). The project would involve construction of approximately 13,640 square feet of new buildings (main building and hazardous materials building), is on less than a two-acre construction footprint and would only involve up to 15 employees onsite during operations. Therefore, the project would be substantially below the operational screening level criteria. According to BAAQMD, if all of the screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. However, according to BAAQMD, if a project includes emissions from stationary source engines (e.g., back-up generators) subject to Air District Rules and Regulations, the screening criteria should not be used (BAAQMD May 2010). The project involves a back-up generator that is considered a stationary source of emissions.

The BAAQMD has also provided numeric thresholds for criteria pollutants for projects that exceed the screening criteria described above or for projects where the screening criteria do not apply.

[1] PM is made up of particles that are emitted directly, such as soot and fugitive dust, as well as secondary particles that are formed in the atmosphere from chemical reactions involving precursor pollutants such as oxides of nitrogen (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOCs), and ammonia (NH_3).

Table 4 presents the BAAQMD's May 2017 numeric significance thresholds for construction and operational-related criteria air pollutant and precursor emissions. These represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin's existing air quality conditions. For the purposes of this analysis, the project would result in a significant impact if emissions would exceed the thresholds shown in Table 4.

Table 4 Air Quality Thresholds of Significance

	Construction-Related Thresholds	Operation-Related Thresholds	
Pollutant/ Precursor	Average Daily Emissions (pounds per day)	Maximum Annual Emissions (tpy)	Average Daily Emissions (lbs/day)
ROG	54	10	54
NO_X	54	10	54
PM_{10}	82 (exhaust)	15	82
$PM_{2.5}$	54 (exhaust)	10	54

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

Source: Table 2-1, Bay Area Air Quality Management District, CEQA Air Quality Guidelines, May 2017

According to BAAQMD, a proposed project would result in less-than-significant impacts to localized carbon monoxide concentrations if the following screening criteria are met:

1. Project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans
2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour
3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway)

Impact Analysis

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

The BAAQMD has adopted several air quality policies to reduce air emissions in the Basin. In April 2017, the BAAQMD adopted its final 2017 Clean Air Plan (BAAQMD 2017a). Vehicle use, energy consumption, and associated air pollutant emissions are related directly to population growth. A project would conflict with or obstruct implementation of the 2017 Clean Air Plan if it would result in substantial new regional emissions not foreseen in the air quality planning process. The 2017 Clean Air Plan assumes that development associated with general plans, specific plans, residential projects, and public facilities will be constructed in accordance with population growth projections identified by the BAAQMD. In effect, if a project is proposed in a city with a general plan that is consistent with the Clean Air Plan (i.e., it does not require a general plan amendment), then the project would be consistent with the Clean Air Plan.

The proposed project does not involve new residential uses and would not directly increase population. The proposed project would accommodate approximately 15 employees; however, these employees would primarily consist of employees relocating to this site from other CVSan offices (see Section 14, *Population and Housing*). This incremental increase in the number of employees would not involve a substantial increase in employment in the area. Because the project would not substantially increase population or employment, air pollution emissions associated with the project would be consistent with the assumptions in the 2017 Clean Air Plan and the project would not conflict with or obstruct implementation of the Plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project would result in temporary construction emissions and long-term operational emissions. Construction activities such as the operation of construction vehicles and equipment over unpaved area and grading, trenching, and disturbance of stockpiled soils have the potential to generate fugitive dust (PM_{10}) through the exposure of soil to wind erosion and dust entrainment. In addition, exhaust emissions associated with heavy construction equipment would potentially degrade regional air quality. Long-term emissions associated with project operation would include emissions from stationary equipment, such as the proposed back-up generator, as well as emissions from vehicle trips (mobile sources), natural gas and electricity use (energy sources), landscape maintenance equipment, consumer products, and architectural coating (area sources).

Construction and operational emissions associated with the project were quantified using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. Complete CalEEMod results and assumptions are provided in Appendix A.

Construction Emissions

As described in the project description, construction would occur over approximately 12 months. Table 5 summarizes the estimated maximum daily emissions of pollutants during construction on the project site. As shown in the table, the BAAQMD thresholds would not be exceeded. Therefore, impacts would be less than significant.

Table 5 Construction Emissions

	Emissions (lbs/day)					
Year	**ROG**	**NO_X**	**CO**	**PM_{10} (exhaust)**	**$PM_{2.5}$ (exhaust)**	**SO_X**
Maximum Daily Emissions	15.4	19.7	14.8	1.0	1.0	<0.1
BAAQMD Thresholds (average daily emissions)	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

See Table 2.1 "Overall Construction-Unmitigated" emissions. CalEEMod worksheets in Appendix A.
N/A = not applicable; no BAAQMD threshold for CO or SO_X

Long-Term Emissions

As shown in Table 6, operational emissions would not exceed BAAQMD thresholds for any criteria pollutant. Operational impacts would be less than significant.

Table 6 Operational Emissions

Sources	Emissions (lbs/day)					
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_X
Average Daily Emissions						
Area	0.3	<0.1	<0.1	<0.1	<0.1	0
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile	0.2	1.1	2.0	0.6	0.2	<0.1
Stationary Source	0.1	<0.1	0.4	<0.1	<0.1	<0.1
Total Emissions	**0.7**	**1.2**	**2.3**	**0.6**	**0.2**	**<0.1**
BAAQMD Thresholds	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

See Appendix A for CalEEMod worksheets; emission data presented is the highest of winter or summer outputs
N/A = not applicable; no BAAQMD threshold for CO or SO_X,
Note: numbers may not add up due to rounding

As construction and operational emissions would not exceed BAAQMD thresholds for any criteria pollutant and would comply with BAAQMD criteria pollutant thresholds, the project would not result in individually or cumulatively significant impacts to air quality. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

BAAQMD considers a sensitive receptor to be any facility or land use that includes members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. If a project is likely to be a place where people live, play, or convalesce, it should be considered a sensitive receptor. It should also be considered a sensitive receptor if sensitive individuals are likely to spend a significant amount of time there. Examples of sensitive receptors include residences, schools and school yards, parks and playgrounds, daycare centers, nursing homes, and medical facilities (BAAQMD 2010). The closest sensitive receptors to the project site are the adjacent residences. These receptors may be exposed to pollutants emitted on the project site. Onsite pollution emissions sources include area emissions (e.g.: consumer products and paint application) and emissions from stationary sources such as the emergency generator. As shown in Table 6, total yearly area and generator emission would be below BAAQMD thresholds. The proposed emergency generator would be used infrequently in the event of a power outage and for testing. Further, a permit from the BAAQMD would be required to install and operate the generator. The generator would be subject to BAAQMD permit conditions that would reduce emissions. Therefore, onsite emissions would not expose sensitive receptors to substantial pollution concentrations.

Toxic Air Contaminants (TACs) are a defined set of air pollutants, such as diesel particulate matter, that may pose a present or potential hazard to human health (CARB 2018c). Common sources of

TACs include gasoline stations, dry cleaners, diesel backup generators, truck distribution centers, freeways, and other major roadways (BAAQMD 2017c). The project does not include construction of new gas stations, dry cleaners, highways, roadways, or other sources that could be considered new permitted or non-permitted source of TAC in proximity to receptors. The project does include vehicle and equipment storage, but the types of equipment stored on site are not major sources of TACs. Therefore, impacts under this criterion would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Table 3-3 in the BAAQMD's 2017 CEQA Guidelines provides odor screening distances for land uses that have the potential to generate substantial odor complaints. The uses in the table include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants (BAAQMD 2017c). The proposed project involves construction of an operations and engineering building and vehicle storage. None of the uses identified in the table would occur with the proposed project. The proposed emergency generator would be enclosed in a structure and would only be used in case of power outages or for testing. Therefore, it would not generate objectionable odors affecting a substantial number of people during operation.

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and would cease upon completion. Overall, the proposed project would not generate emissions that would lead to objectionable odors adversely affecting a substantial number of people. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

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

Existing Setting

The project site is located in a developed urban area of Castro Valley in unincorporated Alameda County. The entire site is paved or covered with existing buildings and parking areas. Landscaping onsite is limited to sparse trees at the project boundaries along Center Street, Castro Valley Boulevard, and in the alleyway that divides the property from the multi-family residences and mobile homes surrounding the project site. Approximately six trees are located on-site. The trees appear to be mostly non-native except for a coast live oak near the intersection of Castro Valley Boulevard and Center Street. The project site has experienced extensive human disturbance due to the surrounding urban land uses, as well as its history as a Caltrans maintenance station. These former operations required the use of large trucks and vehicles as well as equipment movement over much of the paved areas. Fencing surrounding the entire site minimizes wildlife access to the project site. In addition, the site is located in an urban residential, commercial and central business district with little natural vegetation and minimal wildlife habitat.

Impact Analysis

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

The project site does not contain habitat for species identified as a candidate, sensitive, or special-status species in local or regional plans, policies or regulations and would not adversely affect species either directly or through habitat modifications (Alameda County Community Development Agency 2007). Several landscaping and trees are present on the project site. These trees could contain bird nests and birds protected under the Migratory Bird Treaty Act. Protected birds include all common songbirds, waterfowl, shorebirds, hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts, martins, swallows, and others, including their body parts (feathers, plumes etc.), nests, and eggs. These trees would be disturbed and/or removed during project construction activities. Because the proposed project involves tree removal and demolition and construction activities could impact nesting migratory bird species, impacts to protected nesting birds are potentially significant. Mitigation Measure BIO-1 is required.

Mitigation Measure

The following mitigation measure would be required to avoid or reduce the project's potentially significant impacts to potential nesting birds.

BIO-1 Nesting Bird Avoidance and Minimization Efforts

If project construction activities occur between February 15 and August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds no more than 14 days prior to construction. The survey shall include the entire project site and a 300-foot buffer to account for nesting raptors. If nests are found the qualified biologist shall establish an appropriate species-specific avoidance buffer of sufficient size to prevent disturbance by project activity to the nest (up to 300 feet for raptors, up to 150 feet for all other birds). The qualified biologist shall perform at least two hours of pre-construction monitoring of the nest to characterize "typical" bird behavior.

During construction, if active nests are present, the qualified biologist shall monitor the nesting birds to determine if construction activities are causing any disturbance to the bird and shall

increase the buffer if it is determined the birds are showing signs of unusual or distressed behavior associated with project activities. Atypical nesting behaviors that may cause reproductive harm include, but are not limited to, defensive flights, vocalizations directed towards project personnel/activities, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority, through the resident engineer, to order the cessation of all project activities if the nesting birds exhibit atypical behavior that may cause reproductive failure (nest abandonment and loss of eggs and/or young) until a refined appropriate buffer is established. To prevent encroachment, the established buffer(s) shall be clearly marked by high visibility material. The established buffer(s) shall remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist. Any sign of nest abandonment shall be reported to the County and California Department of Fish and Wildlife (CDFW) within 48 hours. The monitoring biologist, in consultation with the resident engineer and project manager shall determine the appropriate protection for active nests on a case by case basis using the criteria described above.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1 would ensure protection of nesting birds that may be on-site during construction activities. This measure would reduce the potentially significant impact to special-status species to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

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

No sensitive natural communities, such as riparian habitat, freshwater marsh, or remnant native grasslands occur on the project site (U.S. Department of Fish and Wildlife [USFWS] 2018b). The project site is not located within a known regional wildlife movement corridor or any other sensitive biological area as indicated by the USFWS Critical Habitat portal or the CDFW Biogeographic Information and Observation System (BIOS) (USFWS 2018a; CDFW 2018). The minimal vegetative cover existing at the project site is composed of some marginal landscaping, non-native ruderal grasslands, and surrounding trees. No wetlands or other water bodies were observed on or adjacent to the project site during a site visit conducted by Rincon Consultants. The National Wetlands Inventory (NWI) was reviewed to determine if any wetland and/or non-wetland waters had been previously documented and mapped on or near the proposed survey area (USFWS 2018b). Further, the project would not remove, fill, interrupt, or otherwise have impact on natural communicates or wetland areas. Therefore, there would be no impact as a result of the proposed project.

NO IMPACT

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

The extent of urbanization in Castro Valley limits opportunities for movement and dispersal of native wildlife and plant species through the Central Business District where the project site is located. Common urban features such as roadways, rail lines, fencing, buildings, and hardscape represent barriers to wildlife movement and dispersal. The best opportunities for animal and fish movement exist along the coastal scrub and grassland corridors in the northeastern portion of Castro Valley. However, as there are no coastal scrub and grassland corridors on or immediately adjacent to the project site, development of the proposed project would not adversely impact animal or fish movement. There would be no impact.

NO IMPACT

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

Under Chapter 12.11 of AMC, Alameda County has a Tree Ordinance which preserves trees in the County right-of-way. The ordinance defines the "County right-of-way" as land that is reserved for use by the County, another public entity, or by licensees or agencies of the County or any other public entity. This would refer specifically to areas that are in use as a public roadway. Under this ordinance if any construction is proposed in an area adjacent to or in the right-of-way, the property owner must take all necessary measures prior to and during the work to protect any tree located in the right of way and must apply for and obtain an encroachment permit if tree removal is deemed necessary. However, the proposed project would not require removal of trees in the public right-of-way and thus would not conflict with an applicable local policy or ordinance protecting biological resources. Impacts would be less than significant.

NO IMPACT

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

There are no habitat conservation plans, natural community conservation plans, or other similar plans that govern activities on the project site. Therefore, the project would not be in conflict with any habitat conservation plans and no impact would occur.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	■	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

Regulatory Setting

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

A resource is considered historically significant if it:

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

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

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

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impact Analysis

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

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

The project site is located in an urbanized area of Castro Valley and is developed currently with six structures and a parking lot. Historic aerial photography indicates that two of the buildings located on the project site were constructed by at least 1939 and are over 50 years old (Cardno ATC 2013, [Appendix B]). Both buildings were evaluated by the Alameda County Community Development Agency Planning Department as historical resources and found to be not significant (Alameda County Community Development Agency 2016, [Appendix C]). One building consists of a one-story warehouse of wood frame construction with metal siding and roof. The second building is a one-story, two-bedroom house of wood frame construction with wood siding and a gable roof. The property was in the ownership of the State of California and Caltrans from 1925 to 2014 and is not associated with any significant persons or events. The buildings do not exhibit any distinct architectural detail, style, or methods of construction, possess high artistic value, or are the work of an important creative individual. Finally, neither building is likely to yield information important in prehistory or history. Thus, the project would not impact any buildings or structures considered to be historical resources (Alameda County Community Development Agency 2016, [Appendix C]).

A California Historical Resource Information System records search conducted at the Northwest Information Center of the project site and a 0.5-mile radius did not indicate the presence of any known cultural resources within or directly adjacent to the project site. However, two archaeological sites of Native American origin are located within a 0.5-mile radius. The site nearest to the project site, located approximately 0.25 miles away, consists of a large seasonal occupation site containing several bedrock milling features, a large midden deposit, and several habitation-related features such as living floors and activity areas. Based on past excavations, the site appears to have been seasonally occupied from the Lower Archaic Period (ca. 6000 to 3000 B.C.E.) through the Late Horizon (ca. 1100 to 1300 C.E.). The second archaeological site consists of two isolated boulders with a total of five bedrock milling features located approximately 0.41 miles from the project site. Based on the nearby presence of archaeological sites of Native American origin, the project site is considered moderately sensitive for prehistoric archaeological resources.

The proposed project would include excavation to a maximum depth of three feet for building foundations. The site has been previously graded and disturbed during construction of the existing building and surface parking lot. However, the depth of past ground disturbance at the project site is unknown and thus new ground disturbance may extend below the level of past disturbance. Therefore, the project has the potential to impact archaeological resources that may be considered important examples of California history or prehistory. In the event that such resources are unearthed during construction, applicable regulatory requirements pertaining to the handling and treatment of such resources would apply. If archaeological resources are identified, as defined by Section 21083.2 of the Public Resources Code, the site would be required to be treated in

accordance with the provisions of Section 21083.2 of the Public Resources Code as appropriate. In addition, mitigation measures CR-1 and CR-2 are required to ensure that impacts to archaeological resources would be less than significant.

Mitigation Measures

The following mitigation measures require training for construction personnel on the sensitivity of the area and the potential for encountering cultural resources during ground disturbing activities and require procedures for resource recovery in the event resources are discovered.

CR-1 Worker's Environmental Awareness Program (WEAP)

A qualified archaeologist shall be retained who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology to conduct WEAP training for archaeological sensitivity for all construction personnel prior to the commencement of any ground disturbing activities. Archaeological sensitivity training should include a description of the types of cultural resources that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

CR-2 Resource Recovery Procedures

In the event that archaeological resources are unearthed during project construction, all earth-disturbing work near the find must be temporarily suspended or redirected until a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology has evaluated the nature and significance of the find. If the discovery proves to be significant under CEQA, additional work such as preservation in place or archaeological data recovery, shall occur as required by the archeologist in coordination with County staff and descendants and/or stakeholder groups, as warranted. After the find has been mitigated appropriately, work in the area may resume. A Native American representative shall be retained to monitor any mitigation work associated with Native American cultural material.

Significance After Mitigation

Mitigation Measures CR-1 and CR-2 would ensure that cultural resources are identified properly and preserved in the event they are uncovered during construction. Their implementation would reduce impacts regarding disrupting cultural resources to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

No human remains are known to be present within or near the project site. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires no further disturbance to occur until the county coroner has made the necessary findings as to the origin and disposition pursuant to the Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD must complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. With adherence to existing regulations, impacts to human remains would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	■

Existing Setting

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate (U.S. Energy Information Administration [EIA] 2018a). California consumed 292,039 gigawatt-hours (GWh) of electricity and 2,110,829 million cubic feet of natural gas in 2017 (California Energy Commission [CEC] 2019a, EIA 2018b). In addition, Californians consume approximately 18.7 billion gallons of motor vehicle fuels per year (Federal Transit Administration [FTA] 2017). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2018a).

Most of California's electricity is generated in-state with approximately 30 percent imported from the Northwest and Southwest in 2017 (CEC 2019b). In addition, approximately 30 percent of California's electricity supply comes from renewable energy sources, such as wind, solar photovoltaic (PV), geothermal, and biomass (CEC 2019b). Adopted on September 10, 2018, Senate Bill (SB) 100 accelerates the state's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires that all motorists use California Reformulated Gasoline (CaRFG), which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 15.1 billion gallons sold in 2015 and is used by light-duty cars, pickup trucks, and sport utility vehicles (CEC 2016a). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (CEC 2016b). Both gasoline and diesel are primarily petroleum-based, and their consumption releases greenhouse gas (GHG) emissions, including CO2 and NOX. The transportation sector is the single largest source of GHG emissions in California, accounting for 41 percent of all inventoried emissions in 2016 (CARB 2018a).

On February 4, 2014, the Alameda County Board of Supervisors adopted the Community Climate Action Plan (CCAP) as an element of the Alameda County General Plan. While targeted toward reducing countywide greenhouse gas (GHG) emissions, the CCAP includes energy efficiency measures to reach emissions reduction targets. Energy-related measures described in the CAP include building energy efficiency strategies, conducting outreach programs to encourage renewable energy installation, and encouraging the use of alternatively fueled construction and landscape equipment (Alameda County Board of Supervisors 2014).

Energy consumption accounts for energy consumed during construction and operation of the proposed project, such as fuel consumed by vehicles, natural gas consumed for heating and/or power, and electricity consumed for power. The analysis of energy consumption herein involves the quantification of anticipated vehicle and equipment fuel, natural gas, and electricity consumption during construction and operation of the proposed project, to the extent feasible, as well as a qualitative discussion of the efficiency, necessity, and wastefulness of that energy consumption.

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

Construction of the proposed project would result in short-term consumption of energy from the use of construction equipment and processes. The California Green Building Standards Code includes specific requirements related to recycling, construction materials, and energy efficiency standards that would apply to construction of the proposed project to minimize wasteful, inefficient, and unnecessary energy consumption.

The proposed project would involve the use of energy during construction and operation. Energy use during construction would be primarily from fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction would be temporary in nature, and construction equipment used would be typical of construction projects in the region. Table 7 illustrates the anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the project site. As shown therein, construction of the proposed project, which would last approximately 12 months, would require approximately 32 gallons of gasoline and 23,800 gallons of diesel fuel.

Table 7 Proposed Project Construction Energy Use

	Fuel Consumption (Gallons)	
Source	**Gasoline**	**Diesel**
Construction Equipment and Hauling Trips	–	23,629
Hauling Trips	–	171
Worker Vehicle Trips	32	–
Total	32	23,800

See Appendix A for CalEEMod default values for fleet mix and average distance of travel, and Appendix F for energy calculation sheets.

Operation of the proposed project would generate energy demand in the form of transportation fuel from vehicle trips. Transportation fuel consumed by the additional general light industrial uses under the proposed project is shown in Table 8. The proposed project's consumption of

transportation fuel was derived by identifying the estimated annual vehicle miles traveled (VMT) resulting from the proposed project, contained in the CalEEMod analysis, and applying the U.S. Environmental Protection Agency- (USEPA) approved EMFAC 2014 fleet mix (CARB 2018b) and average fuel economy for the applicable vehicle classes, contained in the U.S. Department of Transportation, Bureau of Transportation Statistics (DOT) National Transportation Statistics 2018 (DOT 2018). As shown in Table 8, the proposed project would result in an estimated annual VMT of 199,066, equating to a daily consumption of approximately 8,539 gallons of gasoline and 2,588 gallons of diesel consumed.

Table 8 Operational Transportation Fuel Consumption

Fuel Type	Gallons	Million British Thermal Units (MMBtu)
Gasoline	8,539	937
Diesel	2,588	330
Total	11,127	1,267

Notes: USEPA-approved EMFAC2014 fleet mix (CARB 2018b) and average fuel economy for the applicable vehicle classes (DOT 2018) were applied to the estimated annual VMT resulting from the proposed project to identify transportation fuel consumption.

In addition to transportation energy use, operation of the project would consume natural gas and electricity for building heating and power, lighting, and water conveyance, among other operational requirements. The proposed project would increase the number of natural gas- and electricity-consuming uses above those existing at the project site. Table 9 shows the total electricity and natural gas required for operation of the proposed project in comparison to usage throughout Alameda County. As shown in below, operation of the proposed project would consume less than 0.01% of Alameda County's current (2017) electricity and natural gas consumption.

Table 9 Operational Electricity and Natural Gas Consumption

Energy Type	Proposed Project	Alameda County	Proposed Project Proportion of County Consumption
Electricity (MWh)	599	11,112,655	0.005%
Natural Gas (MMBtu)	266	35,240,147	0.0008%

Source: CEC 2017a; 2017b

Overall, operation of the proposed project would result in consumption of fuels from vehicle trips and electricity and natural gas consumption for building operations. Project energy consumed would represent an incremental increase in energy usage compared to existing energy use in Castro Valley and Alameda County, and the proposed project would implement energy-efficient components to reduce energy demand. Additionally, the project would meet California Green Building Standards Code specific requirements for energy efficiency in new development as well as Alameda County's CCAP energy efficiency measures. Design plans would include "green building" features that may qualify the proposed project for LEED certification, including the installation of roof solar panels, further reducing unnecessary consumption of energy or wasteful energy use. Therefore, construction and operation of the proposed project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As mentioned above, SB 100 mandates 100 percent clean electricity for California by 2045. Because the proposed project would be powered by the existing electricity grid, the project would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. Additionally, Alameda County's CCAP contains emissions-reduction measures the County may implement, several of which are energy-related in nature. The CCAP is a voluntary planning study undertaken by the County to quantify emissions through an inventory analysis and forecast and to generate possible measures the County could take in the future. The CCAP was adopted as an Element of the Alameda County General Plan in February of 2014 and as such contains mandatory measures and amendments that apply to unincorporated areas of the county (Alameda County Board of Supervisors 2014). Therefore, the energy efficiency measures contained in the CCAP are required and would be adhered to with implementation of the proposed project.

As demonstrated further in Section 8, *Greenhouse Gas Emissions*, the proposed project is consistent with measures and actions from the County's CCAP. Those measures specifically pertaining to energy efficiency include Strategies E-9 through E-12 relating to energy performance in new construction and energy efficient design in new development. The proposed project would include energy efficient design and would include "green building" features such as installing roof solar panels. As such, the proposed project would achieve LEED Silver certification which is aligned with the CCAP and Alameda County Municipal Code Requirement Section 460, *Green Building Program*. The proposed project would not interfere with the CCAP's energy performance in new construction strategy or measures and would not conflict with or obstruct the state plan for renewable energy; therefore, no impact would occur.

NO IMPACT

7 Geology and Soils

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

Existing Setting

The Castro Valley General Plan Environmental Impact Report indicates that Castro Valley has in the past and would in the future experience strong shaking during a major earthquake on the Hayward, Calaveras, or San Andreas fault systems. During a major earthquake, Castro Valley could potentially experience surface rupture, subsidence, and potential collapse of bridge structures, portions of the I-580 freeway, and disruption of major utilities and services. Most of Castro Valley, including the project site, is not prone to soil liquefaction. Only hill areas and land adjacent to principal stream channels is at risk of landslides, and the project site does not have these features (California Department of Conservation 1996).

According to the Alquist-Priolo Earthquake Fault Zoning Map there are not active fault traces, earthquake fault zones, or seismic hazard zones on or adjacent to the project site (California Geologic Survey [CGS] 2012).

The project site is primarily underlain by Quaternary alluvial deposits. Quaternary alluvial deposit includes gravel, sand, silt, and clay deposited mostly in valleys and lowland onshore. The project site is relatively flat at approximately 228 mean sea level (MSL) and has a gradually sloping topography towards the west (Cardno ATC 2013, Appendix B).

Impact Analysis

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

According to the California Department of Conservation, the project site is not located in an Alquist-Priolo Earthquake Fault Zone and there are no known faults crossing or projecting toward the site (CGS 2012). The closest such zone is along the Hayward Fault approximately two miles west of the project site. Therefore, ground rupture due to faulting is unlikely at the site and no impact would occur.

NO IMPACT

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

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

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

c. Would the project be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project site is not in an Alquist-Priolo Earthquake Fault Zone and it is not located in an area identified as having potential for earthquake induced landslides. Additionally, the project site is not located in a liquefaction zone (CGS 2012).

The project site is less approximately two miles west of the Hayward Fault Zone, considered an active fault by the California Geological Survey (2010). This fault runs north/south along the base of the East Bay Hills from San Jose to San Pablo Bay. Because the project is in a seismically active area, all structures could be affected by ground shaking if an earthquake occurs. The effects of earthquake-related ground shaking could include direct or indirect damage to structures, as well as damage to streets and utilities. However, compliance with the current California Building Code requirements would ensure that the proposed structures would be able to: (1) resist minor earthquakes without damage; (2) resist moderate earthquakes without structural damage, but with some non-structural damage; and (3) resist major earthquakes without collapse, but with some structural as well as nonstructural damage. By adhering to State and County building code requirements, the direct or indirect impacts from development of the proposed project as they relate to strong seismic ground shaking would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Construction of the proposed project would require earthwork activities to prepare the site for the proposed new building and associated structures. As the proposed project would disturb over one acre of land, the applicant would be required to obtain coverage under the General Permit for Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ or 2009-0009-DWQ General Permit) to comply with Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) requirements. Compliance with these requirements would include preparation of a Storm Water Pollution Prevention Plan (SWPPP), which would specify Best Management Practices (BMP) to quickly contain and clean up accidental spills or leaks. AMC Section 15.36.600 prescribes erosion and sediment control methods to prevent illicit discharge during construction. Appropriate erosion control and permanent site surface drainage elements per the latest California Building Code would also be implemented. With required implementation of these plans, permits, and BMPs, substantial erosion or the loss of topsoil would not occur at the project site and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Expansive soils, also known as shrink-swell soils, refer to the potential of soil to expand when wet and contract when dry. The U.S. Department of Agriculture (USDA), Natural Resources Conservation Service indicates that the project site contains Altamont Clay (USDA 1981). Generally, this soil type exhibits shrink-swell characteristics consistent with expansive soils. As previously addressed, the proposed project would be designed and constructed to meet all applicable seismic requirements set forth in the current California Building Codes and the Alameda County Code of Ordinance, which have been created to address various soil constraints, including expansive soils. Compliance with all applicable state and local requirements would reduce the direct or indirect risk of loss, injury, or death posed by expansive soils. Therefore, impacts associated with expansive soil would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project would not include components that would require the use of septic tanks. The project would connect to CVSan's sanitary sewer system. There would be no impact.

NO IMPACT

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

Rincon Consultants evaluated the paleontological sensitivity of the geologic units that underlie the project area using the results of the paleontological locality search and review of existing information in the scientific literature concerning known fossils within those geologic units. Rincon reviewed fossil collections records from the University of California Museum of Paleontology (UCMP) online database, a resource for fossil localities in Alameda County.

Following the literature review and museum record search, a paleontological sensitivity classification was assigned to the geologic units in the project area. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. The Society of Vertebrate Paleontology has developed a system for assessing paleontological sensitivity and describes sedimentary rock units as having high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources (Society for Vertebrate Paleontology 2010). This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present.

The project area is mapped at a scale of 1:24,000 by Dibblee and Minch (2005) and includes one geologic unit mapped at ground surface: Holocene alluvial deposits (Qa) composed of unconsolidated fine-grained sand, silt, and gravel. These sediments are generally too young (<5,000 years old) to contain significant paleontological resources (Dibblee and Minch 2005). Quaternary alluvial deposits have low to no potential to yield significant fossil resources.

Ground disturbance associated with the construction of the proposed project would not exceed 3 feet in depth. The Panoche Formation (Kp and Kpc), which lies near the project site, and at considerable depth under it, is a late Cretaceous marine clay shale, sandstone, and conglomerate package that has yielded invertebrates, plants, and a mosasaur (large marine reptile; *Plotosaurus tuckeri*) (Ford 2006; Hilton 2003). However, in this area the Panoche dips steeply, in excess of 70 degrees to the east (Dibblee and Minch 2005), and so would not be impacted by project construction. As such, all impacted sediments in the project area consist of Quaternary alluvial deposits (Qa; late Holocene), which are not sensitive for paleontological resources. Thus, the proposed project would not impact significant paleontological resources.

Because construction-related impacts to project site sediments are anticipated to be shallow and in sediments that have likely been re-worked for agricultural purposes, late Pleistocene to early Holocene sediments with high paleontological sensitivity have a low potential of occurring on the Project site. As such, direct or indirect unanticipated impacts to paleontological resources are not likely to occur. Therefore, no direct or indirect impact to paleontological resources would occur with project development.

NO IMPACT

8 Greenhouse Gas Emissions

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

Climate Change and Greenhouse Gas (GHG) Emissions

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC 2014), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-twentieth century (IPCC 2014).

Greenhouse gases (GHG) are gases that absorb and re-emit infrared radiation in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFC) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Observations of CO_2 concentrations, globally averaged temperature, and sea level rise are generally well within the range of the extent of the earlier IPCC projections. The recently

observed increases in CH_4 and N_2O concentrations are smaller than those assumed in the scenarios in previous assessments. Each IPCC assessment has used new projections of future climate change that have become more detailed as the models have become more advanced.

Manmade GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. CO_2 has a 100-year GWP of one. By contrast, CH_4 has a GWP of 25, meaning its global warming effect is 25 times greater than carbon dioxide on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 34° C cooler. However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations (CalEPA 2015).

Thresholds

Pursuant to the requirements of Senate Bill (SB) 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for the feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The adopted CEQA Guidelines provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The vast majority of individual projects do not generate sufficient GHG emissions to influence climate change directly, but physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines §15064[h][1]).

According to the *CEQA Guidelines*, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2016). Palo Alto does not currently have a qualified GHG reduction plan and thus this approach is not currently feasible.

To evaluate whether a project may generate a quantity of GHG emissions that may have a significant impact on the environment, state agencies have developed a number of operational bright-line significance thresholds. Significance thresholds are numeric mass emissions thresholds that identify the level at which additional analysis of project GHG emissions is necessary. Projects that attain the significance target, with or without mitigation, would result in less than significant GHG emissions. Many significance thresholds have been developed to reflect a 90 percent capture rate tied to the 2020 reduction target established in AB 32. Numerous lead agencies have identified

as appropriate significance screening tools for residential, commercial, industrial, and public land uses and facilities projects with horizon years before 2020.

In the 2017 BAAQMD CEQA Air Quality Guidelines, the BAAQMD outlines an approach to determine the significance of projects. For residential, commercial, industrial, and public land use development projects, the thresholds of significance for operational-related GHG emissions are as follows:

- Compliance with a qualified GHG Reduction Strategy
- Annual emissions less than 1,100 metric tons (MT) per year (MT/yr) of carbon dioxide equivalent (CO_2e)
- Service person threshold of 4.6 MT CO_2e/SP/yr (residents + employees)

The BAAQMD annual emissions threshold of 1,100 MT of CO_2e per year was designed to capture 90 percent of all emissions associated with projects in the Basin and require implementation of mitigation so that a considerable reduction in emissions from new projects would be achieved. According to the California Air Pollution Control Officers Association (CAPCOA) white paper, *CEQA & Climate Change*, a quantitative threshold based on a 90 percent market capture rate is generally consistent with AB 32 (CAPCOA 2008). SB 32, codified in 2016, sets a more conservative emission reduction target of 40 percent below the 1990 level by 2030. Because the previously established threshold of 1,100 MT CO_2e was not developed to meet the targets established by SB 32, it must be adjusted to meet the new, more conservative, emission reduction target of 40 percent below the 1990 level by 2030. As such, to be consistent with SB 32, the project would need to emit no more than 1,034 MT CO_2e in 2022, the estimated project opening year, to be on trajectory to meet the 2030 reduction established by SB 32. Therefore, the threshold for this project is 1,034 MT of CO_2e per year.

Alameda County Climate Action Plan

On February 4, 2014, the Alameda County Board of Supervisors adopted the Community Climate Action Plan (CCAP) as an element of the Alameda County General Plan. According to the criteria described in the BAAQMD's 2010 CEQA Guidelines and listed above, the CCAP qualifies as a GHG reduction strategy. With implementation of the measures contained in the CCAP, the unincorporated areas of the County would achieve a 15.6 percent reduction in GHG emissions below 2005 levels by 2020 and would reduce the GHG emission to service population ratio to approximately 4.4 MT CO_2e. The CCAP includes GHG reduction strategies, measures, and actions in the areas of transportation, land use, building energy, water, waste, and green infrastructure. Together, these enable the County to achieve its climate protection goals.

Methodology

As discussed under Section 3, *Air Quality*, the BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant GHG impacts. If all of the screening criteria are met by a project, then the lead agency or applicant would not need to perform a detailed GHG assessment of their project's GHG emissions (BAAQMD 2017c). However, because the project involves a stationary source, screening criteria cannot be used.

Therefore, CalEEMod version 2016.3.2 was used to calculate total project emissions, which include construction and operational emissions. This methodology is recommended by the CAPCOA CEQA and Climate Change white paper (CAPCOA 2008). The analysis focuses on CO_2, N_2O, and CH_4 as these

are the GHG emissions that on-site development would generate in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF_6, were also considered for the analysis. However, the proposed project is not expected to be a significant contributor of fluorinated gases since fluorinated gases are primarily associated with industrial processes. Calculations were based on the methodologies discussed in the CAPCOA white paper and included the use of the California Climate Action Registry (CCAR) General Reporting Protocol (CCAR 2009).

Operational Emissions

Operational emissions for the proposed project were modeled using CalEEMod and compared to BAAQMD thresholds.

CalEEMod provides operational emissions of CO_2, N_2O, and CH_4. Emissions from energy use include electricity and natural gas use. The emissions factors for natural gas combustion are based on EPA's AP-42 (Compilation of Air Pollutant Emissions Factors) and CCAR. Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt hour (CAPCOA 2016). The default electricity consumption values in CalEEMod include the California Energy Commission-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies. CalEEMod incorporates 2016 Title 24 CALGreen Building Standards, which are the most recent and thus apply to the proposed project.

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating were calculated in CalEEMod and utilize standard emission rates from CARB, USEPA, and emission factor values provided by the local air district (CAPCOA 2016).

Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CAPCOA 2017). Waste disposal rates by land use and overall composition of municipal solid waste in California was based primarily on data provided by the California Department of Resources Recycling and Recovery (CalRecycle).

Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the California Energy Commission's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California.

For mobile sources, CO_2 and CH_4 emissions were quantified in CalEEMod. Because CalEEMod does not calculate N_2O emissions from mobile sources, N_2O emissions were quantified using the CCAR General Reporting Protocol (CCAR 2009) direct emissions factors for mobile combustion. Estimates of vehicle trips associated with the proposed development were based on default rates provided in CalEEMod. Emission rates for N_2O emissions were based on the vehicle mix output generated by CalEEMod and the emission factors found in the CCAR General Reporting Protocol.

Although the project would comply with 2016 CALGreen Building Standards, the specific sustainability features that would be applied to the project are not known to the level of detail required for applying reductions in CalEEMod. Thus, the analysis excludes these sustainability features and is thus a conservative analysis of operational emissions.

Construction Emissions

Construction of the development would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Although

construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches adequately address impacts from temporary construction activity. As stated in the CEQA and Climate Change white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA 2008). Additionally, the BAAQMD does not have specific quantitative thresholds for construction activity. Therefore, although estimated in CalEEMod and provided for informational purposes, construction activity is not included in the total emissions calculations.

Impact Analysis

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

The project's proposed construction activities, energy use, daily operational activities (including use of a back-up generator), and mobile sources (traffic) would generate GHG emissions. CalEEMod was used to calculate emissions resulting from project construction and long-term operation (see Appendix A for model output).

Construction Emissions

Emissions generated by construction of the proposed project are estimated at 256 MT of CO_2e. However, as the BAAQMD does not have a recommended threshold for construction-related GHG emissions, emissions associated with construction are included in Table 10 and compared to BAAQMD significance thresholds.

Operational Indirect and Stationary Direct Emissions

Long-term emissions relate to area sources, energy use, solid waste, water use, and transportation. Each of the operational sources of emissions is discussed further below.

Area Source Emissions

CalEEMod was used to calculate direct sources of air emissions associated with the proposed project. These include consumer product use and landscape maintenance equipment. Area emissions are estimated at less than 1 MT of CO_2e per year.

Energy Use Emissions

Operation of the project would consume both electricity and natural gas. The generation of electricity through combustion of fossil fuels emits CO_2, and to a smaller extent, N_2O and CH_4. The proposed project would generate approximately 66 MT of CO_2e per year associated with overall energy use, of which approximately 51 MT of CO_2e per year is due to electricity consumption and approximately 14 MT of CO_2e per year is due to natural gas use.

Solid Waste Emissions

Based on the estimate of GHG emissions from project-generated solid waste as it decomposes, solid waste associated with the proposed project would generate approximately 9 MT of CO_2e per year.

Water Use Emissions

Based on the amount of electricity generated to supply and convey water for the project, the proposed project would generate an estimated 10 MT of CO_2e per year.

Transportation Emissions

As calculated by CalEEMod, the proposed project would generate an estimated 199,066 annual VMT. As noted above, CalEEMod does not calculate N_2O emissions related to mobile sources. As such, N_2O emissions were calculated based on the project's VMT using calculation methods provided by the CCAR General Reporting Protocol (CCAR 2009). The proposed project would emit an estimated 92 MT of CO_2e per year from mobile sources.

Combined Stationary and Mobile Source Emissions

Table 10 combines the operational and mobile GHG emissions associated with the proposed project. The annual emissions would total approximately 177 MT of CO_2e per year. These emissions do not exceed the 1,034 MT of CO_2e per year threshold for compliance with BAAQMD thresholds as adjusted for SB 32 targets. Since GHG emissions would not exceed the adjusted BAAQMD threshold, the project would not generate a substantial increase in GHG emissions and would not conflict with AB 32 or SB 32. This impact would be less than significant.

Table 10 Operational GHG Emissions

Emissions Source	Annual Emissions (MT of CO2e/year)
Operational	
Area	<1
Energy	66
Waste	9
Water	10
Back-Up Generator	<1
Mobile	
CO_2 and CH_4	88
N_2O	4
Total	**177**
BAAQMD Threshold (adjusted for SB 32)	1,034
Exceeds Threshold?	No

See Table 2.2 "Overall Operational" emissions. CalEEMod worksheets in Appendix A.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

BAAQMD's screening criteria for GHG emissions identifies the emissions level at which a project would not be expected to conflict substantially with existing California legislation adopted to reduce statewide GHG emissions and move towards climate stabilization. If a project would generate GHG emissions above the screening criteria level, it would be considered to contribute substantially to a cumulative impact and would be considered significant. Thus, if a project is below the BAAQMD's screening criteria for GHG, it would not substantially conflict with existing California legislation adopted to reduce statewide GHG emissions. As discussed in the response to question (a), the proposed project is well below the GHG screening criteria thresholds.

On February 4, 2014, the Alameda County Board of Supervisors adopted the Community Climate Action Plan (CCAP) as an element of the Alameda County General Plan. According to the criteria described in the BAAQMD's 2010 CEQA Guidelines and listed above, the CCAP qualifies as a GHG reduction strategy. With implementation of the measures contained in the CCAP, the unincorporated areas of the County would achieve a 15.6 percent reduction in GHG emissions below 2005 levels by 2020 and would reduce the GHG emission to service population ratio to approximately 4.4 MT CO2e. The CCAP includes GHG reduction strategies, measures, and actions in the areas of transportation, land use, building energy, water, waste, and green infrastructure. Together, these enable the County to achieve its climate protection goals.

As demonstrated in Table 11, the proposed project is generally consistent with strategies, measures, and actions from the County's CCAP. Only strategies and measures from the CCAP that are applicable to the proposed project were included in the table. As shown, the proposed project would support and implement some strategies and measures contained in the CCAP. Impacts associated with conflicting with applicable plan, policy, or regulation of an agency adopted for reducing the emissions of GHG would be less than significant.

Table 11 Proposed Project Consistency with Alameda County CCAP

Transportation Action Area	
Strategies/Measures	**Project Consistency**
Walking Strategy **T-4:** Enhance pedestrian infrastructure within easy walking distance from community activity centers. T-3: Increase the number of bicycle racks and storage facilities in underserved civic and commercial area **T-6:** Improve pedestrian connectivity and route choice in neighborhoods.	**Consistent.** The proposed project's vision includes safe pedestrian access to the project site that would better connect the community with the site and provide access to the proposed demonstration garden. The landscaped area onsite would include pedestrian pathways to ensure safe access to the demonstration garden and would allow the public to view the area in a manner similar to a public park or garden. Additionally, the proposed project would include four bicycle parking spaces for guests and two bicycle storage lockers for employees, which would meet the CCAP's minimum bicycle parking requirement for new office uses. Therefore, the design of the proposed project would be consistent with the CCAP's walking and strategy and measures.
Energy Performance in New Construction Strategy **E-8:** Renew the County Green Building Ordinance. **E-9:** Provide incentives for buildings that exceed the California Title-24 standards for energy efficiency by 30 percent (Tier 2).	**Consistent.** The proposed project would be consistent with the Castro Valley General Plan's Greenhouse Gas goals and policies, which include encouraging energy efficiency of new and remodeled buildings, requiring that new construction and remodels above a certain size comply with the County's Green Building Ordinances, and implementing incentives to encourage

Transportation Action Area	
Strategies/Measures	**Project Consistency**
E-10: Require new construction to use building materials containing recycled content. **E-11:** Require new commercial parking lots to incorporate heat gain-mitigating design strategies. **E-12:** Require all new multi-unit buildings and major renovations to existing multi-unit buildings to be "sub-metered" in order to enable each individual unit to monitor energy and water consumption.	green building practices and energy efficiency. This policy is consistent with the County's Green Building Ordinance. New construction and remodels not required to achieve certification under the Green Building Ordinance are encouraged to incorporate green building techniques designed to reduce the energy and water use of new or remodeled buildings. In addition, the proposed project design would comply with any requirements adopted by the County regarding the energy performance of building materials, or parking lots. The proposed project would not interfere with the CCAP's energy performance in new construction strategy or measures.
Renewable Energy Strategy **E-14:** Facilitate the installation of solar hot water heating systems on large commercial buildings.	**Consistent.** The proposed project design would include solar panels to power the building and is therefore consistent with the CCAP's renewable energy strategy for solar power in large buildings.
Water Conservation – Building and Landscape Efficiency Strategy **WT-1:** Encourage residents and businesses to conserve water in existing buildings and landscapes. **WT-2:** Require new landscape projects to reduce outdoor potable water use by 40 percent. **WT-3:** Adopt an ordinance that allows the installation and use of greywater (recycled) systems for subsurface irrigation.	**Consistent.** The proposed project includes plans for a landscaped area and demonstration garden that would use Bay-friendly landscaping, which would use plants known to be drought tolerant. Additionally, the building would be designed to qualify for LEED certification which includes water conservation and efficiency requirements for outdoor and indoor water uses. These design elements would be consistent with the CCAP's water conservation, building and landscape efficiency strategy.
Waste Reduction and Diversion Strategy **WS-1:** Increase solid waste reduction and diversion to 90 percent by 2030. **WS-2:** Strengthen the Construction and Demolition Debris Management Ordinance	**Consistent.** The proposed project would be designed sufficiently to meet standards to qualify for LEED certification. This includes "green building" features that would aim to meet CVSan's goal of Zero Waste (greater than 90 percent diversion of waste from landfills) by the year 2029. Additionally, the proposed project would meet the County's construction and demolition debris management requirement that at least 50 percent of total debris generated by project construction be diverted from a landfill via reuse or recycling. The proposed project would therefore be consistent with the CCAP's waste reduction and diversion strategy.
Urban Forest Strategy **G-1:** Expand the urban forest (e.g., street trees and trees on private lots) in order to sequester carbon and reduce building energy consumption.	**Consistent.** The proposed project includes landscape design plans to expand the urban forest in the area by planting trees. Therefore, the proposed project would not interfere with the CCAP's urban forest strategy or measure.

Source: Alameda County (Unincorporated Areas) Community Climate Action Plan, An Element of the Alameda County General Plan, 2014

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	■

Regulatory Setting

The management of hazardous materials and hazardous wastes is regulated at the federal, state, and local levels through programs administered by the U.S. Environmental Protection Agency (U.S. EPA), agencies within the California Environmental Protection Agency (CalEPA), such as the Department of Toxic Substances Control (DTSC), federal and state occupational safety agencies, the Bay Area Air Quality Management District (BAAQMD), and Alameda County Department of Environmental Health.

At the federal level, the Environmental Protection Agency (EPA) is the principal administering agency for hazardous waste regulation. The Occupational Safety and Health Administration (Fed/OSHA) regulates the use and handling of hazardous materials, including the reporting of incidents and occupational injuries, workplace conditions, employee protection requirements, first aid and fire protection, as well as material handling and storage. Furthermore, at the federal level, the Department of Transportation (DOT) regulates transportation of hazardous materials.

At the State level, agencies such as Cal/OSHA, the Office of Emergency Services (OES), and the Department of Health Services (DHS) have rules governing the use of hazardous materials that parallel federal regulations and are sometimes more stringent. The DTSC is the primary State agency governing the storage, transportation and disposal of hazardous wastes. DTSC, as a department of CalEPA, is authorized by the U.S. EPA to enforce and implement certain federal hazardous materials laws and regulations. DTSC has oversight of Annual Work Plan sites (commonly known as State Superfund sites).

The Regional Water Quality Control Board (RWQCB) is authorized by the State Water Resources Control Board to enforce provisions of the Porter-Cologne Water Quality Control Act of 1969. This act gives the RWQCB authority to require groundwater investigations when the quality of groundwater or surface waters of the State is threatened and to require remediation of the site, if necessary. In the Bay Area, the Bay Area Air Quality Management District (BAAQMD) may impose specific requirements on remediation activities to protect air quality from dust or other airborne contaminants.

Administration and enforcement of the major environmental programs were transferred to local agencies as Certified Unified Program Agencies (CUPAs) beginning in 1996. The purpose of this was to simplify environmental reporting by reducing the number of regulatory agency contacts a facility must maintain and requiring the use of more standardized forms and reports.

The Alameda County Department of Environmental Health (ACDEH) is the CUPA that has primary responsibility for enforcing most regulations pertaining to hazardous materials in Castro Valley. The Alameda County Fire Department acts as first responder to hazardous materials incidents within Castro Valley. Hazardous waste programs in Castro Valley are also governed by the *Alameda County Hazardous Waste Management Plan* (HWMP) and the *Alameda County Integrated Waste Management Plan* (IWMP). These plans include forecasts for the generation of hazardous waste and provide policies for the management of this waste in Alameda County. The County HWMP outlines a program for reducing the production of hazardous wastes and safely treating wastes that cannot be eliminated. The program sets a hierarchy of hazardous waste management priorities as: (1) waste minimization/toxics use reduction, (2) recycling, (3) treatment, and (4) safe residual repositories. The HWMP includes generalized Siting Criteria, calls for a Local Review Process and Criteria, and requires local findings of Plan Conformance for proposed hazardous waste facilities. The County IWMP also includes a hierarchy of waste management practices similar to those listed above, as: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation or land disposal for all types of waste (Alameda County Waste Management Authority 2003). The primary focus of both plans is to reduce the amount of hazardous waste generated in the County and to safely reuse, recycle or store any waste that is generated (Alameda County Community Development Agency 2012).

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Activities

The proposed project would involve the construction of a new operations and engineering building and vehicle maintenance and storage facility to support CVSan operations. A separate hazardous materials storage building would also be constructed on the project site. Construction activities may include the temporary transport, storage, use, or disposal of potentially hazardous materials including fuels, lubrication fluids, cleaners, solvents, or contaminated soils. If spilled, these substances could pose a risk to the environment and to human health. As the project would disturb over one acre of land, the applicant would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) to comply with CWA NPDES requirements. Compliance with these requirements would include preparation of a SWPPP, which would specify BMPs to quickly contain and clean up accidental spills or leaks.

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 county, such as along Castro Valley Boulevard, thereby limiting risk of upset. Therefore, the potential for an accidental release of hazardous materials to harm the public or the environment would be minor. Impacts related to hazardous materials during construction would be less than significant.

Project Operation

In addition to serving as an office facility for CVSan staff, the project site would also be used for storage and maintenance of CVSan vehicles and storage of equipment and materials. This would include storage of potentially hazardous materials such as oil, diesel fuel, gasoline, and hydraulic fluid. These materials would be used, stored, and transported to the project site. Several chemical and synthetic materials would also be used for cleaning and routine service to CVSan equipment and vehicles. These materials would include substances such as auto-fluid, auto-motor oil and grease, lubricants, spray paint and other paint, solvents, cleaners and degreasers, disinfectants, and adhesives.

As with any industrial activities that involve the storage and use of hazardous materials, on-site activity involving hazardous substances (such as the petrochemicals, polymers, and basic inorganics described above), and the transport, storage, handling of these substances, must adhere to applicable safety standards, ordinances, or regulations, including a Hazardous Materials Business Plan (HMBP). This is regulated and monitored by the ACDEH and requires the submittal of a hazardous materials inventory for every facility that stores hazardous materials onsite. Businesses engaged in the use, sale, storage, or transport of hazardous substances are monitored by various local (e.g., ACDEH and the Alameda County Fire Department) and State (e.g., DTSC) entities. The project would be required by the ACDEH through the CUPA program to store hazardous materials in areas designed to prevent accidental release into the environment. In accordance with these requirements, hazardous materials would be stored in the separate hazardous materials building located onsite and would be secured in a manner to decrease the risk of exposure or accident. Compliance with applicable federal, state, and local standards and regulations concerning proper handling of potentially hazardous materials would ensure less than significant impacts with regard to hazardous materials during project operations. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is located approximately 0.36 mile southeast of Marshall Elementary School and approximately 0.42 mile southwest of Creekside Middle School. No existing or proposed schools are within 0.25 mile of the project site. Therefore, no impact would occur.

NO IMPACT

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

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. Cardno ATC prepared a Phase I Environmental Site Assessment (ESA) for the project site in November of 2013. As part of the report, Cardno ATC conducted a review of federal,

state, and local regulatory databases to evaluate the likelihood of contamination incidents at and near the project site.

Although sampling and analyses for asbestos-containing building materials (ACM) was not conducted as part of the 2013 Phase I ESA, Cardno ATC reported that Buildings 1, 2, 3, 5 and 6 on the property were built prior to 1960. Observed building materials and finishes within Building 1 and Building 6 were noted to be in poor condition at the time of Cardno ATC's site visit. Since the onsite buildings are reported to have been constructed prior to 1960, ACM may be present in the structures. Exposure to ACM during demolition could be hazardous to the health of onsite workers, as well as area residents and employees. Therefore, all suspected ACM should be properly assessed prior to any site redevelopment activities. Potential impacts associated with suspect ACM are potentially significant. Mitigation Measure HAZ-1 is required.

Similarly, based on the scope of work completed for the 2013 Phase I ESA, sampling and analyses for lead-based paint (LBP) was not conducted. However, based on the age of the onsite structures, there is the potential for LBP to be present onsite. Therefore, all suspect ACM should be properly assessed prior to any site redevelopment activities. Potential impacts associated with LBP are potentially significant. Mitigation Measure HAZ-2 is required.

According to the 2013 Phase I ESA, the project site is reported in regulatory records as a leaking underground storage tank (LUST) site (Cardno ATC 2013). According to the State Water Resources Control Board (SWRCB) online GeoTracker database, the project site was formerly occupied by the Caltrans Hayward Maintenance Station. Cleanup status of the former LUST case is reported as "Completed – case closed as of 6/25/1997." In January of 1989, one 1,000-gallon gasoline UST and one 260-gallon diesel UST were removed from the property. During the UST removal, three soil samples were collected from the tank excavation cavity and found to have gasoline and diesel contamination. In September of 1992, the site was excavated to remove approximately 391 tons of contaminated soil associated with the former onsite USTs (Cardno ATC 2013). From 1990 and 1996, further monitoring was conducted, which included additional soil testing and the installation of groundwater monitoring wells. According to the Fuel Leak Site Case Closure Summary issued by the ACDEH on June 25, 1997, detectable levels of gasoline, diesel, ethylbenzene, and xylene remained in the soil in the vicinity of the former UST pit and dispenser area. In addition, benzene, toluene, ethylbenzene, and xylenes existed within groundwater beneath the site as of March 1996. According to the ACDEH, the corrective actions and cleanup performed at the site protect public health for the current land use (i.e. the previous Caltrans maintenance yard); however, if land use changes would occur in the future, corrective actions should be reviewed. As of 1997, no further actions were required by ACDEH. Additionally, based on current regulatory status, the LUST listing is considered a historical recognized environmental condition (HREC) with respect to the project site (Cardno ATC 2013).

The proposed project would constitute a change in land use due to the addition of the new facility and therefore, would require a review of the corrective actions by ACDEH. As the last site analysis and sampling was conducted in 1997, contaminated soil or groundwater could be present beneath the project site. Additionally, the analysis included in the Phase I ESA concludes that proposed redevelopment at the project site could necessitate additional sampling, health risk assessment, and/or mitigation measures. Based on these site conditions, construction activities could expose construction workers or nearby residents to potentially unacceptable health risks from contaminated media. Therefore, impacts associated with residual concentrations of gasoline, diesel, ethylbenzene, benzene, toluene, and xylenes are potentially significant. Mitigation Measures HAZ-3 and HAZ-4 are required.

Mitigation Measures

The following mitigation measures are required:

HAZ-1 Asbestos Containing Materials (ACMs)

Prior to demolition, a qualified asbestos abatement consultant shall complete an ACM survey for the project site. If the results of the ACM survey indicate that ACM are present, then the materials shall be abated in compliance with BAAQMD Regulation 11, Rule 2, as well as all other State and federal rules and regulations. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement activities onsite. All ACMs removed from the onsite structures shall be hauled and disposed offsite by a transportation company certified to handle the transportation and disposal of asbestos.

HAZ-2 Lead-Based Paint (LBP)

All project work with materials that could contain LBP shall be monitored under the direction of a Certified Industrial Hygienist (CIH) who is also a Certified Lead Project Designer. Oversight by the CIH shall ensure that onsite workers have received appropriate training and adhere to safety requirements during construction activities. All contractors working on the project shall be informed of policies for notifying the appropriate management personnel if previously unidentified suspect hazardous materials are discovered during demolition of the onsite buildings. Standard handling and disposal practices for LBP shall be implemented pursuant to OSHA regulations.

HAZ-3 Soil Management Plan

Prior to ground disturbance, CVSan shall prepare a Soil Management Plan (SMP). The SMP shall be submitted to the ACDEH for approval. The SMP shall address known and unknown environmental issues that may be encountered during development. The plan shall identify appropriate measures to be followed if contaminants are encountered during excavation including health and safety measures to reduce exposure to potentially impacted soil for construction workers and dust control measures to reduce exposure to contaminated dust particles for nearby residents. Health and safety measures shall include the required personal protective equipment (PPE) to be used by site personnel, including action levels and decision criteria for upgrading the levels of PPE. The SMP shall also identify personnel to be notified, emergency contacts, and a sampling protocol if impacted media is encountered. The excavation and demolition contractors shall be made aware of the possibility of encountering known and unknown hazardous materials including impacted soil, soil vapor, and groundwater (if encountered), and shall be provided with appropriate contact and notification information. The plan shall include a provision stating at what point it is safe to continue with the excavation or demolition, and identify the person authorized to make that determination. Removal, transportation, and disposal of impacted soil or groundwater shall be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances. Based on the current project plans, groundwater is not anticipated to be encountered. However, if groundwater is encountered, then the SMP shall be revised and re-submitted to the ACDEH for approval.

HAZ-4 Site Assessment

Prior to start of construction, CVSan shall coordinate with the ACDEH to determine whether the project should be enrolled in the ACDEH's Voluntary Remedial Action Program (VRAP) or if a site assessment can be conducted under the previous (historical LUST) case number. The soil and soil vapor assessment shall be completed under the supervision of a professional geologist or engineer.

If soil sampling indicates the presence of contaminants in quantities not in compliance with applicable laws or regulations, CVSan shall coordinate with the ACDEH to develop and implement a program to remediate or manage onsite contaminated soil and/or soil vapor. Remediation shall be conducted prior to site redevelopment. Remediation shall include, but not be limited to, actions such as soil matrix and soil vapor analysis, remedial excavations, and confirmation soil sampling. Disposal of waste generated as part of the site assessment shall occur at an appropriate facility licensed to handle such contaminants. All proper waste handling and disposal procedures shall be followed. Remedial excavation, if warranted, shall proceed under the supervision of an environmental consultant licensed to oversee such remediation. The remediation/disposal program shall be approved by the ACDEH. CVSan shall submit all correspondence, preliminary data, and said reports to the ACDEH, prior to issuance of grading permits. Upon completion of the remediation/waste disposal activities, a qualified environmental consultant shall prepare a report summarizing the project, the methods of remediation/disposal implemented, and all analytical results, including waste disposal or treatment manifests.

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 through HAZ-4 would reduce the potential for construction workers and adjacent residences to be exposed to LBP, ACM, and subsurface contaminants. Therefore, these mitigation measures would reduce impacts to construction workers, residents, and the environment from onsite contamination to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The nearest airport to the project site is the Hayward Executive Airport, located approximately 3.8 miles to the southwest. The project site is not located within the Hayward Executive Airport Influence Area and is located outside the existing noise level contours for the airport (Alameda County Airport Land Use Commission [ALUC] 2012). The project would not subject persons working at the site to safety hazards, and there would be no impact from potential air traffic safety risks.

NO IMPACT

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

The Castro Valley General Plan addresses emergency response plans and evacuations under the Public Services and Utilities chapter (Alameda County Community Development Agency 2012). Construction of the proposed project would occur within the boundary of the project site and no street closures would occur. The project does not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No streets or property access points would be closed, rerouted, or substantially altered during or after construction. There would be no impact.

NO IMPACT

g. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project site is located in a developed urbanized area that is surrounded by residential and commercial uses and no adjacent wildlands or densely vegetated areas are located in the area that would represent a significant fire hazard. The project site is not located in a Fire Hazard Severity Zone or Very High Hazard Severity Zone for wildland fires (California Department of Forestry and Fire Protection [CalFire] 2007, 2008). Therefore, the project would not expose people or structures to significant risk of loss, injury, or death involving wildland fires. There would be no impact.

NO IMPACT

10 Hydrology and Water Quality

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

Existing Setting

Castro Valley is located within the southern San Francisco Bay hydrologic region, within the San Lorenzo watershed, and is underlain by the Castro Valley groundwater basin (Alameda County Community Development Agency 2012). The project site is developed with impervious surfaces and is equipped with an existing stormwater piping system. Stormwater runoff ultimately discharges to San Lorenzo Creek, which contains pollutants from urban runoff and storm sewers.

The project site is located outside of known flood zones (Alameda County Community Development Agency 2007; Federal Emergency Management Agency [FEMA] FIRM #06001C0279G, effective August 3, 2009).

Impact Analysis

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

c.(i). Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

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

Construction Impacts

During construction of the project, existing vegetation, concrete, and asphalt materials would be removed from the site. Grading of the site would also occur. There are no creeks or streams that cross the site, although all drainage from the site ultimately discharges to San Lorenzo Creek. The proposed project would involve construction of a new building and associated parking lot with similar materials and grade to what is currently onsite. Therefore, the proposed project would not alter the course of a creek in a manner that would result in erosion or siltation on- or off-site. However, during removal grading activities the site's soils may be exposed to wind and water erosion that could transport sediments into local stormwater drainages. Additionally, accidental spills of fluids or fuels from construction vehicles and equipment, or miscellaneous construction materials and debris, could be mobilized and transported off-site in overland flow. These contaminant sources could potentially degrade the water quality of receiving water bodies (i.e., San Lorenzo Creek), potentially resulting in a violation of water quality standards.

As part of Section 402 of the CWA, the U.S. EPA has established regulations under the National Discharge Elimination System (NDPES) program to control both construction and operation (occupancy) stormwater discharges. The federal CWA was first adopted in 1972 and is intended to protect and preserve water supply and quality in the "waters of the nation." In the Bay Area, the San Francisco Regional Water Quality Control Board (RWQCB) administers the NPDES permitting program and is responsible for developing permitting requirements. The project would be subject to the San Francisco Bay Region Municipal Regional Stormwater Permit (MRP), NPDES Permit Order No. R2-2015-0049, and the provisions set forth in Section C.3 *New Development and Redevelopment*. Under the conditions of the permitting program, the applicant would be required to eliminate or reduce non-stormwater discharges to waters of the nation, develop and implement a SWPPP for construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the site SWPPP. A SWPPP would be

developed during design development for the proposed project and will be determined with the assistance of the project civil engineer and landscape architect on the plan and site design. Because the project would disturb at least one acre of land, the project must provide stormwater treatment and would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ or 2009-0009-DWQ General Permit).

Further, in accordance with Alameda Municipal Code (AMC) Chapter 15.36 (Grading Erosion and Sediment Control), grading work within the unincorporated area of the county must be conducted in a manner such that quantities of dirt, soil, rock, debris, or other material would not be washed or discharged into a watercourse, a flood control facilities or other drainage facility. If requested by the director of public works, the project applicant would be required to prepare a detailed erosion and sediment control plan including specific locations, construction details, and supporting calculations for temporary and permanent sediment control structures and facilities. Therefore, with compliance with construction-related water quality and erosion control requirements, construction of the project would not violate any water quality standards or waste discharge requirements, substantially alter the drainage pattern of the area such that substantial erosion or siltation would occur and would not degrade surface or ground water quality. Impacts during construction would be less than significant.

Operational Impacts

The proposed project would not increase the total area of impervious surfaces on the project site and would not alter the site's existing drainage pattern. Operational use of the site would include storage of materials such as auto-fluid, auto-motor oil and grease, lubricants, spray paint and other paint, solvents, cleaners and degreasers, disinfectants, and adhesives. Additionally, as described in the *Project Description*, operations at the project site would include vehicle maintenance and washing which may contribute to runoff. Pollution associated with vehicle washing could potentially degrade water quality and find its way into sediments on and off the project. Therefore, there is the potential for some materials to contact rainwater or be blown into storm drains.

Stormwater discharge during operation is regulated by the Municipal Separate Storm Sewer System (MS4) Permit, issued by the RWQCB, pursuant to NPDES regulations. Water quality in stormwater runoff is regulated locally by the Alameda County Clean Water Program, which includes the C.3 provisions set by the San Francisco Bay RWQCB. Provision C.3 of the MRP addresses post-construction stormwater requirements for new development and redevelopment projects that add and/or replace 10,000 square feet or more of impervious area. Because the project would replace in excess of 10,000 square feet of the impervious surface of the project site, it must comply with the C.3 provisions set by the RWQCB. Therefore, the project must meet certain criteria including 1) incorporate site design, source control, and stormwater treatment measures into the project design; 2) minimize the discharge of pollutants in stormwater runoff and non-stormwater discharge; and 3) minimize increases in runoff flows as compared to pre-development conditions. A Stormwater Control Plan (SCP) that details the site control, source control, and stormwater measures that would be implemented at the site must be submitted to the County. In addition, Low Impact Development (LID) requirements apply. The Alameda County Clean Water Program's C.3 Technical Guidance document (2016) provides guidance on how to meet the C.3 requirements.

Pursuant to C.3 requirements, the project is required to include design features that would reduce impacts associated with the increased impervious surfaces. The project would direct runoff from roofs, sidewalks, and other paved areas such as the proposed car wash station into vegetated areas

and include landscaped bioretention areas to collect, store, and treat runoff before entering the stormwater system. These bioretention areas would control the runoff from operations including vehicle maintenance and washing, which would otherwise enter storm drains. By adhering to the provisions of NPDES Section C.3, the SWPPP, and the stormwater control plan, the project would not result in adverse effects on surface or ground water quality and or in the violation of water quality standards or waste discharge requirements during construction or operation. Additionally, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the project would have a less than significant impact on water quality. With implementation of the measures contained in these plans, excessive stormwater runoff, erosion, and sedimentation would not occur and the potential for the project to violate water quality standards and substantially degrade surface or ground water quality would be reduced. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

As discussed in Section 19, *Utilities and Service Systems*, the proposed project would receive its water from East Bay Municipal Utilities District (EBMUD). According to EBMUD's Urban Water Management Plan 2015 (UWMP), EBMUD's primary water source is the Mokelumne River, providing approximately 90 percent of the water used by EBMUD. The UWMP identifies groundwater supplies as a supplemental water supply source and indicates that the quantity of water injected into the aquifer of the Groundwater Basin presently exceeds the quantity of water extracted. Thus, regardless of the proposed project's water requirements, the majority of water provided to the project would originate from sources other than groundwater supplies.

The proposed project would be required by EBMUD to incorporate water conserving fixtures and landscaping. All landscaped areas would also be required to meet the provisions established by the Alameda County Landscape Water Conservation Guidelines and the California Water Efficient Landscapes Ordinance. Additionally, the project would include a demonstration garden which would comply with the landscaping principles and programs of the Bay-Friendly Coalition, which, in part, encourages practices that conserve water resources and lessen the impact of conventional landscape practices on the environment. Thus, the project would limit its use of water supplies, of which groundwater makes up only a small percentage of overall sources.

Development under the project does not include installation of new groundwater wells or use of groundwater from existing wells. The proposed project site is urbanized, and adjacent areas are predominately built-out. Implementation of the project would not cause an increase of impervious surfaces and therefore would not interfere with sustainable groundwater management of the basin. Impacts related to groundwater would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(ii). Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii). Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

c.(iv). Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would impede or redirect flood flows?

Crow Creek, located approximately 0.2 mile east of the project site, is the nearest watercourse to the site and does not flow through or adjacent to the site. The area is currently developed, and construction of the proposed project would not alter the course of this creek or other streams or rivers (no other surface water features are present in the project area). Project runoff would not be directed to the banks of any creeks and no impacts to bank stability would occur.

Construction activities would temporarily result in greater exposure of on-site soils, but as discussed above under thresholds a and c(i) the project would be required to comply with NPDES permit requirements during construction activities that would minimize erosion and runoff. In addition, the project would be required to comply with MS4 permit requirements during operation that would minimize runoff. Thus, the project would not substantially increase stormwater discharge, substantially alter drainage patterns on-site or the surrounding area, and would not contribute runoff that would exceed the capacity of the existing on-site or off-site stormwater drainage system. Impacts would be less than significant.

FEMA is responsible for the preparation of Flood Insurance Rate Maps (FIRMs). These maps present flood hazard, expressed as areas that are subject to inundation in a storm with either a 1 percent Annual Exceedance Probability (AEP), also referred to as a 100-year flood, or a 0.2 percent AEP (500-year flood). The project site is located in Flood Zone X, which is considered an area of minimal flood hazard and is outside of FEMA designated flood zones (FEMA FIRM #06001C0279G, effective August 3, 2009). Therefore, the project is not located within a flood zone and impacts concerning flood hazards would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is not adjacent to a large body of water, and as a result, the project would not be susceptible to inundation by seiche. As discussed above, the project site is not located within the 100-year floodplain or a FEMA-designated Special Flood Hazard Area. Additionally, according to the California Emergency Management Agency's Tsunami Inundation Map for Emergency Planning, the project site is located well outside of the tsunami inundation area associated with the San Francisco Bay. Lastly, no unvegetated or unstable hillsides occur upgradient from the project site, and thus, the project would not be susceptible to mudflow. Therefore, no impacts or risk of pollutant release due to inundation caused by flood hazards, tsunami or seiche would occur.

NO IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	■	☐

Existing Setting

According to the Castro Valley General Plan and the 1992 Castro Valley Central Business District Specific Plan, the project site has a land use designation of Public Facilities (Alameda County Planning Department 1993; Alameda County Community Development Agency 2012). The project site is zoned Central Business District sub-area 10 (Alameda County Planning Department 1993).

According to the General Plan, the primary goal of the public facilities land use designation is to provide locations for uses that support government, civic, cultural, health and infrastructure aspects of the community. The designation indicates public ownership as well as public use and covers uses such as the water treatment plant, fire stations, police stations, post offices, libraries, hospitals and publicly-owned office buildings. Public uses may include ancillary non-public uses that support the primary use. Public uses are scattered throughout Castro Valley. Public uses are also allowed in areas with residential and commercial designations (Alameda County Community Development Agency 2012).

The project site is located within the *Castro Valley Central Business District Specific Plan* Sub-area 10, which allows Land Use Group B (Low Volume, Predominately Motor Vehicle-Oriented Retail and Service Commercial, Wholesale Commercial and Industrial), and Land Use Group D (High Density Residential) land uses. The *Specific Plan* also allows to a lesser extent, and on a case by case basis, Land use Group A (Intensive Retail), Convenience Markets and Neighborhood Commercial land uses (Alameda County Planning Department 1993).

The Subarea 10 zoning designation allows for Land Use Group B uses, which include, but are not limited to, Equipment and Sales Rental, Lumber Yard, Contractor's Yard, Nurseries, Distribution Facilities, Manufacturing Uses, Wholesale Uses, Research and Development, and Auto-Oriented Businesses. Auto Oriented Businesses are those geared towards sales, service, or repair of automobiles. Other uses, which may be allowed depending on factors such as design of the development, the specific characteristics of the use, and consistency with the development objectives of this subarea, include but are not limited to Type C3 Offices. Type C3 Offices include Headquarters Offices and Staff Support Offices. The proposed use by the proposed project would be maintenance, engineering, and permits.

Impact Analysis

a. Would the project physically divide an established community?

The proposed project would involve the construction of new building and vehicle and equipment storage on a site that has previously operated as a maintenance and storage facility. No operational or structural changes are proposed that would separate connected areas physically or socially, nor are any linear features, new roads or other barriers to movement proposed. There would be no impact.

NO IMPACT

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

The project site has a land use designation of Public Facilities (Alameda County Community Development Agency 2012). The purpose of this designation is to "provide locations for uses that support government, civic, cultural, healthy, and infrastructure aspects of the community." The proposed project involves a new operations facility to support CVSan activities which serve the community. Therefore, the project would be consistent with the land use designation for the site.

The project site is zoned Castro Valley Business District (CBD) as it in the Castro Valley Central Business District Specific Plan (Alameda County Planning Department 1993). In the specific plan, it is part of the Subarea 10. The Central Business District Subarea 10 zone allows for contractor's yards and auto-oriented businesses, and in some cases, offices including headquarters and staff support office facilities. As described above under Section 1, *Aesthetics*, the new building would comply with the maximum allowed building height for the CBD Subarea 10 land use zoning of 45 feet according to the Castro Valley Central Business District Specific Plan. For buildings above 30 feet, the Castro Valley Central Business District Specific Plan requires a Site Development Review process in which a project must demonstrate that it compliments, rather than blocks, view corridors and that it enhances rather than obscures, significant topographic features or adjacent development (Alameda County Community Development Agency 1993). The County's Site Development Review would determine if the use and physical improvements would be consistent with the development objectives of this Subarea 10 and with the general policies of the Castro Valley Central Business District Specific Plan. This process would help ensure that the project is compatible with the intended development of the site under the applicable zoning and regulations governing scenic quality, and that the project would not substantially degrade the character of its urbanized surroundings. The proposed project would be consistent with the applicable zoning requirements and with its Public Facilities General Plan land use designations. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Due to Castro Valley's long-established urban character, the community has no active mineral extraction operations. The construction associated with the proposed project would not result in a loss of available minerals (California Department of Conservation 1982). There would be no impact.

NO IMPACT

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13 Noise

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

Fundamentals of Noise

Noise is defined as unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1 to 2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while arterial streets are in the 50 to 60+ dBA range. Normal conversational levels are in the 60 to 65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

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

provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows (FTA 2018).

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses. The nearest noise sensitive receptors to the project site are mobile homes located directly adjacent to the project site's western border and single-family residences located adjacent to the site's northern border.

Existing Setting

The noise environment on the project site is dominated by vehicle noise generated from adjacent streets and I-580, which is located approximately 200 feet south of the project site.

To determine existing ambient noise levels on the project site, two 15-minute measurements (Leq [15] dBA)[2] were taken adjacent to the project site during the weekday on October 11, 2018, using an ANSI Type II integrating sound level meter (Figure 6). As shown in Table 12, the existing ambient noise levels on the site range from approximately 69 to 72 dBA Leq. Full noise measurement results are provided in Appendix D.

Table 12 Noise Measurement Results

Site	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	Leq[15] (dBA)[1]
1	Northeastern corner of the project site along Center Street	1:00 – 1:15 p.m.	40 feet[1]	72.4
2	Southern edge of the project site along Castro Valley Blvd	1:34 – 1:49 p.m.	40 feet[2]	68.7
3	Northern boundary of project site	8:10 – 8:25 a.m.	250 feet[2]	57.0
4	Southeastern corner of project site	8:30 – 8:45 a.m.	240 feet[1]	60.1

[1] Distance to centerline of Castro Valley Boulevard

[2] Distance to centerline of Center Street

[3] The equivalent noise level (Leq) is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). For this measurement, the Leq was over a 15-minute period (Leq [15]).

Source: Rincon Consultants, field measurements conducted on October 11, 2018 (measurements #1 and #2) and December 11, 2018 (measurements #3 and #4), using ANSI Type II Integrating sound level meter. See Appendix D.

[2] The equivalent noise level (Leq) is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). For this measurement, the Leq was over a 15-minute period (Leq [15]).

Figure 6 Noise Measurement Locations

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Regulatory Setting

The Alameda County General Plan Noise Element contains goals, objectives and implementation programs for the County to provide its residents with an environment that is free of excessive noise and promote noise compatibility of land uses. The noise level standard for residential land uses in the General Plan is 55 dBA Ldn for exterior noise and 45 dBA Ldn for interior noise.

The Alameda County Code of Ordinances Section 6.60 contains the County's noise ordinance. Section 6.60.040 establishes exterior noise standards at the property line of receiving land uses, as shown in Table 13. Section 6.60.040(B) states that if the measured ambient noise level exceeds the applicable noise level standard in any category then the standard should be adjusted to equal the ambient noise level. Table 14 shows ambient noise levels at the three residential property lines bordering the project site and the adjusted noise standard based on noise measurements taken in the project vicinity. Section 6.60.070(E) of the Alameda County Code exempts construction noise between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturday and Sunday. However, as stated in Section 6.60.070(G) the exemption does not apply if construction equipment is not maintained in good working order. Finally, Section 6.60.050(B)(8) of the Alameda County Code prohibits vibration that is above the vibration threshold of any individual at or beyond the property boundary of the source. A vibration level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people (FTA 2018).

Table 13 Alameda County Exterior Noise Standards

Cumulative Number of Minute in Any One-Hour Time Period	Daytime (7 AM to 10 PM)	Nighttime (10 PM to 7 AM)
Residential Uses, Schools, Hospitals, Churches, and Libraries		
30	50 dBA	45 dBA
15	55 dBA	50 dBA
5	60 dBA	55 dBA
1	65 dBA	60 dBA
Maximum (0)	70 dBA	55 dBA
Commercial Uses		
30	65 dBA	60 dBA
15	70 dBA	65 dBA
5	75 dBA	70 dBA
1	80 dBA	75 dBA
Maximum (0)	85 dBA	80 dBA

Source: Alameda County General Code, Chapter 6.60

Table 14 Adjusted Noise Level Standard

Location	Existing Noise Level (dBA Leq[15])[1]	Alameda County Ordinance Code Noise Standard (dBA Leq[15])	Adjusted Noise Standard (dBA Leq[15])	Adjusted Noise Standard (dBA Leq[30])[3]
Northern residential property line	57.0	55	57.0	52.0
Western residential property line	60.1[2]	55	60.1	55.1
Southern residential property line	60.1[2]	55	60.1	55.1

[1] See Table 8 for noise measurement results and Figure 8 for noise measurement locations.

[2] Noise measurement 4 at the southeastern corner of the project site is representative of noise on the western and southern property line because of noise characteristics on the project site.

[3] Applies a 5-dBA reduction from 15 minute standard for 30 minutes noise per Alameda County Code Section 6.60

Impact Analysis

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

Construction Noise

Construction noise was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Because a specific construction equipment list is not yet available for the project, the construction equipment list used in RCNM was generated using the CalEEMod output for the air quality and GHG analysis (see Appendix A). CalEEMod uses project characteristics, such as land use, building sizes, and lot acreage, to estimate a project's emissions and uses default equipment lists in its modeling based on empirical data. Noise was modeled based on the project's construction equipment list for each phase and distance to nearby receptors. Although the nearest noise sensitive receptors are adjacent to the project site this analysis assumes that on average construction would occur approximately 25 feet from the project boundary because on average construction equipment would not operate on the project boundary line. Table 15 identifies the maximum expected noise levels at the nearest sensitive receptors based on the combined use of construction equipment anticipated to be used concurrently during each phase of construction.

Table 15 Maximum Estimated Noise Levels by Construction Phase

Construction Phase	Equipment	Estimated Noise (dBA Leq) at 25 Feet
Demolition	Concrete saw, dozer, backhoe	91
Site Preparation	Grader, backhoe, dozer	89
Grading	Grader, backhoe, dozer	89
Building Construction	Generator, tractor, lift, crane, welders	89
Paving	Cement mixers, paver, roller, backhoe, paving equipment	91
Architectural Coating	Air compressors	80

Source: Roadway Construction Noise Model. See Appendix D for equipment noise impact data sheets.

The estimated construction noise levels shown in Table 15 do not take into account the fact that equipment is typically dispersed in various areas of the site. Due to site and equipment limitations, only a limited amount of equipment can operate near a given location at a particular time. Intervening buildings or portions of buildings between construction equipment and noise-sensitive receptors also would reduce exposure to construction noise below the levels shown in Table 15. Therefore, this analysis of construction noise impacts is conservative.

As show in Table 15, construction noise could be as high as approximately 91 dBA Leq at surrounding residential receptors approximately 25 feet from construction activity. The Alameda County Code exempts construction noise between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. through 5:00 p.m. Saturday and Sunday. Although construction noise would be perceptible at adjacent sensitive receptors, the additional noise would not be louder than typical urban construction as no major excavation or non-standard construction methods such as pile driving are proposed. Therefore, project construction would be within the range of typical construction noise for an urban area. Mitigation Measure N-1 would ensure that construction noise occurs within the hours specified in the Ordinance Code and would reduce construction-related noise at nearby sensitive receptors. Impacts would be less than significant with mitigation incorporated.

Mitigation Measure

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

N-1 Construction Noise Reduction

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

- **Construction Hours**. Construction activity shall not occur between 7:00 p.m. and 7:00 a.m. Monday through Friday and 5:00 p.m. through 8:00 a.m. Saturday and Sunday.
- **Mufflers.** During all project site excavation 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 air compressors and similar 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.
- **Disturbance Coordinator.** CVSan shall designate a disturbance coordinator who shall be responsible for responding to any local complaints about construction noise. The noise disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler) and shall require that reasonable measures warranted to correct the problem be implemented. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.
- **Additional Noise Attenuation Techniques.** During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and the residential noise sensitive receptors to the north, south, and southwest of the project boundary. Temporary sound barriers shall consist of sound blankets, other equivalent materials, affixed to construction fencing along all sides of the construction site boundary facing residential sensitive receptors.

Significance After Mitigation

With implementation of Mitigation Measure N-1, construction noise would only occur within the hours specified in the County Ordinance Code. Further, implementation of Mitigation Measure N-1 would reduce overall noise levels from construction activity. The use of manufacturer-certified mufflers associated with construction equipment has been shown to reduce noise levels by 8-10 dBA Leq (City of West Hollywood 2014). Impacts would be less than significant with mitigation incorporated.

Operational Noise

Off-site Traffic Noise

The project would generate new vehicle trips and increase traffic on area roadways. As discussed in Section 17, *Transportation*, the project would generate approximately 95 daily vehicle trips. Because there are entrances to the project site on both Castro Valley Boulevard and Center Street, it was assumed that project trips would be added to both streets. To determine existing traffic volumes along area roadways, two traffic counts were taken along Center Street at the location of NM 1 and along Castro Valley Boulevard at the location of NM 2 each over a 15-minute interval. During the 15-minute interval at NM 1 on Center Street 126 vehicles were counted and over the 15-minute interval on Castro Valley Boulevard there were 188 vehicles counted. Traffic numbers were multiplied by four to obtain an approximate hourly traffic volume of 504 vehicles along Center Street and 752 vehicles along Castro Valley Boulevard. Because hourly traffic is equivalent to up to 10 percent of daily traffic, the daily traffic volume along Center Street and Castro Valley Boulevard was estimated at approximately 5,040 and 7,520 vehicles, respectively (Precision Traffic 2018).

The proposed project's contribution to roadway noise was evaluated through a calculation by comparing existing traffic noise levels to traffic noise levels with operation of the project. Generally, a doubling of traffic (i.e., 100 percent traffic increase) would increase noise levels by approximately

3 dBA, which is the human level of perception for an increase in noise (FTA 2018). Therefore, a 10 percent increase in the number of vehicles on a roadway would result in a noise increase of approximately 0.4 dBA increase. The 95 daily trips added by the project would constitute an approximately one percent increase in traffic volume along Castro Valley Boulevard, resulting in a noise increase of less than 0.4 dBA. Such an increase would be imperceptible and would not result in a substantial permanent increase in ambient noise levels. Traffic noise would be less than significant.

On-site Equipment Noise

On-site operational noise would result in a significant impact if it would exceed the adjusted noise levels included in Table 14. The project would include the use of mechanical equipment including a Godwin pump, AMT pump, Vac-Con, Rodder, Jetter[3], and generator that may be audible at sensitive noise receptors adjacent to the project site. Table 16 shows the average noise level for each piece of equipment, as provided by the project applicant. Diesel and gasoline powered equipment listed in Table 16 would be located outside of the building and may be within 50 feet of residences to the west, north, and south of the site. The generator would be located inside an enclosure attached to the building and would be for emergency backup use only and tested on average once a month. It is assumed that the enclosure would reduce generator noise by approximately 5 dBA (FTA 2018) and generator testing would not occur at the same time as mechanical equipment maintenance. In addition, an air compressor and other air tools would be operated in the vehicle bay area. If the bay doors are closed, noise from the equipment in the vehicle bay area would be attenuated from the proposed building and would be quieter than operation of mechanical equipment outside of the building. If the bay doors are open, air compressors would generate noise at a level of approximately 80 dBA at 25 feet (see Table 15), or 74 dBA at 50 feet, which would be quieter than operation of mechanical equipment outside of the building as shown in Table 16. Therefore, this analysis focuses on the noise from mechanical equipment operating near adjacent residences. The hours of operation for equipment would vary, but would occur during working hours from 8:00 a.m. to 12:00 p.m. and from 1:00 to 4:00 p.m. The Godwin pump would be on a monthly maintenance schedule with a half hour recommended runtime and the Vac-Con would be on a monthly flow test maintenance schedule with a half hour recommended run time per vehicle. It was assumed that only one piece of equipment would be operated at a time for maintenance. Other equipment on the site would leave the yard in the morning and return in the evening for storage.

[3] These are all District vehicles that are commonly used in the field and would not be used on-site. Common noise associated with these vehicles on-site would be back-up alarms, when applicable.

Table 16 On-Site Equipment Noise Levels

Equipment	Description	Location of Equipment	Average Noise Level (dBA Leq) at 10 feet	Average Noise Level (dBA Leq) at 50 feet[1]
SSO/ER Standby Generator	2KW generator (gasoline)	Inside enclosure	85.6	66.6[2]
Godwin pump	1.6 Ls (diesel)	Outside	99.5	85.5
AMT pump	305cc B&S 1350 (gas)	Outside	98.1	84.1
Vac-Con 1	2003 CAT 7.2L (diesel)	Outside	103.0	89.0
Vac-Con 2	2017 PACCAR 8.9L (diesel)	Outside	100.0	86.0
Rodder	Hydraulic pump and motor	Outside	88.3	74.3
Jetter	HATZ motor (diesel)	Outside	98.0	84.0
Air compressor	Ingersoll Rand	Inside vehicle bay area	88.0	74.0

[1] Distance to nearest noise sensitive receptor

[2] Includes 5 dBA reduction from enclosure

Source: applicant supplied information

Conservatively assuming that one piece of equipment would be operating outside of the building for up to 30 minutes, noise from operational equipment would be as loud as approximately 89 dBA Leq at 50 feet assuming operation of Vac-Con 1. This equipment is scheduled to be retired in approximately five years. Once that equipment is retired, the loudest piece of equipment would be the Goodwin pump which has an estimated average noise level of 85.5 dBA Leq at 50 feet. Operational noise would exceed the County's noise standards; this impact would be less than significant with mitigation incorporated. Mitigation Measure N-2 would reduce operational noise levels below the standards shown in Table 14 with implementation of noise silencer and/or a sound wall (see Appendix D for equipment specifications and barrier calculations). Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measure

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

N-2 Operational Noise Reduction

One of the following operational noise reduction measures shall be implemented to reduce noise at adjacent noise-sensitive receptors:

- **Equipment Silencers.** Diesel and gasoline operated mechanical equipment that will be used outside of the maintenance building shall be equipped with silencers that reduce noise from between approximately 58 to 72 dBA at 4.5 feet. Silencers applied to equipment may include AA Series Silencers, ST Series Silencers, FA-51 Series Silencers, or other equivalent silencers; or,
- **Sound Wall Plus Equipment Silencers.** An eight-foot noise reduction barrier wall shall be constructed adjacent to noise-sensitive receptors along the northern, western, and southern property lines of the project site. The wall shall be made of any outdoor weather-resistant solid material. All gaps between barrier panels and between the barrier and ground shall be sealed. In

addition, diesel and gasoline operated mechanical equipment that will be used outside of the maintenance building shall be equipped with silencers to reduce noise by at least 29 dBA Leq at 50 feet (silencers that reduce noise from 58 to 72 dBA at 4.5 feet). Silencers applied to equipment may include AA Series Silencers, ST Series Silencers, FA-51 Series Silencers, or other equivalent silencers.

Significance After Mitigation

As explained above, it is estimated that operational activities would increase noise levels when used simultaneously at surrounding residential receptors before mitigation. Implementation of the first option under Mitigation Measures N-2 would reduce noise levels due to on site operations by requiring silencers on mechanical equipment. Silencers applied to mechanical equipment would reduce noise from machinery on the project site to approximately 58 to 72 dBA at 4.5 feet (see Appendix D). Therefore, as shown in Table 17, mechanical noise at receptors 50 feet from project operations would be reduced to approximately 37 to 51 dBA during the 30-minute maintenance period. Mechanical noise would not exceed the 52 dBA Leq[30] standard and noise generated by on-site operations would be reduced to a less than significant level with the first option under Mitigation Measure N-2.

Implementation of the second option under Mitigation Measure N-2 would reduce noise levels due to on site operations. Noise reductions from implementation of the eight-foot sound wall and silencers are shown in Table 18. Operational noise levels would be reduced to approximately 51 dBA with silencers. Operational noise levels would range from approximately 79 to 81 dBA Leq with implementation of the eight-foot sound wall. Therefore, silencers applied to mechanical equipment would further reduce noise by at least 29 dBA Leq and mechanical noise would not exceed the 52 dBA Leq[30] standard and noise generated by on-site operations would be reduced to a less than significant level with the second option under Mitigation Measure N-2.

Table 17 Noise Reductions with Mitigation from Silencers

Location	Operational Noise Level (dBA Leq[30])	Noise Reduction from Silencer (dBA)[1]	Noise Level with Silencer (dBA Leq[30])	Noise Level Threshold (dBA)
Northern residential property line	89	38	51	52.0
Western residential property line	89	38	51	55.1
Southern residential property line	89	38	51	55.1

[1] Reduction conservatively applies the lowest grade (least noise reducing) silencer that reduces noise to 72 dBA at 4.5 feet. The highest grade silencers (most noise reducing) would reduce noise by 52 dBA to 37 dBA Leq at 50 feet.

See Appendix D for silencer specifications.

Table 18 Noise Reductions with Mitigation from Sound Wall and Silencers

Location	Operational Noise Level (dBA Leq[30])	Noise Reduction from Barrier (dBA)	Noise Level with Barrier (dBA Leq[30])	Noise Reduction from Silencers (dBA)[1]	Noise Level with Barrier and Silencers (dBA Leq[30])	Noise Level Threshold (dBA)
Northern residential property line	89	9	80	29	51	52.0
Western residential property line	89	10	79	29	50	55.1
Southern residential property line	89	8[2]	81	29	52	55.1

[1] Reduction conservatively applies the lowest grade (least noise reducing) silencer that reduces noise to 72 dBA at 4.5 feet.

[2] Reduction only applies to first story of the residences. However, second story residences would not be exposed to exterior noise as the residences do not have outdoor useable space (such as balconies) on the second floor.

See Appendix D for barrier calculations.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Construction of the proposed project would intermittently generate vibration on and adjacent to the project site. Construction of the project would potentially utilize a large bulldozer during site preparation and/grading and would likely utilize loaded trucks during most construction phases and a vibratory roller during the paving phase. Table 19 shows vibration levels at the nearest sensitive receptors to project construction. It is assumed that project construction would occur on average 25 feet from receptors adjacent to the project site.

Table 19 Vibration Levels for Construction Equipment at Noise-Sensitive Receptors

Construction Equipment	Estimated VdB at Nearest Sensitive Receptors at 25 feet
Large bulldozer	87
Vibratory roller	94
Loaded truck	86

Source: FTA 2018

As shown in Table 19, noise-sensitive receptors would experience the strongest vibration of up to 94 VdB during paving with vibratory rollers. Compliance with the Alameda County Ordinance Code would restrict vibration-generating construction activity to daytime hours of between 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. through 5:00 p.m. Saturday and Sunday, outside of normal sleeping hours. However, vibration from project construction would exceed 75 VdB, which is the dividing line between barely perceptible and distinctly perceptible. Impacts would be less than significant with mitigation incorporated.

Mitigation Measure

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

N-3 Construction Vibration Mitigation

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

- Operations: keep vibration-intensive equipment as far as possible from vibration-sensitive site boundaries. Machines and equipment should not be left idling.
- Schedule vibration-intensive operations to minimize their duration at any given location. Notify adjacent noise sensitive receptors at surrounding residences in advance of performing work creating unusual noise and schedule such work at times mutually agreeable between nearby residential receptors and CVSan as determined by a stakeholder meeting with the receptors.
- Whenever practical, the most vibration-intensive construction operations shall be scheduled to occur together in the construction program to avoid continuous periods of vibration.

Significance After Mitigation

Construction activities would contribute intermittent vibration on and adjacent to the project site. Implementation of Mitigation Measure N-3 would ensure that vibration levels at sensitive receptors would be reduced to a level below the perceptibility threshold for vibration. This measure would reduce the potentially significant impact due to construction vibration to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

As discussed in Section 9, *Hazards and Hazardous Materials*, the nearest airport to the project site is the Hayward Executive Airport, located approximately 3.8 miles to the southwest. The project site is not located within the Hayward Executive Airport Influence Area and is located outside the existing noise level contours for the airport (Alameda County Airport Land Use Commission [ALUC] 2012). Therefore, the project would not subject workers at the site to excessive noise and there would be no impact.

NO IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Impact Analysis

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

The proposed project does not involve development of new housing. Implementation of the project would not affect residential growth and would not directly add residents to the Castro Valley community. The proposed project would accommodate approximately 15 staff members at the site. The addition of these employees would not result in substantial population growth; the positions are expected to be filled primarily through relocation of existing CVSan employees currently working at other locations. Therefore, no substantial unplanned growth would be generated from the proposed project, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site includes a one-story, two-bedroom house located south of the existing warehouse structure. While it appears the original purpose of the building was to serve as a residence, Caltrans used it as workshop and office space for many years and was not used for residential purposes (Alameda County Community Development Agency 2016). Construction activities proposed for the project site do not involve the demolition or displacement of housing. No impact would occur.

NO IMPACT

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15 Public Services

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

Impact Analysis

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

The Alameda County Fire Department provides fire protection, paramedic service, and hazardous materials response to the Castro Valley area. Under the Alameda County Mutual Aid Plan, Hayward, and Union City Fire Departments also respond to incidents with alarm levels of 2 or higher. In addition, the Fremont Fire Department, Hayward and Union City provide mutual aid for wildland fires. The project site is located approximately 0.8 mile southwest of Station 6 at 19780 Cull Canyon Road. This fire station houses an engine and patrol unit and responds to all of the canyon areas and the eastern areas in Castro Valley (Alameda County Fire Department 2018).

The proposed project involves the construction of new facilities including vehicle storage and office space. Project operations would require onsite storage of hazardous materials associated with vehicle maintenance. Some materials such as fuels, oils and lubricants used for vehicle maintenance could increase fire risk at the project site through improper storage or use. Because the Alameda

County Fire Department already provides hazardous materials response to the project area, the fire protection facilities and infrastructure required to protect the existing facilities are in place.

The project would accommodate 15 employees at the project site, and therefore may incrementally increase the demand for fire or medical services. However, as this would constitute a minimal increase in population over existing conditions, no additional fire fighters would be required to maintain existing service levels. The project would be required to comply with County requirements for fire access and on-site fire prevention facilities (e.g. fire hydrants and sprinkler systems). As described under Section 11, *Land Use and Planning,* and Section 14, *Population and Housing,* the proposed project would be consistent with the General Plan's PF land use designation and would not generate substantial population growth. Therefore, the proposed project would not place an unanticipated burden on fire services or affect response times or service ratios such that new or expanded fire facilities would be needed. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Alameda County's Extended Police Protection County Service Area (CSA), administered by the County Sheriff's Office, supplements funding for police services in unincorporated areas of the county. The County Sheriff provides dispatch emergency services from its center on Foothill Boulevard in San Leandro, which receives 911 calls and dispatches patrols from the Eden Township Substation on 150th Avenue in San Leandro. Average response times for the Sheriff's Office are 11:48 minutes for calls requiring an immediate emergency response and 17:13 for non-emergency calls requiring an urgent response. There are 198 sworn officers assigned to the Eden Township substation in San Leandro, which serves Castro Valley. The proposed project involves the construction of new facilities and associated vehicle storage and office space. The proposed project would accommodate 15 employees at the project site, and therefore may incrementally increase the need for police services. However, as this would constitute a minimal increase in population over existing conditions, no additional police officers would be required to maintain existing service levels. The project would not require the construction or expansion of police protection facilities beyond those already planned under General Plan assumptions. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is located in the Castro Valley Unified School District. The nearest schools to the project site are Marshall Elementary School and Creekside Middle School, located approximately 0.3 mile to the northwest and 0.4 mile to the north, respectively. The project does not include residential development and would not directly or indirectly add a substantial population to Castro Valley. Therefore, the project would not generate substantial numbers of new students, and thus would not require new schools or expansion of existing schools.

NO IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Castro Valley has approximately 322 acres of local (neighborhood) and community parks owned and operated by the Castro Valley Unified School District, the Hayward Area Recreation and Park District, and the East Bay Regional Park District. This averages about 5.35 acres of local and community parkland for every 1,000 residents. The nearest recreation facilities to the project site are in the Don Castro Regional Recreational Area, approximately 0.4 mile to the southeast of the project site, across I-580. Don Castro Regional Recreation Area includes wildlife areas, hiking/walking trails and lagoon for public swimming.

As discussed above and in Section 14, *Population and Housing*, the proposed project would not add substantial population to the Castro Valley community. Therefore, the proposed project would not substantially increase demand for recreational resources. There would be no impact.

NO IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

As discussed above and in Section 14, *Population and Housing*, the proposed project would not add substantial population to the Castro Valley community. Therefore, the proposed project would not substantially increase demand for other public facilities and resources. Impacts would be less than significant. Impacts to stormwater, wastewater, and water facilities are discussed in Section 19, *Utilities and Service Systems.*

LESS THAN SIGNIFICANT IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

Existing Setting

The project site is located in a suburban area in Castro Valley, a community in unincorporated Alameda County. The nearest recreational facilities are in the Don Castro Regional Recreational Area, approximately 0.4 mile to the southeast of the project site, across I-580. The Don Castro Regional Recreation Area includes wildlife areas, hiking/walking trails and a lagoon for public swimming.

Impact Analysis

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

As discussed in Section 14, *Population and Housing*, the proposed project would not include construction of residences or otherwise result in a substantial population increase and would therefore not increase the use of parks or other recreational facilities such that substantial physical deterioration would occur. There would be no impact.

NO IMPACT

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. There would be no impact.

NO IMPACT

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17 Transportation

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

Impact Analysis

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

The proposed project would generate additional trips to and from the project site and would result in an increase in vehicle trips compared to current conditions. CVSan anticipates that once the project is operational there would be approximately 60 to 80 daily vehicle trips to and from the project site. Additional calculations using the trip generation rates for Corporate Headquarters land use from the Institute of Transportation Engineers (ITE) *9th Edition Trip Generation Manual* were performed to provide a conservative estimate of vehicle trips to and from the project site under project conditions. Table 20 shows the estimated trip generation from the proposed project based on trip generation rates provided by the ITE.

Table 20 Estimated Project Vehicle Trip Generation

Land Use	Square Feet	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Corporate Headquarters[1]	19,795	158	28	2	30	3	25	28

[1] Trip generation rates from ITE *Trip General Manual, 9th Edition*, land use category 714 (Corporate Headquarters).

As shown in Table 20, based on ITE trip rates the proposed project would generate up to approximately 158 daily trips including 30 AM peak hour trips and 28 PM peak hour trips. The primary roadways that would be affected are Center Street and Castro Valley Boulevard. Center Street is a two-lane residential street, while Castro Valley Boulevard is a four-lane road designed to carry relatively high levels of vehicle traffic. The modest number of new trips associated with the proposed project does not warrant a detailed traffic study and would not significantly alter the area's transportation network and operations. Alameda County does not require transportation impact analyses for projects generating fewer than 100 PM peak hour trips. The proposed project would generate approximately 28 PM peak hour trips. According to Alameda County's Castro Valley General Plan, Castro Valley Boulevard has an estimated average daily traffic volume of approximately 21,100 typical of arterial roadways in the area, while Center Street average daily traffic volume along Center Street is approximately 11,400 (Alameda County Community Development Agency 2012). The proposed project's additional up to 158 daily trips would generate a 0.7 percent increase in traffic along Castro Valley Boulevard and a 1.4 percent increase over existing conditions along Center Street. This is assuming that all new trips would occur along one of the streets alone, which would most likely not be the case. Due to the minimal increase in daily trips over existing traffic volumes, the proposed project would not create conflicts with applicable plans, ordinance, or policies related to Castro Valley's circulation system.

As the Congestion Management Agency (CMA) for Alameda County, the Alameda County Transportation Commission (ACTC) is responsible for establishing, implementing, and monitoring the County's Congestion Management Program (CMP). Through its implementation of the CMP, the ACTC works to ensure that roadways operate at acceptable levels of service (LOS) and reviews development proposals to ensure that transportation impacts are minimized. The additional trips from the proposed project would not create conflicts with Alameda County CMP impact criteria.

Although the County does not require traffic queuing impact analyses for projects generating fewer than 100 PM peak hour trips; it is assumed that due to low traffic volumes, cars turning from both Castro Valley Boulevard and Center Street would be accommodated with existing turn capacity. Particularly those cars turning left from Center Street into the project site's parking area would be permitted to turn due to the existing "Keep Clear" markings at the Center Street entrance. By maintaining this access and street marking, impacts related to congestion and traffic flow would be less than significant.

Additionally, the proposed project would not conflict with adopted policies, plans, or programs regarding alternative transportation as the project does not include alterations to existing bike access, pedestrian pathways, or transit routes. Because the proposed project construction and operations would be contained within the boundary of the project site no changes to the existing transportation policies, plans, or programs would result, either directly or indirectly, from development on the project site. In addition, the proposed project would not involve the obstruction, removal or relocation of, or excessive additional demand for, existing transit, pedestrian, or bicycle facilities. Therefore, impacts would be less than significant.

As the Congestion Management Agency (CMA) for Alameda County, the Alameda County Transportation Commission (ACTC) is responsible for establishing, implementing, and monitoring the County's Congestion Management Program (CMP). Through its implementation of the CMP, the ACTC works to ensure that roadways operate at acceptable levels of service (LOS) and reviews development proposals to ensure that transportation impacts are minimized.

As shown in Table 20, the proposed project would generate up to 158 daily trips. The additional trips from the proposed project would not create conflicts with Alameda County CMP impact

criteria. The County does not require transportation impact analyses for projects generating fewer than 100 PM peak hour trips; the proposed project would generate approximately 28 PM peak hour trips. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Section 15064.3(c) states that the requirement to use these criteria only applies on and after July 1, 2020. Although a lead agency may elect to apply the criteria in Section 15064.3(b) sooner, CVSan has not adopted these criteria as of the date of this Initial Study. Therefore, this section does not apply to the proposed project or the analysis in this Initial Study.

LESS THAN SIGNIFICANT IMPACT

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

Project implementation would occur on the existing parcels and would not alter or affect existing street and intersection networks. The proposed project would be required to comply with Alameda County's street standards for vehicular access and circulation, including fire and emergency access. Compliance would prevent hazardous geometric design features and would ensure adequate and safe site access and circulation. The proposed project involves placing CVSan's operations and engineering facility on a site designated for public facility uses and historically supporting similar uses under prior Caltrans ownership, and would not introduce an incompatible use. There would be no impact.

NO IMPACT

d. Would the project result in inadequate emergency access?

The project site is directly accessible from Center Street and Castro Valley Boulevard. The proposed project would be required to comply with all building, fire, and safety codes, and specific development plans would be subject to review and approval by the County's Public Works Agency and the Alameda County Fire Department. Required review by these departments would ensure the circulation system for the project site would provide adequate emergency access. In addition, the proposed project would not require temporary or permanent closures to roadways. There would be no impact.

NO IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	■	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe.	☐	■	☐	☐

Regulatory Setting

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

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

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

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

No tribes have requested to be notified of projects proposed by CVSan; thus, a contact list was requested from the Native American Heritage Commission (NAHC) for the purposes of initiating AB 52 consultation. CVSan mailed notification letters to the six tribes listed by the NAHC on October 29, 2018. Under AB 52, tribes have 30 days to respond and request consultation. Over 30 days have elapsed since the notification letters were sent and no tribes requested AB 52 consultation with CVSan.

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

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1?

CVSan sent notification letters in accordance with AB 52 on October 29, 2018 and no tribes requested AB 52 consultation with CVSan.

Although no tribal cultural resources are expected to be present on-site, there is the possibility of encountering undisturbed subsurface tribal cultural resources. The proposed excavation of the project site could potentially result in significant impacts on unanticipated tribal cultural resources. Mitigation Measure TCR-1 identified below would reduce impacts on unidentified tribal cultural resources to a less than significant level.

Mitigation Measure

TCR-1 Unanticipated Discovery of Tribal Cultural Resources

In the event that cultural resources of Native American origin are identified during construction, all earth-disturbing work in the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource in accordance with Mitigation Measure CR-2 and an appropriate Native American representative, based on the nature of the find, is consulted. If CVSan, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the

resource in coordination with the archeologist, if applicable, and the appropriate Native American tribal representative.

Significance After Mitigation

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

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

Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As described in Section 10, *Hydrology and Water Quality*, the proposed project would not require new or expanded water supply entitlements or facilities, and existing drainage patterns would be maintained to the maximum extent feasible, such that adverse impacts related to water supply requirements and stormwater drainage would not occur.

Water quality in the State of California is regulated by the SWRCB and the nine RWQCBs. Castro Valley is located in the jurisdiction of the San Francisco Bay RWQCB. Section 303(d) of the CWA requires that states identify water bodies including bays, rivers, streams, creeks, and coastal areas that do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting established water quality standards. A TMDL requires that all sources of pollution and all aspects of a watershed's drainage system be reviewed and set forth action plans that examine factors and sources adversely affecting water quality and identify specific plans to improve overall water quality and reduce pollutant discharges into impaired water bodies.

The project would connect to the CVSan sewer system. Sanitary sewage from the CVSan system is treated at the Oro Loma/Castro Valley Water Pollution Control Plant (Alameda County Community Development Agency 2007). The treatment facility discharges into the San Francisco Bay through pipelines operated by the East Bay Dischargers Authority under a permit with the RWQCB. Since the Oro Loma Plant is considered a publicly-owned treatment facility, operational discharge flows treated at the plant would be required to comply with applicable water discharge requirements issued by the RWQCB. Compliance with conditions or permit requirements established by the County as well as water discharge requirements outlined by the RWQCB would ensure that wastewater discharges coming from the project site and treated by the Oro Loma system would not exceed applicable RWQCB wastewater treatment requirements and would not result in the construction of new wastewater treatment facilities or the expansion of existing facilities.

The project site is located in an urban area within the CVSan boundaries. Utility infrastructure would not require significant improvements other than infrastructure to service the proposed facility. The project is consistent with the General Plan's PF land use designation and would not generate growth beyond that anticipated in the General Plan. The Environmental Impact Report (EIR) for the Castro Valley General Plan found that there was adequate capacity at the Oro Loma Plant to serve development under the General Plan (Alameda County Community Development Agency 2007). Therefore, there is adequate capacity at the Oro Loma Plant to service the project and no expansion of the plant would be required (Alameda County Community Development Agency 2007). Impacts would be less than significant.

The proposed project would not substantially alter existing hydrological conditions on the project site. The project site is entirely paved with either concrete or asphalt and would continue to be mostly covered in impervious surfaces under project conditions. Therefore, resultant stormwater runoff volumes would not substantially change as a result of the project. All site runoff would be directed to the existing municipal storm drainage system, which was designed to accommodate flows resulting from buildout in the project area. The proposed project would be subject to local policies requiring that post-construction runoff volumes be less than or equal to preconstruction volumes (MS4 C.3, discussed further in Section 10). Therefore, expansion of the existing stormwater collection system is not required. Therefore, impacts would be less than significant.

As discussed under Section 6, *Energy*, the proposed project would not require new or substantially revised electrical power facilities. In addition, neither construction nor operation and maintenance of the proposed facility would require new or revised natural gas or telecommunications facilities.

LESS THAN SIGNIFICANT IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The proposed project would receive its water from EBMUD, which is primarily drawn from the Mokelumne River in the Sierra Nevada Mountains, but also relies on runoff from local watersheds and storage in reservoirs. EBMUD provides water for residential, commercial, industrial, governmental, and fire suppression uses. EBMUD has planned recycled water projects and water conservation programs in place to address future supply insufficiency (EBMUD 2015).

EBMUD's 2015 Urban Water Management Plan (UWMP) provides an overview of EBMUD's water supply sources and usage, recycled water and conservation programs and is part of EBMUD's long range planning to ensure water service reliability for EBMUD customers, especially during multiple-year drought periods. The UWMP determined that while planning for long term improvements to facilities, EBMUD does not anticipate the need for new or expanded facilities to provide water to new development (assuming typical, non-anomalous water needs) in the built-out areas of Castro Valley, which would include the Central Business District, and thus the project site.

As determined in EBMUD's UWMP, there is adequate water supply available to serve anticipated growth in Castro Valley. The project is consistent with the General Plan's PF land use designation and would not generate growth beyond that anticipated in the General Plan. Therefore, there would be sufficient potable water supply to accommodate the anticipated demand increases resulting from the project. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Currently, solid waste, organics, and recyclable material collection, processing, and disposal is managed by the CVSan under contract with Waste Management, Inc. (WMI). Solid waste is transported to the Davis Street Transfer Station and eventually to the Altamont Landfill. In July 2019, CVSan's will begin contracting with Alameda County Industries (ACI) to be the franchise hauler for organic and recyclable material for areas under CVSan jurisdiction, including the project site. However, municipal solid waste would still be hauled by WMI and transported to the Davis Street Transfer Station and eventually to the Altamont Landfill. The Altamont Landfill processes approximately 1,500,000 tons of solid waste per year and has a remaining permitted capacity of 42.4 million tons (WMI 2014). The Altamont Landfill has a permitted 2.5-year capacity left in its fill area and is in the process of constructing a permitted additional fill area which will have 40-year capacity. According to the Castro Valley General Plan, the Altamont Landfill has the capacity to serve planned growth in Castro Valley, which includes infill development of the Central Business District, through 2025 (Alameda County Community Development Agency 2007).

AMC Chapter 4.38 (Construction and demolition debris management) requires that county projects meet requirements of at least 50 percent of the total debris generated by a project being diverted from a landfill via reuse or recycling.

Given the available capacity at the landfill, the incremental additional of solid waste generated by the proposed facility would not cause the facility to exceed its daily permitted capacity. In addition,

implementation of CVSan's recycling programs, including construction debris, would further reduce solid waste generation. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

20 Wildfire

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

Impact Analysis

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is located on a former Caltrans operated site in Castro Valley at the intersection of Castro Valley Boulevard and Center Street. Undeveloped wildland areas are not located within proximity to the project site. Additionally, according to CalFire the project site is not located in a "Fire Hazard Severity Zone" or "Very High Hazard Severity Zone" for wildland fires (CalFire 2007, 2008). Therefore, the project site is not located near a state responsibility area or classified as having a high fire hazard.

As discussed in Section 15, *Public Services*, the Alameda County Fire Department provides fire protection and emergency response services for the project site and the surrounding Castro Valley area. In addition, the Fremont Fire Department, Hayward and Union City provide mutual aid for

wildland fires. The Castro Valley General Plan addresses emergency response plans and evacuations under the Public Services and Utilities chapter (Alameda County Community Development Agency 2012). Construction of the proposed project would maintain emergency access to the site and on area roadways and would not interfere with any emergency response plan or evacuation route as described in the Castro Valley General Plan. No impact would occur.

NO IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Castro Valley is on the eastern side of the San Francisco Bay and is characterized by a centralized location with the Bay to the west and hills on the far eastern edge of the community. The project site and the surrounding area in Castro Valley is relatively flat. Prevailing winds in Castro Valley are generally westerly to northwesterly (California Air Resources Control Board 1984). Westerly to northwesterly prevailing wind means that winds generally move across the Castro Valley from the west to the east, from the Bay toward the hillside area to the east. The project site and surrounding area is not at risk to high windspeeds or slopes that may exacerbate wildfire risk.

There are no streams or rivers located on or adjacent to the project site, and the project site and surrounding areas are not at high risk of downslope or downstream flooding or landslides. The project site is located in an urbanized area and is not located in a high fire hazard severity zone (CalFire 2008). Therefore, wildfire risks would not be exacerbated and risks to people or structures due to runoff, post-fire slope instability, or drainage changes would not occur. Employees and visitors of the project site would not be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

NO IMPACT

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project site is located in an urbanized area and is not located in or near a state responsibility area or land classified as a very high fire hazard severity zone (CalFire 2008). The project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk. The project site would be adequately served by existing facilities and utilities. Temporary or ongoing impacts to the environment due to facilities that may exacerbate fire risk would not occur.

NO IMPACT

21 Mandatory Findings of Significance

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

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

Based on the information and analysis provided in this Initial Study, with implementation of the mitigation measures identified in this Initial Study the proposed project would not do any of the following: substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of California history or prehistory. Cultural resources, which illustrate examples of California history and prehistory, are discussed in Section 5, *Cultural Resources*, and Section 18, *Tribal Cultural Resources*. Mitigation

measures CUL-1, CUL-2, and TCR-1 have been designed to reduce potential impacts of disturbing archaeological and tribal cultural resources and human remains. Biological resources are addressed in Section 4, *Biological Resources*. With Mitigation Measure BIO-1 related to nesting birds, the project would not substantially reduce wildlife habitat or population. Based on the ability of the identified mitigation measures to reduce potential impacts to less than significant levels, the proposed project's impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Cumulative impacts associated with some of the resource areas are addressed in the individual resource sections above, including Air Quality, Greenhouse Gases, Water Supply, and Solid Waste (CEQA Guidelines Section 15064[h][3]), and would be less than significant. Some of the other resource areas were determined to have no impact in comparison to existing conditions and therefore would not contribute to cumulative impacts, such as Mineral Resources and Agricultural Resources. As such, cumulative impacts in these issue areas would also be less than significant (not cumulatively considerable). The proposed project would incrementally increase traffic compared to existing conditions. However, due to the low volume of traffic generated by the project, the project would not significantly contribute to cumulative impacts to nearby roadways. The project involves development of an operations and engineering building to support CVSan's operations and would be consistent with the County's General Plan designation and density for the site. The proposed project would not result in a significant contribution to cumulatively considerable impacts.

LESS THAN SIGNIFICANT IMPACT

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

Effects to human beings are generally associated with aesthetics, air quality, noise, traffic safety, and hazards. As discussed in this Initial Study, implementation of the proposed project would result in less than significant environmental impacts with respect to these issue areas with mitigation incorporated. Mitigation Measure AES-1 discussed in Section 1, *Aesthetics*, would reduce light impacts that would impede nighttime views and degrade visual quality for local residents. Mitigation measures N-1, N-2, and N-3 discussed in Section 13, *Noise*, would ensure that construction and operational noise impacts as well as impacts due to onsite vibration are less than significant which would reduce exposure and health risks to nearby sensitive receptors. In addition, Mitigation Measures HAZ-1 through HAZ-4 would reduce impacts associated with LBP, ACM, and subsurface contaminants for construction workers, and nearby residents to a less than significant level. With mitigation, the project would not cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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