CITY OF ALAMEDA, CALIFORNIA

McKay Wellness Center
(Alameda Federal Center Reuse Project)

INITIAL STUDY &
MITIGATED NEGATIVE DECLARATION

SEPTEMBER 2018

Douglas Herring & Associates
Environmental, Policy, and Planning Services

ENVIRONMENTAL ANALYSIS

Initial Study

1. Project Title:	McKay Wellness Center
2. Lead Agency Name and Address:	City of Alameda 2263 Santa Clara Avenue, Room 190 Alameda, CA, 94501
3. Contact Person and Phone Number:	Andrew Thomas, 510-747-6881 athomas@alamedaca.org
4. Project Location and Address:	West side of McKay Avenue Address: 620 Central Avenue Alameda, CA 94501
5. Project Sponsor's Name and Address:	Doug Biggs, Executive Director Alameda Point Collaborative DBiggs@apcollaborative.org
6. General Plan Designation(s):	Federal Facilities
7. Zoning:	Administrative Professional with a Government Combining District

8. Description of Project:

The proposed project is a General Plan amendment to change the General Plan designation for the subject property from "Federal Facilities" to "Office" to conform to the underlying Administrative Professional (AP) Zoning District designation for the property. The project also includes a Zoning Map amendment to remove the Government Combining District designation ("G –Overlay") from the property to reflect the removal of the "Federal Facilities" General Plan designation and allow for private use and redevelopment of 3.65 acres of former Federal land located at 620 Central Avenue by the Alameda Point Collaborative for the purposes of providing services to formerly homeless individuals and families. The site location is shown on Figure 1 and the context of surrounding development is shown on Figure 2.

The property is currently developed with 79,880 square feet of space within eleven (11) vacant structures, which were constructed in 1942 to support a training facility and barracks for the US Maritime service during World War II. An aerial view of the site is shown on Figure 3.

The Alameda Point Collaborative plans to rehabilitate four of the existing buildings and site areas and demolish and rebuild one building to provide approximately 81,000 square feet of space for:

- 90 units of senior housing,
- a 50 bed 22,950 square foot medical respite center,
- a 1,000 square foot Resource Center, and
- a 7,000 square foot Primary Care Clinic.

The proposed site plan is shown on Figure 4. Table 1 describes the proposed programs that would be provided at the site and Table 2 shows the proposed allocation of space to the various uses.

Table 1: Summary of Programs

Program	Scope	Persons Served
Senior Housing	90 units	Medically fragile and aging adults experiencing homelessness in Alameda County who need a safe home to age in dignity and access to health care and other services
Medical Respite	50 beds	Individuals experiencing homelessness in Alameda County who are being discharged from hospitals or identified in other medical settings as in need of recuperative care
Resource Center	Support Center—local residents	City of Alameda residents who are homeless
Primary Care Clinic	On-site clinical care	Senior Housing residents, Medical Respite patients, and Resource Center clients

Source: Firstcarbon Solutions

Table 2: Proposed Uses and Associated Square Footage, by Building

Proposed Building	Number of Floors	Proposed New Use	Gross Square Feet[a]	Total
FQHC (Within Building 1 footprint)	1	Resource Center	1,000	8,000
		Medical and Behavioral Clinic	7,000	
Medical Respite (Within Building 1 footprint)	2	Medical Respite (50-beds)	22,800	22,950
Building 2A	2	20 units Senior Housing	8,673	8,673
Building 2B	2	20 units Senior Housing	8,755	8,755
Building 2C	2	20 units Senior Housing	9,119	9,119
Building 2D	2	30 units Senior Housing 2 units Resident Managers	23,768	23,768
Total proposed building area				81,115 square feet

Note:
[a] Square footage rounded to the nearest whole number.
Source: APC, 2018.

Source: Firstcarbon Solutions

The existing 93 parking spaces would be reduced to 85 spaces. One office building and four existing accessory buildings would be removed, and a new approximately 33,500-square-foot medical clinic, respite center, admin and resource center would be constructed within the footprint of the demolished office building. The project would reduce the amount of impervious surfaces on the site and result in a total of 26,290 square feet of new open space on the property.

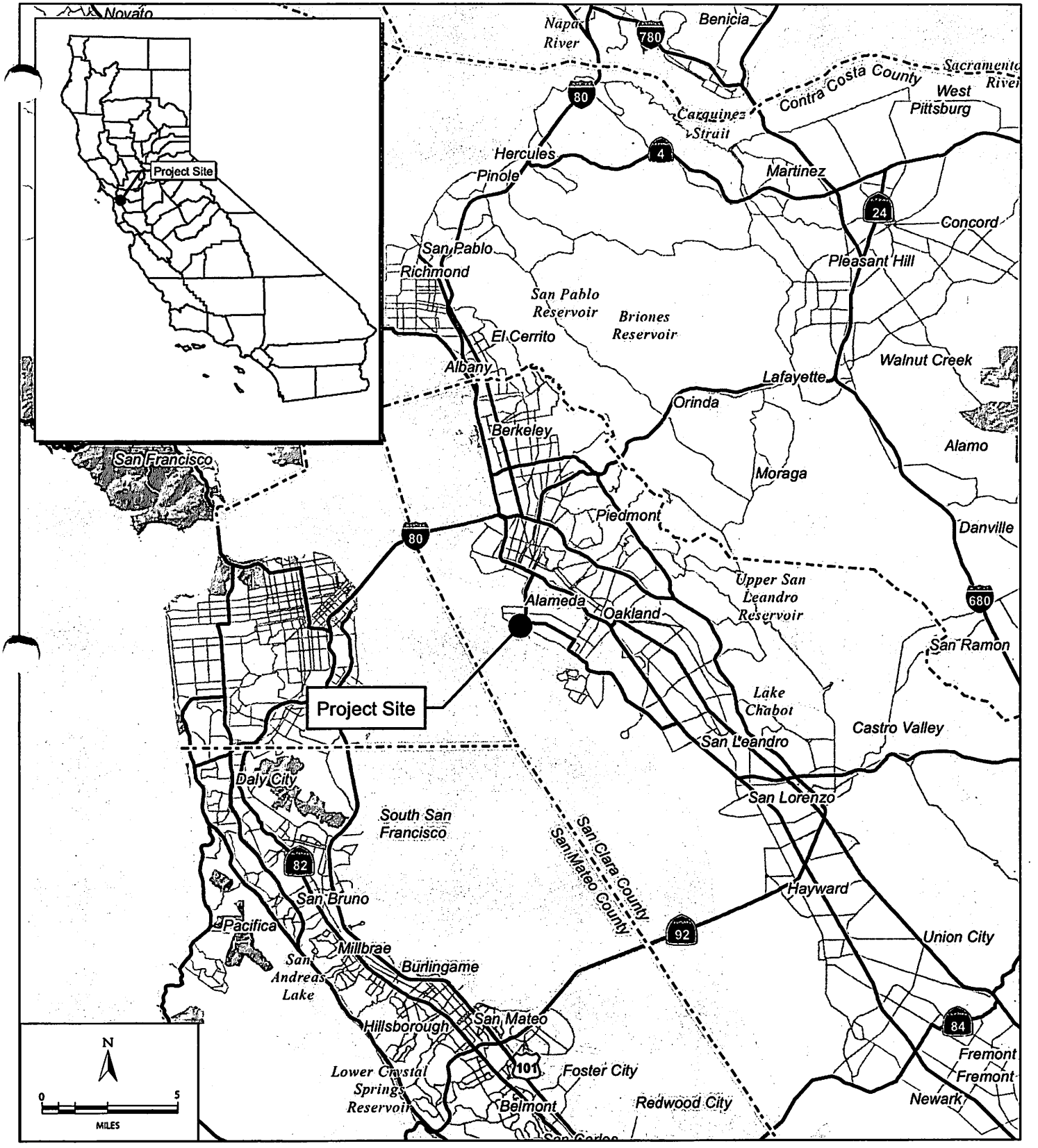

Figure 1

Regional Location Map

Source: Firstcarbon Solutions

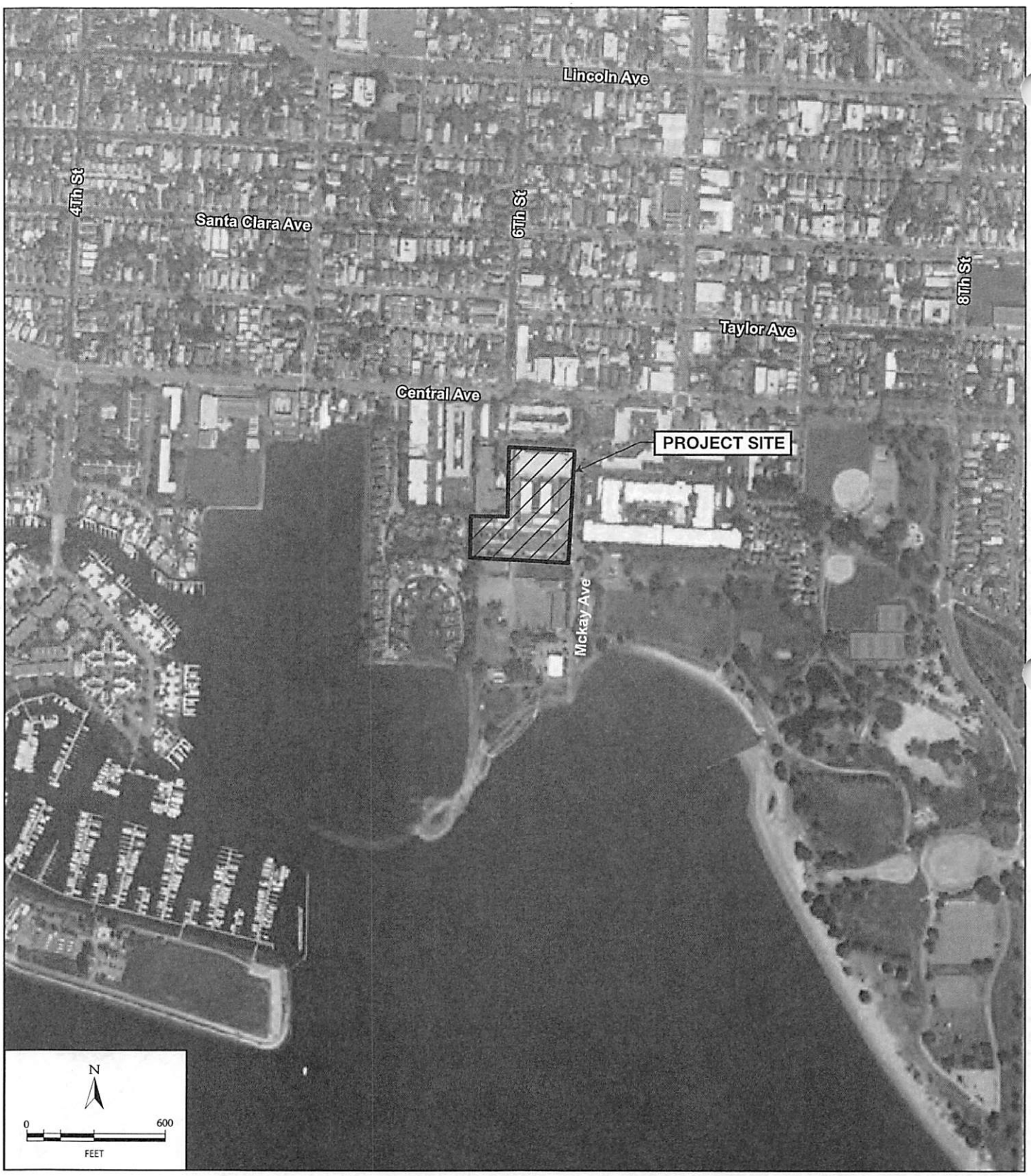

Figure 2

Aerial Overview of Project Site and Surroundings

Source: Firstcarbon Solutions

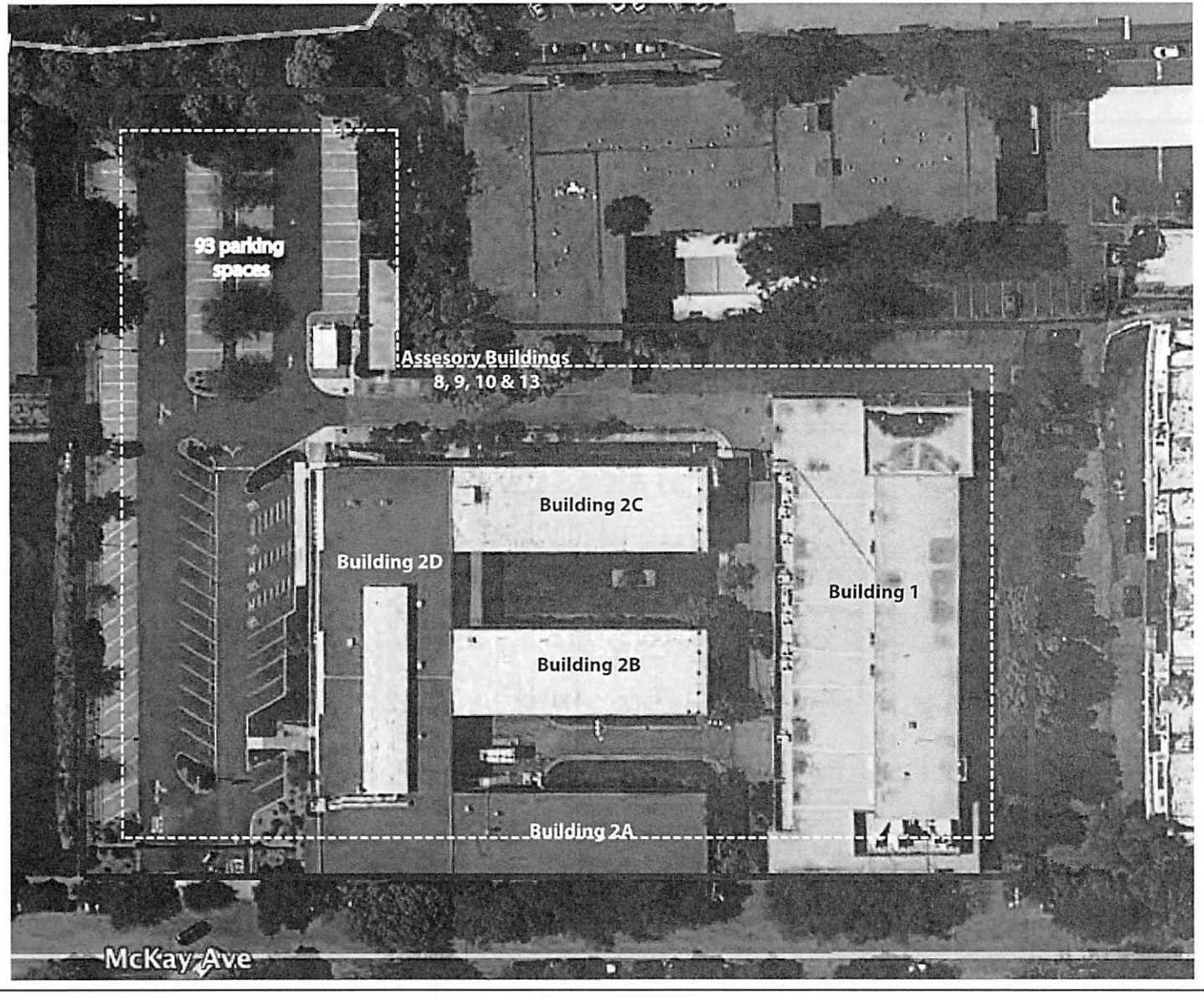

Figure 3

Aerial Overview of Project Site

Source: Firstcarbon Solutions

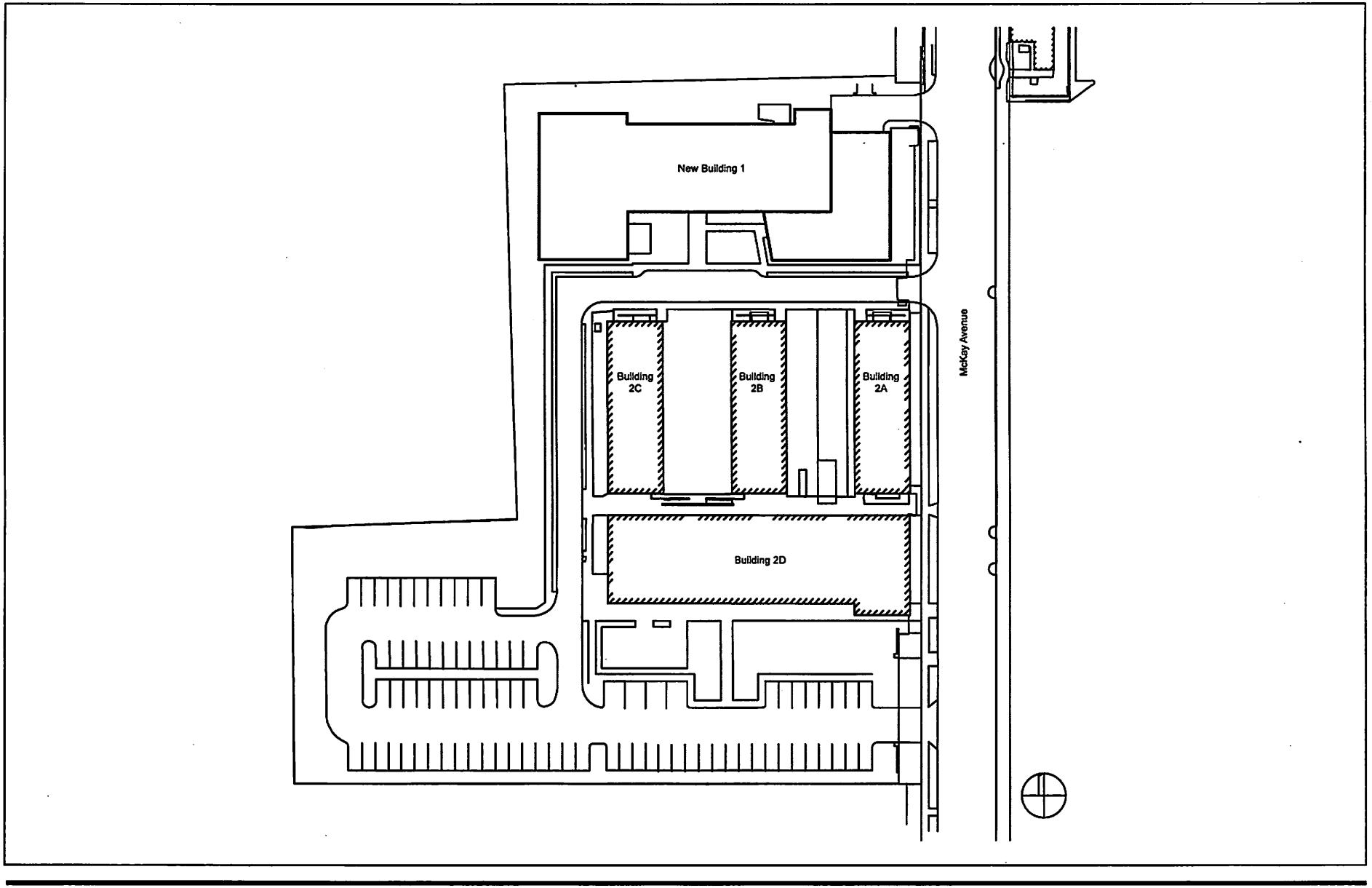

Figure 4

Proposed Site Plan

Source: Firstcarbon Solutions

9. Surrounding Land Uses and Setting. (Briefly describe the project's surroundings.)

The project site is located in the City of Alameda in Alameda County, California. The site is situated on the west side of McKay Avenue, approximately 200 feet south of Central Avenue and approximately 450 feet north of the City's southern waterfront.

Multifamily residential uses border the project site to the west, north, and east. A former federal building and associated parking to the south of the site is being redeveloped for parking and park services.

Crown Memorial State Beach is approximately 475 feet southeast of the project site, across from McKay Avenue.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

Regional Air Quality Management District, East Bay Municipal Utility District.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

As discussed in Section 17, letters requesting consultation were mailed to eight tribal representatives identified by the Native American Heritage Commission. No response has been received to date.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

☐ 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 in 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 "potentially significant unless mitigated" 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 potentially 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.

Signature _____ Date _____

Signature _____ Date _____

Environmental Checklist

Aesthetics

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
1. AESTHETICS — 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) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Discussion

The proposed General Plan and Zoning Amendments and adaptive reuse and reconstruction of existing buildings would not have an adverse impact on any existing scenic vistas. Existing buildings would be retained and new buildings would replace existing buildings and reflect existing building sizes and locations.

The site is not on a State scenic highway.

The existing visual character of the site would be largely unchanged or improved by the rehabilitation of the existing vacant buildings.

Existing lighting would be maintained. New lighting would meet standard City of Alameda requirements.

All exterior improvements and new building designs are subject to review and approval of a Design Review application by the City of Alameda Planning Board.

References

Agricultural and Forest Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
2. AGRICULTURAL AND FOREST RESOURCES — In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:**				
a) Convert Prime Farmland, Unique Farmland, or 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) 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?	☐	☐	☐	☒

Discussion

The site does not include any farmland or forests. The project site and all surrounding lands are designated "Urban and Built-Up Land" by the Department of Conservation (DOC), a department of the California Resources Agency.[1]

[1] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, "Alameda County Important Farmland 2010" (map), April 2011.

Air Quality

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a) **Conflict with an air quality plan:** The Bay Area Air Quality Management District (BAAQMD) is the air quality agency with jurisdiction over the Bay Area. It is responsible for monitoring regional air quality, developing regional clean air plans, responding to citizen air quality complaints, and authorizing permits for most types of stationary sources in the San Francisco Bay Area. According to BAAQMD, if project review is conducted in accordance with the BAAQMD CEQA Guidelines and is not found to have any unavoidable significant air quality impacts, a project is typically assumed by the Air District to comply with the Clean Air Plan and with the Ozone Strategy, the applicable air quality plans. Since the project is not anticipated to result in any unavoidable significant air quality impacts, as discussed in Section III(b), below, the project would not conflict with the Clean Air Plan or Ozone Strategy.

b) **Violate an air quality standard:** For most types of development projects in the San Francisco Bay Area, there is potential for an applicable air quality standard to be exceeded during two phases of project implementation: 1) during construction of the project, and 2) during operation of the project following completion of construction. The BAAQMD treats these two phases separately and differently, as described below. However, the same air quality standards and the same thresholds of significance apply to both construction-related and operational emissions of criteria air pollutants. BAAQMD's CEQA Air Quality Guidelines establish the following thresholds of significance for criteria air pollutant emissions: 54 pounds per day (lb./day) for reactive organic gases (ROG), fine particulate matter equal to or less than 2.5 microns ($PM_{2.5}$), and nitrogen oxides (NO_x); and 82 lb./day for respirable particulate matter equal to or less than 10

microns (PM_{10}). On an annualized basis, these thresholds are 10 tons per year for ROG, NO_x, and $PM_{2.5}$). The annual threshold for PM_{10} is 15 tons.

Construction Emissions

Construction activities associated with development of the proposed project would include demolition of existing buildings and pavements, site preparation, grading, new building construction, interior renovations and construction of new partitions, and applying architectural finishes. Construction-related activities on- and offsite would generate air pollutant emissions. On-site emissions would consist principally of exhaust emissions from the heavy-duty off-road construction equipment and motor vehicle operation. Particulate Matter (PM_{10}) is of concern during construction because of the potential to emit fugitive dust during earth-disturbing activities (construction fugitive dust). Off-site emissions would consist primarily of motor vehicle exhaust associated with delivery vehicles and heavy-duty trucks, construction worker commuting, and associated road dust. The BAAQMD does not recommend a numerical threshold for fugitive, dust-related particulate matter emissions. Instead, BAAQMD bases the determination of significance for fugitive dust on a consideration of control measures that a project would implement. These measures are generally recommended for all projects regardless of their level of emissions with respect to significance thresholds. If all recommended and appropriate measures are implemented to reduce fugitive particulate matter dust emissions, then fugitive dust emissions during construction are considered less than significant.

The BAAQMD CEQA Air Quality Guidelines include both construction and operational screening criteria for purposes of determining whether a proposed development project has the potential to exceed its adopted thresholds of significance. Thresholds are provided for a wide range of different land use types. The BAAQMD significance thresholds are more stringent than the *de minimus* thresholds adopted by the U.S. Environmental Protection Agency (USEPA) for assessing whether a conformity determination must be made to ensure that a federal project does not interfere with a state's plans to attain and maintain the national standards for air quality.

The screening criteria do not include a land use category for homeless shelter or wellness center, but there are two land use types that are relevant to the proposed project: congregate care facility and medical office building. These land uses have screening thresholds of 240 dwelling units and 277,000 square feet, respectively, for construction emissions. Although the proposed project would develop approximately 81,000 square feet of space, the property is currently developed with nearly 80,000 square feet of space that was recently used as a U. S. Department of Agriculture testing facility. Much of the existing space would be reused, and new construction would total just 30,950 square feet. With 90 units of senior housing and a 50-bed medical respite center, the project would be well below the 240-unit threshold. Thus, the project is well below the relevant BAAQMD screening thresholds, above which quantified analysis is recommended.

Although the project size is well below BAAQMD's adopted screening thresholds, a quantified analysis was nonetheless performed by the environmental consulting firm FirstCarbon Solutions during preparation of an Environmental Assessment (EA) for the project pursuant to the National Environmental Policy Act (NEPA). The CalEEMod land use emission model Version 2016.3.2 was used to estimate the project's construction emissions. The CalEEMod model provides a consistent platform for estimating construction and operational emissions from a wide variety of land use projects and is the model recommended by the BAAQMD for estimating project emissions.

The inputs for the model included the demolition of Buildings 1, 8, 9, and 10, as well as the demolition of the parking area adjacent to Building 2D. Project implementation would also include construction of a two-story Medical Respite Center and a one-story primary health care clinic. The proposed construction would start in April 2019 and last for 14 months. The working schedule was assumed to be 8 hours per day, 5 days per week. CalEEMod default assumptions were used for construction equipment and related construction factors. Table AQ-1 shows the average annual construction emissions prior to implementation of mitigation measures.

Table AQ-1: Average Annual Construction Emissions

Construction Activity	Annual Emissions (tons/year)			
	CO	NO_X	ROG	$PM_{2.5}$[2]
Demolition	0.10	0.14	0.01	0.01
Site Preparation	<0.01	0.01	<0.01	<0.01
Grading	0.02	0.02	<0.01	<0.01
Building Construction	0.67	0.88	0.09	0.05
Building Construction-2020	0.24	0.29	0.03	0.02
Paving	0.04	0.04	<0.01	<0.01
Architectural Coating	0.01	0.01	0.16	<0.01
Total Annual Construction Emissions	1.08	1.38	0.30	0.08
Average Annual Emissions[1]	0.92	1.18	0.25	0.07
***de minimis* Emissions Significance of Thresholds**	100	100	50	100
BAAQMD Significance Threshold	n/a	10	10	10
Exceeds thresholds?	No	No	No	No

Notes:
CO = carbon monoxide; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; ROG = reactive organic gases; VOC = volatile organic carbon
Totals may not appear to add exactly due to rounding.
[1] Average annual emissions were calculated by dividing the total construction emissions by 14 months, which is the total construction period for construction.
[2] Basic Construction Mitigation Measures are applied.
Source: CalEEMod 2016.3.2 version.

Source: Firstcarbon Solutions

As shown in Table AQ-1, the criteria pollutant emissions during construction would be well below both the USEPA *de minimis* thresholds of significance and the more stringent BAAQMD thresholds of significance. However, as noted above, BAAQMD recommends implementation of fugitive dust control measures during all construction projects. Absent implementation of these control measures, the project's emissions of construction-generated criteria pollutants would have a ***potentially significant impact*** on air quality. Implementation of the following mitigation measure would reduce the impact to a less-than-significant level:

Mitigation Measure AQ-1:

The project construction contractor shall reduce the severity of project construction period dust and equipment exhaust impacts by complying with the following control measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Operational Emissions

As noted above, BAAQMD's operational thresholds of significance are the same as the construction thresholds. However, the screening criteria for project operations differ; for congregate care facility and medical office building, the operational screening thresholds are 657 dwelling units and 117,000 square feet, respectively. If a project falls below the

applicable operational screening criteria, then BAAQMD has determined that the project would not result in the generation of operations-related criteria air pollutants and/or precursors that exceed the thresholds of significance, and there is no need to perform a detailed air quality assessment of the project's air pollutant emissions. (However, the screening criteria should not be used if a project includes emissions from stationary source engines (e.g., back-up generators) or industrial sources subject to Air District Rules and Regulations. These exceptions are not applicable to the proposed project.)

Again, although the proposed project would be well below BAAQMD's operational screening thresholds for congregate care facilities and medical office buildings, a quantified analysis was performed by FirstCarbon Solutions during preparation of the EA for the project. Table AQ-2 presents the results of the air quality modeling of operational emissions. As shown in the table, the operational emissions would be well below both the USEPA *de minimis* thresholds of significance and the more stringent BAAQMD thresholds of significance. Therefore, the project would have a ***less-than-significant impact*** on air quality from project operations, and no mitigation is required.

Table AQ-2: Average Annual Operational Emissions

Category	Emission (tons/yr)			
	CO	NO_X	ROG	$PM_{2.5}$
Area	<0.01	<0.01	0.14	<0.01
Energy	0.10	0.12	0.01	0.01
Mobile	1.18	0.70	0.11	0.08
Total	1.28	0.82	0.26	0.09
***de minimis* Emissions Significance of Thresholds**	100	100	50	100
BAAQMD Significance Threshold	n/a	10	10	10
Exceeding thresholds?	No	No	No	No

Notes:
ROG = reactive organic gases
NO_X = oxides of nitrogen
CO = carbon monoxide
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: CalEEMod 2016.3.2 version.

Source: Firstcarbon Solutions

c) **Result in cumulatively considerable increase of criteria pollutant:** As noted in BAAQMD's CEQA Air Quality Guidelines, air pollution is, by its very nature, largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. According to the Air Quality Guidelines, if a project's contribution to the cumulative impact would be considerable, then the project's impact on air quality would be considered significant. The Air Quality Guidelines state that if a project would exceed the identified significance thresholds, its emissions would be cumulatively considerable. Conversely, if a project is determined to have less-than-significant project-level emissions, then it would also have a less-than-significant cumulative air quality impact.

As discussed in the preceding subsection, with implementation of the identified mitigation measures, the project would have a less-than-significant impact on air quality. Therefore, the project's cumulative impact on air quality would also be ***less than significant*** with implementation of Mitigation Measure AQ-1.

d) **Expose sensitive receptors to substantial pollutant concentrations:** Health risk from exposure to air pollutants is evaluated based on the potential for exposure to $PM_{2.5}$ and toxic air contaminants (TACs), the two emission types that pose the most significant threat to human health. According to BAAQMD, more than 80 percent of the inhalation cancer risk from TACs in the Bay Area is from diesel engine emissions. TACs are a set of airborne pollutants that may pose a present or potential hazard to human health, and are separated into carcinogens and non-carcinogens. State and local regulatory programs are intended to limit exposure to TACs and the associated health risk. Both TACs and $PM_{2.5}$ are emitted by trucks, cars, construction equipment, and other mobile sources. They are also emitted by stationary sources that require permitting by the BAAQMD, which requires source controls.

Project impacts related to increased health risk can occur either by introducing a new sensitive receptor in proximity to an existing source of TACs or by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity. The BAAQMD defines sensitive receptors as facilities where sensitive receptor population groups (children, the elderly, the acutely ill, and the chronically ill) are likely to be located. These land uses include schools, playgrounds, child care centers, retirement homes, convalescent homes, hospitals, and residences. The population served by the proposed project would be considered sensitive receptors.

The BAAQMD recommends using a 1,000-foot radius around a project site for purposes of identifying community health risk from siting a new sensitive receptor or a new source of TACs. A lead agency should enlarge the radius if an unusually large source or sources of hazardous emissions that might affect a project lie outside the 1,000-foot radius. The proposed project would introduce new sensitive receptors to the project site, and there are also existing sensitive receptors within 1,000 feet of the project, including other

residences and a school, William G. Paden Elementary School, both located at 444 Central Avenue, about 970 feet west of the project site. There is also an assisted living facility, the Bay Harbour Care Home, located at 510 Central Avenue, approximately 800 feet northwest of the project site.

Virtually any land use that attracts and/or generates vehicle trips emits TACs and $PM_{2.5}$. It is only when substantial quantities of TACs are emitted that cancer or health risk can potentially rise to a level of significance. The BAAQMD considers an excess cancer risk of more than 10 in one million or a non-cancer (i.e., chronic or acute) health risk greater than a Hazard Index (HI) of 1.0 caused by project-generated TACs or $PM_{2.5}$ to be a significant adverse impact.

The proposed project would create a new short-term emission source of diesel particulate matter (DPM) due to construction activities. Studies have demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk. However, construction activities would be short-term in duration and emissions would quickly disperse, and implementation of Mitigation Measure AQ-1 would reduce combustion emissions such that health impacts on existing residents in the vicinity from project construction emissions would be a ***less-than-significant impact.***

Impacts to Future Project Residents

Prior environmental documents prepared by the City also considered whether conditions on or near a project site would have impacts on the persons or development introduced onto the site by the new project. However, the California Supreme Court issued an opinion on December 15, 2015, which established that CEQA review is limited to a consideration of the impacts of a project on the environment, and not the impacts of the environment on the project, unless the project would exacerbate existing environmental hazards. (*California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal 4th 369 (2015).) However, the Supreme Court also held that public agencies remain free to conduct this analysis regardless of whether it is required by CEQA. Consequently, the City of Alameda has elected to provide the following analysis for informational purposes only, and not to assess impacts under CEQA.

Although the proposed project would not site a new operational source of substantial TAC and $PM_{2.5}$ emissions, it would introduce new sensitive receptors to the project site. BAAQMD provides screening tools and recommended procedures for evaluating the potential health risk associated with proposed land use development. For new receptor projects, such as the proposed wellness center and senior housing project, lead agencies should review the risks from nearby roadways, freeways, and stationary sources. The BAAQMD's CEQA Air Quality Guidelines include standards and methods for determining the significance of cumulative health risk impacts. The method for determining cumulative health risk requires the tallying of health risk from permitted stationary sources, rail activities, and roadways in the vicinity of a proposed project (i.e., within a 1,000-foot radius), then adding the proposed project impacts due to construction

and operations to determine whether the cumulative health risk thresholds are exceeded. These evaluations are described below.

Stationary Sources of TACs

BAAQMD has developed a geo-referenced database of permitted emissions sources throughout the San Francisco Bay Area, and has developed the Stationary Source Risk & Hazard Analysis Tool for estimating cumulative health risks from permitted sources. Permitted sources of TACs include facilities such as oil refineries, gas stations, dry cleaners, crematories, landfills, wastewater treatment plants, hospitals, and coffee roasters, among many others. For each stationary source listed, the cancer risk and health hazard risk are identified. The hazard index (HI) is defined as the ratio of the predicted incremental exposure concentration from the project to a published reference exposure level (REL) that could cause adverse health effects, as established by the California Office of Environmental Health Hazard Assessment (OEHHA). The BAAQMD considers an excess cancer risk of more than 10 in one million persons or a non-cancer (i.e., chronic or acute) health risk greater than an HI of 1.0 to be a significant adverse impact.

Five permitted stationary sources are located within 1,000 feet of the project site. They are:

> **G16478: USDA Food Safety Inspection Service, 620 Central Avenue, Building 2A.** Despite the address, this building is located on the project site. It is listed in the BAAQMD database because of a diesel-powered back-up power generator. However, it is no longer operational, so the cancer and health hazard risk listed in the BAAQMD Hazard Analysis Tool has not been factored into this analysis.
>
> **G118740: East Bay Regional Park District, Crown Beach, end of McKay Avenue.** There is no indication why this site is included as a stationary source, although the "G" prefix to the source number indicates a Gasoline Dispensing Facility (GDF). However, no cancer risk or health hazard risk is identified for the facility.
>
> **1003: Anthony Cleaners, 1417 Webster Street.** This permitted source is located about 630 feet east of the project site. It has a cancer risk of 16.50 cancers per million and a health hazard risk index of 0.044.
>
> **12466: California Cleaners, 709 Santa Clara Avenue.** This permitted source is located about 850 feet northeast of the project site. For unknown reasons, the cancer and health hazard risk are both identified as 0.000.
>
> **11636: Garden Cleaners, 1529 Webster Street.** This permitted source is located approximately 900 feet northeast of the project site. It has a cancer risk of 7.49 cancers per million and a health hazard risk index of 0.020.

Although BAAQMD provides distance multiplier tools for adjusting the cancer and health hazard risk factors for GDFs, diesel generators, and major roadways, it does not provide a similar tool for dry cleaners and similar stationary sources. Rather, their guidelines direct users to District staff for direction on scaling concentrations based on

distance. Although an attempt was made to contact District staff for the current analysis, no response was received. Consequently, the BAAQMD Diesel Internal Combustion Engine Multiplier Tool was utilized to estimate the potential cancer risk from the dry cleaners in the project vicinity. It is assumed that there is greater health risk from operation of a diesel-powered generator—typically operated outdoors—than from the perchloroethylene used indoors by dry cleaners.

Based on the applicable distance adjustment multipliers for the Anthony Cleaners at 1417 Webster Street and the Garden Cleaners at 1529 Webster Street, the adjusted cancer risks are 1.485 cancers per million and 0.2996 cancers per million, respectively. Since the risk is additive, the combined conservative cancer risk for future project residents would be 1.7846 cancers per million, well under the threshold of significance. Given the low HI values for these two permitted sources at close distance, it can also be seen that the combined hazard index would be well below threshold.

The BAAQMD cancer and health hazard risk factors are very conservatively estimated for a maximally exposed individual (MEI). They are based on continuous exposure of the MEI to the highest air concentration of TACs over a 70-year lifetime. This is a highly conservative assumption, since most people do not remain at home all day and on average residents change residences every 11 to 12 years. In addition, this assumption assumes that residents are experiencing outdoor concentrations for the entire exposure period, which provides a further overestimate of the exposure.

Given these highly conservative assumptions and the low resulting cancer and health hazard risks, the project would not expose future residents to a substantial cancer or other health risk from the permitted stationary air pollutant sources located in the project vicinity. This would be a ***less-than-significant impact.***

Freeway, Roadway, and Railway Sources of TACs

BAAQMD has also developed a geo-referenced database of highways throughout the San Francisco Bay Area and has developed the Highway Screening Analysis Tool and Rail Screening Analysis Tool for estimating cumulative health risks from highways and rail activities. For large non-highway arterial roadways, the District has prepared a Roadway Screening Analysis Calculator for determining cancer risk and health risk from exposure to $PM_{2.5}$. The Traffic Volume Linkage Tool created by the California Environmental Health Tracking Program (CEHTP), which BAAQMD recommends for use in conjunction with its Highway Screening Analysis Tool, was retired by CEHTP in October 2017, and was therefore not used for this analysis. However, Fehr & Peers, the traffic consultant for the proposed project, provided traffic data for the most heavily trafficked roadway in the project vicinity.

Major roadways are only considered to have a potential cancer risk or chronic health hazard risk if they have a traffic volume of at least 10,000 average annual daily traffic (AADT). No analysis is required or recommended by BAAQMD when AADT on nearby surface streets is less than 10,000 vehicles. The highest-volume roadways in the project

vicinity is Central Avenue, located about 200 feet north of the site. Fehr & Peers estimated that Central Avenue west of Webster Street has a current AADT of approximately 11,000 vehicles. This traffic volume was input to BAAQMD's Roadway Screening Analysis Calculator along with a distance from the south edge of the roadway of 190 feet. For east-west roadways in Alameda County, the cancer risk predicted by the tool is 2.16 cancers per million, well under the 10-per-million threshold. Therefore, the project would not expose future residents to a substantial cancer risk from vehicle emissions. This would be a ***less-than-significant impact.***

e) **Create objectionable odors:** Diesel exhaust and ROG would be emitted during construction of the project resulting from heavy-duty construction equipment and asphalt paving activities, both of which could be objectionable odors to some populations. However, emissions would disperse rapidly from the site and construction activities would be relatively low in intensity and short-term. Therefore, it is not anticipated that construction-related activities would create objectionable odors affecting a substantial number of people. As such, construction odor impacts would be less than significant.

Land uses typically associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not involve land uses typically associated with the emission of objectionable odors. The project is not located near odor-producing facilities or uses, and therefore would not expose future residents or clients to objectionable odors. During operation of the project, odors could also be emitted from vehicles travelling to and from the site; however, these occurrences would not produce a significant amount of odors. Therefore, operational impacts would be ***less than significant.***

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

Alison Kirk, Senior Environmental Planner, Bay Area Air Quality Management District, personal communication, June 8, 2017.

Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, May 2017.

Bay Area Air Quality Management District (BAAQMD), *Recommended Methods for Screening and Modeling Local Risks and Hazards*, Version 3.0, May 2012.

Bay Area Air Quality Management District (BAAQMD), *Stationary Source Screening Analysis Tool*, updated May 30, 2012.

Sam Tabibnia, Fehr & Peers Transportation Consultants, personal communication, August 30, 2018.

Biological Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
4. BIOLOGICAL RESOURCES — 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 Game 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, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

The previously cited Federal Center Reuse Project EA included an evaluation by a qualified biologist of the proposed project's potential impacts to biological resources. That EA provides the basis for the analysis summarized in this section.

a) The project site consists almost entirely of developed hardscape, with areas of ornamental vegetation typical of residential landscaping. Ornamental vegetation observed include citrus trees (*Rutacea* spp.) and pines (*Pinus* spp.). Because of the developed and disturbed nature of the project site, only three wildlife species were observed: California ground squirrel (*Otospermophilus beecheyi)*, Alameda song sparrow (*Melospiza melodia pusillula*), and American crow (*Corvus brachyrhynchos*). These common urban wildlife species are not sensitive or special-status species protected under CEQA. There is no habitat on the project site to support candidate, sensitive, or special-status plant or terrestrial wildlife species.

However, the trees on the site could provide nesting and roosting habitat for raptors or other bird species protected by the Migratory Bird Treaty Act of 1918, which forbids the destruction of the birds and active nests. The Act protects both special-status birds and

common bird species, such as house finch (*Carpodacus mexicanus*), common raven (*Corvus corax*), and Anna's hummingbird (*Calypte anna*); in total, more than 800 species are protected under the Migratory Bird Treaty Act. Proposed construction may require removal of one or more of the existing trees on the site. In addition, construction disturbance near trees proposed for retention could disturb nesting birds and destroy active nests, were they to be present, during site preparation and project construction. This would be a ***potentially significant impact***, which would be reduced to less than significant with implementation of the following mitigation measure:

> **Mitigation Measure BR-1:**
> Removal of trees shall be limited to trees that must be removed in order to accommodate the proposed construction. If any tree removal, site grading, or project construction will occur during the general bird nesting season (February 1st through August 31st), a bird nesting survey shall be conducted by a qualified raptor biologist prior to any grading or construction activity. If conducted during the early part of the breeding season (January to April), the survey shall be conducted no more than 14 days prior to initiation of grading/construction activities; if conducted during the late part of the breeding season (May to August), the survey shall be performed no more than 30 days prior to initiation of these activities. If active nests occupied by birds protected under the Migratory Bird Treaty Act are identified, a 250-foot fenced buffer (or an appropriate buffer zone determined in consultation with the California Department of Fish and Wildlife) shall be established around the nest tree and the site shall be protected until September 1st or until the young have fledged. A biological monitor shall be present during earth-moving activity near the buffer zone to make sure that grading does not enter the buffer area.

b) There is no riparian habitat or other sensitive natural community present on the project site.

c) The project site does not contain any riparian habitat, wetlands, or other areas designated as waters of the United States pursuant to the federal Clean Water Act.

d) Use of the project site by wildlife as travel corridors is highly unlikely because, as illustrated on Figure 2, the site is largely surrounded by residential and commercial development. Although Crown Memorial State Beach is to the southeast of the project site, there are no natural habitat areas to the north or east of the project site that could potentially induce wildlife to utilize the site as a natural corridor, and there is no significant foraging habitat for wildlife on the project site. Were migratory birds to be present on the site when tree removal and other site disturbance occurs, they could readily vacate the site and relocate to other trees in the area. Any nesting birds would be protected by implementation of Mitigation Measure BR–1. Therefore, the project would have a ***less-than-significant impact*** on migratory wildlife species.

e) The City of Alameda's Historic Preservation Ordinance protects significant trees by requiring approval by the Historical Advisory Board for removal of trees from sites designated by the City as Historical Monuments. The project site is not a designated

Historical Monument, and any removal of trees from the site necessary to accommodate proposed construction would therefore not conflict with the City's Historic Preservation Ordinance. If trimming or removal of trees from the public right-of-way adjacent to the site were required, the project sponsor would obtain written permission from the Public Works Director prior to removal, in accordance with Section 23-3.2 of the City's municipal code. There are no other local policies or ordinances protecting biological resources that are applicable to the project site or the proposed project.

f) There are no habitat conservation plans or other similar plans applicable to the project site.

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

City of Alameda, Municipal Code, Chapter XIII, Article VII, Section 13-21–Preservation of Historical and Cultural Resources.

Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

a) **Substantial adverse change to significance of an historical resource:** The Government Services Agency (GSA) filed an Historic Evaluation request for the proposed project site with the Department of Parks and Recreation on March 12, 2003. A response was received on March 20, 2003 indicating that the Alameda Federal Center is not eligible for inclusion on the National Register of Historic Places (NRHP) in accordance with 36 CFR 800, regulations implementing Section 106 of the National Historic Preservation Act.

During preparation of the Federal Center Reuse Project EA, on April 4, 2018, an archaeologist from FirstCarbon Solutions conducted a records search for the project area and a 0.5−mile radius beyond the project boundaries at the Northwest Information Center (NWIC) at California State University Sonoma, part of the California Historical Resources Information System (CHRIS). To identify any historic properties or resources, the current inventories of the NRHP, the California Register of Historical Resources (CRHR), the California Historical Landmarks list, the California Points of Historical Interest list, and the CHRIS were reviewed to determine the existence of previously documented local historical resources. Although the records search identified four historic resources (all buildings) within the half-mile search radius, none of them are located in proximity to the project site. The proposed project would not adversely affect these or other historic resources.

b) **Substantial adverse change to significance of an archaeological resource:** The NWIC archival search discussed above also identified 14 prior cultural resources investigations that were conducted within one-half mile of the project site dating back to 1977, the majority of them pertaining to prehistoric archaeological resources. However, none of the study areas were located in close proximity to the project site, and no known archaeological resources were identified on the project site.

In accordance with Assembly Bill 52, FirstCarbon Solutions sent a letter to the Native American Heritage Commission (NAHC) on March 28, 2018 in an effort to determine

whether any sacred sites or tribal cultural resources were listed for the project site on its Sacred Lands File. Although the NAHC's April 30, 2018 response stated that the results from the Sacred Lands File search were negative, the NAHC noted that the absence of specific site information did not negate the possibility that tribal cultural resources may be present within the project site, and recommended consultation with eight local tribal representatives, who were listed in the NAHC letter. Accordingly, on May 2, 2018 FirstCarbon Solutions sent letters to each of the tribal representatives soliciting any concerns they might have about the project and its potential to adversely affect tribal cultural resources. As of the time of publication of this Initial Study, no responses had been received from the Native American tribes.

Although no cultural resources have been identified on or in close proximity to the project site, there is still potential for encountering such resources on the site during site disturbance activities required for project construction. Such resources, if present, could be damaged or destroyed during subsurface disturbance of the site, which would constitute a ***potentially significant impact.*** Implementation of the following mitigation measures would reduce this potential impact to a less-than-significant level.

Mitigation Measure CR-1:

City Staff shall advise the Project Construction Superintendent, Project Inspector, and Building Inspector at a pre-construction conference of the potential for encountering cultural resources during construction and the applicant's responsibilities per CEQA should resources be encountered. This advisory shall also be printed on the Plans and Specification Drawings for this project.

Mitigation Measure CR-2:

If any cultural artifacts are encountered during site grading or other construction activities, all ground disturbance within 100 feet of the find shall be halted until the City of Alameda is notified, and a qualified archaeologist can identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). The results of any additional archaeological effort required through the implementation of Mitigation Measures CR–2 or CR–3 shall be presented in a professional-quality report, to be submitted to the project sponsor, the City of Alameda Community Development Department, and the Northwest Information Center at Sonoma State University in Rohnert Park. The project sponsor shall fund and implement the mitigation in accordance with Section 15064.5(c)-(f) and Public Resources Code Section 21083.2.

Mitigation Measure CR-3:

In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and a qualified archaeologist shall notify the Office of the Alameda County Coroner and advise that office as to whether the remains are likely to be prehistoric or historic period in date. If determined to be prehistoric, the Coroner's Office will notify the Native American Heritage Commission of the find, which, in turn, will then appoint a "Most Likely Descendant" (MLD). The MLD in consultation with the archaeological consultant and the project sponsor, will advise and help formulate

an appropriate plan for treatment of the remains, which might include recordation, removal, and scientific study of the remains and any associated artifacts. After completion of analysis and preparation of the report of findings, the remains and associated grave goods shall be returned to the MLD for reburial.

c) **Destruction of a unique paleontological resource:** Based on a geologic map of the Oakland Metropolitan Area that encompasses the City of Alameda, the project site is underlain by artificial fill and Quaternary surficial deposits of probable Pleistocene to Holocene age. Such deposits that have the potential to include significant paleontological resources. To further evaluate this potential, on April 3, 2018 consulting paleontologist Dr. Ken Finger performed a records search for the project site on the University of California Museum of Paleontology (UCMP) database, as part of the EA previously prepared for the project. The search identified 26 specimens recorded in two different localities on the north side of Alameda, including fossils *Bison* (bison), *Arctodus* (short-faced bear), *Glossotherium* (ground sloth), *Camelops* (camel), and *Mammuthus* (mammoth). Sixty-two other localities were identified in Alameda County that produced a total of 355 fossils from the Rancholabrean North American Land Mammal Stage.

Given these findings, and due to the geologic age of the subsurface layers at the project site, there is a high potential for encountering Pleistocene vertebrates during subsurface disturbance. Any destruction of unique paleontological resources during earthmoving activities would be a ***potentially significant impact***. Implementation of the following measure would reduce this potential impact to a less-than-significant level:

Mitigation Measure CR-4:

If any paleontological resources are encountered during site grading or other construction activities, all ground disturbance shall be halted until the services of a qualified paleontologist can be retained to identify and evaluate the scientific value of the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). Significant paleontological resources shall be salvaged and deposited in an accredited and permanent scientific institution, such as the University of California Museum of Paleontology (UCMP).

d) **Disturbance of human remains:** See Section 5-b, above.

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

Graymer, R. W. 2000. Geologic Map and Map Database of the Oakland Metropolitan Area, Alameda, Contra Costa and San Francisco Counties, California, U.S. Geological Survey Miscellaneous Field Studies MF−2342.

Kenneth L. Finger, Ph.D., Consulting Paleontologist, *Paleontological Records Search: Federal Center Reuse Project (FCS 5092.0001), Alameda, Alameda County, California* [letter report], April 3, 2018.

Geology, Soils, and Seismicity

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
6. GEOLOGY and Soils — Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Discussion

a-i) **Exposure to rupture of a known earthquake fault:** No active faults are present on the project site. The Northern section of the Hayward Fault is the closest active known fault and is located approximately 4.90 miles northeast of the site; the site is not within the active Hayward fault zone. Therefore, there is no potential for fault rupture at the project site.

a-ii) **Exposure to strong seismic ground shaking:** Similar to most locations throughout the San Francisco Bay Area, the project site is potentially subject to strong seismic ground shaking during an earthquake on one of the major active earthquake faults that transect the region. Existing buildings on the project site were damaged during the Loma Prieta Earthquake in October 1989. A subsequent seismic investigation identified cracks in the foundations of most of the buildings on site, along with other structural deficiencies. In addition to recommended corrective actions, the seismic hazard report recommended a more thorough structural seismic analysis for all of the two-story buildings and the auditorium of Building 3 (no longer present on the project site). Given the potential for

strong seismic ground shaking at the site and the age and condition of existing buildings proposed for reuse, structural damage could occur to project buildings during a large earthquake that could expose the residents and workers to serious injury or death.

In accordance with recent CEQA case law (e.g., *California Building Industry Association v. Bay Area Air Quality Management District* (Aug.12, 2016) 2 Cal.App.5th 1057), CEQA generally no longer considers an impact of the environment on a project to be a significant impact. Under this interpretation, impacts on a project from seismic shaking do not constitute significant impacts unless the project would exacerbate the environmental hazards and expose a project's residents or users to the increased hazards. However, the City of Alameda has adopted policies calling for the protection of people and property from harm caused by earthquakes and seismic-related ground failure. Specifically, the Safety and Noise Element of the General Plan establishes the following objective:

> *Minimize risks of loss of life, personal injury, property damage and environmental degradation posed by earthquakes and other geologic hazards.*

Additionally, the following Safety and Noise policy is pertinent to the proposed project:

> *SN-10. Require owners of vulnerable structures, to the extent feasible, to retrofit existing structures to withstand earthquake ground shaking, and require retrofitting when such structures are substantially rehabilitated or remodeled.* [additional subclauses of Policy SN-10 are not relevant to the project.]

Since there is potential for the project to conflict with these policies, which were adopted for the purpose of avoiding or reducing a potential environmental impact—an explicit standard of significance under CEQA—the proposed project would have a ***potentially significant impact*** from exposing future occupants of the project to the risk of loss of life, personal injury, and/or property damage due to seismic ground shaking or seismic-related ground failure. Implementation of the following mitigation measure would reduce the impact to less than significant:

> **Mitigation Measure GS-1:**
>
> Prior to the issuance of building permits, the project applicant shall submit a soil report/geotechnical investigation to the City of Alameda for review and approval. The investigation shall be prepared by a qualified geotechnical engineer and shall stipulate site preparation and building design features necessary to achieve compliance with the latest adopted edition of the California Building Standards Code's geologic, soils, and seismic requirements. The recommendation from the approved soils report/geotechnical investigation shall be incorporated into the project plans to ensure compliance with City and State building code standards. Additionally, the project shall implement the structural upgrades proposed in the June 1990 Seismic Hazard Report prepared by Walk, Haydel & Associates for Buildings, 2A, 2B, 2C, and 2D. As recommended in that report, a more thorough structural seismic analysis for all of the two-story buildings on the site shall be

conducted by a qualified structural engineer, and the recommendations of the resulting report shall be incorporated into the project.

a-iii) **Exposure to seismic-related ground failure:** Liquefaction occurs when clean, loose, saturated, uniformly graded, fine-grained soils are exposed to strong seismic ground shaking. The soils temporarily lose strength and cohesion and behave as viscous liquid rather than as a solid, resulting in a loss of ground stability that can cause building foundations to fail. The project site is within an area mapped by the U.S. Geological Survey (USGS) as having very high liquefaction potential. Lateral spreading, another form of seismic ground failure, is generally associated with liquefaction; since the potential for liquefaction at the site is high, the potential for lateral spreading is presumed to also be high. Based upon the same rationale provided in Section VI(a)(ii), above, exposure of the project (buildings and people) to seismic-related ground failure would be a ***potentially significant impact.*** Implementation of Mitigation Measure GS-1 would reduce the impact to less than significant.

a-iv) **Exposure to landslides:** The project site and the surrounding areas are relatively flat and there are no hillsides or steep slopes nearby that would be susceptible to landslides. There would be ***no impact*** due to landslides.

b) **Substantial soil erosion:** Any construction project that exposes surface soils creates a potential for erosion from wind and stormwater runoff. The potential for erosion increases on large, steep, or windy sites; it also increases significantly during rainstorms. Although the proposed project would occur on a level site, the site is exposed to winds from nearby San Francisco Bay. Construction may also occur during the rainy season, which increases the potential for erosion at the site. Therefore, the potential for erosion during project construction would be fairly high and would be considered a ***potentially significant impact*** on the environment. The impact would be reduced to a less-than-significant level through implementation of the Stormwater Pollution Prevention Plan required by Mitigation Measure WQ-1 and additional erosion controls required by Mitigation Measure WQ-2 (see Section 9).

c) **Located on unstable geologic unit or soil:** As previously noted, there is no potential for landslide at the project site. As discussed in Section VI(a)(iii), there is a high potential for liquefaction and the potential for lateral spreading is also presumed to be high. There may be other soil stability hazards at the site that will be identified by the site-specific geotechnical investigation required by Mitigation Measure GS-1. Based upon the same rationale provided in Section VI(a)(ii), above, exposure of the project (buildings and people) to unstable ground that could result in structural failure would be a ***potentially significant impact.*** Implementation of Mitigation Measure GS-1 would reduce the impact to less than significant.

d) **Located on expansive soils:** According to the USDA Natural Resource Conservation Service, the project site is underlain by expansive soils. Expansive soils change in volume with changes in moisture, which can cause heaving and cracking of slabs-on-grade, pavements, and structures founded on shallow foundations. Although this type of

hazard would not be expected to result in substantial structural failure, and would therefore be a ***less-than-significant impact***, adherence to the site engineering and building design recommendations presented in the required geotechnical report would prevent or minimize potential damage from expansive soils.

e) **Located on soils incapable of supporting use of septic tanks:** The project would not rely on septic tanks for sewage disposal, which would be discharged into the City's existing sanitary sewer system.

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

City of Alameda, *General Plan*, Safety and Noise Element, January 1, 2017.

Walk, Haydel & Associates, *Seismic Hazard Report, Federal Center, 620 Central Avenue, Alameda, California*, Project No. ZCA72270, June 1990.

Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Discussion

a) Similar to the criteria air pollutants evaluated in Section 3, the project would generate temporary or short-term GHG emissions during construction activities, including demolition, grading, site preparation, on-site heavy-duty construction vehicle use, vehicles hauling materials to and from the project site, and construction worker trips to and from the site. Operational emissions would be generated be vehicle trips to and from the facility from employees, visitors, deliveries, maintenance and repair personnel, trash collection, etc. A limited number of project residents could have cars that would represent another source of GHG emissions. Operational emissions would also result from energy sources used to provide heating, cooling, and lighting of project buildings; provision of water supply; and solid waste management.

BAAQMD's recommended project-level and cumulative significance thresholds for operational greenhouse gas (GHG) emissions are as follows:

- 1,100 metric tons of carbon dioxide equivalent per year (MT CO2e/year), or
- 4.6 MT CO2 equivalent per service population (employees plus residents).

Exceeding either of these thresholds or conflicting with a qualified Greenhouse Gas Reduction Strategy would constitute a significant project-level and cumulative impact on global climate change. The BAAQMD has not developed a specific construction GHG threshold. Therefore, this analysis uses the significance threshold for construction-related GHG emissions adopted by the Sacramento Metropolitan Air Quality Management District (SMAQMD), which is 1,100 MT CO2e/year.

The screening criteria discussed in Section 3 that are recommended in the BAAQMD CEQA Air Quality Guidelines—for purposes of determining whether a proposed development project has the potential to exceed its adopted thresholds of significance—are also provided for operational GHG emissions, using the same list of different land use types. As was done for the screening for potentially significant criteria air pollutant emissions in Section 3, the congregate care facility and medical office building land uses were selected as those most applicable to the proposed project, since the screening criteria do not include a land use category for homeless shelter or wellness center.

For operational GHG emissions, these land uses have screening thresholds of 143 dwelling units and 22,000 square feet, respectively. The medical clinic and the medical respite center components of the proposed project would total 29,800 square feet, exceeding the screening criterion for medical office buildings, while the 90 units of senior housing would be below the screening thresholds a congregate care facility. Exceeding the screening criteria does not mean a project necessarily would have a significant impact, but rather is an indication that the project has potential to exceed the threshold of significance. In these cases, the BAAQMD recommends that a quantified analysis of a project's GHG emissions be performed.

A quantified analysis was performed by the environmental consulting firm FirstCarbon Solutions during preparation of the EA for the project. The CalEEMod land use emission model Version 2016.3.2 was used to estimate the project's construction and operational emissions of GHGs. The same inputs for the model listed in Section 3 for criteria air pollutants were used for the GHG emissions. The resulting estimates for construction emissions are listed in Table GHG-1 and the estimates for operational emissions are listed in Table GHG-2.

Table GHG-1: Greenhouse Gas Emissions During Construction

Construction Phase	Total Emissions MT CO_2e
Demolition	22
Site Preparation	1
Grading	3
Building Construction	103
Building Construction-2020	37
Asphalt Paving	6
Architectural Coating	1
Total Construction Emissions	**173**
GHG Emission Threshold	1,100
Exceed Threshold?	No
Notes: MT CO_2e = metric tons of carbon dioxide equivalent Source: SMAQMD, 2015. CalEEMod Appendix B.	

Source: Firstcarbon Solutions

Table GHG-2: Operational Greenhouse Gas Emissions

Source	Total Emissions MT CO_2e
Area	<1
Energy	238
Mobile	363
Waste	168
Water	10
Total Emissions	779
Threshold of Significance	1,100
Exceeds Threshold	No
Notes: MT CO_2e = metric tons of carbon dioxide equivalent Source: BAAQMD, 2017. FCS 2017. See Appendix B.	

Source: Firstcarbon Solutions

As shown in the tables, the project's construction-related and operational GHG emissions would be below the applicable thresholds of significance. Therefore, the project would have a ***less-than-significant impact*** on climate change due to GHG emissions.

b) In 2008 the City of Alameda adopted the *City of Alameda Local Action Plan for Climate Protection*, which provides a strategy for reducing emissions of GHGs in the City.[2] The Local Action Plan establishes an overall goal of reducing community-wide GHG emissions by 25 percent below 2005 levels by 2020 and sets forth specific initiatives for achieving this goal that are organized into the following four categories: 1) transportation and land use; 2) energy; 3) waste and recycling; and 4) community outreach and education. With one exception, all of the adopted initiatives require implementation by the City; the proposed project would not interfere with or impede implementation of any of the initiatives.

The one exception also requires City implementation but applies explicitly to new development projects. Transportation and Land Use Initiative 1 requires all new major developments' short- and long-term transportation emissions impacts to be reduced by 10 percent. The Local Action Plan does not define a "major development" project, but it is assumed that the proposed reuse of existing buildings and construction of a new building providing approximately 31,000 square feet of space—for a project that would have low traffic trip generation characteristics—would not be classified as a major development project. Therefore, the project would not conflict with the Local Action Plan, nor would it conflict with General Plan conservation or air quality protection policies.

References

City of Alameda, Climate Protection Task Force and Planning and Building Department, *Local Action Plan for Climate Protection*, adopted February 5, 2008.

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[2] City of Alameda, *City of Alameda Local Action Plan for Climate Protection*, adopted February 5, 2008.

Hazards and Hazardous Materials

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8. HAZARDS AND HAZARDOUS MATERIALS — 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 one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials 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 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?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) 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?	☐	☐	☐	☒

Discussion

a) **Routine transport, use, or disposal of hazardous materials:** Operational activities would involve the use of small quantities of household hazardous chemicals or wastes (e.g., cleaning products, ammonia, paints, and oils) which would not be considered significant. The proposed development would not involve the routine transport, use, storage, or disposal of reportable quantities of hazardous materials. Because safe disposal of household hazardous waste collection events and the quantities of hazardous materials that would be used onsite are considered minimal, impacts associated with the routine transport, use, or disposal of hazardous materials would be considered less than significant.

The proposed resource center and senior housing would not use or store hazardous materials other than small quantities of cleaning agents typically used in office and home environments. Such chemicals are not subject to regulation and, with proper use and

storage, do not pose a significant hazard to the environment. The proposed medical respite facility could use pharmaceuticals that, depending on their chemical constituency, could be hazardous. Pharmaceuticals would be stored and used in small, containerized quantities, and would not pose an undue hazard.

The greatest potential hazard associated with pharmaceuticals would be if they were improperly disposed of. In addition, operation of the proposed medical respite facility could generate sharps and other biohazardous medical waste. Generally, medical waste is health care waste that may be contaminated by blood, body fluids, or other potentially infectious materials. Handling and disposal of medical waste is regulated by the federal Occupational Safety and Health Administration (OSHA) under the Bloodborne Pathogens Standard codified at Title 29, Section 1910.1030 of the Code of Federal Regulations. The regulations require regulated employers to develop an Exposure Control Plan designed to protect employees, patients, and others from potential exposure to medical waste and other infectious materials. It regulates the containment and labeling of medical/infectious waste, use of personal protective equipment, and employee training.

Disposal of medical waste is also regulated in California by the California Department of Public Health, Environmental Management Branch. The Department's Medical Waste Management Program is responsible for overseeing compliance with Medical Waste Management Act (MWMA), codified in California Health and Safety Code, Division 104, Part 14. The MWMA considers any person whose act or process produces medical waste to be a "medical waste generator" and categorizes generators producing over 200 pounds of medical waste per month as large quantity generators (LQGs) and those producing less than 200 pounds per month as small quantity generators (SQGs). Medical waste generators must register with their local enforcement agency (LEA). The LEA in Alameda County is the Office of Solid/Medical Waste Management in the Alameda County Environmental Health Department.

It is assumed that the proposed medical respite facility would be classified as a SQG of biomedical waste. If the facility would include onsite treatment of medical waste using steam sterilization, incineration, or microwave technology, it would be required to register with the LEA prior to commencing operations. In this case, the clinic would be required to prepare a Medical Waste Management Plan that would provide details on medical waste storage and accumulation areas, disinfection procedures, procedures for disposal of pharmaceutical waste, and any on-site treatment (e.g., autoclave, microwave, incineration, etc.). The plan must designate a registered medical waste hauler that will dispose of medical waste. SQGs using onsite treatment are subject to biennial inspection by the LEA, and operators of the treatment equipment are subject to a variety training requirements that must comply with applicable federal OSHA regulations. Medical waste generators are required to maintain a completed tracking document of all medical waste removed for treatment or disposal for a period of three years.

The proposed medical respite facility would be required to comply with all applicable State and federal laws and regulations. This compliance would ensure that the project

would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, including medical waste. This would be a ***less-than-significant impact.***

b) **Release of hazardous materials into the environment:** A Phase I Environmental Site Assessment (ESA) of the site was performed by AEI Consultants to identify recognized environmental conditions on the site, including the presence or likely presence of any hazardous substances that could create a significant hazard to the public or the environment, whether through an existing release, past release, or threat of a release into structures, into the ground, or into surface or groundwater. The results of that investigation are summarized in this section.

Previous Use of the Project Property

Prior to 1939, the southwestern portion of the project site was submerged under San Francisco Bay waters, while the northern portion was vacant land that appeared to be utilized as a parking lot. The southeastern portion of the site was occupied by a portion of a race track that extended into the property to the south. Fill of unknown origins was placed on the site prior to 1946. By 1946, the site was developed with the buildings that remain on site today. These buildings were previously used by the United States Department of Agriculture (USDA) for food testing programs and other operational activities that involved the use and storage of small quantities of household janitorial hazardous chemicals, wastes, and USDA laboratory chemicals. These materials included pesticides, hydrocarbon solvents, alkaline solution, polychlorinated biphenyls (PCBs), and more. Between 1946 and 2018 when the Phase I ESA was performed, no significant changes to the site occurred.

Hazardous Materials Sites On Or In the Vicinity of the Project

As part of the Phase I ESA, Environmental Risk Information Services (ERIS) reviewed more than 100 publicly available local, State, and federal environmental databases to identify hazardous waste and hazardous materials release sites in the project vicinity.

The project site and the adjacent property to the south were listed as a closed leaking underground storage tank (LUST) cleanup site. According to the database and records with the Alameda County Department of Environmental Health (ACDEH), a 1,000-gallon used oil UST and a 5,000-gallon gasoline UST were removed from the adjacent property to the south in January 1994. Two 10,000-gallon fuel oil USTs were removed from the subject property in December 1996. The USTs were located southwest of Building 1. Soil and groundwater samples collected during the removal activities detected elevated concentrations of total petroleum hydrocarbons as gasoline (TPH-g); total petroleum hydrocarbons as diesel (TPH-d); benzene, toluene, ethylbenzene, and xylene (BTEX); and total oil and grease (TOG). Additionally, concentrations of halogenated volatile organic compounds (VOCs) were detected above laboratory reporting limits, but below applicable screening levels.

Ten groundwater monitoring wells were installed as part of the site investigation. Three of the monitoring wells (AMW-1 through AMW-3) were installed on the project site. In the most recent sampling of the wells conducted in February 1999, TPH-d was detected in AMW-1 and AMW-3 at concentrations of 53 and 140 parts per billion (ppb), respectively. The sample from AMW-1 detected xylenes at 0.6 ppb. TPH-g, benzene, toluene, ethylbenzene, and TOG were not detected above laboratory reporting limits. The analytical results were submitted to the ACDEH for review and the project site and the adjacent property to the south were granted closure on August 15, 2003.

The records search also identified one Controlled Recognized Environmental Condition (CREC) identified on the project site, registered in 2009. According to ACDEH files, approximately 50 gallons of hydraulic elevator fluid leaked from a pipe in Building 2C in September 2009. It was determined that the leak had occurred from an underground hydraulic supply line located beneath the sidewalk and street. In January 2010, a trench was excavated to expose the hydraulic fluid lines. Soil samples were collected as part of the excavation. Two of the seven soil samples detected elevated concentrations of TPH as hydraulic oil (TPH-ho). Subsequently, the old supply and return hydraulic lines for the elevator were replaced and placed within secondary containment to prevent future leaks.

Seven borings were drilled on the project site in September 2010 and a soil sample and groundwater sample were collected from each boring and analyzed for TPH-ho. Maximum concentrations of TPH-ho were detected at 8,900 parts per million (ppm) the soil samples, while maximum concentrations detected in the groundwater samples 1,300 ppb. Based on the analytical results, the environmental assessor conducting the work concluded that since the TPH-ho did not appear to be very mobile and the contamination was limited in extent to the area near the pipeline leak location, no further investigation was recommended.

Following review of the results, the ACDEH determined that the project site qualified for the Low-Threat Closure Policy and the subject property was granted closure on September 15, 2014. The approved closure comes with recommendation that future uses of the site implement a Health and Safety Plan. The closure letter indicates that excavation or construction activities in areas of residual contamination require planning and implementation of appropriate health and safety procedures by the responsible party prior to and during excavation and construction activities.

The Phase I ESA also noted an Other Environmental Consideration (OEC) at the site that does not qualify as a Recognized Environmental Condition (REC) warranting additional action. As previously noted, the source of the fill material used to reclaim the southwestern portion of the site from Bay waters around 1946 is unknown, but it could have originated from the dredging of nearby harbor areas, in which case it could contain elevated levels of metals and/or petroleum product constituents. However, the entire site is either paved over or covered by improvements. The area where existing buildings would be demolished and a new building would be constructed is outside the historic fill area. Due to these considerations, the Phase I ESA concluded that direct contact with any

potential remaining concentrations in the soil is unlikely. However, in the event the subject property undergoes future development activities, the Phase I ESA recommends proper soil characterization, as well as management and disposal of any contaminated soils that are identified.

Although the records search identified four offsite contamination sites within 1,000 feet of the project site, the Phase I ESA determined that all of the site cases are closed and do not require further action, and would pose no environmental threat to the proposed project.

Asbestos and Lead

Based on the age of the extant buildings on the site, there was a possibility that lead-based paint (LBP) and/or asbestos-containing building materials (ACBM) are present in the buildings. In the case of ACBM, its presence was previously confirmed, as discussed below.

Asbestos was common in a variety of construction materials until the late 1970s, and can be found in building insulation (both spray-on and blanket types), pipe wraps, floor and ceiling tiles, tile mastics (adhesives), wallboard, joint compound, mortar, roofing materials, and more. Asbestos is a known human carcinogen, and inhalation exposure to asbestos fibers or dust, known as friable asbestos, has been linked to an increase risk of lung cancer and mesothelioma, which is a relatively rare cancer of the thin membranes that line the chest and abdomen. Inconclusive evidence has also linked asbestos exposure to a variety of other cancers. With cumulative exposure, asbestos fibers can cause inflammation and scarring of the lungs, resulting in breathing difficulties.

Lead is a highly toxic metal that was a common ingredient in paint until it was banned from residential paint in 1978. Exposure to LBP has been linked to learning disabilities and behavioral problems in children, who are particularly susceptible. Lead may also cause brain damage, kidney damage, seizures, and even death in extreme cases.

Prior to some planned renovation work in 2007, a limited asbestos survey of some of the buildings on the project site was conducted by AEI in 2007. The survey confirmed that ACBMs are present in the buildings, but determined that the ACBMs were in good condition at the time of the site reconnaissance and were not expected to pose a health and safety concern to the occupants of the subject property at that time.

Nonetheless, subsequent to the asbestos survey, abatement was performed by IHI Environmental in two phases in 2012. The abatement included removal of ACBMs from the interior of nine restrooms within Buildings 1, 2A,2B, and 2C. The work also included removal of lead-containing ceramic tile and various building components painted with LBP. Appropriate safety precautions were observed during the abatement work and asbestos and lead wastes were disposed of in compliance with applicable State and federal regulations. Post-abatement inspections and air sampling determined that the work areas were cleared for construction and re-occupancy.

However, the abatement work was focused on the bathrooms where renovation was planned. It is presumed that ACBMs remain in other building components. During the proposed demolition of Building 1 and several small outbuildings as well as interior renovations to existing buildings, friable asbestos and/or lead could be released into the environment, posing a health hazard to workers. If not addressed properly, the potential health hazards to construction workers posed by ACBM and LBP that may be present on the site would represent a ***potentially significant adverse impact.*** Implementation of the following mitigation measures would reduce the impact to a less-than-significant level.

Mitigation Measure HM–1:

Prior to issuance of a demolition permit for the existing buildings on the site, a comprehensive survey for asbestos-containing building materials (ACBM) shall be conducted by a qualified asbestos abatement contractor. Sampling for ACBM shall be performed in accordance with the sampling protocol of the Asbestos Hazard Emergency Response Act (AHERA). If ACBM is identified, all friable asbestos shall be removed prior to building demolition by a State-certified Asbestos Abatement Contractor, in accordance with all applicable State and local regulations, including Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2 pertaining to demolition, removal, and disposal of ACBM. BAAQMD shall be notified at least ten business days in advance of building demolition, in compliance with Regulation 11, Rule 2. To document compliance with the applicable regulations, the project sponsor shall provide the City of Alameda Building Division with a copy of the notice required by BAAQMD for asbestos abatement work, prior to and as a condition of issuance of the demolition permit.

Mitigation Measure HM–2:

Prior to issuance of a demolition permit for the existing buildings on the site, a survey for lead-based paint (LBP) shall be conducted by a qualified lead assessor. If LBP is identified, lead abatement shall be performed in compliance with all federal, State, and local regulations applicable to work with LBP and disposal of lead-containing waste. A State-certified Lead-Related Construction Inspector/Assessor shall provide a lead clearance report after the lead abatement work in the buildings is completed. The project sponsor shall provide a copy of the lead clearance report to the City of Alameda Building Division prior to issuance of a demolition permit.

Chemical, Biological, and Radiological Hazards

The Phase I ESA also included reporting on chemical, biological, and radiological hazards that may have been present during the use of the facility as a food safety lab. A Laboratory Decommissioning Report was prepared in February 7, 2017 to provide the results of the identification, assessment, and decontamination actions taken for closure of the USDA Food Safety and Inspection Service (FSIS), Western Laboratory. Decommissioning is a process used to identify potential hazards to ensure that the facility meets environmental, health, and safety requirements for its next use. For the Chemical Hazard Assessment, a walk-through survey was conducted by Alameda County on November 7, 2016 and an Official Closeout Inspection Report was issued showing no

violations cited. For the Biological Hazard Assessment, the Western Laboratory provided Alameda County Office of Solid and Medical Waste Management with a closure letter, verifying that the laboratory no longer generated medical waste and all medical waste had been treated or shipped off-site, and documentation that the property has been decontaminated, rendering it to an acceptable sanitary condition. As of October 20, 2016, the Western Laboratory's medical waste treatment permit has been closed out for this facility. A Radiological Hazards Assessment was conducted, since there are potential sources of radiological contamination as a result of laboratory operations, including:

- Electron Capture Devices (ECDs)—used in Gas Chromatographs (GCs)
- A calibration source for the Berkeley Nucleonics SAM unit—previously used for screening incoming sample boxes and packages for radiological contamination
- Limited use of uranium and thorium chemicals—based on historical inventories and knowledge of use

On September 7, 2016, Katina Jones, Health Physicist, USDA Radiation Safety Division (RSD) staff, conducted a close-out survey at the Western Laboratory during which previous ECD use areas were tested for contamination. As part of the survey, laboratory areas that may have potentially stored or used uranium or thorium compounds were also tested. The surface tests were conducted using a Ludlum model 26 integrated pancake frisker that can detect alpha, beta, or gamma radiation. All test results were negative showing no radiological contamination.

The Phase I ESA concluded that the FSIS Western Laboratory Decommissioning Process has resulted in the remediation/mitigation of the health, safety, and environmental risk associated with FSIS operations, to the extent feasible, under the conditions described in the Phase I report. All FSIS-owned hazardous materials in removable containers have been removed from the facility. Those items specified in the report as not removable have been cleaned, decontaminated, and tested. Accessible areas that were identified as potentially being contaminated, have been cleaned and decontaminated. FSIS has complied with the scope of work as defined and described in the Western Laboratory Decommissioning Report and agreed to by GSA. FSIS has also provided laboratory reports to document that the decontamination efforts were successful. Consequently, there are no potential impacts from chemical, biological, or radiological hazards at the project site.

No other RECs were identified at the site by the Phase I ESA, and no further investigation of the site was recommended.

c) **Hazardous materials or emissions within one-quarter mile of a school:** There is one school located within one-quarter mile of the project site: William G. Paden Elementary School, located at 444 Central Avenue, approximately 0.18-mile west of the project site. However, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. As discussed in Section 8-a, the use of containerized cleaning products and similar hazardous materials in small quantities that are typically used in office and home environments are not subject to regulation and,

with proper use and storage, do not pose a significant hazard to the environment. There is no potential for this type of usage to adversely affect school children at the elementary school located in the project vicinity.

d) **Site listed as hazardous materials site:** The review of environmental databases described in Section 8-b includes the lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. See Section 8-b for additional discussion.

e) **Airport safety hazard:** There are no airports within 2 miles of the project site; the closest airport is the Oakland International Airport, located approximately 3.8 miles southeast of the site.

f) **Private airstrip safety hazard:** There are no private airstrips within 2 miles of the project site.

g) **Impair implementation of an emergency response plan:** The City of Alameda has an Emergency Management Plan that sets forth the City's responsibilities during emergencies associated with natural disaster, human-caused emergencies, and technological incidents. It provides a framework for coordination of response and recovery efforts within the City in coordination and with local, State, and federal agencies. The plan establishes an emergency organization to direct and control operations during a period of emergency by assigning responsibilities to specific personnel. The plan conforms to the State-mandated Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS), as well as Alameda County's policies on emergency response and planning. The plan provides for coordinated emergency response at all levels in compliance with the Incident Command System (ICS).

The Emergency Management Plan identifies emergency evacuation routes throughout the City. In the vicinity of the project, both McKay Avenue and Central Avenue are identified as evacuation routes. The routes in west Alameda ultimately lead to evacuation of the island city via the Webster and Posey tunnels, while evacuation routes in the eastern portion of the City lead to the Park Street, Fruitvale Avenue, and High Street bridges. The nearest emergency shelter site to the project site is a Priority 1 shelter at Encinal High School, located at 210 Central Avenue, about one-half mile west of the project site.

The proposed project would not block or impede progress on the emergency evacuation routes located in the project vicinity and would not interfere with access to the nearest emergency shelter site. There are no project components or characteristics that would potentially interfere with implementation of the City's Emergency Management Plan.

h) **Exposure to wildland fires:** The project is located in a fully built-out urbanized area, with no wildlands anywhere near the project area, and therefore there is no potential for the proposed project to result in the exposure of people or structures to wildland fires.

References

Code of Federal Regulations, Title 29, Section 1910.1030.

California Health and Safety Code, Division 104, Part 14.

AEI Consultants, *Phase I Environmental Site Assessment, 620 Central Avenue, Alameda, Alameda County in Union City, California*, April 6, 2018.

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

IHI Environmental, *Hazardous Materials Abatement Monitoring, Alameda Federal Center, 620 Central Avenue, Alameda, California*, July 5, 2012.

Google Earth, 2018.

City of Alameda, *Comprehensive Emergency Management Plan*, July 2008.

Hydrology and Water Quality

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

Discussion

a) **Violation of water quality standards:** There is potential to generate water pollutants and thereby violate water quality standards during both construction and operation of the proposed project. Construction activities that require disturbance of the ground surface can lead to soil erosion and the transport of sediment into surface waters, resulting in degradation of water quality. In addition, leaks from construction equipment; accidental spills of fuel, oil, or hazardous liquids used for equipment maintenance; and accidental spills of construction materials are all potential sources of pollutants that could degrade water quality during construction. Stormwater runoff from the site is ultimately discharged, without treatment, to San Francisco Bay, which is on the list of impaired water bodies compiled by the San Francisco Bay Regional Water Quality Control Board

(RWQCB) pursuant to the federal Clean Water Act. Because the State is required to develop action plans and establish Total Maximum Daily Loads (TMDLs) to improve water quality within these water bodies, uncontrolled discharge of pollutants into them is considered particularly detrimental.

Generally, new development that entails "land disturbance" of 1 acre or more requires the project sponsor to obtain coverage under Construction General Permit (CGP) Order 2009-0009-DWQ, administered by the RWQCB. Development of the proposed wellness center would require disturbance of more than 1 acre, and the project would therefore be required to obtain coverage under the CGP. Order 2009-0009-DWQ requires project sponsors to implement construction Best Management Practices (BMPs) at the project site and comply with numeric action levels (NALs) in order to achieve minimum federal water quality standards. The CGP requires control of non-stormwater discharges as well as stormwater discharges. Measures to control non-stormwater discharges such as spills, leakage, and dumping must be addressed through structural as well as non-structural BMPs.

Although project construction effects on surface water quality could result in a ***potentially significant impact*** on water quality, implementation of Mitigation Measures WQ–1 and WQ–2 would ensure that construction impacts on water quality remain less than significant.

Mitigation Measure WQ–1:

Prior to issuance of a grading permit the project sponsor shall obtain National Pollutant Discharge Elimination System (NPDES) construction coverage as required by Construction General Permit (CGP) No. CAS000002, as modified by State Water Resources Control Board (SWRCB) Order No. 2009-0009-DWQ. Pursuant to the Order, the project applicant shall electronically file the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI), a risk assessment, site map, signed certification, Stormwater Pollution Prevention Plan (SWPPP), and other site-specific PRDs that may be required. At a minimum the SWPPP shall incorporate the standards provided in the Association of Bay Area Governments' Manual of Standards for Erosion and Sedimentation Control Measures (2005), the California Stormwater Quality Association's California Stormwater Best Management Practices Handbook (2009), the prescriptive standards included in the CGP, or as required by the Clean Water Program Alameda County, whichever are applicable and more stringent. Implementation of the plan will help stabilize graded areas and reduce erosion and sedimentation. The SWPPP shall identify Best Management Practices (BMPs) that shall be adhered to during construction activities. Erosion-minimizing efforts such as hay bales, water bars, covers, sediment fences, sensitive area access restrictions (for example, flagging), vehicle mats in wet areas, and retention/settlement ponds shall be installed before extensive clearing and grading begins. Mulching, seeding, or other suitable stabilization measures shall be used to protect exposed areas during construction activities. The SWPPP shall also be reviewed and approved by the City of Alameda Public Works Department.

Mitigation Measure WQ–2:

All cut-and-fill slopes shall be stabilized as soon as possible after completion of grading. No site grading shall occur between October 15th and April 15th unless approved erosion control measures are in place.

b) **Depletion of groundwater supplies:** There are no existing on-site groundwater wells within the project site. The proposed project would be served with potable water service provided by the East Bay Municipal Utility District (EBMUD); no on-site groundwater wells would be drilled. The project would increase the amount of permeable surfaces on the site, which would allow for a small incremental increase in the amount of water percolating to groundwater during storm events. The project would have a minor beneficial effect on groundwater and would cause no adverse effects on groundwater supplies.

c) **Substantial alteration of existing drainage patterns resulting in erosion:** During project construction, site grading would cause a temporary change in existing drainage patterns that could result in erosion and transport of sediment into downstream receiving waters. This ***potentially significant impact*** was addressed in Section 9-a, above, and would be reduced to a less-than-significant level through implementation of Mitigation Measures WQ-1 and WQ-2.

Following completion of construction, there would be permanent changes to existing drainage patterns that could result in erosion and offsite sedimentation. The proposed project would result in the renovation of four existing buildings and demolition of five of the remaining buildings and accessory structures. The existing site is covered with predominately impervious surfaces such as asphalt and buildings and a small amount of landscaping on the parking lot and front McKay Avenue. The project would create approximately 26,486 square feet of pervious surfaces (community garden, landscaping, etc.), which would reduce impervious surface coverage from existing conditions and reduce the amount of stormwater runoff during rain events. However, the project would replace more than 10,000 square feet of existing impervious surfaces, and therefore it would be subject to the Provision C.3 stormwater management requirements of NPDES Permit No. CAS612008, issued to the Alameda Countywide Clean Water Program (ACCWP) and other Bay Area jurisdictions by the RWQCB (NPDES Order No. R2-2015-0049). This revised Municipal Regional Stormwater Permit (MRP) was adopted on November 19, 2015 and became effective on January 1, 2016.

Among other requirements, Provision C.3 of the MRP requires any private or public development project that would create or modify 10,000 square feet or more of impervious surfaces to take measures to improve water quality of stormwater discharges from the project site (i.e., stormwater runoff), including providing treatment of 100 percent of the stormwater runoff from the site. (The size threshold is reduced to 5,000 square feet for certain special land use categories, which include auto service facilities, retail gasoline outlets, restaurants, and uncovered parking lots. In addition, small projects

of at least 2,500 square feet but less than 10,000 square feet must meet certain site design requirements intended to minimize impacts to water quality.)

Provision C.3 of the MRP also includes hydromodification management (HM) requirements for certain projects located in areas susceptible to hydrograph modification. Hydrograph modification occurs when an undeveloped site is developed with impervious surfaces such as buildings and pavements, resulting in an increase in the volume and rate of stormwater runoff from the site. Hydrograph modification has the undesirable effect of increasing erosion of natural creeks and earthen channels, which can cause flooding, property damage, degradation of stream habitat, and deterioration of water quality. Due to the amount of new and replacement impervious surfaces that would be created by the proposed project, it would not be subject to HM requirements because the amount of impervious surfaces would be below the 1-acre threshold that triggers the HM requirements.

Although implementation of the project would not result in a significant change to existing conditions with respect to stormwater because so much of the site is already covered with impervious surfaces, there are currently no measures in place to treat contaminated stormwater from the site. Therefore, absent such measures, stormwater runoff from the proposed project would entrain a variety of urban pollutants that would ultimately discharge to San Francisco Bay. Uncontrolled stormwater runoff from the site would contribute pollutants to downstream surface waters, including San Francisco Bay, which would be a ***potentially significant impact.*** Implementation of the following mitigation measures would ensure the project's compliance with the Alameda Countywide Clean Water Program and would ensure that the project does not violate Waste Discharge Requirements associated with the ACCWP's NPDES municipal stormwater permit:

Mitigation Measure WQ–3:

Prior to issuance of a grading permit, the project applicant shall prepare a C.3 Stormwater Control Plan in accordance with current construction and post-construction requirements specified by State Water Resource Control Board (SWRCB) Order No. 2009-0009-DWQ and the post-construction requirements specified by National Pollutant Discharge Elimination System (NPDES) Order No. R2-2015-0049 and the Alameda Countywide Clean Water Program (ACCWP). The C.3 Stormwater Control Plan shall be developed in accordance with the provisions of ACCWP's C.3 Stormwater Technical Guidance manual (Version 5.1, May 2, 2016). Additionally, as required by the C.3 Provisions, building permit applications must be accompanied by a Stormwater Control Plan, for review and approval by the City Engineer, which specifies the treatment measures and appropriate source control and site design features that will be incorporated into project design and construction to reduce the pollutant load in stormwater discharges and manage runoff flows.

The C.3 Stormwater Control Plan shall be submitted for review and approval by the City of Alameda Public Works Department. The plan and a Stormwater Requirements Checklist shall be prepared by a qualified civil engineer or

landscape architect. The applicant shall demonstrate to the City via drawings and engineering calculations that the proposed project includes site design features sufficient to capture and treat on site all stormwater runoff from the project site, in compliance with Provision C.3 of the ACCWP. Landscape features shall be used in lieu of structural features to the degree feasible. As part of compliance with the ACCWP, the applicant shall execute and implement a maintenance agreement with the City of Alameda to provide for the maintenance of all onsite stormwater treatment features and devices in perpetuity, including specification of how the maintenance will be financed. Prior to issuance of the building permit, the applicant shall provide proof of recording this agreement from the Alameda County Clerk Recorder's Office. The applicant shall submit to the Alameda Public Works Department annual certificates of compliance with the operations and maintenance requirements stipulated in the maintenance agreement.

d) **Substantial alteration of existing drainage patterns resulting in flooding:** The proposed project would reduce the amount of impervious surfaces on the site, thereby reducing the volume and rate of stormwater discharge from the site (even absent the onsite treatment measures required by Mitigation Measure WQ-3, the implementation of which would reduce the rate of stormwater discharge from the site). Therefore, there is no potential for the project to result in an increased risk of flooding downstream of the project site.

e) **Generation of runoff water that would exceed the capacity of existing stormwater drainage systems:** Because the project would reduce the amount and rate of stormwater discharge from the site in comparison with existing conditions, there is no potential for the project's storm runoff to exceed capacity of the downstream drainage system. Potential impacts to water quality would be addressed by Mitigation Measures WQ-1 through WQ-3.

f) **Otherwise substantially degrade water quality:** See Sections 9-a and 9-c. No other impacts to water quality were identified for the project.

g) **Place housing within 100-year flood zone:** As shown on Figure WQ-1, the project site is located outside the 500-year flood plain (Zone X), and is not located in a floodway as defined by the Federal Emergency Management Agency (FEMA). As shown on Figure WQ-2, the project site is not located in an area projected to be susceptible to encroachment due to sea level rise

h) **Place structures within 100-year flood zone:** The project site is located outside the 500-year flood plain (Zone X), and is not located in a floodway as defined by the Federal Emergency Management Agency (FEMA).

i) **Exposure to risk of flooding due to dam failure:** Because Alameda is an island city and there are no large reservoirs within the City, there is no potential for dam failure inundation at the project site.

Figure WQ-1

Figure WQ-2

j) **Inundation by seiche, tsunami, or mudflow:** In the San Francisco Bay Area, any potential tsunami would originate in the Pacific Ocean, and to reach East Bay areas including the project site, would need to pass through the relatively narrow Golden Gate and into San Francisco Bay, where it would lose much of its energy. Given the project site's distance from the Golden Gate—approximately 12 miles—and the intervening land mass of San Francisco, the amount of potential tsunami runup near the project site is likely small. The project site is adjacent to but outside of the area of potential tsunamis inundation, as mapped by the California Emergency Management Agency. This would therefore be a ***less-than-significant impact***.

A seiche is a free or standing wave oscillation(s) of the surface of water in an enclosed or semi-enclosed basin that may be initiated by an earthquake. Aside from San Francisco Bay, which is addressed by the tsunami inundation potential discussed above, there is no surface water body near the project site; there is therefore no potential for inundation of the site due to seiche.

Debris flows, mudslides, and mudflows begin during intense rainfall as shallow landslides on steep slopes. The rapid movement and sudden arrival of debris flows can pose a hazard to life and property during and immediately following a triggering rainfall. There are no steep slopes on or in the vicinity of the project site, and it is not located downslope of unstable areas that would be subject to mudflows. There is therefore no potential for mudslides or debris flows.

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

California Regional Water Quality Control Board, San Francisco Bay Region, *Municipal Regional Stormwater NPDES Permit, Order No. R2-2015-0049, NPDES Permit No. CAS612008*, November 19, 2015.

Alameda Countywide Clean Water Program, *C.3 Stormwater Technical Guidance: A Handbook for Developers, Builders, and Project Applicants*, Version 6, October 31, 2017, revised April 2018.

California Emergency Management Agency, California Geological Survey and University of Southern California, "Tsunamis Inundation Map for Emergency Planning, State of California, San Francisco Bay Area" [map], December 9, 2009.

Land Use and Land Use Planning

Issues (and Supporting Information Sources):		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
10.	**LAND USE AND LAND USE PLANNING — Would the project:**				
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Discussion

Reuse and redevelopment of existing buildings formerly used by the military and federal departments for use for assisted living and wellness center activities would not physically divide the community, conflict with any plan or policy adopted to mitigate an environmental effect or conflict with any conservation plan.

The project site is currently zoned Administrative Professional (AP) with a Government (G) overlay. Pursuant to the City of Alameda Municipal Code Section 30-4.7 (b)(2), the proposed use, a medical respite and wellness center, is a permitted use under the AP zoning. The G zoning signifies that the land is under the ownership of the U.S. Government or the State of California and local regulations do not apply while that zoning is in place. As part of the project, the G zoning overlay would be removed and the underlying AP zoning would become the applicable zoning. One of the provisions of the G overlay is that "rezoning procedures shall be completed to remove the G classifications and to consider further appropriate district classification changes." Because the underlying zoning is consistent with the proposed use, no further action would be required after removal of the G zoning. In addition, the property is not one of the parcels specified in the zoning code slated for development consistent with the Community Reuse Plan Amendment (2009), so this provision does not apply to the project site. Therefore, after removal of the G zoning, the proposed use would be permitted under the AP zoning.

All redevelopment activities would be subject to the requirements of the City of Alameda Administrative Professional Zoning District and the Alameda Municipal Code.

References

City of Alameda General Plan.

City of Alameda Municipal Code.

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

Mineral Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
11. MINERAL RESOURCES — 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?	☐	☐	☐	☒

Discussion

All of the City of Alameda is classified as Mineral Resource Zone (MRZ) category MRZ-1 by the California Department of Conservation's Division of Mines and Geology (DMG). The MRZ-1 designation is assigned to areas where adequate data is available to indicate that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. In addition, no locally significant mineral resources are designated in the City's General Plan. The proposed project would have ***no impact*** on mineral resources.

References

California Department of Conservation, Division of Mines and Geology, Generalized Mineral Land Classification Map of the South San Francisco Bay Production-Consumption Region, Open-File Report 96-03, Plate 1 of 29, 1996.

City of Alameda General Plan.

Noise

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
12. NOISE — Would the project result in:				
a) Exposure of persons to or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a) **Exposure to excessive noise levels:** Future residents and employees of the proposed project would be exposed to typical noise sources in a developed urban environment. The primary source of existing ambient noise at the project site is vehicular traffic on surrounding streets. With the exception of Central Avenue, most of the streets in the project vicinity have low traffic volumes and therefore do not represent sources of substantial noise. The project site is well outside the 65-decibel (dB) noise contour for Oakland International Airport, which is located more than 4 miles from the site.

According to the Future Noise Contour Map presented in the Safety and Noise Element of the City's General Plan, existing traffic noise levels along Central Avenue in the vicinity of the project site range between 65 A-weighted decibels (dBA) community noise equivalent level (CNEL) and 69 dBA CNEL at 50 feet from the centerline.[3] Given that the project site is located approximately 250 feet from the centerline of Central Avenue, traffic noise from this roadway attenuates to approximately 57 dBA CNEL at the project site's nearest property line. Furthermore, the continuous building façade on the south side of Central Avenue and to the north of the project site substantially shields the project site from traffic noise originating from Central Avenue. Conservatively, this shielding provides additional noise attenuation of at least 6 dBA. Therefore, ambient

[3] CNEL is the average A-weighted noise level during a 24-hour day, obtained by addition of 5 decibels in the evening from 7:00 to 10:00 p.m., and an addition of a 10-decibel penalty in the night between 10:00 p.m. and 7:00 a.m.

noise levels at the project site are expected to be around 51 dBA CNEL or lower at the portion of the site closest to Central Avenue.

The Safety and Noise Element establishes an ambient noise level of 60 dBA CNEL as "normally acceptable" for residential use, requiring no special noise insulation in construction. A higher level of 65 dBA CNEL is normally acceptable for multi-family residential use, which is more applicable to the proposed project. For hospitals and nursing homes, which could apply to the medical respite center component of the project, the normally acceptable ambient noise level is 70 dBA CNEL. The existing noise environment is below all of these thresholds and, therefore, the impact of traffic noise on the project site would be considered ***less than significant.***

b) **Exposure to excessive vibration:** There are no existing sources of groundborne vibration, such as a railroad line, in proximity to the project site. While vibration generated by construction activity can cause annoyance to nearby receptors, groundborne vibration falls off quickly with distance. Some vibration would likely be generated during demolition of the existing buildings and pavements and during site grading. Such vibration is typical of most construction projects and is not sufficiently extreme to have the potential to result in structural damage to nearby properties. It's possible that the closest nearby residential receptors could experience some annoyance from construction-related vibration. However, such vibration would not be expected to result in adverse physical effects; it would represent an intermittent and short-term annoyance. Only the closest adjacent receptors would be able to experience perceptible levels of intermittent vibration. Because construction activities would occur during daytime business hours, it's likely that a majority of nearby residents would be at work or away from home on personal business. Therefore, construction-related vibration would be a ***less-than-significant impact.*** Following completion of construction, operation of the project would not generate vibration.

c) **Substantial permanent increase in ambient noise:** Once the short-term construction activities were completed, the only operational noise that would be generated by the project would be from vehicular traffic traveling to and from the site, and from periodic landscape maintenance, which is not treated as a significant noise impact. With respect to traffic noise sources, a doubling of traffic volumes is generally required before an increase in ambient noise will be perceived by the average person, corresponding to a noise level increase of 3 dB. With existing traffic volumes along Central Avenue of approximately 11,000 vehicles per day, the project would need to generate roughly 5,500 vehicle trips per day in order to cause a 3-dB increase in ambient noise. As discussed in detail in Section 19, the project would generate a modest amount of vehicle traffic far below 5,500 trips per day. Furthermore, as discussed in Section 12-a, above, even if the ambient noise level were to increase by 3 dB, it would still be well within acceptable limits. The project would have a ***less-than-significant impact*** due to generation of noise.

d) **Substantial temporary increase in ambient noise:** Temporary noise would be generated during demolition of some of the existing structures on the site and

construction of the proposed project. Noise impacts resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise generating activities, and the distance between construction noise sources and noise sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise sensitive land uses, or when construction lasts over extended periods of time.

Construction activities generate considerable amounts of noise, especially during demolition and earth moving activities when heavy equipment is used. The highest maximum noise levels generated by project demolition and construction activities would typically range from about 90 to 95 dBA at a distance of 50 feet from the noise source. Typical hourly average construction generated noise levels are about 81 dBA to 88 dBA measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.), while lower noise levels occur during building construction and finishing. Construction-generated noise levels drop off at a rate of about 6 dBA per doubling of distance between the source and receptor. Shielding by buildings or terrain often result in lower construction noise levels at more distant receptors.

With residential receptors located in close proximity to east, north, and west of the project site, nearby residents who remain at home during daytime construction hours could be exposed to excessive noise levels during noisy construction activities. However, most Bay Area cities do not treat temporary construction noise as a significant impact pursuant to CEQA if construction activities are limited to stipulated hours. Pursuant to Section 4-10.7 of the Alameda Municipal Code, noise-generating construction activities must be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturdays. Construction is prohibited on Sundays and holidays. Construction of the proposed project would be required to occur only during these hours and, therefore, the project would have a ***less-than-significant impact*** related to temporary construction noise.

e) **Exposure to excessive aircraft noise from public airport:** The project site is not located within the planning area of an airport land use plan and is not located within 2 miles of a public airport.

f) **Exposure to excessive aircraft noise from private airstrip:** The project site is not located within 2 miles of a private airstrip.

References

City of Alameda, *General Plan*, Safety and Noise Element, January 1, 2017.

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

Population and Housing

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
13. POPULATION AND HOUSING — Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

The proposed actions would facilitate the reuse of a vacant mixed-use campus for the purpose of providing living facilities and medical facilities for existing Bay Area residents that are homeless. These individuals and families are already part of the Bay Area population; thus, the project would not directly induce an increase in the City's population. There is no existing housing on the site, so the project would not displace any existing residents, necessitating construction of additional housing elsewhere.

The proposed project would provide employment for 48 workers in the senior housing, medical respite, and supportive services facilities, creating new jobs that could potentially induce workers to relocate to the project regions. However, the previous use of the site provided employment for approximately 150 employees, resulting in a net decrease in job positions at the site. Consequently, the project would not be expected to increase in the City's population, and therefore would not create the need for construction of new housing in the City or surrounding area. The project would not result in adverse effects on population or housing.

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
14. PUBLIC SERVICES — Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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 following public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

Discussion

a.i) **Adversely affect fire protection services:** Alameda Fire Station Number 2 is located approximately 0.39 mile north of the project site. The Alameda Fire Department (AFD) currently provides emergency fire service to the project site and would continue to do so with existing stations, equipment, and staffing. The project would have a ***less-than-significant impact*** on fire protection services.

a.ii) **Adversely affect police protection services:** The Alameda Police Department (APD) is headquartered approximately 1.97 miles east of the project site. The APD currently provides police service to the project site and would continue to do so with existing stations, equipment, and staffing. The project would have a ***less-than-significant impact*** on police protection services.

a.iii) **Adversely affect schools:** The proposed project is intended to serve aging homeless adults, who are not expected to have school age children, nor would children be accommodated by the project. The medical respite center would serve homeless adults needing short-term recuperative care, and this population would also not have children who would be added to the enrollments of local schools.

Although the project would create 48 new jobs, and some positions could be filled by workers with families who would relocate to the City of Alameda or nearby cities, there would be a net reduction in employment positions created by the project, because the prior use of the site employed approximately 150 people. New school-age children moving to Alameda as a result of the project would be offset by children leaving the City in response to the termination of previous employment positions at the project site. Therefore, the project would have a ***less-than-significant impact*** on schools.

a.iv) **Adversely affect parks:** With 90 senior housing units, the project could incrementally increase the use of nearby neighborhood and recreational parks. However, it would not induce population growth, as the project would serve the homeless of the City of Alameda and would not draw new residents from outside Alameda. In addition, the proposed project would include on-site community facilities such as a community garden and an outdoor common space. Residents would also be expected to utilize the nearest open space, the Robert W. Crown Memorial State Beach, which is located approximately 470 feet southeast of the project site, across from McKay Avenue. The minor incremental increase in the use of existing parks could be readily accommodated by existing facilities and would not require the construction or expansion of parks. Therefore, the project would have a ***less-than-significant impact*** on parks.

a.v) **Adversely affect other public facilities:** Two libraries serve the City of Alameda: the West End Library, at 788 Santa Clara Avenue, and the Alameda Free Library, at 1550 Oak Street. Project residents could utilize existing library facilities in the City, and some future project residents could already be patronizing one of these libraries. The minor incremental increase in the use of existing libraries could be readily accommodated by existing facilities and would not require the construction or expansion of libraries. There are no other public facilities that would potentially be affected by the proposed project. Therefore, the project would have a ***less-than-significant impact*** on other public facilities.

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

Recreation

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. RECREATION:				
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?	☐	☒	☐	☐

Discussion

a) **Deterioration of parks or other recreational facilities:** As discussed in Section 14, with 90 senior housing units, the project could incrementally increase the use of nearby neighborhood and recreational parks, as well as other recreational facilities in the City. However, the project's target population is homeless seniors who already reside in the City, so the potential growth in use of existing parks and other recreational facilities could be readily accommodated by existing facilities and would not require the construction or expansion of parks. Therefore, the project would have a ***less-than-significant impact*** on parks and other recreational facilities.

b) **Environmental impacts from construction of recreational facilities:** The proposed project would include the construction on-site of new recreational facilities such as a community garden and an outdoor common space. The impacts of constructing those facilities are addressed throughout this Initial Study. With implementation of the mitigation measures identified elsewhere in this document, the project would have a ***less-than-significant impact*** on parks.

References

Transportation and Traffic

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
16. TRANSPORTATION/TRAFFIC — Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

Discussion

a) **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system:** The proposed use of the site and facilities as described in the project description will generate very few vehicle trips compared to more typical residential uses or commercial uses that might occupy the site. Furthermore, the site is located within a few blocks of the Webster Street commercial district which is one of the City of Alameda's best-served transit corridors and commercial shopping districts. AC Transit provides some of the City of Alameda's best transit service, with buses running every 15 minutes or less on Webster Street providing direct service through the City of Alameda and to/from Oakland and beyond.

The new vehicle, transit, bicycle, and pedestrian trips generated by the operations of the proposed new facilities would not conflict with any General Plan Transportation Element policy, City of Alameda Transportation Choices Plan strategy or governing policy, Alameda Municipal Code provision or regulation establishing measures of effectiveness for the performance of the circulation system, and the use of the property and facilities for the intended uses described in the Project Description would not result in a significant impact on transportation systems due to the small number of additional trips generated by the proposed use.

Table TR-1 presents the estimated automobile trip generation for the new facilities based on the methodology and data published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th Edition) using the land use categories that best fit the project. It is estimated that the new facilities would generate about 610 daily trips, 37 AM peak-hour trips, and 55 PM peak-hour trips. This trip generation estimate is rather conservative because the project would have up to 60 employees working a variety of shifts with different start and end times and the majority of patients and residents would not have a personal vehicle and would travel to and from the site by other modes.

Of those commute-hour trips, the estimated number of vehicle trips leaving the facility and the island during the AM peak commute hour is estimated to be less than five (5) trips and the number of vehicles coming to the facility in the PM peak hour from off-island locations is expected to be less than seven (7) vehicle trips. Therefore, at existing congested intersections in Alameda, the additional traffic volume generated by the project represents significantly less than a 3-percent increase in volume, and the anticipated number of vehicle trips added to the Alameda estuary crossings during the peak congestion periods in the commute direction will be less than the average daily variation in trips in the tubes and on the bridges, and would not be noticeable to drivers.

Table TR-1 - Project Trip Generation Summary

Use	Size	Daily	AM Peak hour	PM Peak Hour
Senior Permanent Supportive Housing[1]	90 beds	180	7	16
Medical Respite[2]	50 beds	150	8	11
Resource Center / Primary Care Clinic[3]	8,000 square feet	280	22	28
Total		**610**	**37**	**55**

1. ITE Trip Generation (10th Edition) land use category 253 (Congregate Care Facility) average rates: Daily = 2.02, AM Peak Hour = 0.07, PM Peak Hour = 0.18
2. ITE Trip Generation (10th Edition) land use category 620 (Nursing Home) average rates: Daily = 3.06, AM Peak Hour = 0.17, PM Peak Hour = 0.22
3. ITE Trip Generation (10th Edition) land use category 720 (Medical-Dental Office Building) average rates: Daily = 34.80, AM Peak Hour = 2.78, PM Peak Hour = 3.46

Source: Fehr & Peers, 2018.

b) **Conflict with an applicable congestion management program or level of service standards:** The new vehicle, transit, bicycle, and pedestrian trips generated by the operations of the new facilities would not conflict with the Alameda County Congestion Management Program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management

agency for designated roads or highway primarily because the project would generate fewer than 100 peak-hour trips.

c) **Change air traffic patterns, resulting in substantial safety risks:** The new facilities and the new vehicle, transit, bicycle, and pedestrian trips generated by the operations of the new facilities would not result in a change to air traffic patterns or a substantial safety risk to air traffic or the risk of casualties on the ground as the result of airplane failure.

d) **Result in hazards due to a design feature or incompatible uses:** The anticipated number of vehicle trips would not result in the need to modify any of the exiting streets or intersections in the vicinity of the project. The proposed facility would use the existing driveways and McKay roadway access that was used for over 74 years by the federal government when the facility was occupied and used as laboratory, office, and living space. The proposed project would not modify site access or the transportation network in the surrounding areas, and the former use of the site generated more daily and weekday peak-hour trips than the proposed use. Furthermore, the medical and residential uses proposed by the project would be compatible with the existing residential, commercial, and recreational uses in the surrounding area and would not introduce incompatible vehicles, such as farm equipment or heavy trucks, in the surrounding areas. Thus, the proposed uses would not increase hazards due to design features or incompatible uses.

e) **Emergency Access:** The site provides adequate emergency access for fire department service in the event of the emergency. McKay Avenue provides access to the site and the site includes two means of access to the facilities on the property.

f) **Conflicts with public transit, bicycle, or pedestrian facilities:** As described above, the proposal and the anticipated trips generated by the use would not conflict with any adopted or proposed plans for public transit, bicycle, or pedestrian facilities, nor would the number of trips adversely affect the performance or safety of the transit, bicycle, or pedestrian facilities in the vicinity of the project.

References

Fehr & Peers, Transportation Consultants, September 2018.

Tribal Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Tribal Cultural Resources — Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in 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 Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion

a) On March 28, 2018, FirstCarbon Solutions sent a letter to the Native American Heritage Commission (NAHC) in an effort to determine whether any sacred sites or tribal cultural resources were listed for the project site on its Sacred Lands File. A response was received on April 30, 2018, indicating that the results from the Sacred Lands File search were negative; however, the letter stated that the absence of specific site information did not negate the possibility that tribal cultural resources may be present within the project site and recommended consultation with local tribal representatives. To this end, the NAHC included a list of eight tribal representatives available for consultation. To ensure the protection of potential tribal cultural resources and address potential concerns about the project, a letter containing project information and a request for any additional information was sent to all eight tribal representatives on May 2, 2018. No response has been received to date.

Although no tribal cultural resources have been identified on or in close proximity to the project site, there is still potential for encountering such resources on the site during site disturbance activities required for project construction. Such resources, if present, could be damaged or destroyed during subsurface disturbance of the site, which would constitute a potentially significant impact. Implementation of Mitigation Measures CR-1, CR-2, and CR-3 (see Section 5) would reduce this potential impact to a less-than-significant level.

b) Public Resources Code Section 5024.1 establishes the California Register of Historical Resources and defines the criteria for determining whether a resource is eligible for inclusion on the Register. As discussed in Section 5-a, no significant historical resources, tribal or otherwise, have been identified on the project site, nor have attempts to contact local tribal representatives produced information indicating that such resources may be

present. Nonetheless, as noted above, there is still potential for encountering historic tribal resources on the site during site disturbance activities required for project construction. Such resources, if present, could be damaged or destroyed during subsurface disturbance of the site, which would constitute a potentially significant, adverse impact. Implementation of Mitigation Measures CR-1, CR-2, and CR-3 (see Section 5) would reduce this potential impact to a less-than-significant level.

References

FirstCarbon Solutions, *Environmental Assessment: Federal Center Reuse Project, City of Alameda, Alameda County, California*, May 21, 2018.

Utilities and Service Systems

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
18. UTILITIES AND SERVICE SYSTEMS — Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion

The proposed action to amend the General Plan and Zoning to allow for private use of a former 80,000 square foot military office, laboratory and residential campus for the purpose of assisted living, medical services, and office space to serve homeless individuals would not significantly impact utility and service systems.

The site is currently served by all required utilities and service systems. The reduction of impermeable surfaces on the site will reduce storm water system demands from the current site surfaces.

References

Mandatory Findings of Significance

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
19. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to 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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

a) **Degradation of biological or cultural resources:** There is no potential for the project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self–sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal so long as Mitigation Measure BR-1 is implemented. There is a remote possibility for encountering buried historic/prehistoric cultural resources on the site, but mitigation measures have been identified in Section 5 to minimize potential impacts in the event such resources are encountered during project construction.

b) **Cumulatively considerable impacts:** The potential air quality and water quality impacts identified in Sections 3 and 8, respectively, are inherently cumulative impacts. With implementation of the mitigation measures identified for those impacts, the cumulative impacts would be reduced to a less-than-significant level. No other significant cumulative impacts were identified for the proposed project.

c) **Adverse effects on human beings:** The proposed project—consisting of an amendment to the General Plan and zoning to allow for private use of a former 80,000-square-foot military office, laboratory, and residential campus for the purpose of assisted living, medical services, and office space to serve homeless individuals—would not introduce any significant hazards to the project area. Measures have been identified to address potentially significant impacts associated with strong seismic shaking, liquefaction, lateral spreading, and expansive soils. In addition, the project could result in adverse

impacts on water quality, which could result in indirect health effects in swimmers in San Francisco Bay (waterborne diseases) and to those consuming fish or shellfish. Mitigation measures have been identified to reduce these potential impacts to a less-than-significant level.

References

Mitigation Measures

The following mitigation measures have been identified in this document to reduce potentially significant impacts to less-than-significant levels:

Air Quality

Mitigation Measure AQ-1:

The project construction contractor shall reduce the severity of project construction period dust and equipment exhaust impacts by complying with the following control measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Biological Resources

Mitigation Measure BR-1:

Removal of trees shall be limited to trees that must be removed in order to accommodate the proposed construction. If any tree removal, site grading, or project construction will occur during the general bird nesting season (February 1st through August 31st), a bird nesting survey shall be conducted by a qualified raptor biologist prior to any grading or construction activity. If conducted during

the early part of the breeding season (January to April), the survey shall be conducted no more than 14 days prior to initiation of grading/construction activities; if conducted during the late part of the breeding season (May to August), the survey shall be performed no more than 30 days prior to initiation of these activities. If active nests occupied by birds protected under the Migratory Bird Treaty Act are identified, a 250-foot fenced buffer (or an appropriate buffer zone determined in consultation with the California Department of Fish and Wildlife) shall be established around the nest tree and the site shall be protected until September 1st or until the young have fledged. A biological monitor shall be present during earth-moving activity near the buffer zone to make sure that grading does not enter the buffer area.

Cultural Resources

Mitigation Measure CR-1:

City Staff shall advise the Project Construction Superintendent, Project Inspector, and Building Inspector at a pre-construction conference of the potential for encountering cultural resources during construction and the applicant's responsibilities per CEQA should resources be encountered. This advisory shall also be printed on the Plans and Specification Drawings for this project.

Mitigation Measure CR-2:

If any cultural artifacts are encountered during site grading or other construction activities, all ground disturbance within 100 feet of the find shall be halted until the City of Alameda is notified, and a qualified archaeologist can identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). The results of any additional archaeological effort required through the implementation of Mitigation Measures CR–2 or CR–3 shall be presented in a professional-quality report, to be submitted to the project sponsor, the City of Alameda Community Development Department, and the Northwest Information Center at Sonoma State University in Rohnert Park. The project sponsor shall fund and implement the mitigation in accordance with Section 15064.5(c)-(f) of the and Public Resources Code Section 21083.2.

Mitigation Measure CR-3:

In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and a qualified archaeologist shall notify the Office of the Alameda County Coroner and advise that office as to whether the remains are likely to be prehistoric or historic period in date. If determined to be prehistoric, the Coroner's Office will notify the Native American Heritage Commission of the find, which, in turn, will then appoint a "Most Likely Descendant" (MLD). The MLD in consultation with the archaeological consultant and the project sponsor, will advise and help formulate an appropriate plan for treatment of the remains, which might include recordation, removal, and scientific study of the remains and any associated artifacts. After completion of analysis and preparation of the report of findings, the remains and associated grave goods shall be returned to the MLD for reburial.

Mitigation Measure CR-4:

If any paleontological resources are encountered during site grading or other construction activities, all ground disturbance shall be halted until the services of a qualified paleontologist can be retained to identify and evaluate the scientific value of the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). Significant paleontological resources shall be salvaged and deposited in an accredited and permanent scientific institution, such as the University of California Museum of Paleontology (UCMP).

Geology and Soils

Mitigation Measure GS-1:

Prior to the issuance of building permits, the project applicant shall submit a soil report/geotechnical investigation to the City of Alameda for review and approval. The investigation shall be prepared by a qualified geotechnical engineer and shall stipulate site preparation and building design features necessary to achieve compliance with the latest adopted edition of the California Building Standards Code's geologic, soils, and seismic requirements. The recommendation from the approved soils report/geotechnical investigation shall be incorporated into the project plans to ensure compliance with City and State building code standards. Additionally, the project shall implement the structural upgrades proposed in the June 1990 Seismic Hazard Report prepared by Walk, Haydel & Associates for Buildings, 2A, 2B, 2C, and 2D. As recommended in that report, a more thorough structural seismic analysis for all of the two-story buildings on the site shall be conducted by a qualified structural engineer, and the recommendations of the resulting report shall be incorporated into the project.

Hazardous Materials

Mitigation Measure HM–1:

Prior to issuance of a demolition permit for the existing buildings on the site, a comprehensive survey for asbestos-containing building materials (ACBM) shall be conducted by a qualified asbestos abatement contractor. Sampling for ACBM shall be performed in accordance with the sampling protocol of the Asbestos Hazard Emergency Response Act (AHERA). If ACBM is identified, all friable asbestos shall be removed prior to building demolition by a State-certified Asbestos Abatement Contractor, in accordance with all applicable State and local regulations, including Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2 pertaining to demolition, removal, and disposal of ACBM. BAAQMD shall be notified at least ten business days in advance of building demolition, in compliance with Regulation 11, Rule 2. To document compliance with the applicable regulations, the project sponsor shall provide the City of Alameda Building Division with a copy of the notice required by BAAQMD for asbestos abatement work, prior to and as a condition of issuance of the demolition permit.

Mitigation Measure HM–2:

Prior to issuance of a demolition permit for the existing buildings on the site, a survey for lead-based paint (LBP) shall be conducted by a qualified lead assessor. If LBP is identified, lead abatement shall be performed in compliance

with all federal, State, and local regulations applicable to work with LBP and disposal of lead-containing waste. A State-certified Lead-Related Construction Inspector/Assessor shall provide a lead clearance report after the lead abatement work in the buildings is completed. The project sponsor shall provide a copy of the lead clearance report to the City of Alameda Building Division prior to issuance of a demolition permit.

Hydrology and Water Quality

Mitigation Measure WQ–1:

Prior to issuance of a grading permit the project sponsor shall obtain National Pollutant Discharge Elimination System (NPDES) construction coverage as required by Construction General Permit (CGP) No. CAS000002, as modified by State Water Resources Control Board (SWRCB) Order No. 2009-0009-DWQ. Pursuant to the Order, the project applicant shall electronically file the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI), a risk assessment, site map, signed certification, Stormwater Pollution Prevention Plan (SWPPP), and other site-specific PRDs that may be required. At a minimum the SWPPP shall incorporate the standards provided in the Association of Bay Area Governments' Manual of Standards for Erosion and Sedimentation Control Measures (2005), the California Stormwater Quality Association's California Stormwater Best Management Practices Handbook (2009), the prescriptive standards included in the CGP, or as required by the Clean Water Program Alameda County, whichever are applicable and more stringent. Implementation of the plan will help stabilize graded areas and reduce erosion and sedimentation. The SWPPP shall identify Best Management Practices (BMPs) that shall be adhered to during construction activities. Erosion-minimizing efforts such as hay bales, water bars, covers, sediment fences, sensitive area access restrictions (for example, flagging), vehicle mats in wet areas, and retention/settlement ponds shall be installed before extensive clearing and grading begins. Mulching, seeding, or other suitable stabilization measures shall be used to protect exposed areas during construction activities. The SWPPP shall also be reviewed and approved by the City of Alameda Public Works Department.

Mitigation Measure WQ–2:

All cut-and-fill slopes shall be stabilized as soon as possible after completion of grading. No site grading shall occur between October 15th and April 15th unless approved erosion control measures are in place.

Mitigation Measure WQ–3:

Prior to issuance of a grading permit, the project applicant shall prepare a C.3 Stormwater Control Plan in accordance with current construction and post-construction requirements specified by State Water Resource Control Board (SWRCB) Order No. 2009-0009-DWQ and the post-construction requirements specified by National Pollutant Discharge Elimination System (NPDES) Order No. R2-2015-0049 and the Alameda Countywide Clean Water Program (ACCWP). The C.3 Stormwater Control Plan shall be developed in accordance with the provisions of ACCWP's C.3 Stormwater Technical Guidance manual (Version 5.1, May 2, 2016). Additionally, as required by the C.3 Provisions, building permit applications must be accompanied by a Stormwater Control Plan,

for review and approval by the City Engineer, which specifies the treatment measures and appropriate source control and site design features that will be incorporated into project design and construction to reduce the pollutant load in stormwater discharges and manage runoff flows.

The C.3 Stormwater Control Plan shall be submitted for review and approval by the City of Alameda Public Works Department. The plan and a Stormwater Requirements Checklist shall be prepared by a qualified civil engineer or landscape architect. The applicant shall demonstrate to the City via drawings and engineering calculations that the proposed project includes site design features sufficient to capture and treat on site all stormwater runoff from the project site, in compliance with Provision C.3 of the ACCWP. Landscape features shall be used in lieu of structural features to the degree feasible. As part of compliance with the ACCWP, the applicant shall execute and implement a maintenance agreement with the City of Alameda to provide for the maintenance of all onsite stormwater treatment features and devices in perpetuity, including specification of how the maintenance will be financed. Prior to issuance of the building permit, the applicant shall provide proof of recording this agreement from the Alameda County Clerk Recorder's Office. The applicant shall submit to the Alameda Public Works Department annual certificates of compliance with the operations and maintenance requirements stipulated in the maintenance agreement.