1919 Williams Street Warehouse Project

Final Environmental Impact Report
State Clearinghouse No. 2021080547

prepared by

City of San Leandro
Planning Division, Community Development Department
835 East 14th Street
San Leandro, California 94577
Contact: Anne Wong, AICP, Associate Planner

prepared with the assistance of

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

May 2022

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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1 Introduction

1.1 Environmental Review Process

Pursuant to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft Environmental Impact Report (EIR).

On August 27, 2021, the City of San Leandro circulated a Notice of Preparation (NOP) and Initial Study for a 30-day period to identify environmental issue areas potentially affected if the proposed project were to be implemented. The NOP was mailed or otherwise provided to public agencies, the State Clearinghouse, organizations, and individuals considered likely to be interested in the proposed project and its potential impacts. Comments received by the City of San Leandro on the NOP and Initial Study are provided in Appendix NOP of the Draft EIR and are summarized in Table 1-1 of the Draft EIR. These comments were taken into account during the preparation of the Draft EIR.

The Draft EIR was made available for public review on March 1, 2022, was distributed to local agencies. Copies of the Notice of Availability of the Draft EIR were mailed to a list of interested parties, groups and public agencies. The Draft EIR and an announcement of its availability were posted electronically on the City's website, and a paper copy was available for public review at the San Leandro Community Development Department. The Notice of Availability of the Draft EIR was also posted at the office of the Alameda County Clerk.

The 30-day CEQA public comment period began on March 1, 2022 and ended on March 31, 2022. The City of San Leandro received two comment letters on the Draft EIR. Copies of written comments on the Draft EIR received during the comment period, as well as responses to those comments, are included in Section 3 of this document.

1.2 Document Organization

This Response To Comments (RTC) document consists of the following sections:

- *Section 1: Introduction.* This section discusses the purpose and organization of this RTC Document and the Final EIR and summarizes the environmental review process for the project.
- *Section 2: List of Commenters.* This section contains a list of the agencies and private groups, organizations, and individuals that submitted written comments during the public review period on the Draft EIR.
- *Section 3: Comments and Responses.* This section contains reproductions of all comment letters received on the Draft EIR. A written response for each CEQA-related comment received during the public review period is provided. Each response is keyed to the corresponding comment.

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2 Responses to Comments on the Draft EIR

This section presents a list of comment letters received during the public review period and describes the organization of the letters and comments that are provided in Section 4, *Comments and Responses*, of this document.

2.1 Organization of Comment Letters and Responses

The City received comment letters from private groups and organizations. No federal or state agencies provided written comments. Each comment letter has been numbered sequentially and each issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue. For example, Response 1.1 indicates that the response is for the first issue raised in comment Letter 1.

2.2 Comments Received

The following letters were submitted to the City:

2.3 Comments and Responses

Written responses to each comment letter received during the public review period on the Draft EIR and reproductions of those letters are provided in this section in their entirety. Text within individual letters that has not been numbered does not specifically raise environmental issues nor relate to the adequacy of the information or analysis within the Draft EIR, and therefore that comment is not enumerated and no response is required, pursuant to CEQA Guidelines Sections 15088 and 15132.

LETTER 1

TEAMSTERS JOINT COUNCIL NO. 7

Affiliated with the International Brotherhood of Teamsters

Organized November 18, 1907
United with JC# 38 January 1, 2010

March 31, 2022

Anne Wong, AICP, Associate Planner
Community Development Department
City of San Leandro
835 East 14th Street
San Leandro, CA 94577
awong@sanleandro.org

Re: 1919 Williams Street Warehouse Project Final EIR Comment Letter

This letter is submitted as a comment on the Final EIR proposed for the industrial warehouse project at 1919 Williams Street. The Teamsters Joint Council 7 represents more than 100,000 members in 20 Local Unions in 48 counties of Northern California and the Central Valley. We represent workers in warehousing, distribution, and related industries, as well as drivers dealing with package deliveries. Our members not only work in this industry but live in the neighborhoods and communities often directly impacted by it. Joint Council 7 is part of a coalition of local community members and organizations including the Teamsters Local 70, the Alameda Central Labor Council, and the United Food and Commercial Workers Local 5. We are unified in our concerns about potentially unknown environmental impacts of the project involving traffic and emissions, air quality impacts, and the bigger picture of logistical systems in San Leandro. 1.1

1. Project

This letter is submitted to as a comment to the proposed Final EIR for the proposed project at 1919 Williams Street. The project applicant ("Applicant") proposed demolition of the existing historically significant warehouse and office space and construction of an approximately 212,000 square foot, two-story warehouse ("the Project"). The proposal calls for the warehouse to include 30 dock-high loading doors, indicating a high-intensity warehouse use. This is because warehouses that anticipate high frequency of unloading and loading typically require a greater number of loading doors. No tenant ("Operator" or "Project Operator") has been identified for the Project as of the time of the publication of the FEIR draft. However, as the transportation analysis suggests, the site may be used as a delivery hub-style warehouse. 1.2

2. Standard

If substantial evidence supports a fair argument that unmitigated significant impacts may occur as a result of approval of a project, an EIR must be prepared. 1.3

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E-Mail:teamjc7@teamjc7.org

In determining whether an EIR is adequate, "the ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 516. Comment on a Final EIR and the analysis that makes it up is appropriate at any public hearing at which CEQA compliance is raised, prior to the issuance of a NOD. Galante Vineyards v. Monterey Peninsula Water Mgmt. Dist., (1997) 60 Cal. App. 4th 1109, 1119-20. 1.3

3. Substantive Areas of Potential Significant Impact

A. Transportation

As the transportation analysis memo prepared by Kimley-Horn, found in Appendix TRA of the Initial Study ("Transportation Memo"; "Tra. Memo") points out, the features of the proposed warehouse, particularly the number of dock-high loading doors, match that of more high-intensity warehouse uses. (Tra. Memo at 2). However, the consultant rejected use of the Institute for Transportation Engineers Trip Generation Manual's ("ITE Manual") Code 154 use ("High-Cube Transload and Short-Term Storage Warehouse") because the constituent studies that composed that use-code classification did not include any facilities under 250,000 square feet. *Id.*

As a result, in determining the appropriate trip-generation characteristics for the Project, the transportation analysis in the Initial Study relies on the trip-generation characteristics of a Code 150, general warehousing, use, for the previous use. 1.4
However, the Tra. Memo is not clear as to what ITE Manual code was used for the proposed Project. It is presumed that the Code 150 classification was used for both. The Transportation Memo does not state why other potentially applicable ITE Manual codes were not considered, despite the fact that the proposed use, particularly given its particular design characteristics, would qualify for a number of these classifications.

This is a critical choice because the differential trip generation characteristics would support a potential significant impact. For example, Code 155, for a "Parcel Hub Warehouse," has a trip generation number more than three times that of the chosen Code 150. This results in a trip generation number of approximately 136, as opposed to approximately 40 under Code 150. This couples with the consultant's methodology for computing employee trips to present a problem with the VMT analysis.

Importantly, the fact that the structure will be less than 250,000 square feet should not preclude application of Code 155 trip generation characteristics; e-commerce "last-mile" type delivery stations, i.e., warehouses that briefly store packages for purpose of sorting and final delivery to retail consumers, have been developed throughout California at sizes ranging from 140,000 to 250,000 square feet or more, and sometimes less. As will be discussed further below, this is the problem with entitling a project prior to any commitment as to who the final project operator will be: the physical characteristics of the site are insufficient alone to determine what the impacts of the site will be, without specific knowledge of the range of operations that will actually take place at the site. 1.5

The consultant concludes that the proposed project should be screened from a quantitative VMT analysis because it will result in a net decrease in vehicle miles traveled, since the proposed Project will decrease the size of the warehouse structure by approximately 15,000 square feet. This in turn is based on the idea that because the footprint of the building will be smaller, and because the number of employees is determined by the size of the structure (in the ITE Manual) there will be fewer employees and therefore fewer trips.

This is deficient as a matter of law under CEQA because what is relevant is the uses that will be allowed by the entitlement, unless conditions on the entitlement specifically restrict those uses. The transportation analysis has attempted, without knowing the specific use, to project VMT not by the *highest possible use given the entitlements*, but rather by approximating or estimating a fairly low-level use and using that as the appropriate level of analysis.

In California over the last two years, numerous e-commerce last-mile style delivery stations have been opened that operate at sizes considerably under 250,000 square feet, in warehouses with similar designs to that of the proposed Project. There have been at least 40 e-commerce last-mile delivery stations under 250,000 square feet permitted in California since 2020.[1] 1.6

These last-mile delivery stations are unique and differ from the type of warehouse contemplated by the Code 150-type warehouse, and certainly from the prior use of the site, as a warehousing and delivery facility for auto parts. A retail last-mile delivery station does not, as an auto-parts facility would, deliver in large quantities to retailers, using heavy trucks. Instead, an e-commerce last-mile delivery station, apparently a permitted use under the entitlements being sought, sends commercial vans and passenger vehicles circulating through the community throughout the day to complete deliveries of household and retail goods. This entails a higher intensity of use throughout the day and greater VMT.

(i) Employee Count & VMT

The nature of e-commerce last-mile delivery stations relates also to the fundamental error in the VMT analysis used to the screen the Project from a quantitative analysis. This is because the number of "employees" cannot be analogized to the number of employees at a traditional warehouse, as existed at the site prior.

The fact, or objection, that no specific project operator has been identified is not a strike *against* conducting a more thorough analysis; it is a strike *for* doing so, because there is a broader range of possible uses given the entitlements sought. If the project is entitled as the Applicant wants, there will be no *subsequent* discretionary review necessary to shift the Project into an e-commerce last-mile delivery facility, meaning that the City and the public will have no future opportunity to study the potential impacts of such a use. Therefore, the City must conduct this analysis now, or else the environmental review is fundamentally deficient. 1.7

[1] For reference, facilities in Gardena (W Gardena Road), Pleasanton (Busch Road), Sonoma (Aviation Boulevard), Fresno (East Olive Avenue), Manteca (Airport Way), Moorpark (Condor Drive), and Rancho Cordova are examples just from the first three months of 2022.

The last-mile delivery station model entails potentially hundreds or scores of workers picking up and delivering packages. This is a qualitative difference from the prior warehouse use, where the "employees/square footage" formula is based on the idea that the primary purpose of the site is for the wareh use workers who unload, sort, and load goods onto a relatively small and predictable number of heavy trucks (presumably employed by third party wholesalers or retailers) per day. In fact, the model is inverted: most of the work activity on the site happens in the form of commercial van and passenger vehicle drivers accessing the site and completing deliveries from it. The technicality of whether these drivers are classified, for federal labor and wage statutory purposes, as independent contractors or employees is immaterial to the land use.

1.8

As one example, e-commerce giant Amazon requires its Delivery Service Partners–those who provide the delivery service labor to each warehouse–to rent up to 40 vans from Amazon and have up to 100 employees running routes seven days a week 365 days a year.[2]

The Tra. Memo does not mention the possibility of this kind of activity, instead simply subtracting the square footage from a traditional warehouse use to arrive at a simplistic determination that there will be a net savings in VMT.

No consideration was given to a potential use under the entitlements sought, and that potential use would increase, significantly, the number of workers at the site, and, therefore, could reasonably result in an increase in VMT. To satisfy CEQA's information disclosure requirements, it was necessary for the Applicant and City to consider the entire range of uses being entitled, and to conduct a study that incorporate presumptions from the highest and greatest intensity use, so long as that use would not entail a further discretionary approval. Therefore, this analysis is deficient under CEQA, and further study was necessary. The FEIR should not be approved so long as this underlying deficiency exists.

1.9

B. Greenhouse Gas Emissions

The Initial Study, and therefore the FEIR, are deficient because the greenhouse gas emissions (GHG) analysis does not account for the highest-intensity use that will be entitled should the FEIR be approved and the request permits issued. The presumptions in the FEIR lay out specifically that that analysis rested on presumptions in the transportation analysis. (See Initial Study at 73).

This failure to study the reasonably predictable vehicle trips associated with the entitlements sought means that the GHG emissions model used in the IS is deficient as an informational document. The stated GHG figure for "mobile" emissions is 351 (of CO2e), but as stated in the section on the transportation analysis, above, the figure may be at least three times higher, if not greater, put it at 1,053 as a minimum. This would raise the total to 1,974 CO2e, well in excess of the 1,100 figure found in the Bay Area Air Quality Mitigation District (BAAQMD) guidelines. What's more, these impacts come from sources not directly related to the mitigation measures found in the City's Climate Action Plan (CAP). Specifically, bicycle stations, EV chargers, and mitigation of construction waste do not bear a direct nexus with the operation of a last-mile delivery station that operates on the basis of vehicle delivery of packages to retail consumers, where there is no requirement that some proportion of the delivery fleet be EV.

1.10

1.11

[2] For Amazon's own description of this, see e.g., https://logistics.amazon.com/marketing/opportunity

There is no evidence extant in the record to indicate whether this figure would conform to the City's Climate Action Plan and therefore represent a less than significant impact under CEQA Guidelines Section 15183.5. 1.11

4. Conclusion

For the foregoing reasons, the Final EIR and the constituent environmental documents are deficient and should not be adopted. Further study on the relevant areas is necessary to make this environmental review adequate. 1.12

Sincerely,

Doug Bloch

Doug Bloch
Political Director

Letter 1

COMMENTER: Doug Bloch, Political Director, Teamsters Joint Council No. 7

DATE: March 31, 2022

Response 1.1

The commenter provides a summary of the Teamsters Joint Council 7 and their affiliations within Northern and Central California. The commenter generally summarizes their concerns over projects within San Leandro, which are stated more specifically in the following comments.

This comment does not pertain to the Draft EIR; however, it has been noted. Accordingly, no revisions to the Draft EIR are required in response to this comment.

Response 1.2

The commenter states their understanding of the proposed project in the form of a summary.

In the context of brief summary, the commenter's project understanding is accurate as proposed and evaluated in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 1.3

The commenter states their understanding of the CEQA Guidelines requirements for adequately informing the public on the EIR process and adequate opportunity for public participation.

In the context of brief summary, the commenter's understanding of CEQA's public participation requirements and guidelines is accurate. No revisions to the Draft EIR are required in response to this comment.

Response 1.4

The commenter states that the transportation analysis prepared by Kimley-Horn (Appendix TRA) rejected the use of the Institute for Transportation Engineers Trip Generation Manual's (ITE Manual) ITE Land Use Code 154. The commenter further states that the transportation analysis and initial study rely upon ITE Land Use Code 150 for the site's existing conditions, but that it is unclear which ITE code was used for the proposed project or why other ITE Land Use Codes were not considered.

Section 2.4.2 of the Draft EIR, Page 2-4, describes the project site's General Plan land use designation of General Industrial and zoning of Industrial General District. Allowable uses within the General Industrial land use designation include manufacturing, transportation, food and beverage processing, technology, warehousing, office-flex, and distribution. Allowable uses within the Industrial General District include, but are not limited to, research and development industry, laboratories, parcel processing and shipping centers, big box retail sales, and wholesale/retail distribution. Under the existing General Plan land use and zoning, the project site could be occupied by any of these allowable uses without discretionary approval. Allowable uses for the project site could include more intensive land uses, in terms of trip generation, than ITE Land Use Code 150 considers, such as manufacturing and distribution. The project site could be occupied by any of the permitted uses under existing conditions and under the proposed project. The trip generation

assumptions used the same ITE code (150) to reasonably compare the difference between existing and proposed uses considering that no end user for the warehouse has been identified.

Further, the transportation analysis (Appendix TRA of the Draft EIR) states that typical functions under the ITE Land Use Code 150 include "storage of materials, but it may also include office and maintenance areas." As described in Section 2 of the Draft EIR, the existing warehouse is approximately 236,294 square feet and the proposed warehouse would be 221,895 square feet. ITE Land Use Code 150 is based on studies for similar-sized facilities, while ITE Land Use Code 154 "High Cube Transload and Short-Term Storage Warehouse" is based on studies from larger facilities. Further, the data for ITE Land Use Code 150 is based on 31 facilities averaging 292,000 square feet, whereas the data for ITE Land Use Code 154 is based on 91 facilities averaging 798,000 square feet. Therefore, ITE Land Use Code 154 would not be as representative of either the existing or proposed buildings on the project site. The commenter does not provide specific data or analysis to support a different approach than that used in the Draft EIR. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.5

The commenter states that the use of different ITE Land Use Codes would result in a range of values for project trip generation, as certain ITE Land Use Codes (ITE 155), have higher trip generation rates than ITE 150 which was used for the project. The commenter further states an opinion that utilizing the physical characteristics of the proposed project to determine the ITE trip generation rate, without knowledge of the final project operator, is a problematic approach.

Section 2 of the Draft EIR (pages 2-1 to 2-11) describes the project, including the proposed land use type, pursuant to CEQA Guidelines Sections 15063 and 15071. Specifically, Page 2-5 of the Draft EIR indicates that "[a]t the time of publishing, a tenant has not been identified for the building. Operational hours and activities would be typical of a warehouse land use." While no tenant has been identified, the building would be designed as a Class A industrial warehouse facility to attract users such as manufacturing, research and development, warehouse/distribution, and wholesale warehouse. As discussed under Response 1.4, the proposed project could be occupied by any of these uses permitted under the project site's General Plan land use and zoning. As such, ITE Land Use Code 150 "Warehousing" was utilized to estimate the proposed project's trip generation because it represents several of the permitted land uses.

According to the ITE Trip Generation Manual 11th Edition, ITE Land Use Code 155 "High Cube Fulfillment Center Warehouse" is used for buildings that typically have at least 200,000 gross square feet of floor area, a ceiling height of 24 feet or more, and are used primarily for the storage and/ or consolidation of manufactured goods prior to their distribution to retail locations or other warehouses. The data for Land Use 155 (Non-Sort) is based on only 10 facilities ranging between 322,000 square feet and 1,472,000 square feet, which reflect sizes considerably larger than the existing and proposed facilities.

As discussed under Response 1.4, the existing project site and proposed buildings could each be occupied by a number of permitted uses. Given that the ultimate tenants under either existing or proposed conditions are unknown, the transportation analysis considered a consistent trip generation rate between the two scenarios. Had the transportation analysis used ITE Land Use Code 155 for the existing site and proposed project, the net trip generation would remain consistent with the findings of the Draft EIR. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.6

The commenter states an opinion that the transportation analysis has attempted to project VMT without knowledge of the proposed project's specific use, resulting in estimation based on a low-level use. The commenter further suggests that this approach is deficient as a matter of law under CEQA. The commenter expresses that last-mile delivery stations are unique and differ from the types of warehouses covered under the ITE Code 150 trip generation since they entail a higher intensity of use throughout the day with greater VMT.

The State of California Governor's Office of Planning and Research (OPR) Technical Advisory on evaluating transportation impacts in CEQA provides suggestions to lead agencies regarding methodologies to analyze VMT associated with a project. The Technical Advisory further advises that where a project replaces existing VMT-generating land uses, the methodology and screening criteria for redevelopment projects would apply. As specified on Page 1 of the transportation analysis (Appendix TRA), this methodology was used to evaluate the project. Further, as stated under Response 1.5, the proposed project could be occupied by a range of permitted uses under the project site's General Plan Land Use and Zoning. Given that the ultimate tenants under either existing or proposed conditions are unknown, the project transportation analysis considered a representative use case to evaluate potential impacts. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.7

The commenter states an opinion that the nature of e-commerce or last-mile delivery stations relates to a fundamental error in the VMT analysis used to screen the project from quantitative analysis because the number of employees cannot be analogized to the number of employees at a traditional warehouse. The commenter suggests that because no specific project operator has been identified, the transportation analysis is inadequate because a broader range of potential uses are possible under the entitlements sought.

As stated under Response 1.5, the proposed project could be occupied by a range of permitted uses under the project site's General Plan Land Use and Zoning. According to CEQA Guidelines Section 15151, an EIR should include "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." The Guidelines continue to state that "an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. The courts have looked for adequacy, completeness, and a good faith effort at full disclosure." According to Title 14 California Code of Regulations Section 15204(a), "adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." Given that the ultimate tenants under either existing or proposed conditions are unknown, the transportation analysis considered a representative use case to evaluate potential impacts. Furthermore, if a tenant were identified at the time of the Draft EIR analysis and associated technical reports, the categorization of the land use item would not change for either the Draft EIR analysis or the transportation analysis to be a more impactful categorization, as both analyses have taken into consideration a conservative use that is consistent with the project description. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.8

The commenter states an opinion that operational characteristics of last-mile delivery station facilities result in large numbers of on-site employees, which differs from the "employees/square footage" formula used to calculate employee generation for warehouse uses. The commenter states that the transportation analysis does not consider the possibility of these activities on the project site.

Section 2.5 of the Draft EIR (Page 2-5) states that the proposed project would employ approximately 117 full-time employees, based on the US Green Building Council's default occupancy counts for warehouse distribution facilities and office space. As described under Response 1.4, the existing project site and proposed buildings could each be occupied by a number of permitted uses. Accordingly, on-site employees are assumed tobehave the same under existing and proposed conditions. Further, as described in Section 2.4 of the Draft EIR, the existing building has a footprint of approximately 236,294 square feet. The existing building is larger than the proposed project and could reasonably accommodate more employees on site. As discussed on Page 2 of the transportation analysis (Appendix TRA), when using average employee rates for existing conditions and the proposed project, the project implementation would not increase employment on the project site. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.9

The commenter states an opinion that the City must consider the entire range of uses being entitled for the project site, and analyze the highest and greatest intensity use for the site. The comment notes that the transportation analysis did not consider this and suggests that it therefore does not satisfy CEQA's information disclosure requirements. The commenter further opines that, based on this deficiency, the Final EIR should not be approved.

As discussed under Response 1.4 and 1.5, the existing project site and proposed buildings could each be occupied by a number of permitted uses. ITE Land Use Code 150 "Warehousing" was utilized to estimate the proposed project's trip generation because it represents several of the permitted land uses. Further, the use of ITE Land Use Code 150 provides a conservative approach, as it has a lower trip generation rate and provides a consistent and representative use case to analyze the two scenarios. If the Draft EIR and transportation analysis, included as Appendix TRA, used an alternate land use code such as ITE Land Use Code 155 for the existing site and proposed project, the net trip generation would remain consistent with the findings of the Draft EIR. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.10

The commenter states an opinion that the Initial Study is deficient because the greenhouse gas emissions analysis does not account for the highest intensity use that could be entitled and therefore does not recognize the project's CO2e levels could be in excess of the Bay Area Air Quality Management District (BAAQMD) Guidelines.

As described in Section 8, *Greenhouse Gas Emissions*, of the Initial Study, the impact of greenhouse gas (GHG) emissions was determined using the City of San Leandro's 2021 Climate Action Plan (CAP), which is a qualified GHG reduction strategy that complies with CEQA Guidelines Section 15183.5(b)(1). The GHG emissions were quantified for informational purposes and the Bay Area Air Quality Management District recommended threshold of 1,100 metric tons (MT) of carbon dioxide

equivalent (CO_2e) was used to provide further context. It was concluded in the Initial Study (Appendix IS) that the project would comply with measures from the City's 2021 CAP, and therefore GHG impacts would be less than significant.

In addition, the commenter suggests that the GHG mobile emissions were underestimated because the mobile emissions do not reflect the land use that the commenter suggests in Comment 1.4, which is a "High-Cube Transload and Short-Term Storage Warehouse." Since an end user has not yet been determined for the proposed project, it is speculative to assume that a higher intensity land use would be developed. The analysis reflects the most appropriate land use and is consistent with the transportation analysis (Appendix TRA). Additionally, the GHG mobile emissions do not have a 1:1 ratio relationship with vehicle trips and it would be speculative to assume that the mobile emissions would increase by threefold. Therefore, no changes or revisions are required for the GHG analysis, and impacts would remain less than significant because the project would be consistent with the City's CAP. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.11

The commenter states that greenhouse gas impacts come from sources not directly related to mitigation measures found in the City of San Leandro's Climate Action Plan (CAP) and suggests that there is no evidence to indicate if the GHG emissions model used in the transportation analysis would conform to the City's CAP and represent a less than significant impact under CEQA.

The City's CAP states that "a project-specific environmental document that relies on this CAP for its cumulative impacts analysis must identify specific GHG reduction strategies applicable to the project and demonstrate the project's incorporation of the strategies. Project applicants and City staff will identify specific strategies applicable to each project during project review. If applicable strategies are not otherwise binding and enforceable, they must be incorporated as mitigation strategies for the project." Measures related to transportation and waste management were identified in Table 14 of Section 8, *Greenhouse Gas Emissions*, of the Initial Study (Appendix IS) as strategies that would be applicable to the project and feasible. These are enforceable measures as the project must comply with requirements outlined in the City of San Leandro Municipal Code and the 2019 Title 24 California Green Building Standards. There is no evidence that proves the project would not conform to said measures. Additionally, the commenter suggests that the measures identified in Table 14 of the Initial Study do not address mobile emissions because the actions do not specifically reduce emissions from vehicle delivery activity for a last-mile delivery station. However, no end user has been identified for the project. Measures that would apply for a last-mile delivery station do not need to be identified since that is not the proposed land use. Therefore, the project would be consistent with the CAP and impacts would remain less than significant. This comment does not require revisions to the Draft EIR, and no further response is required.

Response 1.12

The commenter states an opinion that for the aforementioned reasons (see Responses 1.4-1.11, above), the Draft EIR and supplemental environmental documents are deficient and should not be adopted. The commenter additionally suggests that further studies on relevant areas are necessary to ensure adequate environmental review.

As addressed in Responses 1.4 through 1.11, the Draft EIR and Initial Study adequately evaluates the proposed project as required by CEQA. Trip generation, VMT, and potential transportation impacts were properly assessed with consideration of proposed project features in the transportation

analysis, which constitutes a conservative, good faith effort to evaluate potential project impacts. Further, the project would not generate CO_2e levels that would exceed the BAAQMD threshold of 1,100 MT of CO_2e, would be consistent with the CAP and would incorporate applicable measures related to transportation and waste management. Therefore, the Draft EIR and Initial Study adequately assess the potential environmental impacts of the project under CEQA. No revisions to the Draft EIR or further studies are required.

SIERRA CLUB
SAN FRANCISCO BAY
NORTHERN ALAMEDA COUNTY GROUP
ALAMEDA ALBANY BERKELEY EMERYVILLE OAKLAND PIEDMONT SAN LEANDRO

LETTER 2

March 31, 2022

Anne Wong
Associate Planner, City of San Leandro
835 East 14th Street
San Leandro, CA 94577
awong@sanleandro.org

Re: 1919 Williams Street Warehouse Project Final EIR Comment Letter

This letter is submitted as a comment on the Final EIR proposed for the industrial warehouse project at 1919 Williams Street. The Sierra Club SF Bay Chapter Northern Alameda County Group that includes the City of San Leandro joins with environmental justice groups including Teamsters Joint Council 7, Teamsters Local 70, the Alameda Central Labor Council and United Food and Commercial Workers Local 5 in submitting these comments on the proposed industrial warehouse project at 1919 Williams Street. 2.1

1. Project

This letter is submitted to as a comment to the proposed Final EIR for the proposed project at 1919 Williams Street. The project applicant ("Applicant") proposed demolition of the existing historically significant warehouse and office space and construction of an approximately 212,000 square foot, two-story warehouse ("the Project"). The proposal calls for the warehouse to include 30 dock-high loading doors, indicating a high-intensity warehouse use. This is because warehouses that anticipate high frequency of unloading and loading typically require a greater number of loading doors. No tenant ("Operator" or "Project Operator") has been identified for the Project as of the time of the publication of the FEIR draft. However, as the transportation analysis suggests, the site may be used as a delivery hub-style warehouse. 2.2

2. Standard

If substantial evidence supports a fair argument that unmitigated significant impacts may occur as a result of approval of a project, an EIR must be prepared. In determining whether an EIR is adequate, "the ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 516. Comment on a Final EIR and the analysis that makes it up is appropriate at any public hearing at which CEQA compliance is raised, prior to the issuance of a NOD. Galante Vineyards v. Monterey Peninsula Water Mgmt. Dist., (1997) 60 Cal. App. 4th 1109, 1119-20. 2.3

3. Substantive Areas of Potential Significant Impact

Transportation

As the transportation analysis memo prepared by Kimley-Horn, found in Appendix TRA of the Initial Study ("Transportation Memo"; "Tra. Memo") points out, the features of the proposed warehouse, particularly the number of dock-high loading doors, match that of more high-intensity warehouse uses. (Tra. Memo at 2). However the consultant rejected use of the Institute for Transportation Engineers Trip Generation Manual's ("ITE Manual") Code 154 use ("High-Cube Transload and Short-Term Storage Warehouse") because the constituent studies that composed that use-code classification did not include any facilities under 250,000 square feet. *Id*. 2.4

As a result, in determining the appropriate trip-generation characteristics for the Project, the transportation analysis in the Initial Study relies on the trip-generation characteristics of a Code 150, general warehousing, use, for the previous use.
However, the Tra. Memo is not clear as to what ITE Manual code was used for the proposed Project. It is presumed that the Code 150 classification was used for both. The Transportation Memo does not state why other potentially applicable ITE Manual codes were not considered, despite the fact that the proposed use, particularly given its particular design characteristics, would qualify for a number of these classifications.

This is a critical choice because the differential trip generation characteristics would support a potential significant impact. For example, Code 155, for a "Parcel Hub Warehouse," has a trip generation number more than three times that of the chosen Code 150. This results in a trip generation number of approximately 136, as opposed to approximately 40 under Code 150. This couples with the consultant's methodology for computing employee trips to present a problem with the VMT analysis.

Importantly, the fact that the structure will be less than 250,000 square feet should not preclude application of Code 155 trip generation characteristics; e-commerce "last-mile" type delivery stations, i.e., warehouses that briefly store packages for purpose of sorting and final delivery to retail consumers, have been developed throughout California at sizes ranging from 140,000 to 250,000 square feet or more, and sometimes less. As will be discussed further below, this is the problem with entitling a project prior to any commitment as to who the final project operator will be: the physical characteristics of the site are insufficient alone to determine what the impacts of the site will be, without specific knowledge of the range of operations that will actually take place at the site. 2.5

The consultant concludes that the proposed project should be screened from a quantitative VMT analysis because it will result in a net decrease in vehicle miles traveled, since the proposed Project will decrease the size of the warehouse structure by approximately 15,000 square feet. This in turn is based on the idea that because the footprint of the building will be smaller, and because the number of employees is determined by the size of the structure (in the ITE Manual) there will be fewer employees and therefore fewer trips. 2.6

This is deficient as a matter of law under CEQA because what is relevant is the uses that will be allowed by the entitlement, unless conditions on the entitlement specifically restrict those uses. The transportation analysis has attempted, without knowing the specific use, to project VMT not by the *highest possible use given the entitlements*, but rather by approximating or estimating a fairly low-level use and using that as the appropriate level of analysis.

In California over the last two years, numerous e-commerce last-mile style delivery stations have been opened that operate at sizes considerably under 250,000 square feet, in warehouses with similar designs to that of the proposed Project. There have been at least 40 e-commerce last-mile delivery stations under 250,000 square feet permitted in California since 2020.

2.6

These last-mile delivery stations are unique and differ from the type of warehouse contemplated by the Code 150-type warehouse, and certainly from the prior use of the site, as a warehousing and delivery facility for autoparts. A retail last-mile delivery station does not, as an auto-parts facility would, deliver in large quantities to retailers, using heavy trucks. Instead, an e-commerce last-mile delivery station, apparently a permitted use under the entitlements being sought, sends commercial vans and passenger vehicles circulating through the community throughout the day to complete deliveries of household and retail goods. This entails a higher intensity of use throughout the day and greater VMT.

<u>Employee Count & VMT</u>

The nature of e-commerce last-mile delivery stations relates also to the fundamental error in the VMT analysis used to the screen the Project from a quantitative analysis. This is because the number of "employees" cannot be analogized to the number of employees at a traditional warehouse, as existed at the site prior.

The fact, or objection, that no specific project operator has been identified is not a strike *against* conducting a more thorough analysis; it is a strike *for* doing so, because there is a broader range of possible uses given the entitlements sought. If the project is entitled as the Applicant wants, there will be no *subsequent* discretionary review necessary to shift the Project into an e-commerce last-mile delivery facility, meaning that the City and the public will have no future opportunity to study the potential impacts of such a use. Therefore the City must conduct this analysis now, or else the environmental review is fundamentally deficient.

2.7

The last-mile delivery station model entails potentially hundreds or scores of workers picking up and delivering packages. This is a qualitative difference from the prior warehouse use, where the "employees/square footage" formula is based on the idea that the primary purpose of the site is for the warehouse workers who unload, sort, and load goods onto a relatively small and predictable number of heavy trucks (presumably employed by third party wholesalers or retailers) per day. In fact, the model is inverted: most of the work activity on the site happens in the form of commercial van and passenger vehicle drivers accessing the site and completing deliveries from it. The technicality of whether these

2.8

drivers are classified, for federal labor and wage statutory purposes, as independent contractors or employees is immaterial to the land use.

As one example, e-commerce giant Amazon requires its Delivery Service Partners–those who provide the delivery service labor to each warehouse–to rent up to 40 vans from Amazon and have up to 100 employees running routes seven days a week 365 days a year.

2.8

The Tra. Memo does not mention the possibility of this kind of activity, instead simply subtracting the square footage from a traditional warehouse use to arrive at a simplistic determination that there will be a net savings in VMT.

No consideration was given to a potential use under the entitlements sought, and that potential use would increase, significantly, the number of workers at the site, and, therefore, could reasonably result in an increase in VMT. To satisfy CEQA's information disclosure requirements, it was necessary for the Applicant and City to consider the entire range of uses being entitled, and to conduct a study that incorporate presumptions from the highest and greatest intensity use, so long as that use would not entail a further discretionary approval. Therefore this analysis is deficient under CEQA, and further study was necessary. The FEIR should not be approved so long as this underlying deficiency exists.

2.9

<u>Greenhouse Gas Emissions</u>

The Initial Study, and therefore the FEIR, are deficient because the greenhouse gas emissions (GHG) analysis does not account for the highest-intensity use that will be entitled should the FEIR be approved and the request permits issued. The presumptions in the FEIR lay out specifically that that analysis rested on presumptions in the transportation analysis. (See Initial Study at 73).

2.10

This failure to study the reasonably predictable vehicle trips associated with the entitlements sought means that the GHG emissions model used in the IS is deficient as an informational document. The stated GHG figure for "mobile" emissions is 351 (of CO_2e), but as stated in the section on the transportation analysis, above, the figure may be at least three times higher, if not greater, put it at 1,053 as a minimum. This would raise the total to 1,974 CO_2e, well in excess of the 1,100 figure found in the Bay Area Air Quality Mitigation District (BAAQMD) guidelines. What's more, these impacts come from sources not directly related to the mitigation measures found in the City's Climate Action Plan (CAP). Specifically, bicycle stations, EV chargers, and mitigation of construction waste do not bear a direct nexus with the operation of a last-mile delivery station that operates on the basis of vehicle delivery of packages to retail consumers, where there is no requirement that some proportion of the delivery fleet be EV.

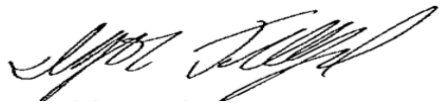
2.11

There is no evidence extant in the record to indicate whether this figure would conform to the City's Climate Action Plan and therefore represent a less than significant impact under CEQA Guidelines Section 15183.5.

4. Conclusion

For the foregoing reasons, the Final EIR and the constituent environmental documents are deficient and should not be adopted. Further study on the relevant areas is necessary to make this environmental review adequate. 2.12

Sincerely,



Igor Tregub
Chair, Sierra Club Northern Alameda County Group

Letter 2

COMMENTER: Igor Tregub, Chair, Sierra Club Northern Alameda County Group

DATE: March 31, 2022

Letter 2 is a duplicate of Letter 1 and was submitted by a different commenter. As such, the comments provided in Letter 2 are the same as those provided in Letter 1. Refer to Responses 1.1 through 1.12 for responses to comments provided in Letter 2.

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3 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (Final EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Initial Study							
Air Quality							
AQ-1. Fugitive Dust Control Best Management Practices (BMPs) The construction contractor(s) shall implement fugitive dust control BMPs during demolition, site preparation, and grading activities, as recommended by the BAAQMD: ▪ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times daily. ▪ 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 miles per hour. ▪ All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. ▪ Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear	**Requirements:** The construction contractor(s) shall implement the BAAQMD-recommended fugitive dust control listed in AQ-1 during demolition, site preparation, and grading activities. Afterwards, a publicly visible sign with the telephone number and person to contact at the City of San Leandro regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. The City shall confirm that BMPs are implemented during site preparation and grading activities through spot checks during construction.	During construction, site preparation, and grading activities.	The construction contractors shall implement the dust control practices throughout the construction process.	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
signage shall be provided for construction workers at all access points. ▪ All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. ▪ A publicly visible sign with the telephone number and person to contact at the City of San Leandro regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. ▪ The City shall confirm that BMPs are implemented during site preparation and grading activities through spot checks during construction.							
Biological Resources							
BIO-1. Pre-construction Special-Status Surveys and Reporting No more than one week prior to vegetation clearing and ground disturbance within the project site, a qualified biologist shall conduct pre-construction surveys for special-status wildlife species within the construction footprint and within a 100-foot survey buffer area. If non-listed special-status species are detected in the construction footprint, the qualified biologist may capture and relocate, as feasible, to a suitable habitat adjacent to	**Requirements:** A qualified biologist shall conduct pre-construction surveys for special status wildlife species within the construction footprint and a 100-foot buffer area. If non-listed special-status species are detected, the biologist shall: ▪ Capture and relocate to a suitable adjacent habitat	No more than one week prior to vegetation clearing and ground disturbance.	The Surveys and Reports shall be conducted by a qualified biologist.	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
the project area. If individuals are not relocated or leave the site of their own accord, the qualified biologist shall implement an avoidance buffer suitable for protection of the individual(s). If listed special status species are detected within the construction footprint or survey buffer area, the California Department of Fish and Wildlife and/or the United States Fish and Wildlife Service, as appropriate, shall be notified prior to construction activities. The methods and results of the pre-construction survey(s) and any relocation efforts during those surveys shall be documented in a brief letter report (Pre-Construction Survey Report) and submitted to the City no later than three weeks following the completion of the survey(s).	▪ If individuals are not relocated or leave on own, then an avoidance buffer for protection shall be implemented If listed special status species are detected, the biologist/applicant shall: ▪ Notify the CFWD and/or USFWD prior to construction **Documentation:** The biologist shall document any methods and results of the survey(s) and any relocation efforts in a brief Pre-Construction Survey Report. The applicant shall ensure it is submitted to the City within three weeks of completion.						
BIO-2. Nesting Bird Pre-construction Surveys and Monitoring To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and California Fish and Game Code, project construction, including, but not limited to, vegetation removal, ground disturbance, and construction shall occur outside of the bird breeding season (February 1 through August 30). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than one week prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction	**Requirements:** All project construction shall occur outside of bird breeding season (February 1 through August 30). If it must begin during breeding season, then a pre-construction nesting bird survey shall be conducted: ▪ By a biologist familiar with the identification of avian species known to occur in the project vicinity ▪ No more than one week prior to initiation of ground	If construction occurs during bird breeding season (February 1 – August 30).	A biologist shall conduct any required surveys and determine buffers. If buffer zones are determined to be infeasible, a full-time qualified biological monitor shall be on site to monitor construction	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
survey shall be conducted on foot inside the project boundary, including a 300-foot buffer (500-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in the project vicinity. If nests are found, an avoidance buffer shall be determined and demarcated by the biologist of a minimum of 50 feet for non-raptor bird species and at least 300 feet for raptor species. Larger buffers may be recommended and/or smaller buffers may be established depending upon the species, status of the nest, and construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is finished and young have fledged the nest prior to removal of the buffer. Encroachment into the buffer shall occur only at the discretion of the qualified biologist. If buffer zones are determined to be infeasible, a full-time qualified biological monitor shall be on site to monitor construction within the buffer zones to avoid impacts to active nests and nesting birds. The methods and results of the pre-construction survey(s) and any relocation efforts during those surveys shall be documented in a brief letter report (Nesting Bird Pre-Construction Survey Report) and	disturbance and vegetation removal activities ▪ On foot inside the project boundary, including a 300-foot buffer (500-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical If nests are found, an avoidance buffer shall be determined and demarcated by the biologist. Larger buffers may be recommended and/or smaller buffers may be established. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site, which the biologist shall determine. Encroachment into the buffer shall occur only at the discretion of the qualified biologist. If buffer zones are determined to be infeasible, a full-time qualified biological monitor shall be on site to monitor construction within the buffer zones to avoid impacts to active nests and nesting birds. **Documentation:** The methods and results of the pre-construction survey(s) and any		within the buffer zones to avoid impacts to active nests and nesting birds. Methods and survey results shall be documented in a brief letter report (Nesting Bird Pre-Construction Survey Report) and submitted to the City no later than three weeks following the completion of the survey(s).				

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
submitted to the City no later than three weeks following the completion of the survey(s).	relocation efforts during those surveys shall be documented in a brief letter report (Nesting Bird Pre-Construction Survey Report) and submitted to the City no later than three weeks following the completion of the survey(s)						
BIO-3. Onsite Tree Site Visit Survey No more than one week prior to vegetation clearing and ground disturbance within the project site, a qualified biologist shall conduct an onsite tree site visit to assess tree suitability for bat roosting to ensure there would be no impact to potential bat habitats within the construction footprint and within a 100-foot survey buffer area. If non-listed special-status species are detected in the construction footprint, the qualified biologist may capture and relocate, as feasible, to suitable habitat adjacent to the project area. If individuals are not relocated or leave the site of their own accord, the qualified biologist shall implement an avoidance buffer suitable for protection of the individual(s). If listed special status species are detected within the construction footprint or survey buffer area, the California Department of Fish and Wildlife and/or the United States Fish and Wildlife Service, as appropriate, shall be notified prior to construction activities. The methods and results of the onsite tree site survey(s) and any relocation efforts during those surveys shall be documented in a brief letter report (Onsite Tree Site Survey Report) and	**Requirements:** A qualified biologist shall conduct an onsite tree site visit within the construction footprint and within a 100-foot survey buffer area to: ▪ assess tree suitability for bat roosting to ensure there would be no impact to potential bat habitats ▪ asses if any non-listed special-status species are detected. If so, the qualified biologist may capture and relocate individual(s) or an avoidance buffer suitable for protection ▪ contact the CDFW/USFWS prior to construction activities, if listed special status species are detected **Documentation:** The methods and results of the onsite tree site survey(s) and any relocation efforts during those surveys shall be documented in a brief letter report (Onsite Tree Site Survey	No more than one week prior to vegetation clearing and ground disturbance within the project site.	A qualified biologist shall conduct an onsite tree site visit and documentation shall be submitted to the City no later than three weeks following the completion of the survey(s).	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
submitted to the City no later than three weeks following the completion of the survey(s).	Report) and submitted to the City no later than three weeks following the completion of the survey(s).						
Geology and Soils							
GEO-1. Ground Improvement Site Performance Testing Observation and testing services shall be provided during demolition, grading, site preparation, and building construction to confirm that conditions are similar to that assumed for design and to conclude whether the work has been performed in accordance with the project plans and specifications. A qualified geotechnical, civil, or structural engineer shall work with the contractor team to evaluate whether differential settlement estimates and bearing capacities are tolerable and adequate or whether additional ground improvement is required. Performance testing would likely consist of a pre-construction test section with post-installation load testing and cone penetration testing (CPT) to confirm that the necessary soil strength and densification increases were achieved to meet the bearing capacity and settlement criteria. The team shall observe and monitor installation of the test arrays and production ground improvement on a full-time basis and review the post-test array settlement analyses provided by the contractor. The proposed design capacity of the ground improvement shall be confirmed prior to construction by	**Requirements:** Performance testing would likely consist of a pre-construction test section with post-installation load testing and cone penetration testing (CPT) to confirm that the necessary soil strength and densification increases were achieved to meet the bearing capacity and settlement criteria. The team shall observe and monitor installation of the test arrays and production ground improvement on a full-time basis and review the post-test array settlement analyses provided by the contractor. ▪ Proposed design capacity of the ground improvement shall be confirmed prior to construction by the installation of at least two test array sections of four ground improvement columns with installation lengths and spacing as agreed on. ▪ Testing of arrays shall include CPT testing at center of	During demolition, grading, site preparation, and building.	A qualified geotechnical, civil, or structural engineer shall provide observation, testing services construction to confirm that conditions are similar to that assumed for design and to conclude whether the work has been performed in accordance with the project plans and specifications. Work shall be done with the contractor team to evaluate whether differential settlement	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
the installation of at least two test array sections of four ground improvement columns with installation lengths and spacing as initially agreed to between the ground improvement contractor and geotechnical team. Testing of arrays shall include CPT testing at center of array, sampling for strength consolidation testing, and a modulus test of at least one pier in each test array. The ground improvement contractor shall make their own interpretation of strength parameters and other characteristics for the soil, obtained or derived from the soil boring logs, cone penetration tests, and any geotechnical laboratory testing data provided in the Geotechnical Investigation and these specifications for bearing capacity analysis. Static settlement shall be assessed using appropriate soil parameters for an elastic settlement analysis based on an area replacement ratio considering the stiffness of the native soils, and the densification columns. Liquefaction and seismic settlement estimates shall be performed using the methodology presented in the project geotechnical report, which followed the procedures in the 2008 monograph, Soil Liquefaction During Earthquakes (Idriss and Boulanger, 2008). Liquefaction and settlement shall be evaluated for the upper 50 feet of the soil profile. Any additional subsurface information needed to design the ground improvement shall be the responsibility of the Contractor.	array, sampling for strength consolidation testing, and a modulus test of at least one pier in each test array. ▪ The ground improvement contractor shall make their own interpretation of strength parameters and other characteristics for the soil, obtained, or derived data provided in the Geotechnical Investigation. ▪ Static settlement shall be assessed using appropriate soil parameters for an elastic settlement analysis based on an area replacement ratio considering the stiffness of the native soils, and the densification columns. ▪ Liquefaction and seismic settlement estimates shall be performed using the methodology presented in the project geotechnical report. ▪ Any additional subsurface information needed to design the ground improvement shall be the responsibility of the Contractor. As part of the site testing, the Project Structural Engineer shall		estimates and bearing capacities are tolerable and adequate or whether additional ground improvement is required.				

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
As part of the site testing, the Project Structural Engineer shall verify the site class of the site pursuant to Chapter 20 American Society of Civil Engineers (ASCE) 7-16. If the structure will have a fundamental period of greater than 0.5 seconds and meets the requirements for a Site Class designation of F, the requirement for a site response analysis would be triggered, and additional geotechnical analysis shall need to be approved. In addition, the northern portion of the structure shall be supported on conventional shallow foundations over ground improvement. The limits of this ground improvement shall be determined following the post-demolition CPT described above. Implementation of the above mitigation measure would ensure that impacts would be less than significant.	verify the site class of the site pursuant to Chapter 20 American Society of Civil Engineers (ASCE) 7-16 and additional geotechnical analysis may need to be approved. The northern portion of the structure shall be supported on conventional shallow foundations over ground improvement and those limits shall be determined following the described post-demolition CPT.						
GEO-2. Temporary Cut and Fill Erosion Prevention Throughout construction, the contractor shall be responsible for maintaining all temporary slopes and providing temporary shoring where required. Temporary shoring, bracing, and cuts/fills shall be performed in accordance with the strictest government safety standards. On a preliminary basis, the upper 10 feet at the site may be classified as OSHA Site C materials. Excavations performed during site demolition and fill removal shall be sloped at 3:1 (horizontal to vertical) within the upper 5	**Requirements:** Maintaining all temporary slopes and providing temporary shoring where required shall follow GEO-2 measures.	Throughout construction.	The contractor shall be responsible for maintaining the mitigation measure.	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
feet below building subgrade. Excavations extending more than 5 feet below building subgrade and excavations in pavement and flatwork areas shall be sloped in accordance with the OSHA soil classification.							
GEO-3. Site Drainage Guidance Ponding shall not be allowed adjacent to building foundations, slabs-on-grade, or pavements during operation. Hardscape surfaces shall slope at least 2 percent towards suitable discharge facilities; landscape areas shall slope at least 3 percent towards suitable discharge facilities. Roof runoff shall be directed away from building areas in closed conduits, to approved infiltration facilities, or on to hardscaped surfaces that drain to suitable facilities. Retention, detention or infiltration facilities shall be spaced at least 10 feet from buildings, and preferably at least 5 feet from slabs-on-grade or pavements. During site design and construction, the project applicant shall ensure that retention, detention or infiltration facilities that are located within these zones meet the following requirements: General Bioswale Design Guidelines ▪ If possible, avoid placing bioswales or basins within 10 feet of the building perimeter or within 5 feet of exterior flatwork or pavements. If bioswales must be constructed within these setbacks, the side(s) and bottom of the trench excavation shall be lined with 10-	**Requirements:** ▪ Ponding shall not be allowed adjacent to building foundations, slabs-on-grade, or pavements during operation. ▪ Hardscape surfaces shall slope at least 2 percent towards suitable discharge facilities ▪ Landscape areas shall slope at least 3 percent towards suitable discharge facilities ▪ Roof runoff shall be directed away from building areas in closed conduits, to approved infiltration facilities, or on to hardscaped surfaces that drain to suitable facilities ▪ Retention, detention, or infiltration facilities shall be spaced at least 10 feet from buildings, and preferably at least 5 feet from slabs-on-grade or pavements Retention, detention, or infiltration facilities that are located within these zones meet	During site design and construction.	The project applicant shall also ensure that retention, detention, or infiltration facilities that are located within these zones meet the requirements.	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Com-pliance Verifi-cation Initial	Com-pliance Verifi-cation Date	Com-pliance Verifi-cation Comments
millimeter visqueen to reduce water infiltration into the surrounding expansive clay. ▪ Bioswales constructed within 3 feet of proposed buildings may be within the foundation zone of influence for perimeter wall loads. Therefore, where bioswales would parallel foundations and would extend below the "foundation plane of influence," the foundation shall be deepened so that the bottom edge of the bioswale filter material is above the foundation plane of influence. ▪ The bottom of bioswale or detention areas shall include a perforated drain placed at a low point, such as a shallow trench or sloped bottom, to reduce water infiltration into the surrounding soils near structural improvements, and to address the low infiltration capacity of the on-site clay soils. Bioswale Infiltration Material ▪ Gradation specifications for bioswale filter material, if required, shall be specified on the grading and improvement plans. ▪ Compaction requirements for bioswale filter material in non-landscaped areas or in pervious pavement areas, if any, shall be indicated on the plans and specifications to satisfy the anticipated use of the infiltration area.	follows the required General Bioswale Design Guidelines**,** Bioswale Infiltration Material**,** and Bioswale Construction Adjacent to Pavement Considerations listed in GEO-3.						

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Com-pliance Verifi-cation Initial	Com-pliance Verifi-cation Date	Com-pliance Verifi-cation Comments
▪ Infiltration (percolation) testing may be performed on representative samples of potential bioswale materials prior to construction to check for general conformance with the specified infiltration rates. ▪ Multiple laboratory tests may be required to evaluate the properties of the bioswale materials, including percolation, landscape suitability and possibly environmental analytical testing depending on the source of the material. A qualified landscape architect shall be available to provide input on the required landscape suitability tests if bioswales are to be planted. ▪ If bioswales are to be vegetated, a qualified landscape architect shall select planting materials that do not reduce or inhibit the water infiltration rate, such as covering the bioswale with grass sod containing a clayey soil base. ▪ Field infiltration testing shall be specified on the grading and improvement plans. The appropriate infiltration test method, duration and frequency of testing shall be specified in accordance with local requirements. ▪ Due to the relatively loose consistency and/or high organic content of many bioswale filter materials, long-term settlement of the bioswale medium shall be anticipated. To reduce initial volume loss,							

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Com-pliance Verifi-cation Initial	Com-pliance Verifi-cation Date	Com-pliance Verifi-cation Comments
bioswale filter material shall be wetted in 12-inch lifts during placement to pre-consolidate the material. ▪ The volume of bioswale filter material may decrease over time depending on the organic content of the material. Additional filter material may need to be added to bioswales after the initial exposure to winter rains and periodically over the life of the bioswale areas, as needed. Bioswale Construction Adjacent to Pavement Considerations ▪ Improvements shall be setback from the vertical edge of a bioswale such that there is at least 1 foot of horizontal distance between the edge of improvements and the top edge of the bioswale excavation for every 1 foot of vertical bioswale depth; or ▪ Concrete curbs for pavements, or lateral restraint for exterior flatwork, located directly adjacent to a vertical bioswale cut shall be designed to resist lateral earth pressures, or concrete curbs or edge restraint shall be adequately keyed into the native soil or engineered to reduce the potential for rotation or lateral movement of the curbs.							
GEO-4. Site Preparation and Demolition Prior to the start of mass grading or the construction of new improvements for the proposed project, all existing improvements not to be reused for the project, including all	**Requirements:** ▪ Prior to the start of work on the new improvements, all existing improvements not to be reused for the project	Prior to the start of mass grading or the construction of new	Prior to project approval, the City shall review and approve all site preparation	San Leandro Planning Division and Building &			

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foundations, flatwork, pavements, utilities, and other improvements shall be demolished and removed from the site. Existing slabs, foundations, and pavements that extend into planned flatwork, pavement, or landscape areas may be left in place provided there is at least 3 feet of engineered fill overlying the remaining materials, they are shown not to conflict with new utilities, and that asphalt and concrete more than 10 feet square is broken up to allow subsurface drainage. Special care shall be taken during the demolition and removal of existing floor slabs, foundations, utilities and pavements to minimize disturbance of the subgrade. If slab or shallow footings are encountered, they shall be completely removed. If drilled piers are encountered, they shall be cut off at an elevation at least 60 inches below proposed footings or the final subgrade elevation, whichever is deeper. The remainder of the drilled pier could remain in place. Foundation elements to remain in place shall be surveyed and superimposed on the proposed development plans to determine the potential for conflicts or detrimental impacts to the planned construction. Following review, additional mitigation or planned foundation elements may need to be modified. All utilities shall be completely removed from within planned building areas. For any utility line to be considered acceptable to remain	shall be demolished and removed from the site. Slab or shallow footings and all utilities shall also be completely removed. Minimize disturbance of the subgrade where possible. ▪ Existing slabs, foundations, and pavements that extend into planned flatwork, pavement, or landscape areas may be left in place provided there is at least 3 feet of engineered fill overlying the remaining materials, there is no conflict with new utilities, and that asphalt and concrete more than 10 feet square is broken up to allow subsurface drainage. ▪ If drilled piers are encountered, they shall be cut off at an elevation at least 60 inches below proposed footings or the final subgrade elevation. The remainder could remain in place and shall be surveyed and superimposed on the proposed development plans to determine the potential for conflicts or detrimental	improvements for the proposed project.	and demolition plans. A qualified geotechnical engineer shall be notified prior to the start of demolition and shall be present on a part-time basis during all backfill and mass grading as a result of demolition.	Safety Department			

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within building areas, the utility line must be completely backfilled with grout or sand-cement slurry, the ends outside the building area capped with concrete, and the trench fills either removed and replaced as engineered fill with the trench side slopes flattened to at least 1:1, or the trench fills are determined not to be a risk to the structure. The assessment of the level of risk posed by the particular utility line shall determine whether the utility may be abandoned in place or needs to be completely removed. The contractor shall assume that all utilities will be removed from within building areas unless provided written confirmation from both the owner and the geotechnical engineer. Utilities extending beyond the building area may be abandoned in place provided the ends are plugged with concrete, they do not conflict with planned improvements, and that the trench fills do not pose significant risk to the planned surface improvements. During site preparation, the site shall be stripped of all surface vegetation, and surface and subsurface improvements to be removed within the proposed development area. Surface vegetation and topsoil shall be stripped to a sufficient depth to remove all material greater than 3 percent organic content by weight. Surficial stripping shall extend approximately 6 inches below existing grade in localized landscape areas. Trees and shrubs designated for removal shall have the root balls and any roots	impacts to the planned construction. ▪ If buried structures (wells, cisterns, debris pits, etc.) are encountered onsite, a qualified geotechnical engineer shall be contacted to address these types of structures on a case-by-case basis.						

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greater than ½-inch diameter removed completely. Grade depressions resulting from root ball removal shall be cleaned of loose material and backfilled. A qualified geotechnical engineer shall be notified prior to the start of demolition and shall be present on a part-time basis during all backfill and mass grading as a result of demolition. Occasionally, other types of buried structures (wells, cisterns, debris pits, etc.) can be found on sites with prior development. If buried structures (wells, cisterns, debris pits, etc.) are encountered onsite, a qualified geotechnical engineer shall be contacted to address these types of structures on a case-by-case basis. Prior to project approval, the City shall review and approve all site preparation and demolition plans.							
GEO-5. Fill Removal The undocumented fill observed in the geotechnical report shall undergo inspection by a qualified geotechnical engineer to determine if the fill meets the criteria to be reused when backfilling the excavations. If materials are encountered that do not meet the "Material for Fill" requirements outlined in the geotechnical report, such as debris, wood, or trash, those materials shall be screened out of the remaining material and shall be removed from the site. Backfill of excavations shall be placed in lifts and compacted in accordance with American Society for Testing and Materials (ASTM)	**Requirements:** The undocumented fill observed in the geotechnical report shall undergo inspection that follows the GEO-5 measure.	Prior to construction.	The inspection shall be performed by a qualified geotechnical engineer. Prior to project approval, the City shall review and approve all site preparation plans.	San Leandro Planning Division and Building & Safety Department			

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D1557 requirements. Prior to project approval, the City shall review and approve all site preparation plans.							
GEO-6. Static Settlement Plan The contractor shall take the potential for significant static settlement to take place into consideration when scheduling the construction of sensitive finishes. Ground improvement shall be designed to provide adequate bearing capacity and reduce total settlement to tolerable levels through densification techniques to improve the ground's resistance to liquefaction, reduce static settlement, and improve bearing capacity and seismic performance. Utility lines constructed within public right-of-way shall be trenched, bedded and shaded, and backfilled in accordance with the local or governing jurisdictional requirements. Utility lines in private improvement areas shall be constructed in accordance with the following requirements unless superseded by other governing requirements: All utility lines shall be bedded and shaded to at least 6 inches over the top of the lines with crushed rock (¾-inch-diameter or greater) or well-graded sand and gravel materials conforming to the pipe manufacturer's requirements. Open-graded shading materials shall be consolidated in place with vibratory equipment and well-graded materials shall be compacted to at least 90 percent relative compaction with	**Requirements:** Ground improvement shall be designed to provide adequate bearing capacity and reduce total settlement to tolerable levels through densification techniques to improve the ground's resistance to liquefaction, reduce static settlement, and improve bearing capacity and seismic performance. Utility lines constructed within public right-of-way shall follow local or governing jurisdictional requirements. Utility lines in private improvement areas shall be constructed in accordance with the GEO-6 requirements unless superseded by other governing requirements. General backfill over shading materials may consist of on-site native materials provided they meet the requirements in the "Material for Fill" section of Appendix GEO, and are moisture conditioned and compacted. Where utility lines will cross perpendicular to strip footings, the footing shall be deepened to encase the utility line, or the	During construction.	The contractor shall take the potential for significant static settlement to take place into consideration when scheduling the construction of sensitive finishes. Prior to project approval, the City shall review and approve statis settlement plan.	San Leandro Planning Division and Building & Safety Department			

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vibratory equipment prior to placing subsequent backfill materials. General backfill over shading materials may consist of on-site native materials provided they meet the requirements in the "Material for Fill" section of Appendix GEO within the IS-MND, and are moisture conditioned and compacted. Where utility lines will cross perpendicular to strip footings, the footing shall be deepened to encase the utility line, providing sleeves or flexible cushions to protect the pipes from anticipated foundation settlement, or the utility lines shall be backfilled to the bottom of footing with sand cement slurry or lean concrete. Where utility lines will parallel footings and will extend below the "foundation plane of influence," either the footing will need to be deepened so that the pipe is above the foundation plane of influence or the utility trench will need to be backfilled with sand-cement slurry or lean concrete within the influence zone. Sand-cement slurry used within foundation influence zones shall have a minimum compressive strength of 75 psi. Prior to project approval, the City shall review and approve static settlement plan.	utility lines shall be backfilled to the bottom of footing with sand cement slurry or lean concrete. Where utility lines will parallel footings and will extend below the "foundation plane of influence," either the footing will need to be deepened so that the pipe is above the foundation plane of influence or the utility trench will need to be backfilled with sand-cement slurry or lean concrete within the influence zone. Sand-cement slurry used within foundation influence zones shall have a minimum compressive strength of 75 psi.						
GEO-7. Subgrade Stabilization Plan The contractor, with input from a geotechnical engineer, shall evaluate in-situ[1] moisture conditions at the beginning of construction	**Requirements:** In-situ moisture conditions shall be evaluated and following the appropriate	During the beginning of the construction period and	The contractor, with input from a geotechnical engineer, shall	San Leandro Planning Division and Building &			

[1] In situ means "the natural or original position or place" (Merriam-Webster n.d.).

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period and throughout grading period. Depending on the findings of the in-situ moisture conditions, the contractor shall follow appropriate subgrade stabilization measures. After site clearing and demolition is complete, and prior to backfilling any excavations resulting from fill removal or demolition, the excavation subgrade and subgrade within areas to receive additional site fills, slabs-on-grade and/or pavements shall be scarified to a depth of 6 inches, moisture conditioned, and compacted. The method used to address potential unstable soil conditions and facilitate fill placement and trench backfill shall be evaluated on a case-by-case basis according to the site conditions. Prior to project approval, the City shall review and approve subgrade stabilization plans.	GEO-7 procedure shall be based on the findings.	throughout the grading period.	evaluate in-situ moisture conditions. Prior to project approval, the City shall review and approve subgrade stabilization plans.	Safety Department			
GEO-8. Material for Fill On-site soils with an organic content less than 3 percent by weight may be reused as general fill. General fill shall not have lumps, clods or cobble pieces larger than 6 inches in diameter; 85 percent of the fill shall be smaller than 2½ inches in diameter. Minor amounts of oversize material (smaller than 12 inches in diameter) may be allowed provided the oversized pieces are not allowed to nest together and the compaction method will allow for loosely placed lifts not exceeding 12 inches.	**Requirements:** General fill: ▪ shall be smaller than 2½ inches in diameter ▪ may have Minor amounts of oversize material provided they do not nest together, and the compaction method will allow for loosely placed lifts not exceeding 12 inches ▪ may reuse on-site soils with an organic content less than 3 percent by weight	During fill for the project site.	Prior to project approval, the City shall review and approve all site preparation and construction plans.	San Leandro Planning Division and Building & Safety Department			

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The asphalt concrete (AC) grindings and aggregate base (AB) and Portland Cement Concrete (PCC) generated during site demolition may be reused within the new pavement and flatwork structural sections if the AC grindings are mixed with the underlying AB to meet Class 2 AB specifications. Fill materials containing recycled asphalt including AC grindings may not be reused within the building areas. Laboratory testing will be required to confirm the grindings meet project specifications. If the PCC is pulverized to meet the "Material for Fill" requirements of this report, it may be used as select fill within the building areas, excluding the capillary break layer; as typically pulverized PCC comes close to or meets Class 2 AB specifications, the recycled PCC may likely be used within the pavement structural sections. PCC grindings also make good winter construction access roads, similar to a cement-treated base (CTB) section. If desired to reuse the asphalt concrete grindings as part of general site fill, the grindings shall be thoroughly mixed with on-site soil resulting in a mixture or less than 40 percent grindings by weight. The resulting mixture shall also meet the "Material for Fill" requirements specified in Appendix GEO. Due to the potential for slight petroleum odors penetrating into habitable building	The asphalt concrete (AC) grindings and aggregate base (AB) and Portland Cement Concrete (PCC) generated during site demolition may: ▪ be reused within the new pavement and flatwork structural sections ▪ not recycled asphalt, including AC grindings, within the building areas. ▪ use select PCC pulverized to meet the requirements within the building areas, excluding the capillary break layer ▪ reuse the asphalt concrete grindings as part of general site fill, provided that the grindings shall be thoroughly mixed with on-site soil resulting in a mixture or less than 40 percent grindings by weight and meet the specified in Appendix GEO. ▪ may not use fill containing asphalt concrete habitable building areas Imported and non-expansive material used for fill shall: ▪ be inorganic with a Plasticity Index (PI) of 15 or less, and not contain recycled asphalt concrete where it will be						

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areas, fill containing asphalt concrete shall not be used within the building areas. Imported and non-expansive material used for fill shall be inorganic with a Plasticity Index (PI) of 15 or less, and not contain recycled asphalt concrete where it will be used within the building areas. To prevent significant caving during trenching or foundation construction, imported material shall have sufficient fines. At a minimum, the proposed fill material shall undergo PI tests. Material data sheets for select fill materials (Class 2 aggregate base, ¾-inch crushed rock, quarry fines, etc.) listing current laboratory testing data (not older than 6 months from the import date) may be provided without providing a sample. If current data is not available, specification testing will need to be completed prior to approval. Environmental and soil corrosion characterization shall also be considered prior to acceptance. Suitable environmental laboratory data of the planned import quantity shall be provided to the project environmental consultant; additional laboratory testing may be required based on the project environmental consultant's review. The potential import source shall also not be more corrosive than the on-site soils, based on pH, saturated resistivity, and soluble sulfate and chloride testing. As an alternative to importing non-expansive fill, chemical treatment can be considered to create non-expansive fill. High PI clayey soil materials can be mixed with quicklime (CaO)	used within the building areas ▪ undergo PI tests and any specified testing required based on the project environmental consultant's review ▪ not be more corrosive than the on-site soils, based on pH, saturated resistivity, and soluble sulfate and chloride testing As an alternative to importing non-expansive fill, chemical treatment can be considered to create non-expansive fill alongside additional laboratory tests during initial site grading to further evaluate the optimum percentage of quicklime required.						

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or approved equivalent to adequately reduce the PI of the on-site soils to 15 or less. If this option is considered, additional laboratory tests shall be performed during initial site grading to further evaluate the optimum percentage of quicklime required. Prior to project approval, the City shall review and approve all site preparation and construction plans.							
GEO-9. Compaction Requirements All fills, and subgrade areas where fill, slabs-on-grade, and pavements are planned, shall be placed in loose lifts 8 inches thick or less and compacted in accordance with ASTM D1557 requirements. In general, clayey soils shall be compacted with sheepsfoot equipment and sandy/gravelly soils with vibratory equipment; open-graded materials such as crushed rock shall be placed in lifts no thicker than 18 inches consolidated in place with vibratory equipment. Each lift of fill and all subgrade shall be firm and unyielding under construction equipment loading in addition to meeting the compaction requirements to be approved. Prior to project approval, the City shall review and approve all site preparation plans.	**Requirements:** All fills, and subgrade areas where fill, slabs-on-grade, and pavements are planned, shall include: ▪ being placed in loose lifts 8 inches thick or less and compacted in accordance with ASTM D1557 requirements ▪ clayey soils shall be compacted with sheepsfoot equipment and sandy/gravelly soils with vibratory equipment ▪ open-graded materials shall be placed in lifts no thicker than 18 inches consolidated in place with vibratory equipment ▪ each lift of fill and all subgrade shall be firm and unyielding under construction equipment loading in addition to	During construction.	Prior to project approval, the City shall review and approve all site preparation plans.	San Leandro Planning Division and Building & Safety Department			

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	meeting the compaction requirements to be approved						
GEO-10. Slabs-on-Grade Stabilization The proposed slabs-on-grade shall be supported on at least 6 inches of non-expansive fill (NEF) to reduce the potential for slab damage due to soil heave. The NEF layer shall be constructed over subgrade. If significant time elapses between initial subgrade preparation and NEF construction, the subgrade shall be proof-rolled to confirm subgrade stability, and if the soil has been allowed to dry out, the subgrade shall be re-moisture conditioned to at least 2 percent over the optimum moisture content. The structural engineer shall determine the appropriate slab reinforcement for the loading requirements and considering the expansion potential of the underlying soils. For unreinforced concrete slabs, American Concrete Institute (ACI) 302.1R recommends limiting control joint spacing to 24 to 36 times the slab thickness in each direction, or a maximum of 18 feet. Warehouse slabs-on-grade shall be at least 6 inches thick and shall have a minimum compressive strength of 3,500 psi. The warehouse slab shall also be supported on at least 6 inches of non-expansive, crushed granular base having an R-value of at least 50 and no more than 10 percent passing the No. 200 sieve, such as Class 2 aggregate base. If there will be areas within the warehouse	**Requirements:** Proposed slabs-on-grade shall include: ▪ Being supported on at least 6 inches of non-expansive fill (NEF) to reduce the potential for slab damage due to soil heave ▪ The NEF layer shall be constructed over subgrade ▪ If significant time elapses between initial subgrade preparation and NEF construction, the subgrade shall be proof-rolled to confirm subgrade stability ▪ If the soil has been allowed to dry out, the subgrade shall be re-moisture conditioned to at least 2 percent over the optimum moisture content. The structural engineer shall determine the appropriate slab reinforcement for the loading requirements and considering the expansion potential of the underlying soils. For unreinforced concrete slabs, limit control joint spacing to 24 to 36 times the slab thickness in each direction, or a maximum of 18 feet. Warehouse slabs-on-grade shall:	During construction.	Plans shall be determined by the structural engineer. Prior to project approval, the City shall review and approve all construction plans.	San Leandro Planning Division and Building & Safety Department			

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that are moisture sensitive, such as equipment and elevator rooms, a vapor barrier may be placed over the upper granular base prior to slab construction. Consideration shall be given to limiting the control joint spacing to a maximum of about 2 feet in each direction for each inch of concrete thickness. Prior to project approval, the City shall review and approve all construction plans.	▪ Be at least 6 inches thick ▪ Have a minimum compressive strength of 3,500 psi ▪ Be supported on at least 6 inches of non-expansive, crushed granular base having an R-value of at least 50 and no more than 10 percent passing the No. 200 sieve ▪ If there will be areas within the warehouse that are moisture sensitive, a vapor barrier may be placed over the upper granular base prior to slab construction ▪ Consideration shall be given to limiting the control joint spacing to a maximum of about 2 feet in each direction for each inch of concrete thickness.						
GEO-11. Exterior Flatwork Exterior concrete flatwork subject to pedestrian loading only shall be at least 4 inches thick and supported on at least 6 inches of Class 2 aggregate base overlying subgrade. To help reduce the potential for uncontrolled shrinkage cracking, adequate expansion and control joints shall be included. Consideration shall be given to limiting the control joint spacing to a maximum of about 2 feet in each direction for each inch of concrete thickness. Flatwork shall be isolated from adjacent	**Requirements:** ▪ Exterior concrete flatwork subject to pedestrian loading only shall be at least 4 inches thick and supported on at least 6 inches of Class 2 aggregate base overlying subgrade ▪ Adequate expansion and control joints shall be	During construction.	Prior to project approval, the City shall review and approve all construction plans.				

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foundations or retaining walls except where limited sections of structural slabs are included to help span irregularities in retaining wall backfill at the transitions between at-grade and on structure flatwork. Prior to project approval, the City shall review and approve all construction plans.	included to reduce shrinkage potential ▪ Consideration shall be given to limiting the control joint spacing to a maximum of about 2 feet in each direction for each inch of concrete thickness ▪ Flatwork shall be isolated from adjacent foundations or retaining walls except where limited sections of structural slabs are						
GEO-12. Construction Site Soil Moisture Monitoring The contractor shall keep exposed expansive soil protected by overlying improvements or trenches that are backfilled. The contractor shall keep all exposed expansive soil subgrade and trench excavation side walls moist until during the construction period. Expansive soils allowed to dry out significantly will require re-moisture conditioning that will consist of several days of re-wetting. Prior to project approval, the City shall review and approve all site preparation and construction plans.	**Requirements:** The contractor shall: ▪ Keep exposed expansive soil protected by overlying improvements or trenches that are backfilled ▪ Keep all exposed expansive soil subgrade and trench excavation side walls moist until during the construction period ▪ Re-moisture any expansive soils allowed to significantly dry out	During construction.	Prior to project approval, the City shall review and approve all site preparation and construction plans.	San Leandro Planning Division and Building & Safety Department			
GEO-13. Expansive Soil Construction Plan Slabs-on-grade shall have sufficient reinforcement and be supported on a layer of non-expansive fill. Footings shall extend below the zone of seasonal moisture fluctuation. Moisture changes in the surficial	**Requirements:** ▪ Slabs-on-grade shall have sufficient reinforcement and be supported on a layer of non-expansive fill	During construction	Prior to project approval, the City shall review and approve all construction plans.	San Leandro Planning Division and Building & Safety Department			

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soils shall be limited by using positive drainage away from buildings and limiting landscaping watering. Prior to project approval, the City shall review and approve all construction plans.	▪ Footings shall extend below the zone of seasonal moisture fluctuation ▪ Moisture changes in the surficial soils shall be limited by using positive drainage away from buildings and limiting landscaping watering						
GEO-14. Expansive Soil Landscape Plan The landscape architect shall consider the near-surface soil's moderately expansive quality when developing landscaping plans. The amount of surface water infiltrating the on-site moderately expansive soils near foundations and exterior slabs-on-grade shall be reduced. Prior to project approval, the City shall review and approve all landscaping plans.	**Requirements:** The landscape architect plans shall: ▪ Consider near-surface soil's moderately expansive quality ▪ Reduce the amount of surface water infiltrating the on-site moderately expansive soils near foundations and exterior slabs-on-grade	During landscape plan development.	Prior to project approval, the City shall review and approve all landscaping plans.	San Leandro Planning Division and Building & Safety Department			
GEO-15. Foundation for Expansive Soil Spread footings shall bear entirely on natural, undisturbed soil, or engineered fill, be at least 12 inches wide, and extend at least 18 inches below the lowest adjacent grade. The deeper footing embedment shall embed the footing below the zone of significant seasonal moisture fluctuation, reducing the potential for differential movement. Top and bottom mats of reinforcing steel shall be included in continuous footings to help span irregularities and differential settlement. Prior to project approval, the City shall review and approve all construction plans.	**Requirements:** Spread footings shall: ▪ Bear entirely on natural, undisturbed soil or engineered fill ▪ Be at least 12 inches wide ▪ Extend at least 18 inches below lowest adjacent grade Deeper footing embedment shall embed footing below the zone of significant seasonal moisture fluctuation. Top and bottom reinforcing steel mats shall be included in continuous footings.	During construction.	Prior to project approval, the City shall review and approve all construction plans.	San Leandro Planning Division and Building & Safety Department			

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GEO-16. Unanticipated Discovery of Paleontological Resources In the event an unanticipated fossil discovery is made during the course of project construction, construction activity shall be halted within 50 feet of the fossil, and a qualified professional paleontologist shall be notified and retained to evaluate the discovery, determine its significance, and determine if additional mitigation or treatment is warranted. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work. Any significant paleontological resources found during construction monitoring will be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist. In the event that paleontological resources are encountered during project construction, at the end of construction, a report shall be submitted to the City to inform the city of the resources found.	**Requirements:** If an unanticipated fossil discovery occurs during construction: ▪ Construction shall be halted within 50 feet of the fossil ▪ A qualified professional paleontologist shall be notified and retained to evaluate the discovery and its significance ▪ Work in the area shall resume after proper documentation and authorization is given **Documentation:** Any significant paleontological resources are found during construction monitoring shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under a qualified paleontologist's oversight. Any significant paleontological resources found during project construction, a report informing the City shall be submitted to the City.	Immediately following any founding during the construction process and monitoring.	A qualified paleontologist shall perform the surveys and any oversight as needed.	San Leandro Planning Division and Building & Safety Department			

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Environmental Impact Report							
Cultural Resources							
CUL-1. Building Documentation The applicant shall prepare archival documentation of as-built and as-found conditions of the property at 1919 Williams Street. Prior to issuance of demolition permits, the City of San Leandro shall ensure that documentation of the buildings and structures proposed for demolition is completed that follows the general guidelines of Historic American Building Survey (HABS)-Level III documentation. The documentation shall include high resolution digital photographic recordation, a historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's *Professional Qualifications Standards* for History and/or Architectural History (36 CFR Part 61). The original archival-quality documentation shall be offered as donated material to organizations and repositories that will make it available for current and future generations, including the City of San Leandro and the San Leandro Historical Society where it would be available to local researchers. Prior to the issuance of demolition permits, the City shall confirm documentation has been provided to all applicable organizations, including the City of San Leandro and the Historic Review Board.	**Requirements:** The applicant shall prepare archival documentation of as-built and as-found conditions of the buildings and structures proposed for demolition at the 1919 Williams Street property. This preparation process includes: ▪ Following the general guidelines of Historic American Building Survey (HABS)-Level III documentation ▪ High resolution digital photographic recordation, historic narrative report, and complication of historic research It shall be provided to the City of San Leandro and the Historic Review Board. **Documentation:** The applicant shall offer original archival-quality documentation to be donated material to organizations and repositories that will make it available, including the City of San Leandro and the San Leandro Historical Society.	Prior to issuance of demolition permits and actual demolition.	The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's *Professional Qualifications Standards* for History and/or Architectural History (36 CFR Part 61). The completion of this process shall be confirmed by the City.	San Leandro Planning Division and Building & Safety Department			

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CUL-2. Unanticipated Discovery of Archaeological Resources Given the nature of the proposed improvements (i.e., no subterranean components) and existing site conditions, project-related ground disturbance (i.e., excavations) would not be anticipated to include ground disturbance in previously undisturbed areas and would thus be unlikely to impact native (intact) fossiliferous deposits. However, if cultural resources are encountered during ground-disturbing activities, work within 50 feet of the find shall be halted, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find (i.e., whether it is a "historical resource" or a "unique archaeological resource"). If the discovery proves to be significant under CEQA, additional work, recommended by the qualified archaeologist, the City, and if appropriate, local Native American Tribes, such as resource avoidance, or, where avoidance is infeasible in light of project design or layout or is unnecessary to avoid significant effects, data recovery excavation, Native American consultation, and archaeological monitoring may be warranted to mitigate significant impacts to cultural resources. In consultation with the archaeologists, the applicant shall implement any measures deemed by City staff to be necessary and feasible to avoid or minimize significant effects to the cultural resources.	**Requirements:** If cultural resources are encountered during ground-disturbing activities: ▪ Work within 50 feet of the find shall be halted ▪ An archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate If the finding is significant under CEQA, there may be additional work recommended by the qualified archaeologist, the City, and if appropriate, local Native American Tribes.	During ground-disturbing activities, in the event that cultural resources are encountered.	In consultation with the archaeologists, the applicant shall implement any measures deemed by City staff to be necessary and feasible to avoid or minimize significant effects to the cultural resources.	San Leandro Planning Division and Building & Safety Department			

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Tribal Cultural Resources							
TCR-1 Unanticipated Discovery of Tribal Cultural Resources In the event that tribal cultural resources of Native American origin are identified during construction, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City, in consultation with local Native Americans, determines the resource is a tribal cultural resource and thus significant under CEQA, a cultural resources management plan shall be prepared and implemented in accordance with state guidelines (PRC Section 20184.3 (b)(2)) and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archaeologist, if applicable, and the appropriate Native American tribal representative(s). The plan shall be reviewed and approved by the City and the consulting Native American tribal representative(s) prior to implementation.	**Requirements:** If tribal cultural resources of Native American origin are identified during construction: ▪ All earth-disturbing work within 50 feet of the find suspended or redirected ▪ An archaeologist shall be consulted to evaluate the nature and significance of the find and an appropriate Native American representative, based on the nature of the find **Documentation:** If significant under CEQA, a cultural resources management plan shall be prepared and implemented. The plan would include avoidance of the resource or, if infeasible, outline the appropriate treatment of the resource	During construction, in the event that tribal resources of Native American origin are identified.	The cultural resources management plan shall be in accordance with state guidelines and Native American consultation groups. The plan shall be reviewed and approved by the City and the consulting Native American tribal representatives prior to implementation	San Leandro Planning Division and Building & Safety Department			