4. Environmental Analysis

This Draft EIR is made up of 14 sub-chapters. This introduction describes the organization of this Draft EIR and the assumptions and methodology of the cumulative impact analysis. The remaining 14 sub-chapters evaluate the direct, indirect, and cumulative environmental impacts of the proposed Plan. The potential environmental effects of the proposed Plan are analyzed for the following issues areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation and Traffic
- Utilities and Service Systems

Due to the past and current uses of the EIR Study Area, no environmental impacts associated with agricultural and forestry resources and mineral resources are expected to occur as a result of the proposed Plan. These resource topics will not be addressed further in the Draft EIR.

CHAPTER ORGANIZATION

This chapter consists of 14 sub-chapters that evaluate the environmental impacts of the proposed San Leandro General Plan Update, referred to as the "proposed Plan." Each issue area uses generally the same organization and consists of the following subsections:

- The *Regulatory Framework* section describes which local, State, and/or federal regulations are applicable to the proposed Plan.
- The *Existing Conditions* section describes current conditions with regard to the environmental issue area reviewed.
- The *Thresholds of Significance* section describes how an impact is judged to be significant in this Draft EIR. These standards are derived from CEQA Appendix G Guidelines unless stated otherwise.

- The *Impact Discussion* assesses potential impacts (direct and indirect), and explains why impacts were found to be significant or less than significant. This section also lists applicable regulations, which are considered to be part of the proposed project.
- The *Cumulative Impact Discussion* section analyzes impacts that the proposed plan may have when considered in addition to other past, present, and reasonably foreseeable projects. (See further discussion below).

ASSUMPTIONS AND METHODOLOGY REGARDING CUMULATIVE IMPACTS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." In the case of a General Plan, cumulative effects occur when future development under the General Plan is combined with development in the surrounding areas or in some instances in the entire region.

Where the incremental effect of a project is not "cumulatively considerable," a Lead Agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Where the cumulative impact caused by the project's incremental effect and the effects of the other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant.

The cumulative discussions in Chapters 4.1 through 4.14 of this Draft EIR explain the geographic scope of the area affected by each cumulative effect (e.g. immediate project vicinity, county, watershed, or air basin). The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing macro-scale air quality impacts, all development within the air basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, on the other hand, only development within the localized area of change would contribute to a cumulative visual effect since the area of change is only visible within the vicinity of that area.

The CEQA Guidelines provide two approaches to analyzing cumulative impacts. The first is the "list approach," which requires a listing of past, present, and reasonably anticipated future projects producing related or cumulative impacts. The second is the projections-based approach wherein the relevant growth projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions are summarized. A reasonable combination of the two approaches may also be used.

The cumulative analysis discussions contained in Chapters 4.1 through 4.14 of this Draft EIR uses the projections approach and takes into account growth from the proposed Plan within the San Leandro city limit and Sphere of Influence (SOI), in combination with impacts from projected growth in the rest of Alameda County and the surrounding region, as forecast by the Association of Bay Area Governments (ABAG). The following provides a summary of the cumulative impact scope for each impact area:

- Aesthetics: The cumulative setting for visual impacts includes potential future development under the proposed project combined with effects of development on lands within the City's SOI and lands adjacent to the city in Oakland to the north, Castro Valley to the east, and the unincorporated Alameda County communities of San Lorenzo and Ashland to the south.
- Air Quality: Cumulative air quality impacts could occur from a combination of the proposed plan with regional growth within the San Francisco Bay Area Air Basin.
- Biological Resources: The geographic scope of the cumulative analysis for biological resources considers growth throughout the region.
- Cultural Resources: Cumulative impacts to cultural resources could occur from development growth within San Leandro and its SOI, combined with impacts from projected growth in the surrounding region.
- Geology, Soils, and Seismicity: Potential cumulative geological impacts could arise from a combination of future development under implementation of the proposed project together with future growth in the immediate vicinity of the adjoining jurisdictions.
- Greenhouse Gas Emissions: The cumulative impact analyses for greenhouse gas (GHG) emissions are related to the ongoing development in the City of San Leandro and the entire region. Because GHG emissions are not confined to a particular air basin but are dispersed worldwide, the cumulative impact analysis focuses on the global impacts and thus, is by its nature cumulative.
- Hazards and Hazardous Materials: The cumulative analysis considers the effects of the proposed project within San Leandro and its SOI, in combination with impacts from projected growth in the rest of Alameda County and surrounding region.
- Hydrology and Water Quality: The geographic context used for the cumulative assessment of hydrology and water quality impacts considers future development within the five watersheds that encompass San Leandro.
- Land Use and Planning: The geographic context for the cumulative land use and planning effects considers future development within the San Leandro city limit and its SOI, in combination with impacts from projected growth in the rest of Alameda County and the surrounding region, as forecast by the ABAG.
- Noise: The traffic noise levels are based on cumulative traffic conditions that take into account cumulative development in the region.
- Population and Housing: Impacts from cumulative growth are considered in the context of their consistency with regional planning efforts.
- Public Services and Recreation: Cumulative impacts are considered in the context of the growth from development within the San Leandro city limit and SOI, in combination with impacts from projected growth in the rest of Alameda County and the surrounding region, as forecast by ABAG.
- Transportation and Circulation: The analysis of the proposed Plan addresses cumulative impacts to the transportation network in San Leandro and surrounding area.
- Utilities and Service Systems: Cumulative impacts are considered in the context of the growth from development under the proposed Plan within the city combined with the estimated growth in each utility's service area.

THRESHOLDS OF SIGNIFICANCE FOLLOWING *CALIFORNIA BUILDING INDUSTRY ASSOCIATION V. BAY AREA AIR QUALITY MANAGEMENT DISTRICT* (2015)

The purpose of this EIR is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the project. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (CBIA), *Ballona Wetlands Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-474 (Ballona).) CEQA does not require an EIR to analyze the environmental effects of attracting development and people to a hazardous area, except when the project exacerbates an existing environmental hazard or condition, or when specifically required by statute. None of the statutory exceptions applies to the project.

Given San Leandro's location on the San Francisco Bay shoreline, the City recognizes that sea level rise is a local issue of concern. The effects of sea level rise on the proposed project are not subject to CEQA review following the *CBIA* and *Ballona* cases.[1] For informational purposes, Appendix D of this Draft EIR provides information on sea level rise that may be used for planning purposes.

To establish thresholds of significance, this Draft EIR primarily uses Appendix G of the CEQA Guidelines, which is a sample checklist form for use in preparing an initial study (see Guidelines, §15063(f)). However, a few of the thresholds concern the exposure of people or structures to environmental hazards. In accordance with the CBIA case, these checklist items will not be analyzed in the EIR unless the existing hazards or conditions could be exacerbated by the project. The following Appendix G checklist items will not be further analyzed in this EIR:

- AQ-4: Expose sensitive receptors to substantial pollutant concentrations. (Note that this threshold remains in Chapter 4.2, Air Quality, as it pertains to the impacts of new sources of pollutants on sensitive land uses. Planning considerations regarding the placement of sensitive receptors proximate to major sources of TACs and $PM_{2.5}$ are not addressed in this threshold but are discussed in Appendix E of this Draft EIR.)
- GEO-1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
  - Strong seismic ground shaking.
  - Seismic-related ground failure, including liquefaction.
  - Landslides. (unless development would trigger a landslide)
- HAZ-8: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with

[1] *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, *Ballona Wetlands Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-474.

wildlands. (Note that this threshold remains in Chapter 4.7, Hazards and Hazardous Materials, as it pertains to the proposed project's potential to exacerbate wildland hazards.)

- HYDRO-7: Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
- HYDRO-9: Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of the failure of a levee or dam.
- HYDRO-10: Inundation by seiche, tsunami, or mudflow. (Note that this threshold remains in Chapter 4.8, Hydrology and Water Quality, as it pertains to the impacts of the creation of mudflow.)
- NOI-1: Expose people to, or generation of, noise levels in excess of standards established in the General Plan or the Municipal Code, and/or the applicable standards of other agencies. (Note that this threshold remains in Chapter 4.10, Noise, as it pertains to the generation of noise levels in excess of applicable standards.)
- NOI-2: Expose people to, or generation of, excessive groundborne vibration or groundborne noise levels. (Note that this threshold remains in Chapter 4.10, Noise, as it pertains to the generation of excessive vibration.)