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DRAFT
Initial Study/Mitigated Negative Declaration
PLN2021-00096, SITE DEVELOPMENT REVIEW
17338 Langton Way Digital Billboard Project
Alameda County, California

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Appendix F: Summary of Soil and Groundwater Sampling Activities

List of Tables

List of Exhibits

ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACBD	Ashland and Cherryland Business District
ACCMA	Alameda County Congestion Management Agency
ACFD	Alameda County Fire Department
ALUC	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQP	Air Quality Plan
ARB	California Air Resources Board
ASF	age-sensitivity factor
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BERD	California Built Environment Resource Directory
bgs	below ground surface
BMP	Best Management Practice
BRT	Bus Rapid Transit
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CBC	California Building Standards Code
cd/m^2	candela per square meter
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNPSEI	California Native Plant Society Electronic Inventory
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CPHI	California Points of Historical Interest
CRHR	California Register of Historical Resources

dB	decibel
dBA	A-weighted decibel
DBR	daily breathing rates
DOC	California Department of Conservation
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
EBMUD	East Bay Municipal Utility District
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
FAA	Federal Aviation Administration
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
fps	feet-per-second
FTA	Federal Transit Administration
GBO	Green Building Ordinance
GHG	greenhouse gas
HI	hazard index
IPaC	Information for Planning and Consultation
IS/MND	Initial Study/Mitigated Negative Declaration
kWh	kilowatt hour
lbs	pounds
L_{dn}	day/night sound level
L_{eq}	equivalent continuous sound level
LED	light-emitting diode
MBTA	Migratory Bird Treaty Act
MIR	Maximally Impacted Sensitive Receptor
MLD	Most Likely Descendant
MM	Mitigation Measure
MT	metric tons
MTBE	methyl tert-butyl ether
MTC	Metropolitan Transportation Commission
MWh	megawatt-hours
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OAAA	Outdoor Advertising Association of America

OEHHA	Office of Environmental Health Hazards Assessment
OHP	California Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
PCE	tetrachloroethene
PD	Planned Development
PG&E	Pacific Gas and Electric Company
PM_{10}	particulate matter, including dust, 10 micrometers or less in diameter
$PM_{2.5}$	particulate matter, including dust, 2.5 micrometers or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
PV	photovoltaics
RPS	Renewables Portfolio Standard
REL	reference exposure limit
ROG	reactive organic gases
RV	recreational vehicle
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SR	State Route
State Water Board	California State Water Resources Control Board
SWH	solar water heating
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TAH	time-at-home factor
TCE	trichloroethylene
TCR	Tribal Cultural Resources
TOD	transit-oriented development
TPH	total petroleum hydrocarbons
TPH-d	total petroleum hydrocarbons as diesel
TPH-mo	total petroleum hydrocarbons as mobile oil
TPH-g	total petroleum hydrocarbons as gasoline
TSP	transit signal prioritization
UCMP	University of California Museum of Paleontology
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds
WAP	Weatherization Assistance Program

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SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify potential environmental impacts that would result from implementation of the 17338 Langton Way Digital Billboard Project (proposed project). Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, Alameda County (the County) is the Lead Agency in the preparation of this Draft IS/MND, and any additional environmental review documentation required for the proposed project. The County has discretionary authority over the proposed project. The intended use of this Draft IS/MND is to determine the level of environmental impacts resulting from the proposed project. Where a potentially significant impact is found, this Draft IS/MND identifies mitigation measures that would reduce such impacts to a less than significant level. This Draft IS/MND also provides the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section briefly describes the project location and characteristics of the proposed project. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation. Each individual subsection elaborates on the information contained in the environmental checklist, along with justification for the responses provided in the environmental checklist. Section 3 includes the List of Preparers.

1.2 - Project Location

The proposed project includes the installation of a new electronic billboard and the removal of five existing sign structures with 10 traditional, static billboard signs in unincorporated Alameda County near Hayward, California (Exhibit 1 and Exhibit 2). The new billboard would be installed at 17338 Langton Way (Assessor's Parcel Number [APN] 414-6-45-2), which is in the southwest corner of Interstate 238 (I-238)/State Route (SR) 185 (Mission Boulevard/East 14th Street) interchange. The five billboard structures that would be removed are in the vicinity of the new billboard site: one at 17081 East 14th Street, one at 910 East Lewelling Boulevard, one at 2860 Castro Valley Boulevard, and two at 970 East Lewelling Boulevard. Exhibit 3 shows the locations of the proposed electronic billboard and the five billboard structures that would be removed.

1.3 - Project Summary

Outfront Media (the project applicant) proposes to construct a double-sided electronic billboard at 17338 Langton Way (the new billboard site) and to remove five existing sign structures with 10 traditional, static billboard signs: one structure at 17081 East 14th Street, one structure at 910 East Lewelling Boulevard, one structure at 2860 Castro Valley Boulevard, and two structures at 970 East Lewelling Boulevard. The new billboard would be V-shaped with west- and east-facing light-emitting diode (LED) displays that would be visible to vehicles traveling eastbound or westbound on I-238.[1]

[1] State Route 238 is a north-south route that passes through Hayward and Union City, parallel to the Hayward hills. At its junction with Interstate 580 (I-580), it then becomes known as I-238, proceeding westward to its junction with I-880.

This project replaces a previous billboard proposed for the public right-of-way at the northern end of Langton Way. This previous project was assessed in an IS/MND and was approved in 2018. After approval by the County, the proposed site was changed to a new location 185 feet to the southeast. The updated location is analyzed throughout this Draft IS/MND.

1.4 - Existing Project Site Characteristics and Surrounding Land Uses

1.4.1 - New Billboard

The new billboard would be located in a parking lot located in the eastern portion of a commercial zoned property. The western portion of said property consists of a residence and a wooden fence that separates the residence from the parking lot. The parking lot in which the new billboard would be located currently serves a commercial limousine and transportation service company located immediately south of the project property. The parcel on which the limousine and transportation service operates will afford access from the public street to the new sign and thus also comprises a portion of the project site. The owner of the limousine company owns and occupies all portions of the project site. The new billboard would be bordered to the north by an embankment for I-238, to the east by a right-turn lane from SR-185 to East Lewelling Boulevard, the limousine company to the south, and a fence and the single-family residence to the west.

The property owner currently occupies the on-site residence and is considered a project proponent who will benefit from and control operations, to a certain extent, through a lease with Outfront Media. Thus, the residence on-site is not considered a sensitive receptor under CEQA, and the nearest sensitive receptor is the residence approximately 180 feet west of the project site.

1.4.2 - Billboards to be Removed

The proposed project includes the removal of five existing sign structures with 10 static billboard sign faces. Below is a discussion of the characteristics and surrounding land uses of the five billboard structures to be removed. Exhibits 4-a and 4-b show the daytime views of these billboards.

- **17081 East 14th Street (APN 80B-302-3-1):** This structure has two advertising panel sign faces. One sign face is 12 feet high by 24 feet wide, and the other is 6 feet high by 12 feet wide. It is located adjacent to the southbound I-238 off-ramp, on the west side of East 14th Street south of 170th Avenue. The property is developed with a building and an adjacent carport. The site is located along a major thoroughfare; surrounded by commercial and residential uses; and bound by East 14th Street to the east, commercial and residential uses to the south and west, and a vacant lot and 170th Avenue to the north.
- **910 East Lewelling Boulevard (APN 414-6-41):** This structure has two advertising panel sign faces, each 12 feet high by 24 feet wide. It is located adjacent to the northbound I-238 on-ramp, on the north side of East Lewelling Boulevard. The property is developed with a single-story office building. The site is located along a major thoroughfare; surrounded by commercial, office, and residential uses; and bound by commercial and residential uses to the east and south, the northbound I-238 on-ramp to the west, and I-238 to the north.

- **970 East Lewelling Boulevard (APN 414-6-46):** These two structures each have two advertising panel sign faces that are 12 feet high by 24 feet wide, for a total of four sign faces. They are located on the north side of East Lewelling Boulevard at SR-185 (Mission Boulevard). The property is developed with a single-story commercial building and limousine storage parking lot. The site is at the corner of two major thoroughfares, surrounded by commercial and residential development. It is bound by commercial and residential uses to the north and west, SR-185 (Mission Boulevard) to the east, and East Lewelling Boulevard to the south. **2860 Castro Valley Boulevard (APN 84A-131-12):** This structure has two advertising panel sign faces, each 12 feet high by 24 feet wide. It is located on the north side of Castro Valley Boulevard, east of Wisteria Street. The property is developed with a recreational vehicle (RV) park and is bound by residential uses to the north, retail uses to the east, Castro Valley Boulevard to the south, and a restaurant to the west.

1.5 - General Plan Designation and Zoning

The Eden Area General Plan, which serves as the General Plan for the western part of Alameda County, designates the new billboard site as General Commercial. The site is located within the area of the Ashland and Cherryland Business District (ACBD) Specific Plan, as shown in Exhibit 5. This site is in the West Eden Corridor of the Specific Plan area. The Specific Plan designates the site ACBD-AC-CN-C (Corridor Neighborhood–Commercial), as shown in Exhibit 6. According to the Specific Plan, this designation is intended "[t]o support neighborhood-serving commercial uses on small and medium sized lots in various structures, including house form building types. Residential allowed as a secondary use." The County's Billboard Ordinance only prohibits billboards in R (Residential), A (Agricultural), or PD (Planned Development) districts.[2] Therefore, placement of a billboard on the project site complies with applicable zoning because the site is located in a commercial district.

[2] County of Alameda. 2021. Code of Ordinances. Section 17.54.226 Site Development Review for Relocation Agreement Billboards—Applications and Criteria. Website: https://library.municode.com/ca/alameda_county/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.54PR_17.54.226SIDEREREAGBIPPCR. Accessed May 13, 2021.

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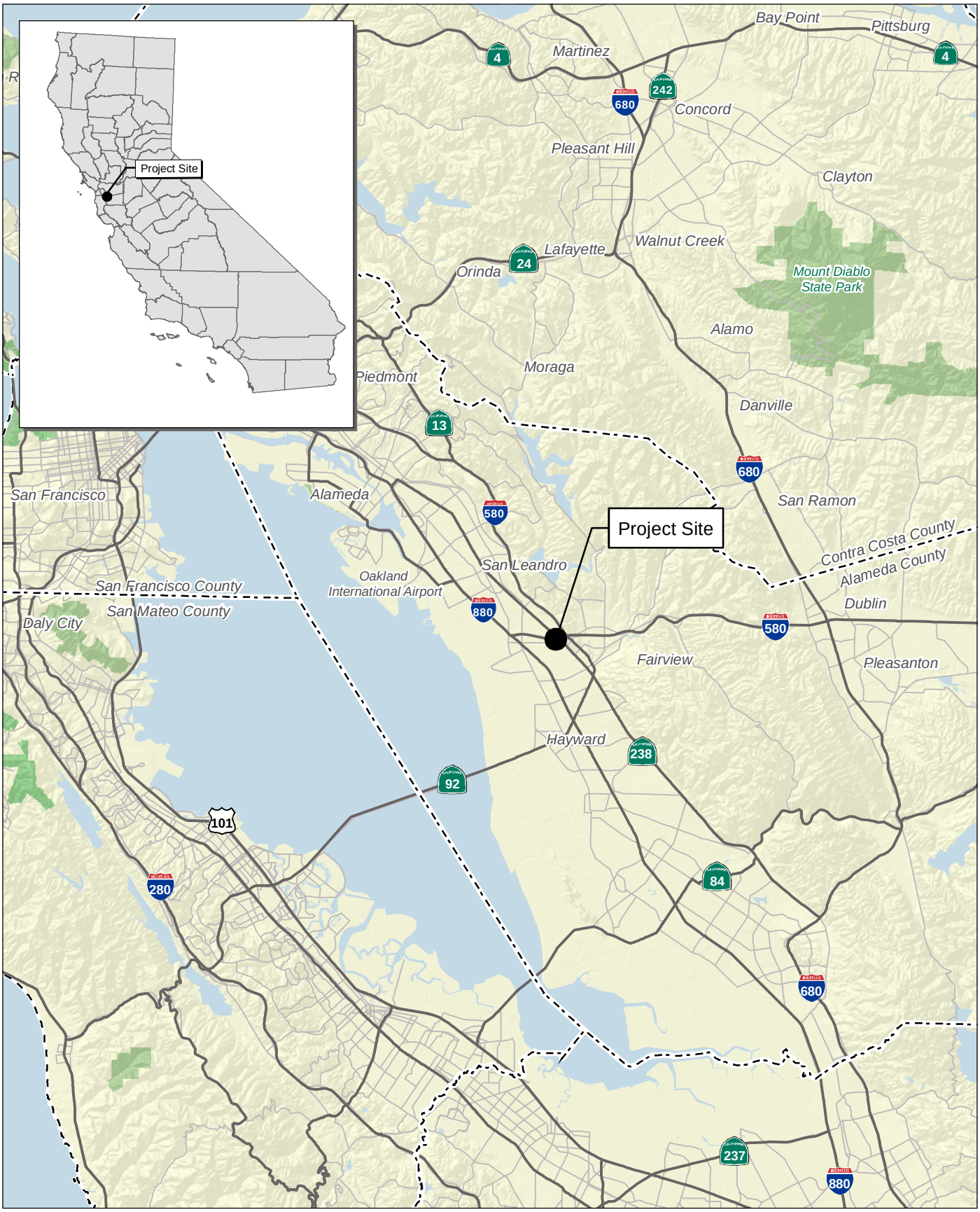

Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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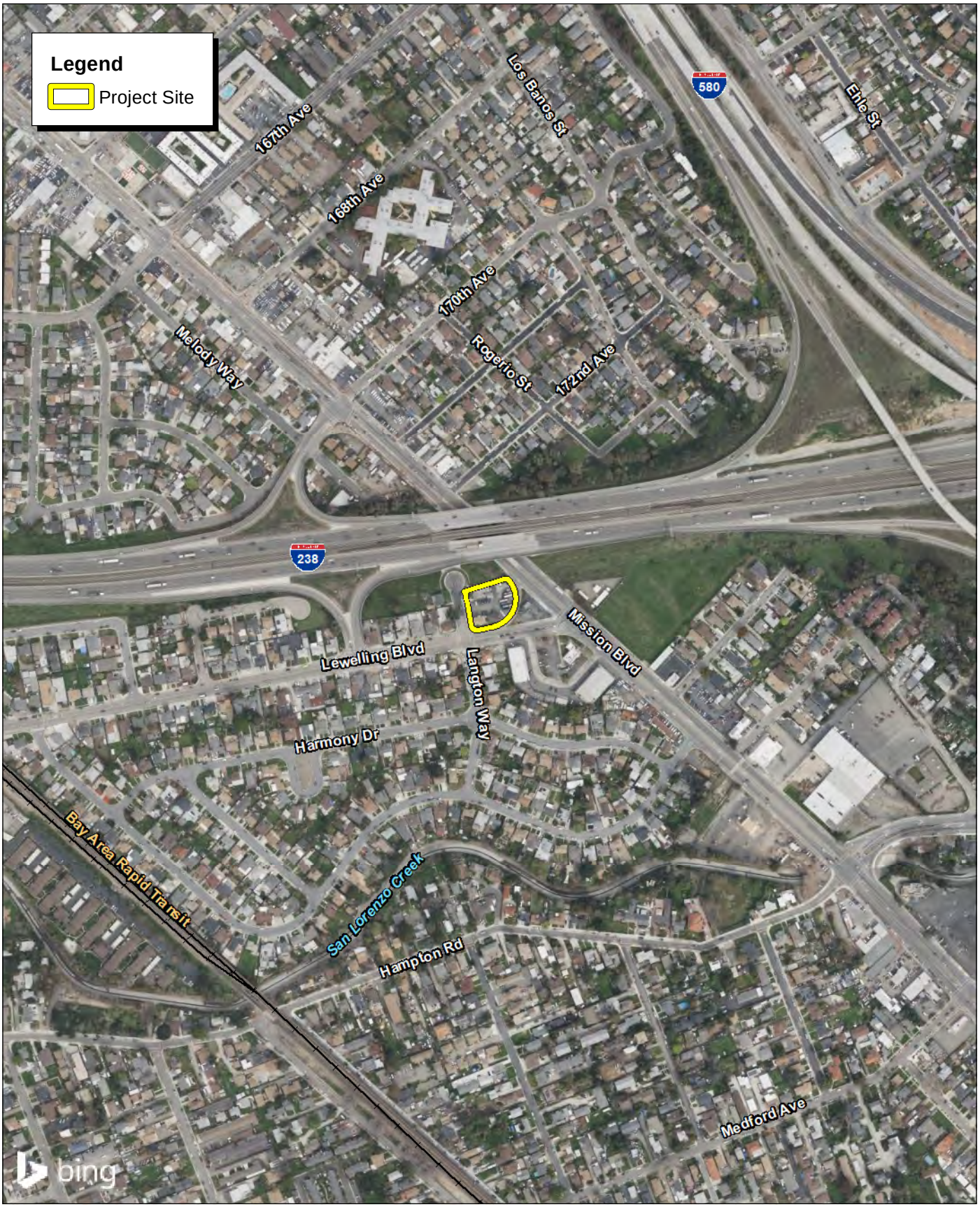

Source: Bing Aerial Imagery.

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510 255 0 510 Feet

Exhibit 2
Local Vicinity Map

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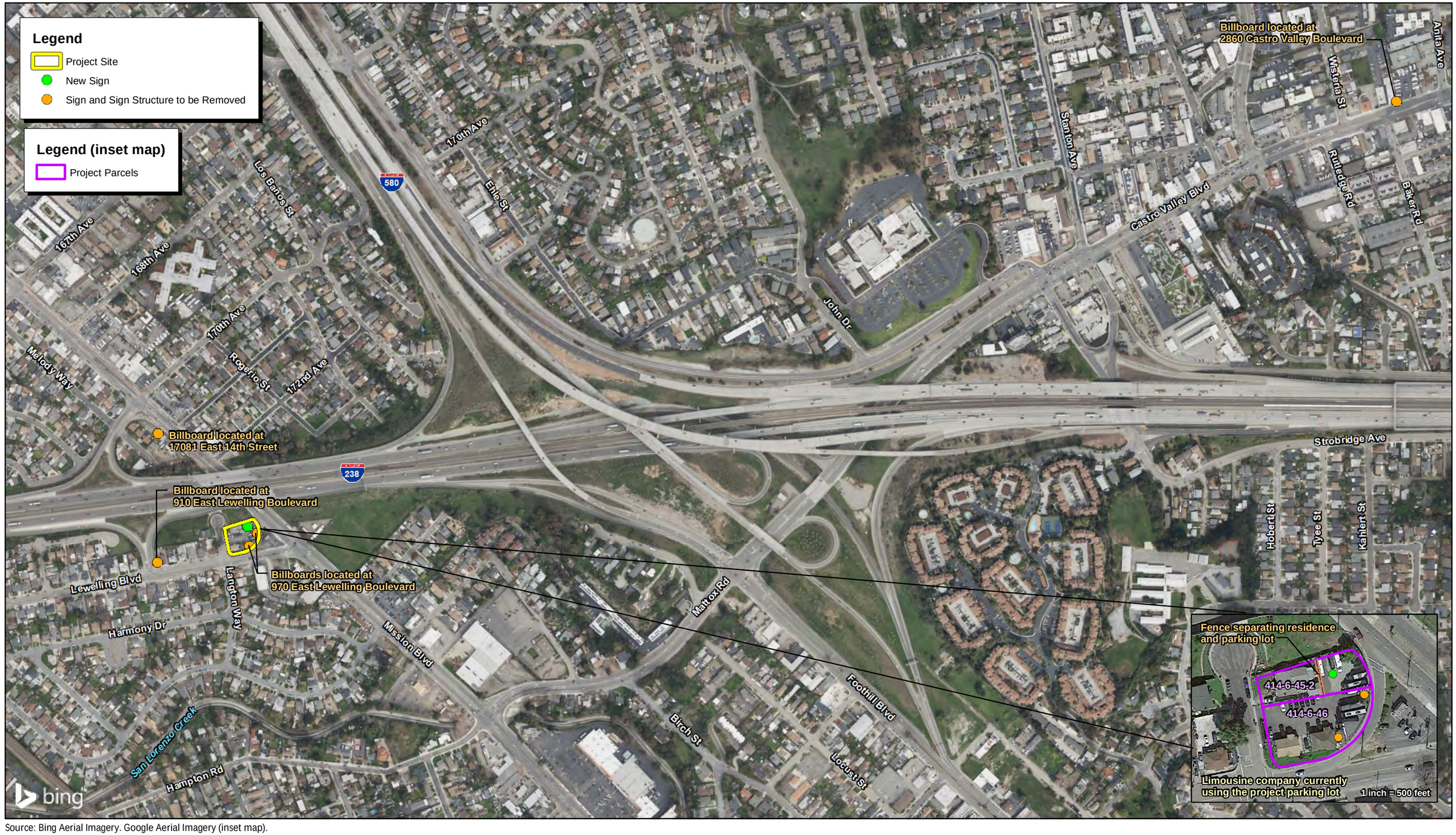

Source: Bing Aerial Imagery. Google Aerial Imagery (inset map).

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500 250 0 500 Feet

Exhibit 3
Project Location

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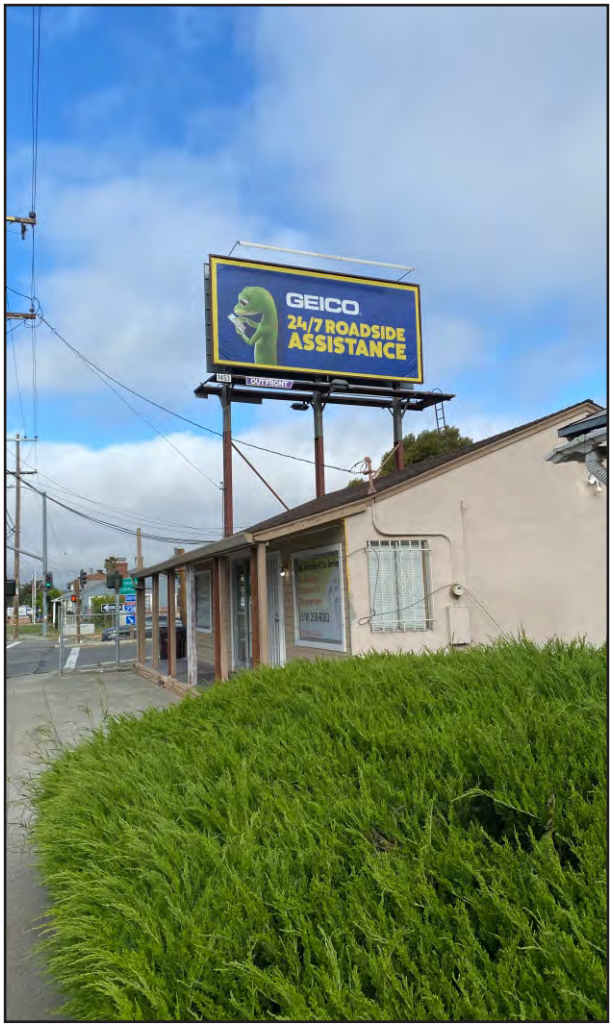
Billboard located at 17081 East 14th Street (APN 80B-302 3-1).



Billboard located at 910 East Lewelling Boulevard (APN 414-64-1).

Billboard located at 2860 Castro Valley Boulevard (APN 84A-131-12).

Source: FirstCarbon Solutions, 2021.

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Exhibit 4a
Billboards to be Removed

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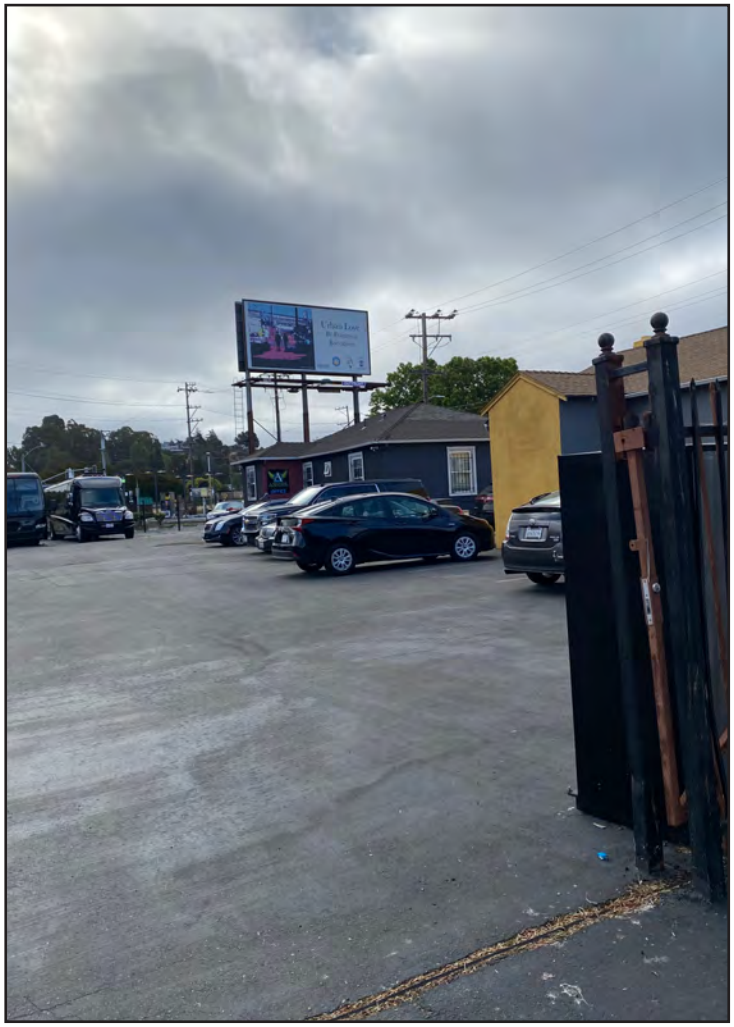

North billboard located at 970 East Lewelling Boulevard (APN 414-6-46).

South billboard located at 970 East Lewelling Boulevard (APN 414-6-46).

Source: FirstCarbon Solutions, 2021.

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Exhibit 4b
Billboards to be Removed

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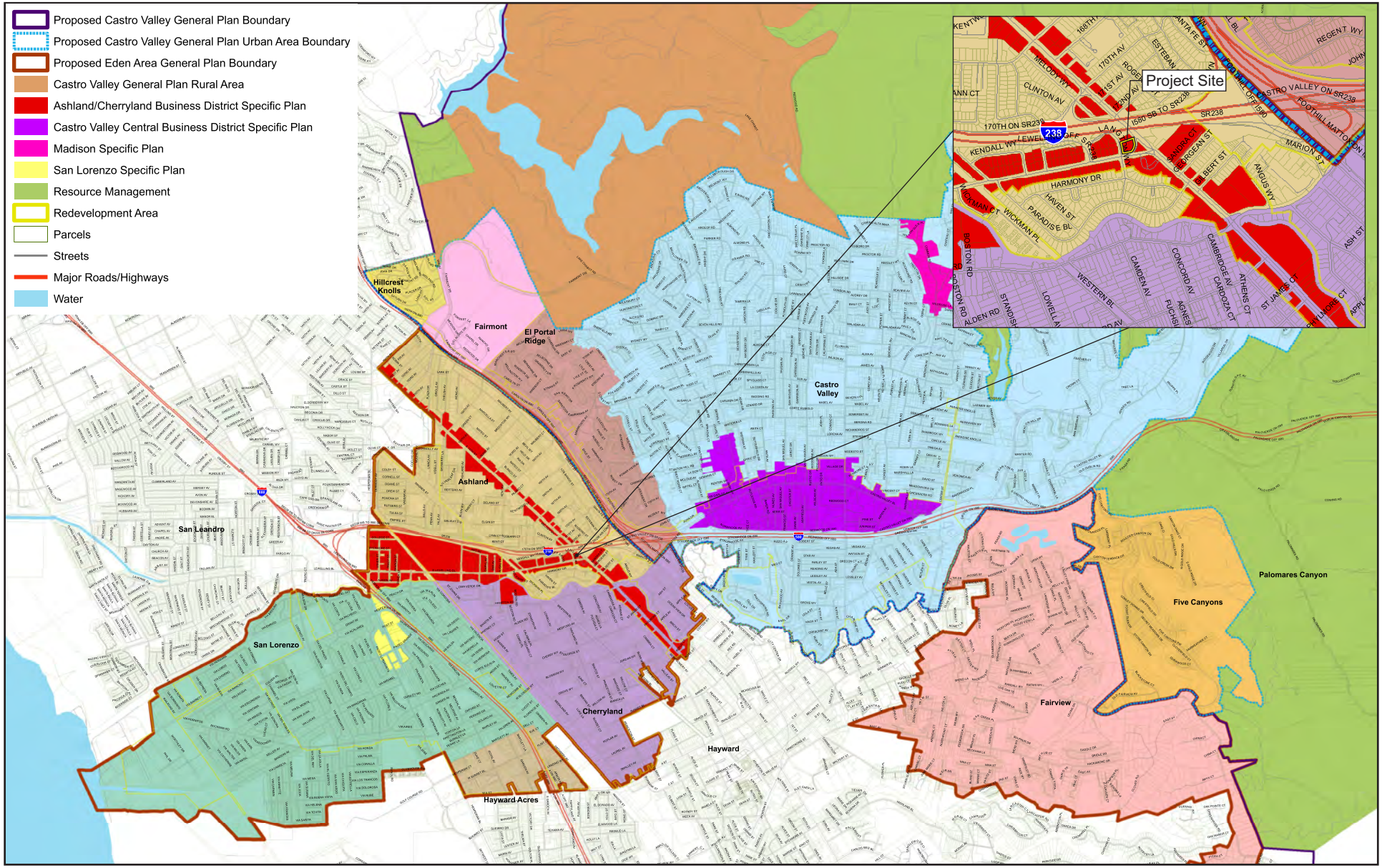

Source: Alameda County Community Development Agency, September 2008.

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Exhibit 5
General Plan Map

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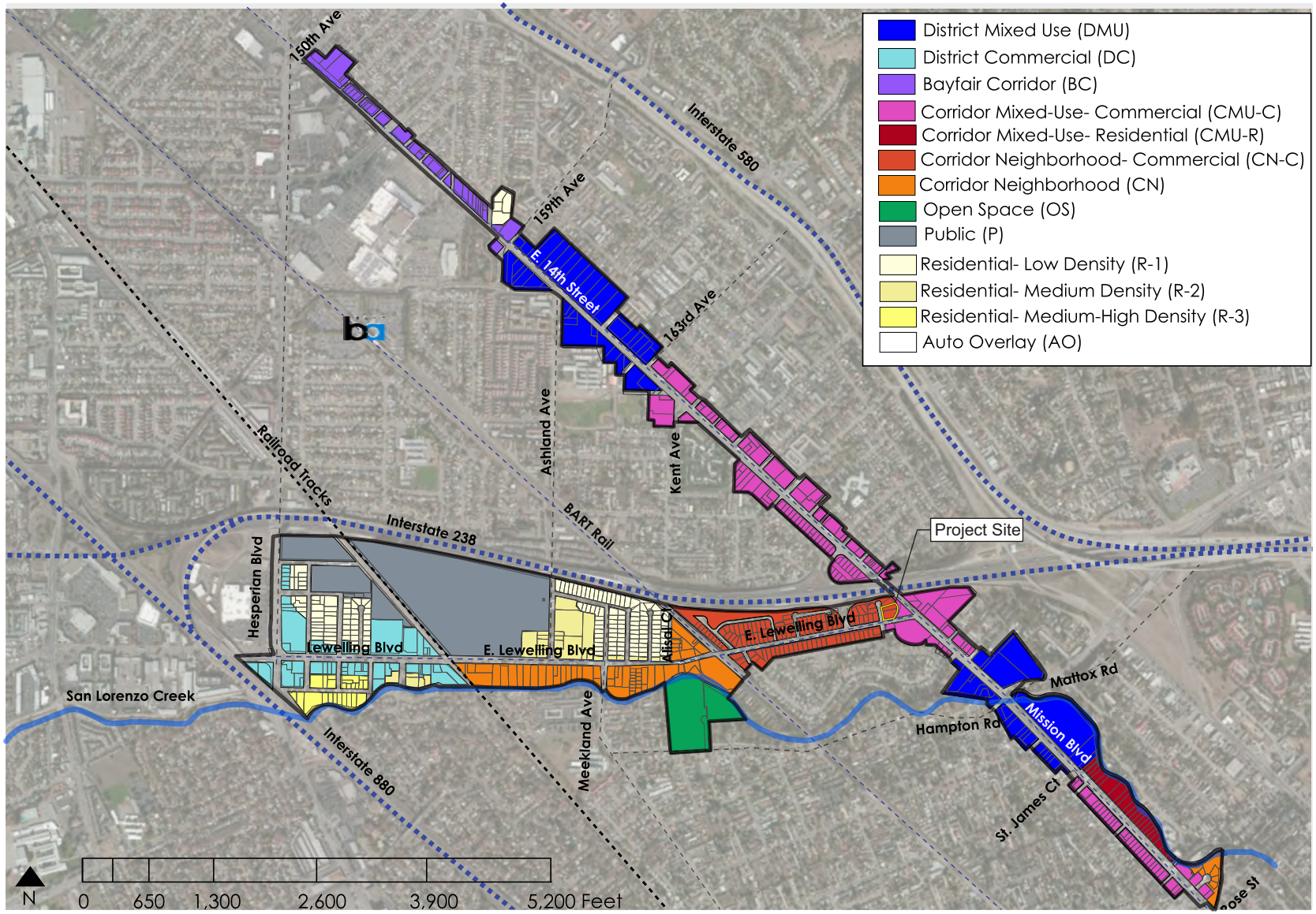

Source: Ashland and Cherryland Business District Specific Plan, December 2015.

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Exhibit 6
Ashland/Cherryland Business District Specific Plan Map

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1.6 - Detailed Project Description

As briefly discussed in Section 1.3, Project Summary, the proposed project includes the installation of one new electronic billboard with two LED-display faces, and the removal of five existing billboard structures with a total of 10 traditional static sign faces.

1.6.1 - Construction and Operation of the Proposed Billboard

The new billboard would be constructed on private property, approximately 100 feet south of the I-238/SR-185 interchange. Construction of the new billboard would be consistent with the land use designation of the site and would be permitted under the existing zoning. The proposed structure would be 80 feet in height as depicted on Exhibit 7. The displays on the billboard would be a flag design structure mounted on a supporting column. The aboveground column supporting the billboard would be approximately 66 feet tall. The billboard is two-sided and V-shaped, meaning there is a 30-degree angle between the sides of the billboard, to increase visibility of both sides. The billboard frames would be 14 feet high by 48 feet wide and would be equipped with upper and lower rear catwalks measuring approximately 2.5 feet wide extending along the back of each side of the billboard. Access to the catwalks would be by an access ladder attached to the structure. The advertising surface area of each face would be 672 square feet, or 1,344 square feet total for both. A site plan is shown in Exhibit 8.

The new billboard would be connected to existing power lines in the project area (Exhibit 8) and would operate 24 hours per day, 7 days per week. The display would cycle through a series of images, primarily commercial advertisements. Other uses for the new billboard could include promoting community events, highlighting public awareness campaigns, and broadcasting emergency messages when necessary.

The new billboard is proposed to operate under specific criteria to limit the potential for driver distraction. These criteria include the following: (1) images from the billboard would rotate no more than once every 8 seconds, and (2) light levels emitted from the billboard would adjust to respond to darker and lighter conditions to provide contrast. The maximum ambient light output level of the sign faces would be 0.3 foot-candle at 250 feet, which is more conservative than State and federal regulations. In addition, the billboards would not show video or motion, and they would not emit noise or audio.

The foundation for the proposed structure would be a drilled shaft with a poured concrete footing. The column foundation would be 5 feet in diameter and would either be constructed to a depth of less than 32 feet with spread footing at grade or extend to a depth of 50 feet outside the range of liquefiable soils minimizing the potential for liquefaction-induced settlement. The excess soils from excavation would be taken to Ox Mountain Landfill, a recycling and waste disposal facility, in Half Moon Bay, California.

1.6.2 - Demolition of the Five Existing Sign Structures With Ten Billboard Signs

Hand tools and small crane rigs would be used to remove the existing traditional billboards. The process for removal would include disassembly and removal of the top of each billboard, and then

each pole would be cut at the ground surface. Only the above-grade portion of the billboard structures would be removed. Below-surface foundations would remain in place. Materials from the removed billboard would be transported to a recycling facility and/or appropriate landfill. Two landfills serve Alameda County: the Altamont and Vasco Road Landfills, both of which are located in Livermore. The applicant estimates it would take approximately 1 to 2 working days to remove each of the existing billboard structures. Removal of all five billboard structures would take approximately 3 weeks.

1.7 - Billboard-specific Regulatory Context

1.7.1 - Relevant Siting/Provision Regulations and Standards

The County's Billboard Ordinance, adopted in 2008 (2008 Billboard Ordinance), prohibits new billboards unless they are part of a relocation program. The goal of the program is to remove at least 50 percent of the billboards in the unincorporated County and to locate any new billboards along commercial corridors (not properties zoned for residential or agricultural use).

The County adopted a Billboard Consolidation and Relocation Program (the Program) to comply with the 2008 Billboard Ordinance. The Program provides that the County shall endeavor to work with outdoor advertising media companies to remove 50 percent of existing billboards located on secondary arterial roadways; in exchange, the County has committed to work with the media companies to approve permits for the development of a limited number of new digital billboards on interstate highway locations.

Alameda County Municipal Code Section 17.52.515(A)(3) provides that, consistent with Section 5412 of the Outdoor Advertising Act, billboards and advertising signs may be installed, moved, altered, expanded, modified, replaced, or otherwise maintained and operated pursuant to a Relocation Agreement, provided that every subject billboard or advertising sign shall fully comply with the County's site development review process and criteria, such as minimum ground clearance and building and curb setbacks, as set forth under Municipal Code Sections 17.54.220 and 17.54.226. The County considers this "planned development" for purposes of Section 5412 of the Outdoor Advertising Act and its authorization of outdoor advertising display relocations.

As part of its planning application, the project applicant has proposed a Relocation Agreement for consideration by the County Board of Supervisors. Approval of the Relocation Agreement would formalize the details for installation and removal of billboards in accordance with 2008 Billboard Ordinance and the Municipal Code.

1.7.2 - Relevant Lighting Regulations and Standards

The California Department of Transportation (Caltrans) Outdoor Advertising Act and Regulations 2011 Edition (Outdoor Advertising Act) addresses illumination generated by advertising displays by stating that displays may not "interfere with the effectiveness of, or obscure any official traffic sign, device, or signal . . . nor shall any advertising display cause beams or rays of light to be directed at the traveled ways if the light is of an intensity or brilliance as to cause glare or to impair the vision of

any driver, or to interfere with any driver's operation of a motor vehicle." Caltrans regulations prohibit images on signs from changing more than once every 4 seconds.[3]

With respect to the brightness of signs, Business and Professions Code Section 5403(g) defines the brightness standard for changeable electronic variable message billboards in relation to Vehicle Code Section 21466.5, which provides:

> No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.
>
> The brightness reading of an objectionable light source shall be measured with a 1½-degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

The applicant, however, commits to a maximum ambient light output level of 0.3 foot-candle at 250 feet from the billboards, a more conservative lighting intensity standard for billboards of this proposed size, as recommended by the Outdoor Advertising Association of America (OAAA). The light levels emitted from the billboards would be set to adjust based on ambient light conditions at any given time (i.e., nighttime versus daytime).

[3] California Department of Transportation (Caltrans). 2011. Outdoor Advertising Act and Regulations 2011 Edition. California Business Professional Code Sections 5200–5486.

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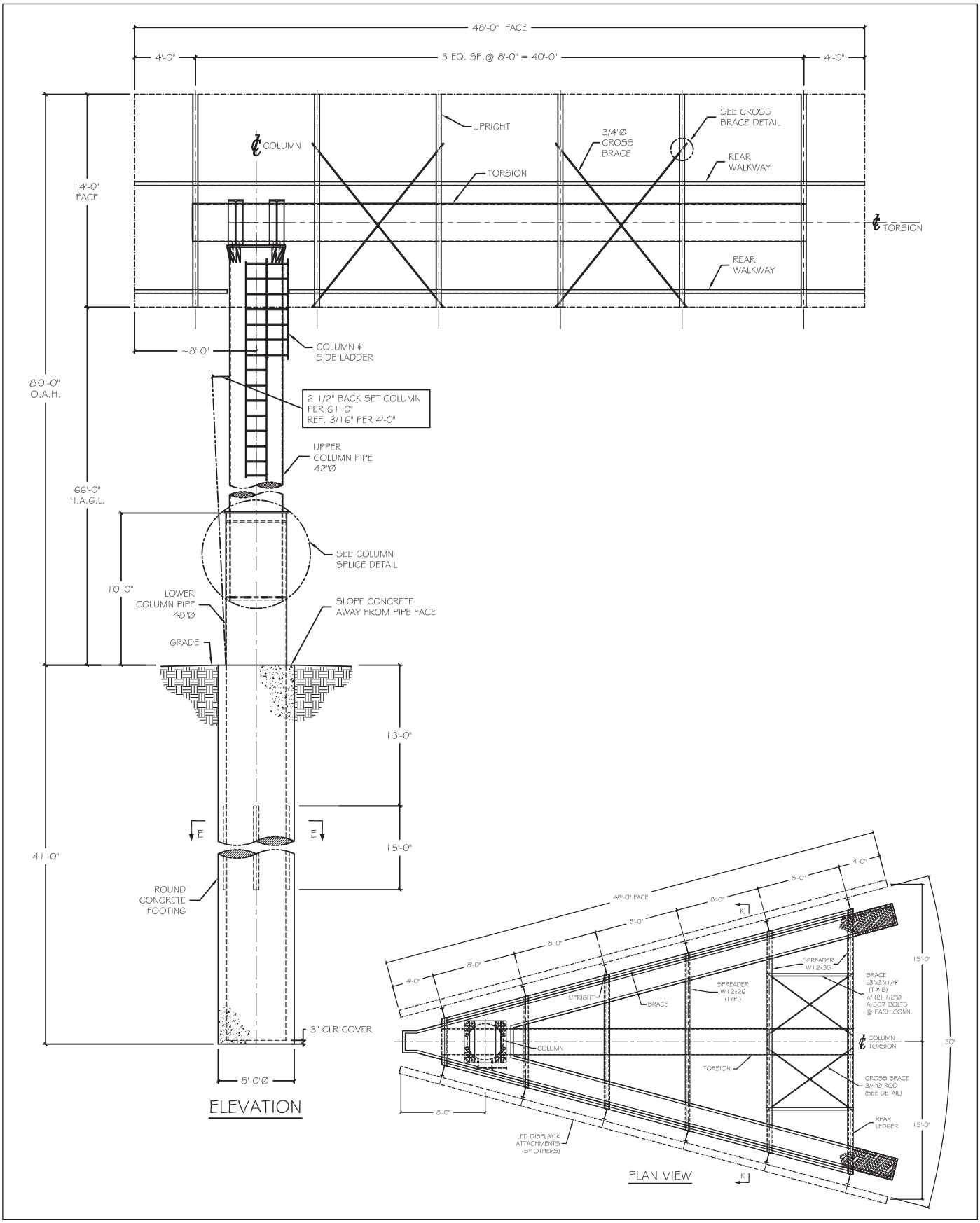

Source: RMG Outdoor Inc., February 23, 2016.

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Exhibit 7
Elevation and Plan View

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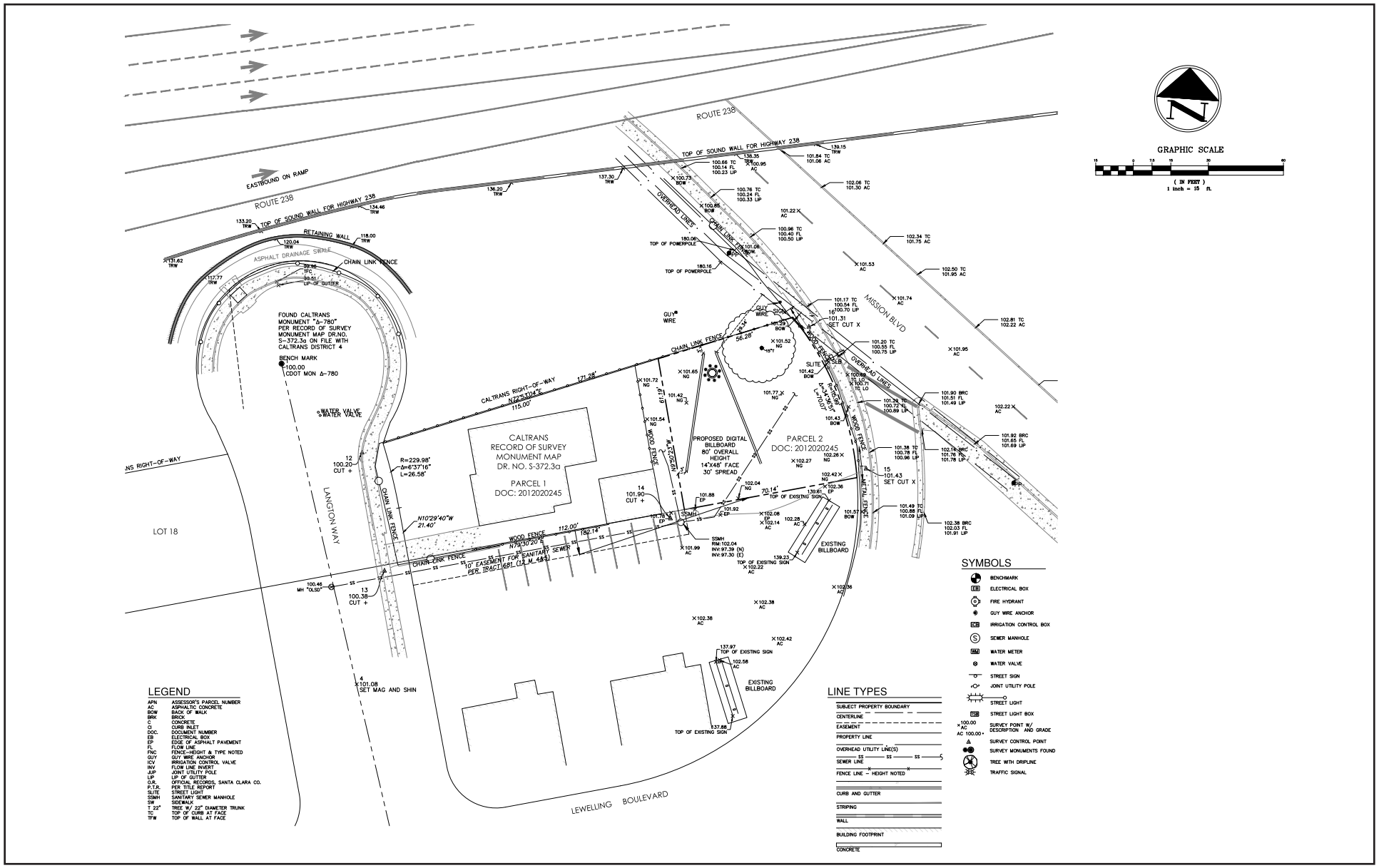

Source: Chappell Surveying, Inc., 2/11/2021.

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Exhibit 8
Preliminary Site Plan

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1.8 - Required Approvals

The following discretionary approvals are required by the County and Caltrans for approval of the proposed project:

- Approval of the IS/MND.
- Approval of the Site Development Review per the County's Billboard Ordinance (Municipal Code Section 17.54.226).
- Approval of the Relocation Agreement between the County and Outfront Media.
- Approval of a ministerial Outdoor Advertising Permit by Caltrans.
- Ministerial approvals from the County, including grading, building, and encroachment permits.

1.9 - Intended Uses of this Document

This Draft IS/MND has been prepared to document potential environmental impacts associated with construction and operation of the new electronic billboard and demolition of the five existing billboards and, where a significant impact might occur, to identify appropriate mitigation to reduce impacts to less than significant levels. This Draft IS/MND also serves as a basis for soliciting comments and input from public agencies, organizations, and interested members of the public regarding the proposed project. This Draft IS/MND will be circulated for a minimum of 30 days, during which comments concerning the analysis should be sent to:

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Email: damien.curry@acgov.org

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected

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

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

Environmental Determination

On the basis of this initial evaluation:

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

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

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

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

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

Date: 1/13/2021 Signed: Damien Curry

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

Environmental Setting

The Scenic Route Element of the County General Plan, adopted in May 1966 and amended through 1994, does not identify any scenic vistas. Scenic routes identified in the County General Plan are discussed in detail, below.

The State of California designates certain segments of State highways as scenic routes. I-238 in the vicinity of the project site is not a State-designated scenic highway, and it is not eligible to become one. The nearest scenic highway to the proposed new digital billboard site is approximately 3.5 miles east on a portion of I-580; a portion of I-580 approximately 0.4 mile from the site is designated as "eligible" to become a State-designated scenic highway.

Locally, the Scenic Route Element of the County General Plan designates all interstate and State highways, and many local highways and routes throughout Alameda County, as scenic routes.[4] In the immediate project area, I-880, I-238, and I-580 are designated Scenic Freeways and Expressways scenic routes. In addition, the ACBD Specific Plan indicates that Lewelling/East Lewelling Boulevard should "be identified as a 'scenic route,' based on its potential designation as one of the County's urban parkways and its role in linking several important cultural resources." [5,6] (The Eden Area General Plan does not identify any designated scenic corridors).

[4] Alameda County. 1966. Alameda County General Plan. May.
[5] Alameda County. 2015. Ashland and Cherryland Business Districts Specific Plan. December.
[6] Alameda County. 1966. Alameda County General Plan. May.

In approving development along scenic corridors, the County's General Plan provides that, in developed areas, the County must adopt "requirements to ensure preservation of outstanding views, through preservation of existing trees, establishment of new landscaping, and controls on the location and type of utility and communication towers, poles, and lines, and of outdoor advertising signs and structures."[7] In addition, signs should be regulated to prevent conglomerations of unsightly signs along roadsides, and attention should be paid to a structure's architecture and design to ensure neighborhood compatibility.[8]

Views available from the project site are limited to the elevated freeway and surrounding development in the immediate area, and do not contain any natural resources. Existing daytime views and photo simulations of the proposed new digital billboard are provided in Exhibits 9a through 9g. Exhibit 9a shows the Viewpoints 1 to 3 in relation to the new digital billboard site, and the existing views and photo simulations for Viewpoints 1 to 3 are shown in Exhibits 9b through 9g. Viewpoint 1 is from the southwest corner of the East Lewelling Boulevard/Langton Way intersection looking northeast. Viewpoint 2 is from northbound I-238 looking east/northeast. Viewpoint 3 is from southbound I-238 looking west/southwest.

The impact assessment in this section is based in part on the lighting analysis prepared in 2017 for the previous location of the proposed new digital billboard, at the end of the Langton Way cul-de-sac, approximately 185 feet northwest of the new location (Appendix A). The lighting type, height, and orientation of the digital billboard itself have not changed for this project.

Environmental Evaluation

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than significant impact.

Proposed New Digital Billboard Site

As previously noted, the County General Plan does not identify scenic resources within the County aside from scenic routes.

As shown in Exhibits 9a through 9g, no hillsides are visible and the proposed new digital billboard would minimally block a small portion of existing trees, telephone wires, and otherwise sky.

The proposed project would be consistent with Goal LU-12 in the ACBD Specific Plan, which states that the County should not approve projects that have a substantial adverse effect on scenic vistas, scenic resources, or the existing visual quality or character of the Specific Plan Area. Therefore, the impact on scenic vistas would be less than significant.

[7] Alameda County. 1966. Alameda County General Plan. May.
[8] Ibid.

Removal Sites

The proposed project would remove five existing billboards near the proposed new digital billboard site. This component would have a beneficial impact on the aesthetic environment, as views would be enhanced by the removal of the five existing billboards.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?

Less than significant impact.

Proposed New Digital Billboard Site

I-238 in the vicinity of the proposed new digital billboard site is not a State-designated scenic highway, nor is it eligible to become one. According to the Caltrans Scenic Highway Guidelines,[9] in order to be eligible to be a scenic highway, the following criteria must be met:

- The State or county highway consists of a scenic corridor that consists of a memorable landscape that showcases the natural scenic beauty or agriculture of California;
- Existing visual intrusions do not significantly impact the scenic corridor;
- Demonstration of strong local support for the proposed scenic highway designation; and
- The length of the proposed scenic highway is not less than a mile and is not segmented.

The segment of I-238 that is in the vicinity of the proposed billboard site does not consist of a scenic corridor that showcases natural, scenic beauty or agriculture of the State.

The nearest State-designated scenic highway is approximately 3.5 miles east on a portion of I-580. However, the County General Plan designates I-880 as a scenic highway, and the ACBD Specific Plan indicates that Lewelling/East Lewelling Boulevard should be identified as a scenic route based on its potential designation as one of the County's urban parkways and its role in linking several important cultural resources.

In such circumstances, signs are permitted if they do not impact any scenic resources and if they have a design that would be compatible with the surrounding area. In this case, the surrounding environment is an urbanized area adjacent to an elevated major highway, and it is surrounded by urban development such as highway infrastructure, sound walls, utility poles, and paved streets and parking lots. No scenic resources are located on or near the site. The digital billboard itself, meanwhile, has been designed so that it is oriented toward highway motorists and at brightness levels well below applicable standards (as discussed further below). The new digital billboard would not directly affect scenic resources, such as trees or rock outcrops along a scenic highway, or block views of scenic vistas. The impact would be less than significant.

[9] California Department of Transportation (Caltrans). 2008. Scenic Highway Guidelines. Website: https://dot.ca.gov/-/media/dot-media/programs/design/documents/scenic-hwy-guidelines-04-12-2012.pdf. Accessed September 17, 2021.

Removal Sites

The proposed project would remove 10 existing billboard signs on five structures near the proposed new digital billboard site. This component would have a beneficial impact on the aesthetic environment.

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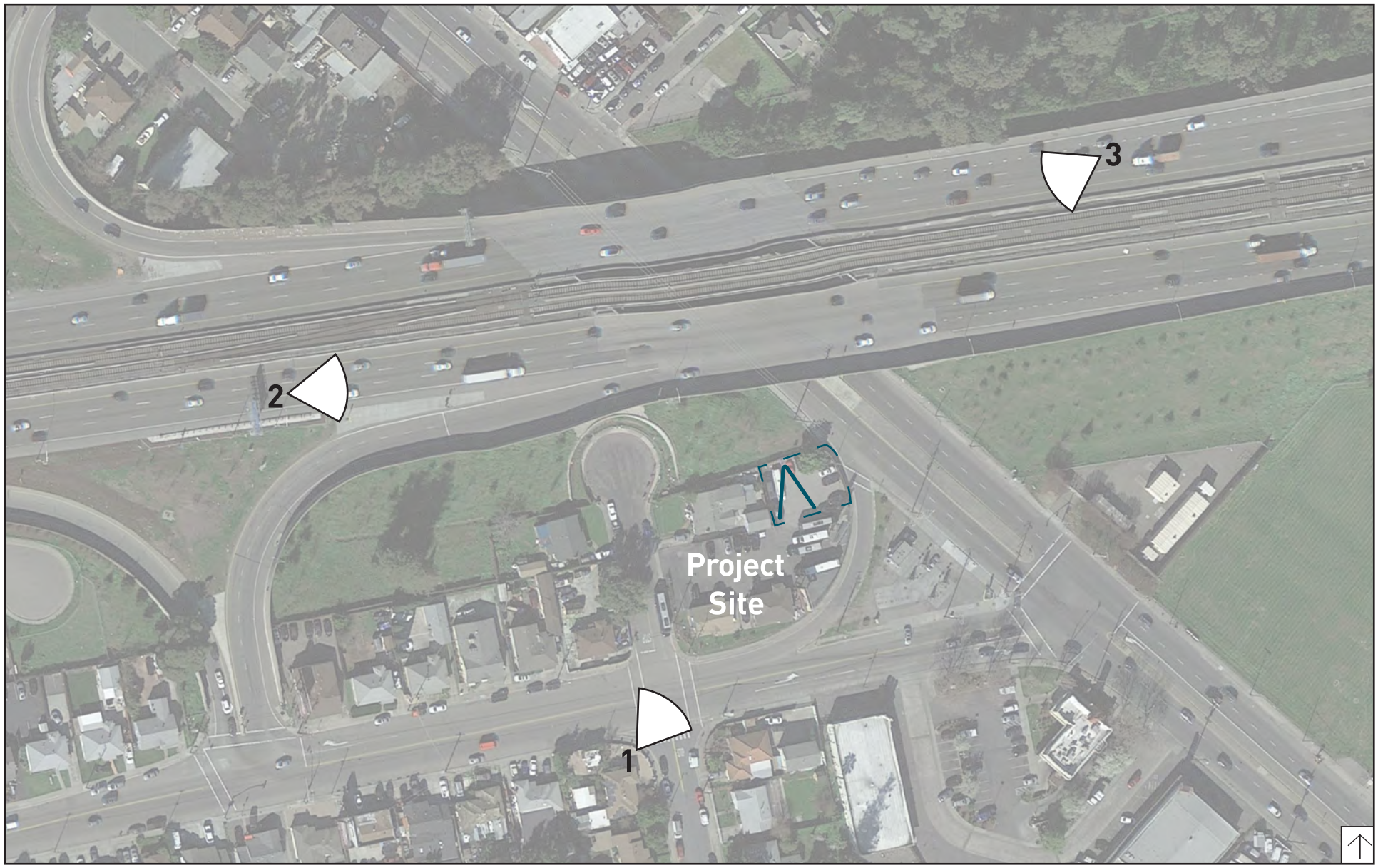

Source: FirstCarbon Solutions, 2021.

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Exhibit 9a
Visual Simulations Vantage Points

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Source: FirstCarbon Solutions, 2021.

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Exhibit 9b
Viewpoint 1 - Existing

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Source: FirstCarbon Solutions, 2021.

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Exhibit 9c
Viewpoint 1 - Simulation

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Source: FirstCarbon Solutions, 2021.

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Exhibit 9d
Viewpoint 2 - Existing

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Source: FirstCarbon Solutions, 2021.

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Exhibit 9e
Viewpoint 2 - Simulation

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Source: FirstCarbon Solutions, 2021.

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Exhibit 9f
Viewpoint 3 - Existing

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Source: FirstCarbon Solutions, 2021.

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Exhibit 9g
Viewpoint 3 - Simulation

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

Less than significant impact.

Proposed New Digital Billboard Site

The proposed project is located in an urbanized area and would be consistent with all applicable zoning and regulations governing scenic quality. The site is designated ACBD-AC-CN-C (Corridor Neighborhood – Commercial) under the ACBD and is therefore not located in a district where new signs are prohibited, namely R (Residential), A (Agricultural), or PD (Planned Development) districts.

The proposed new digital billboard would also be consistent with the standards in the Caltrans Outdoor Advertising Act as related to illumination intensity. The applicant commits to a maximum ambient light output level of 0.3 foot-candle at 250 feet from the billboards, which is a more conservative lighting intensity standard for billboards of this proposed size when compared to State standards. Lastly, the proposed project would require an approval of the Site Development Review per the County's Billboard Ordinance (Municipal Code Section 17.54.226) to ensure conformity with regulations for the ACBD-AC-CN-C district. Therefore, impacts would be less than significant.

Removal Sites

The five existing billboard structures and signs in the project area that would be removed are approximately 20 to 30 feet in height. The removal of these signs (as well as the construction of the new digital billboard) would be undertaken pursuant to a County program designed to reduce the number of signs in the County. Each sign designated for removal is located in a mixed-use, urban environment along public roadways, eight sign faces are located near or visible from East Lewelling/Lewelling Boulevard, which the ACBD Specific Plan identifies as a scenic roadway. The last two sign faces are located on and visible from Castro Valley Boulevard, which is not identified as a scenic roadway. The removal of these five billboard structures would have a beneficial impact on the aesthetic environment.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than significant impact with mitigation incorporated. Nighttime lights in the project area include streetlights, security lights on residential and/or commercial buildings, lights from cars, and other illuminating signs. The new digital billboard is proposed in an urban area of the County where night lighting is ubiquitous.

Proposed New Billboard Site

The closest off-site sensitive receptors to the proposed new digital billboard site is a single-family residence across Langton Way to the west. The nighttime light source in the residential area consists

of local street lighting. The existing sound wall along I-238 reduces the effect of lights emanating from highway traffic.

Analysis of Sign Brightness

Alameda County has no formal requirements regarding brightness or light intensity of advertising signs, although the State of California has adopted lighting restrictions. Business and Professions Code Section 5403(g) defines the brightness standard for changeable electronic variable message billboards in relation to Vehicle Code Section 21466.5, which provides:

> No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.
>
> The brightness reading of an objectionable light source shall be measured with a 1½-degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

Under the foregoing, the most conservative brightness limit with which the signs would have to comply is 500 foot-lamberts,[10] which is equivalent to 1,713 units.

The applicant proposes to operate the signage nighttime limit in accordance with the recommendations of the OAAA, which indicates that the maximum ambient light output should be 0.3 foot-candle at a distance of 250 feet from billboard sign faces.[11] For a frame of reference, 0.3 foot-candle is comparable in brightness to the light emanating from a computer monitor, and the light levels emitted from the proposed billboards would be set to adjust based upon ambient light conditions at any given time (i.e., nighttime versus daytime). To ensure the lighting of signs does not exceed 0.3 foot-candle at 250 feet, the proposed project would ensure that the nighttime brightness of white board faces never exceeds the maximum nighttime luminance value for the display of 300 candela per square meter (cd/m^2). This would also be similar to dimming the sign levels to less than 3 percent of maximum power. The proposed billboard would have built-in programmable controllers, allowing both time of day and intensity programming. These operational parameters (i.e., 0.3 foot-candle at 250 feet) translate into a brightness of approximately 300 nits, meaning that the signs would always operate at one-sixth of the maximum brightness level for LED billboards, as set forth by California State Law.

[10] This calculation assumes a minimum measured brightness in the field of view of less than 10 foot-lamberts, and a view angle of zero degrees (i.e., directly in front of the driver).

[11] Setting a standard in foot candles is a more appropriate metric by which to judge impacts on sensitive receptors, as a foot candela measures light intensity experienced at the receptor, whereas measurement in candela/square meters or nits reveals only the intensity of light at its source.

A lighting study prepared in 2017 for the previously proposed location of the new digital billboard took into account the lighting type, technology, height, and orientation of the signage faces, which have not changed for this project. [12] According to the 2017 light study, the highest amount of light level (approximately 0.4 foot-candle) would be experienced at approximately 75 feet from the billboard, beyond which the amount of light would dissipate and the surrounding area would experience light level that is 0.3 foot-candle or lower. The proposed sign facings are oriented toward the freeway and, since nearest residence is more than 180 feet west of the project site, it would not experience light levels in excess of 0.3 foot-candle, and likely not greater than 0.1 foot-candle.

To ensure that the proposed billboard would not have a significant impact on the nearby sensitive uses, Mitigation Measure (MM) AES-1 would require an operation mechanism that turns off the display or turns it all black in the event of a malfunction. MM AES-2 requires that the LED signs' operational parameters be provided to the County for review and approval prior to initial operation.

Analysis of Driver Distraction

Driver distraction could occur due to the changing of electronic messages on the proposed new digital billboard. This data is provided for information purposes; it is not a CEQA threshold.

As noted in the Project Description, the proposed digital billboard would operate under specific criteria to limit the potential for driver distraction. These criteria include the following: (1) images from the billboard would rotate no more than once every 8 seconds, and (2) light levels emitted from the billboard would adjust to respond to darker and lighter conditions to provide contrast.

California State Law allows LED billboards to operate at a minimum dwell time of no less than 4 seconds before the display may transition to the next image. This requirement is set forth in Business and Professions Code Section 5405(d)(1), which provides, in pertinent part, "no message center display may include any illumination or message change that is in motion or appears to be in motion or that changes in intensity or exposes its message for less than four seconds." The OAAA likewise recommends that billboards display a message for no less than 4 seconds[13] The Federal Highway Administration (FHWA), meanwhile, has approved of a similar dwell time standard. According to a FHWA memorandum, the acceptable range for the "[d]uration of each display is generally between 4 and 10 seconds—8 seconds is recommended."[14]

Per industry standard, the proposed project's compliance with an 8-second dwell time standard, which contemplates a change in messaging that is twice as slow as the State's minimum 4-second standard, would avoid any significant potential to distract drivers, and driver distraction studies confirm this determination. As previously stated, images from the proposed digital billboard would rotate no more than once every 8 seconds.

[12] EXP. 2017. Digital Billboards Photometric Analysis. May.
[13] California Department of Transportation (Caltrans). 2012. Caltrans Division of Research and Innovation, Effects of Outdoor Advertising Displays on Driver Safety, p.9. October 11.
[14] United States Department of Transportation (USDOT). 2007. Fed. Highway Admin., Guidance On Off-Premise Changeable Message Signs, p.2. September 25.

The orientation of the proposed sign vis-à-vis the freeway is similar to many other outdoor advertising displays located along State highways. For instance, FirstCarbon Solutions (FCS) recently evaluated an electronic billboard project in the City of Orange, California. It involved conversion of a static billboard display to a digital display on an existing billboard located approximately 145 feet west of SR-55, south of East Katella Avenue. Since the upgrade of the billboard in 2019, there has been no sign-related accidents caused by driver distraction.[15]

As stated in Section 1, the billboard would be 80 feet high. However, given the grade difference of approximately 30 feet between the project site and I-238, the height from the billboard would be approximately 50 feet as seen from I-238.

Based on this information, there is no evidence that the operation of electronic billboards would cause changes in crashes, eye glances, or driver behavior. Upon implementation of the proposed project, the brightness levels at nighttime are not anticipated to distract drivers on I-238. However, this Draft IS/MND conservatively has determined that unwanted light trespass from the proposed project could result in significant impacts, and that implementation of MM AES-1 and MM AES-2 are required to ensure that impacts are less than significant.

Removal Sites

The five billboards that would be removed are approximately 20 to 30 feet in height. This component would be beneficial in terms of driver distraction.

Mitigation Measures

MM AES-1 The new digital billboard shall include an operating mechanism (hardware or software controlled) that turns off the display or turns it to all black in the event of a malfunction or failure in any system or subsystem that results in the display wholly or partly appearing to flash.

MM AES-2 The signage operational lighting parameters shall be provided to Alameda County Planning Department for review and approval prior to regular operation of the light-emitting diode (LED) billboard, and shall be implemented by the applicant to ensure that no residents or drivers will be adversely affected or impacted by trespass glare lighting.

[15] Jennifer Connally, City of Orange Deputy City Clerk. Personal communication: email. July 27, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.2 Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Setting

There are no agricultural lands or forested areas within the immediate project area, including the proposed new billboard site and removal sites. The California Department of Conservation (DOC) Farmland Inventory Map shows the project area as Urban Land.

Environmental Evaluation

In determining whether impacts to agricultural resources are significant, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the DOC as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant, lead agencies may refer to

information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (ARB).

Would the project:

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

No impact. The DOC Farmland Mapping and Monitoring Program mapping for Alameda County designates the proposed new digital billboard site and the removal sites as "Urban and Built-Up Land."[16] Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. There would be no impact.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No impact. The Specific Plan designates the proposed new digital billboard site as ACBD-AC-CN-C (Corridor Neighborhood – Commercial), which supports neighborhood-serving commercial uses and residential use (as a secondary use). It is not zoned for agricultural use. The site is not encumbered by a Williamson Act contract. Therefore, the proposed project would not conflict with existing agricultural zoning or with a Williamson Act contract. There would be no impact.

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

No impact. The Specific Plan designates the proposed new digital billboard site as ACBD-AC-CN-C (Corridor Neighborhood – Commercial), which supports neighborhood-serving commercial uses and residential use (as a secondary use). It is not zoned as forest land or timberland. Therefore, the proposed project would not conflict with existing zoning or cause rezoning of forest land or timberland. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No impact. As stated in the Public Resources Code, "forest land" is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The proposed new digital billboard site and removal sites do not contain and are not adjacent to any forested land. The surrounding properties are paved and developed. Therefore, there would be no loss of forest land or conversion of forest land to non-forest use. There would be no impact.

[16] California Department of Conservation (DOC). 2018. Alameda County Important Farmlands Map. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed July 2, 2021.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No impact. The proposed new digital billboard site and removal sites are not adjacent to or in the immediate vicinity of any existing agricultural operations; do not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; and do not contain forest land or timberland. Therefore, the proposed project would not cause any changes that would result in the conversion of any farmland or forest land. There would be no impact.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.3 Air Quality *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Setting

Project Area

The proposed project is located within the San Francisco Bay Area Air Basin (Air Basin), which consists of the entirety of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties; the western portion of Solano County; and the southern portion of Sonoma County. The Air Basin is characterized by complex terrain consisting of coastal mountain ranges, inland valleys, and bays. The regional climate of the Air Basin is characterized by mildly dry summers and moderately wet winters. The region experiences moderate humidity with wind patterns consisting of mild onshore breezes during the day. The location of a strong subtropical high-pressure cell located in the Pacific Ocean induces foggy mornings and moderate temperatures during the summer, as well as occasional rainstorms during the winter.

The air pollutants for which national and State standards have been promulgated and that are most relevant to air quality planning and regulation in the Bay Area include ozone, nitrogen oxides (NO_X), carbon monoxide (CO), particulate matter, including dust, 10 micrometers or less in diameter (PM_{10}), and particulate matter, including dust, 2.5 micrometers or less in diameter ($PM_{2.5}$). In addition, toxic air contaminants (TACs) are of concern in the Bay Area. Each of these pollutants is briefly described below. Other pollutants that are regulated but not considered an issue in the project area are sulfur dioxide, vinyl chloride, sulfates, hydrogen sulfide, and lead; the proposed project would not emit substantial quantities of those pollutants, so they are not discussed further in this section.

- Ozone is a gas that is formed when reactive organic gases (ROG) and NO_X—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are conducive to its formation. Its effects can include the following: irritate respiratory system; reduce lung function; cause breathing pattern changes; reduce breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; cause some immunological changes; increase mortality risk; and cause vegetation and property damage.
- CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the Bay Area, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO ranges depending on exposure: slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; and death.
- PM_{10} and $PM_{2.5}$ consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours per days) can include the following: irrigation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravation of existing lung disease causing asthma attacks and acute bronchitis; those affected with heart disease can suffer heart attacks and arrhythmias. Health effects from long-term exposure can include the following: reduced lung function; chronic bronchitis; changes in lung morphology; and death.
- TACs refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. Diesel particulate matter (DPM) is a toxic air contaminant that is emitted from construction equipment and diesel-fueled vehicles and trucks. Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.

Construction and operation of the proposed project would be subject to applicable Bay Area Air Quality Management District (BAAQMD) rules and requirements. The BAAQMD CEQA Guidelines were developed to assist local jurisdictions and lead agencies in complying with the requirements of CEQA regarding potentially adverse impacts to air quality.[17]

[17] Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Guidelines. May. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_ guidelines_may2017-pdf.pdf?la=en. Accessed June 16, 2021.

The proposed new digital billboard site and removal sites are not sources of TACs or criteria pollutants.

Environmental Evaluation

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than significant impact. The 2017 Clean Air Plan is the currently applicable regional Air Quality Plan (AQP) for the San Francisco Bay Air Basin. The primary goals of the 2017 Clean Air Plan are to protect public health and protect the climate. The 2017 Clean Air Plan acknowledges that the BAAQMD's two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants[18] and greenhouse gas (GHG) emissions.[19] Because the proposed project does not involve population or employment growth, determining consistency with the 2017 Clean Air Plan involves assessing whether applicable control measures contained in the 2017 Clean Air Plan are implemented and whether implementation of the proposed project would disrupt or hinder implementation of AQP control measures. The control measures are organized into five categories: stationary and area source control measures, mobile source measures, transportation control measures, land use and local impact measures, and energy and climate measures. The control measures are geared toward traditional land uses (e.g., residential, commercial, and industrial uses) and buildings. None of the control measures contained in the 2017 Clean Air Plan is applicable to the operations of signs; however, all projects within BAAQMD's jurisdiction are required to implement the BAAQMD Best Management Practices (BMPs) during construction activities. As discussed in Impact (b), the proposed project would implement all BMPs for construction activities and would be consistent with the assumptions in the AQP. Furthermore, the proposed project would not include any special features that would disrupt or hinder implementation of the AQP control measures. Therefore, the proposed project would not obstruct implementation of the 2017 Clean Air Plan.

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

Less than significant impact. The BAAQMD's thresholds of significance represent the allowable amount of emissions a project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on a project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. The region is non-attainment for the

[18] The EPA has established National Ambient Air Quality Standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as "criteria" air pollutants (or simply "criteria pollutants").

[19] Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed June 16, 2021.

federal and State ozone standards, State PM_{10} standards, and federal and State $PM_{2.5}$ standards. Impacts related to construction and operations of the proposed project are addressed separately below.

Construction Emissions

Emissions from construction-related activities are generally short-term in duration but may still cause adverse air quality impacts. The proposed project would generate emissions from construction equipment exhaust, worker travel, and fugitive dust. These construction emissions include criteria air pollutants and precursors from the operation of heavy construction equipment. As discussed below, the proposed project's construction emissions would not exceed any significance threshold adopted for this project. Therefore, the proposed project would have a less than significant contribution to cumulative impacts during construction.

Construction Fugitive Dust

For all proposed projects, the BAAQMD recommends the implementation of BMPs, whether or not construction-related emissions exceed applicable thresholds of significance. As such, to ensure construction emission impacts are less than significant, the proposed project would apply the following BAAQMD BMPs during construction activities at the proposed new digital billboard site:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered with non-potable water two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, § 2485 of the California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Construction: ROG, NO_X, PM_{10} (exhaust), and $PM_{2.5}$ (exhaust)

Construction emissions were estimated for the activities associated with the installation of the proposed new digital billboard and the removal of the five existing billboard structures. Based on applicant-provided information, it is expected that construction activities associated with the

proposed project would last 2 to 4 weeks. The construction schedule used to estimate emissions is shown in Table 1. The off-road construction equipment list is shown by construction phase in Table 2. The exhaust emissions generated by construction equipment are based on the hours of operation, horsepower, and load factors of the equipment. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA Guidelines. The number of off-site trips assumed to occur during construction of the proposed project is shown in Table 3. Additional trips were included to account for the transport of material and removed billboards.

Table 1: Combined Construction Schedule

Phase	Total Number of Working Days
Proposed New Digital Billboard Site	
Grading	1
Building Construction (Installation of Billboard)	19
Paving	2
Removal Sites	
Demolition	20

[1] The construction schedule in the CalEEMod Output is based on the previously anticipated schedule as analyzed in the 2018 IS/MND. Because vehicle fuel use becomes more efficient through time in compliance with federal and State regulations, these dates support a conservative evaluation of potential impacts.
Source: CalEEMod Output (see Appendix B).[1]

Table 2: Construction Equipment Assumptions

Activity	Equipment	Amount	Hours per Day	Horsepower	Load Factor
Proposed New Digital Billboard Site					
Grading	Bore/Drill Rigs	1	8	221	0.50
	Concrete/Industrial Saws	1	2	81	0.73
	Tractors/Loaders/Backhoes	1	3	97	0.37
Building Construction (Installation of Billboard)	Cranes	1	4	231	0.29
	Forklifts	1	6	89	0.20
Paving	Cement and Mortar Mixers	1	2	9	0.56
Removal Sites					
Demolition	Concrete/Industrial Saws	1	8	81	0.73
	Tractors/Loaders/Backhoes	1	6	97	0.37
	Cranes	1	2	231	0.29
Source: CalEEMod Output (see Appendix B).					

Table 3: Combined Construction Off-site Trips

Construction Phase	Construction Trips		
	Worker Trips per Day	Vendor Trips per Day	Total Haul Trips
Proposed New Digital Billboard Site			
Grading	8	2	8
Building Construction (Installation of the Billboard)	8	2	0
Paving	8	2	0
Removal Sites			
Demolition	8	2	20
Source: Source: CalEEMod Output (see Appendix B).			

Annual project construction emissions prior to the application of mitigation are shown in Table 4. Average daily construction emissions are compared with the significance thresholds in Table 5.

Table 4: Annual Construction Emissions (Unmitigated)

Construction Phase	Tons/Year			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
Proposed New Digital Billboard Site				
Grading	<0.1	<0.1	<0.1	<0.1
Building Construction (Installation of Billboard)	<0.1	<0.1	<0.1	<0.1
Paving	<0.1	<0.1	<0.1	<0.1
Langton Site Total	<0.1	<0.1	<0.1	<0.1
Removal Sites				
Demolition	<0.1	<0.1	<0.1	<0.1
Removal Sites Total	<0.1	<0.1	<0.1	<0.1
Total Construction Emissions	**<0.1**	**<0.1**	**<0.1**	**<0.1**
Notes: NO_X = oxides of nitrogen PM_{10} = particulate matter, including dust, 10 micrometers or less in diameter $PM_{2.5}$ = particulate matter, including dust, 2.5 micrometers or less in diameter ROG = reactive organic gases Sums were calculated using unrounded numbers from the CalEEMod Output. Source: CalEEMod Output (see Appendix B).				

Table 5: Construction Emissions (Unmitigated Average Daily Rate)

Parameter	Air Pollutants			
	ROG	NO_X	PM_{10}[1]	$PM_{2.5}$[1]
Total Emissions (tons/year)	<0.1	0.13	<0.1	<0.1
Total Emissions (lbs/year)	27	255	14	14
Average Daily Emissions (lbs/day)[2]	1.2	11.6	0.6	0.6
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
lbs = pounds
NO_X = oxides of nitrogen
PM_{10} = particulate matter, including dust, 10 micrometers or less in diameter
$PM_{2.5}$ = particulate matter, including dust, 2.5 micrometers or less in diameter
ROG = reactive organic gases
[1] Exhaust only
[2] Calculated by dividing the total lbs by the total 22 working days of construction for the duration of construction. Calculations use unrounded totals.
Source: CalEEMod Output (see Appendix B).

As shown in Table 5, the combined construction emissions from all components of the proposed project are below the recommended thresholds of significance. Therefore, project construction would have a less than significant impact.

Operational Emissions

The proposed project's operational emissions would not be anticipated to exceed any significance threshold adopted for the proposed project. Therefore, project operations would have a less than significant contribution to cumulative impacts. The following analysis relates to localized and regional criteria pollutant impacts. Emissions resulting from various aspects of the proposed project are discussed separately below.

Operational CO Hotspots

CO emissions from project-related traffic would be the pollutant of greatest concern at the local level because congested intersections with large volumes of traffic have the greatest potential to cause high, localized concentrations of CO.

The BAAQMD recommends a screening analysis to determine whether a project has the potential to contribute to a CO hotspot. The screening criteria identify when subsequent site-specific CO dispersion modeling is necessary.

The BAAQMD considers a project's local CO emissions to be less than significant if one of the following screening criteria is met:

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

Billboards require occasional upkeep and maintenance activities, which generate vehicle trips. The long-term operation of the proposed billboard sign would include vehicle trips with minimal and irregular maintenance activities, occurring only as needed (less than once per month and likely only one vehicle). The expected increase in traffic would not substantially increase traffic volumes at any affected intersection. Therefore, the proposed project would not exceed the CO screening criteria. Furthermore, the adjacent roadways are not located in an area where vertical or horizontal mixing is substantially limited. Therefore, based on the above criteria, the proposed project would have a less than significant impact related to CO hotspots.

Operations: ROG, NO_X, PM_{10}, and $PM_{2.5}$

The BAAQMD has also developed screening criteria whereby an agency can quickly determine whether a given development project has the potential to exceed adopted pollution thresholds. If all of the screening criteria are met by a proposed project, then the Lead Agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. Although the screening criteria do not include a category for billboards, a comparison to the land uses in that screening table can be used to inform the operational analysis. For instance, the BAAQMD has determined that, to violate operational emissions criteria, a use more intense than a 451-unit apartment building would have to be constructed. At the operational phase, the proposed project consists of a new digital billboard, which would require minimal and irregular maintenance activities that would occur only as needed (less than once per month and likely only one vehicle). Operation of the billboard would entail significantly less activity than operation of a 451-unit apartment building. Accordingly, operational criteria pollutant emissions would not be anticipated to exceed the recommended thresholds of significance. Therefore, the proposed project's long-term operational impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact with mitigation incorporated. The BAAQMD considers a sensitive receptor to be any facility or land use that includes members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. If a project is likely to be a place where people live, play, or convalesce, it should be considered a receptor. It should also be considered a receptor if sensitive individuals are likely to spend a significant amount of time there. Examples of receptors include residences, schools and school yards, parks and playgrounds, daycare centers, nursing homes, and medical facilities. Playgrounds

could be play areas associated with parks or community centers. The proposed new digital billboard site and removal sites are located in the vicinity of sensitive receptors, including single-family homes. The closest sensitive receptors are existing homes located more than 180 feet from where project components would be placed.

The following analysis evaluates whether the proposed project would result in construction or operational-period impacts to sensitive receptors. The following three criteria were applied to determine whether project emissions would result in less than significant impacts to sensitive receptors:

- **Criterion 1:** Construction of the project would not result in localized emissions that, if when combined with background emissions, would result in exceedance of any health-based air quality standard.
- **Criterion 2:** Operation of the project would not result in localized emissions that, if when combined with background emissions, would result in exceedance of any health-based air quality standard.
- **Criterion 3:** Construction of the project would not result in an exceedance of asbestos exposure.

Criterion 1: Project Construction Toxic Air Pollutants

DPM has been identified by the ARB as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery truck and worker activities. For purposes of this analysis, DPM is represented as exhaust emissions of $PM_{2.5}$.

Estimation of Construction DPM Emissions

Construction exhaust emissions of DPM for the proposed new digital billboard site estimated using the CalEEMod model (Version 2016.3.2), and the results are summarized in Table 6.

Note: The location of the new digital billboard and timing of construction have changed slightly since this emissions estimate was prepared; however, the results still apply to the proposed project (see Table 9). When this analysis was originally prepared, the Maximally Impacted Sensitive Receptor (MIR) was identified as a residence, approximately 70 feet from the original billboard location at the end of the Langton Way cul-de-sac. The new location is in the adjacent parking lot, now more than 180 feet east of the nearest sensitive receptor. Moreover, because the prevailing wind conditions would blow pollutants to the northeast, they would be directed away from this residence. Therefore, this analysis represents a conservative assessment of health risks and hazards at the residence due to the increase in distance from the nearest sensitive receptor combined with existing meteorological conditions.

Table 6: Project Diesel Particulate Matter Construction Emissions

Construction Scenarios	Annual Average On-site DPM (grams/m^2-sec)	Annual Average Off-site DPM (grams/sec)
Unmitigated Construction	5.76E-04	5.19E-07
Mitigated Construction	2.74E-04	5.19E-07

Construction Scenarios	Annual Average On-site DPM (grams/m^2-sec)	Annual Average Off-site DPM (grams/sec)
Notes: DPM = diesel particulate matter Source: CalEEMod and FirstCarbon Solutions (FCS); see Appendix B.		

Estimation of Cancer Risks

The BAAQMD has developed a set of guidelines for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young children to exposures to TACs.[20] These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The recommended method for the estimation of cancer risk is shown in the equations below, with the cancer risk adjustment factors provided in Table 7 for several types of sensitive/residential receptors (infant, child, and adult).

Cancer Risk = CDPM x Inhalation Exposure Factor (EQ-1)

Where:

Cancer Risk = Total individual excess cancer risk defined as the cancer risk a hypothetical individual faces if exposed to carcinogenic emissions from a particular source for specified exposure durations; this risk is defined as an excess risk because it is above and beyond the background cancer risk to the population; cancer risk is expressed in terms of risk per million exposed individuals.

C_{DPM} = Period average DPM air concentration calculated from the air dispersion model in µg/m^3

Inhalation is the most important exposure pathway to impact human health from DPM, and the inhalation exposure factor is defined as follows:

Inhalation Exposure Factor = CPF x EF x ED x DBR x AAF/AT (EQ-2)

Where:

CPF = Inhalation cancer potency factor for the TAC: 1.1 (mg/kg-day)$^{-1}$ for DPM
EF = Exposure frequency (days/year)
ED = Exposure duration (years of construction)
AAF = Set of age-specific adjustment factors that include age-sensitivity factors (ASF), daily breathing rates (DBR), and time-at-home factors (TAH)—see Table 7:
AT = Averaging time period over which exposure is averaged (days)

[20] Bay Area Air Quality Management District (BAAQMD). 2016. Air Toxics NSR Program Health Risk Assessment Guidelines. December. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en. Accessed June 3, 2021.

The California Office of Environmental Health Hazards Assessment (OEHHA)-recommended values for the various cancer risk parameters shown in EQ-2, above, are provided in Table 7.

Table 7: Exposure Assumptions for Cancer Risk

Receptor Type	Exposure Frequency		Construction Exposure Duration (month)[2]	Age-Sensitivity Factors	Time-at-Home Factor (%)	Daily Breathing Rate[1] (l/kg-day)
	Hours/day	Days/year				
Sensitive/Residential—Infant						
Third Trimester	24	350	1	10	85	361
0–2 years	24	350	1	10	85	1,090
Sensitive Receptor—Child						
3–16 years	24	350	1	3	72	572
Sensitive Receptor—Adult						
> 16 to 30 years	24	350	1	1	73	261

Notes:
l/kg-day = liters per kilogram body weight per day
(1) The daily breathing rates recommended by the BAAQMD for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th percentile breathing rates for all older individuals.
(2) The exposure duration is 1 month, corresponding to the duration of construction.
Source: Bay Area Air Quality Management District (BAAQMD). 2016. Air Toxics NSR Program Health Risk Assessment Guidelines. December. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en. Accessed June 3, 2021.

Estimation of Non-Cancer Chronic Hazards

An evaluation of the potential non-cancer effects of chronic chemical exposures was also conducted. Adverse health effects are evaluated by comparing the annual receptor concentration of each chemical compound with the appropriate reference exposure limit (REL). Available RELs promulgated by the OEHHA were considered in the assessment.

Risk characterization for non-cancer health hazards from TACs is expressed as a hazard index (HI). The HI is a ratio of the predicted concentration of the proposed project's emissions to a concentration considered acceptable to public health professionals, termed the REL.

To quantify non-carcinogenic impacts, the HI approach was used.

$$HI = C_{ann}/REL \qquad \text{(EQ-3)}$$

Where:

HI = chronic hazard index
C_{ann} = annual average concentration of TAC as derived from the air dispersion model ($\mu g/m^3$)
REL = reference exposure level above which a significant impact is assumed to occur ($\mu g/m^3$)

Impact Significance and Mitigation

The estimated health and hazard impacts at the MIR from the proposed project's construction emissions are provided in Table 8.

Table 8: Estimated Health Risks and Hazards: Project Construction—Unmitigated

Health Impact Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[2]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the Maximally Impacted Sensitive Receptor (MIR)[1]	4.2	0.07	0.4
BAAQMD Significance Threshold	10.0	1.0	0.3
Exceeds Individual Source Threshold?	No	No	**YES**

Notes:
$\mu g/m^3$ = micrograms per cubic meter
BAAQMD = Bay Area Air Quality Management District
DPM = diesel particulate matter
$PM_{2.5}$ = particulate matter, including dust, 2.5 micrometers or less in diameter
REL = Reference Exposure Level

[1] When this analysis was originally prepared, the MIR was identified as a residence, approximately 70 feet from the original billboard location at the end of the Langton Way cul-de-sac. The new location is in the adjacent parking lot, now more than 180 feet east of the nearest sensitive receptor. Because the prevailing wind conditions blow pollutants to the northeast, they would be directed away from this residence, meaning this analysis represents a conservative assessment of health risks and hazards at the residence.

[2] Chronic non-cancer HI was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$.

Meteorological Data Source: California Air Resources Board (ARB). 2021. HARP AERMOD Meteorological Files: Metro Oakland International Airport. Website: https://ww2.arb.ca.gov/resources/documents/harp-aermod-meteorological-files. Accessed June 3, 2021.
Emissions Source: CalEEMod and FirstCarbon Solutions (FCS); see Appendix B.

As shown above, the construction emissions from the proposed project prior to mitigation would exceed the BAAQMD's $PM_{2.5}$ emission threshold. As noted in Table 8, the proposed project is anticipated to result in less than significant impacts to nearby sensitive receptors before mitigation related to cancer risk and chronic non-cancer hazard. Nonetheless, a less than significant impact with respect to annual $PM_{2.5}$ concentrations cannot be determined with off-model calculations due to the non-linear relationship between pollutant concentrations at a particular location and the distance from the pollutant source and that location. The reason for this is because the estimated annual $PM_{2.5}$ concentration at a specific location takes into account the region's urban heat factor, the directional orientation between the source and the receptor, the prevailing meteorological conditions, pollutant source volumes, the distance between the source and the receptor, and the region's topography. Therefore, mitigation measures would need to be implemented. The health risk impacts with Tier III mitigation measures (MM AQ-1) are provided in Table 9.

Table 9: Estimated Health Risks and Hazards: Project Construction—Tier III Mitigated

Health Impact Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[2]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the Maximally Impacted Sensitive Receptor (MIR)[1]	2.0	0.03	0.2
BAAQMD Significance Threshold	10.0	1.0	0.3
Exceeds Individual Source Threshold?	No	No	No

Notes:
$\mu g/m^3$ = micrograms per cubic meter
BAAQMD = Bay Area Air Quality Management District
DPM = diesel particulate Matter
$PM_{2.5}$ = particulate matter, including dust, 2.5 micrometers or less in diameter
REL = Reference Exposure Level
[1] The MIR is the resident along Langton Way, 70 feet of the project site.
[2] Chronic non-cancer HI was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$.
Source: CalEEMod and FCS; see Appendix B.

As shown above, with implementation of MM AQ-1—which would require the use of off-road equipment 50 horsepower or greater which meet or exceed Tier 3 engine emissions standards—the health risk impacts and $PM_{2.5}$ emissions from construction emissions would not exceed BAAQMD's threshold of significance. It should be noted that Tier 3 engine emissions standards represent the current minimum emissions standard for new vehicle additions for construction fleets greater than 2,500 total horsepower and will be the minimum emissions standard for new vehicle additions for construction fleets less than 2,500 total horsepower starting in 2023. Therefore, it is likely that the construction fleet which will be utilized to develop the proposed project would already meet or exceed this requirement. Nonetheless, MM AQ-1 would ensure that construction of the proposed project at minimum meets this requirement to reduce the annual $PM_{2.5}$ concentration to below the applicable BAAQMD significance threshold. Impacts relating to Criterion 1 would be less than significant with mitigation.

Criterion 2: Project Operation Localized Emissions

The proposed project would entail the operation of an electronic billboard, which has no localized emissions. Maintenance would involve irregular trips to the sites, usually involving only one light vehicle. It is important to note the proposed sign is associated with the removal of 10 sign faces, including four sign faces at the project site, and therefore trips associated with the proposed sign would likely be significant less than trips associated with the existing signs that will be removed. Therefore, the proposed project would not expose sensitive receptors to substantial criteria air pollutant concentrations during operation or result in localized emissions that, when combined with background emissions, would result in exceedance of any health-based air quality standard. Impacts relating to Criterion 2 would be less than significant.

Criterion 3: Asbestos from Demolition

As discussed in Section 8, Hazards and Hazardous Materials, there is potential for asbestos-containing materials to be present within the project area because of the presence of structures that predate the federal prohibition of asbestos-containing materials. Any demolition of existing buildings and structures would be subject to BAAQMD Regulation 11, Rule 2 (Asbestos Demolition, Renovation, and Manufacturing),[21] which is intended to limit asbestos emissions from demolition or renovation of structure and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with BAAQMD Regulation 11, Rule 2, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality. Impacts relating to Criterion 3 would be less than significant.

d) Result in other emission (such as those leading to odors) adversely affecting a substantial number of people?

Less than significant impact. The proposed project would not be a source of other emissions, such as those leading to odors, during operations. During construction, a limited number of diesel engines would be operated on the project site for limited durations. Diesel exhaust and volatile organic compounds (VOCs) from these diesel engines would be emitted during construction of the proposed project, which are objectionable to some; however, the duration of construction activities is expected to short (2 to 4 weeks), emissions would disperse rapidly from the project site, and diesel exhaust odors would be consistent with existing vehicle odors in the area. Considering this information, construction and operation of the proposed project would not create other emissions or odors adversely affecting a substantial number of people; impacts would be less than significant.

Mitigation Measures

MM AQ-1 All off-road construction equipment greater than 50 horsepower must be equipped with engines meeting the United States Environmental Protection Agency (EPA) Tier III emission standard.

[21] Bay Area Air Quality Management District (BAAQMD). 1998. Regulation 11, Rule 2. Website: https://www.baaqmd.gov/~/media/dotgov/files/rules/reg-11-rule-2-asbestos-demolition-renovation-and-manufacturing/documents/rg1102.pdf?la=en. Accessed June 3, 2021.

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

Environmental Setting

This section evaluates potential effects on biological resources that may result from project implementation. Prior to the field surveys, an FCS Biologist reviewed the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB), a special-status species and plant community account database; the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) system; and the California Native Plant Society (CNPS) Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California database for the Hayward, California, United States Geological Survey (USGS) 7.5-minute

Topographic Quadrangle Map and the eight surrounding quadrangles (Appendix C). An on-site assessment of biological resources was completed by FCS on June 4 and December 17, 2021.

Project Setting

The project area, including the new digital billboard site and removal sites, are in an urban environment surrounded by residential and commercial developments. The project area does not contain any natural or sensitive habitats, including wetlands and riparian habitats. The new digital billboard would be located in a parking lot behind a single-family residence, adjacent to a limousine services business, a major highway (I-238), and other roadways. Ruderal vegetation was observed at the new digital billboard site and removal sites growing in openings within hardscaped surfaces. Ruderal areas are typically associated with urban areas where significant ground disturbance events have previously occurred. Species observed included were including ruderal species Italian thistle (*Carduus pycnocephalus*), bristly ox tongue (*Helminthotheca echioides*), wild radish (*Raphanus raphanistrum*), and slender wild oat (*Avena barbata*).

Removal Sites

These five locations are all close in proximity and are generally composed of parking lots and associated commercial stores. Four locations are generally bounded by Mission Boulevard to the east, Lewelling Boulevard to the south, while I-238 bisects the northern removal site and the three southern removal sites. There is also one billboard to be removed that is located on Castro Valley Boulevard and is bounded by Anita Avenue to the east and Wisteria Street to the west. Vegetation at the five locations was limited to ruderal species, and planted ornamental trees and shrubs.

Proposed New Digital Billboard Site

This location is composed of a parking lot and associated residential and commercial developments. This location is bounded by I-238 to the north, Lewelling Boulevard to the south, Langton Way to the west, and Mission Boulevard to the east. Vegetation observed was limited to ruderal species, planted ornamental trees and shrubs.

Environmental Evaluation

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?

Less than significant impact with mitigation incorporated. Special-status plant and wildlife species typically occur in undeveloped areas, and require specific habitats (e.g., serpentine soils, riparian woodland, vernal pools, etc.). Although it is less likely, it is also possible for them to occur within developed areas. The project sites are located in an area that has undergone an extensive history of development built out with industrial and commercial uses. The project sites contain characteristics

of land that has been developed or disturbed, including disturbed soils and large areas of impervious surfaces.

Special-status Plant Species Potentially Occurring Within the Project Sites

A plant species' potential to occur on the project sites was based on the presence of suitable habitats, soil types, and occurrences recorded by the USFWS, CNPS, or CNDDB within 5 miles of the project sites, and a site survey conducted by a qualified Biologist. A total of 14 special-status plant species were evaluated for their potential for occur within the project sites. Based on the absence of suitable habitat due to past development of the sites, all special-status plant species have no potential to occur on-site. The project sites lack alkaline clay soils, grassland, marshes, and riparian scrub habitats where these special-status plant species are found. Because of the highly-disturbed nature of the project sites and overall lack of suitable habitat, no special-status plant species have the potential to occur within the project sites; therefore, no special-status plant species would be impacted by project construction.

Special-status Wildlife Species Potentially Occurring Within the Project Sites

Based upon the types of habitat that each special-status wildlife species requires, 26 special-status wildlife species were evaluated for their potential to occur within the project sites. Because of the highly urbanized nature of the project sites and previous development efforts coupled with an overall lack of suitable habitat on-site (marshes, meadows, grasslands, etc.), special-status wildlife species with the potential to occur the project sites is limited to native nesting birds. Potential impacts to nesting birds would be considered significant given their status under the Migratory Bird Treaty Act (MBTA) and Fish and Game Code Section 3503.5.

Nesting Birds (Removal Sites and Proposed New Digital Billboard Site)

Potential direct and indirect impacts could occur to resident and migratory species during project construction, which would render the project temporarily unsuitable for birds because of the noise, vibrations, and increased activity levels associated with various construction activities. These activities could potentially subject birds to risk of death or injury, and they are likely to avoid using the area until such construction activities have dissipated or ceased. Relocation, in turn, could cause hunger or stress among individual birds by displacing them into adjacent territories belonging to other individuals.

Construction activities that occur during the nesting season (generally February 1 to August 31) could disturb nesting sites for birds protected by the MBTA and Fish and Game Code. No action is necessary if no active nests are found or if construction occurs during the nonbreeding season (generally September 1 through January 31).

Implementation of MM BIO-1, which requires the applicants for development on both project sites to conduct a pre-construction survey and implement further avoidance and minimization measures (if necessary and required by the survey), would reduce potential impacts to nesting birds to a less than significant level under CEQA.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?

No impact. The proposed removal sites and new digital billboard site are located on residential and commercial developments that have no natural or sensitive habitats, including wetlands and riparian habitats. The proposed project would directly or indirectly have a substantial adverse effect on riparian habitat or other sensitive natural communities. Therefore, there would be no impact.

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

No impact. The proposed removal sites and new digital billboard site are located on residential and commercial developments that have no natural or sensitive habitats, including wetlands and riparian habitats. The proposed project would not directly or indirectly have a substantial adverse effect on State or federally protected wetlands. Therefore, there would be no impact.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

Less than significant impact. An impact to fish or wildlife movement would be considered significant if the proposed construction or operation resulted in a substantial, adverse change in any of the physical conditions (such as the interruption of a channel or terrestrial movement corridor) within the area affected by the proposed plan. Fish or wildlife movement that have the potential to be impacted are discussed in detail below.

FCS Biologists evaluated the removal sites and new digital billboard site for evidence of a wildlife movement corridor during the biological resources survey. The sites are surrounded by a mix of residential and commercial industrial developments and are situated in urban landscapes with high amounts of traffic from local industrial operations. Further, I-238 is located in close proximity to all project sites. These barriers further constrain non-volant wildlife movement.

Migrating birds, such as songbirds, can be affected by human-built structures because of their propensity to migrate at night, their low flight altitudes, and their tendency to be disoriented by artificial light, making them vulnerable to collision with obstructions, which could eventually lead to their injury or mortality. In addition, birds migrating at night can be strongly attracted to sources of artificial light, particularly during periods of inclement weather. Exposure to a light field, specifically red and white lights, at night can distort normal flights and cause the birds to become more susceptible to collision with structures. Transparent and reflective glass can reflect or make the nearby environment (such as trees, vegetation, or food source) visible through structures, which could also lead to migrating bird collision.

The proposed billboard's LED lights would not create large, illuminated zones that can be attractive to night flying birds. Colors on the billboard would change every 8 seconds and would not be

predominately red or white at night. The billboard would not have transparent or reflective surfaces, such as glass or windows that would lead to bird collision. For these separate and independent reasons, operation of the Langton Way billboard would not have a significant impact on the movement of migrating birds.

In summary, the removal sites and new digital billboard site are not part of or within a wildlife movement corridor and construction-related impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No impact. The proposed project would not involve tree removal. Thus, the proposed project would have no impact related to conflict with any local policies or ordinances protecting biological resources.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No impact. The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or State habitat conservation plan. Therefore, there would be no impact.

Mitigation Measures

MM BIO-1 Migratory Birds

- Construction shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most birds, including most raptors in the San Francisco Bay Area, extends from February through August.
- If it is not possible to schedule billboard removal between September and January, pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. This survey shall be completed no more than 7 days prior to the initiation of demolition activities to verify the absence of active nests.
- If an active nest is located during pre-construction surveys, the United States Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW) (as appropriate) shall be notified regarding the status of the nest. Construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned, or the agencies deem disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 100 feet around an active raptor nest and an appropriate radius around an active migratory bird nest depending on the species) or alteration of the construction schedule.
- A qualified Biologist shall determine an appropriately sized buffer around the active nest depending on the species. The applicant shall implement the buffer using environmentally sensitive area fencing, pin flags, and or yellow caution tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.5 Cultural Resources and Tribal Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Environmental Evaluation

This section describes the existing cultural resources and Tribal Cultural Resources (TCR) setting and potential impacts from project implementation.

Cultural Resources

The descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), Northwest Information Center (NWIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks list, California Points of Historical Interest list (CPHI), California Built Environment Resource Directory (BERD) for Alameda County and the University of California Museum of Paleontology (UCMP) Paleontological Database. The record search results, NAHC correspondence, and paleontological reports are provided in Appendix D.

Langton Site

In order to determine the presence or absence of cultural and historical resources within the Langton site location, FCS conducted a records search and literature review for the project site and a 0.5-mile radius surrounding the site at the NWIC on June 4, 2018. The current inventories of the NRHP, CRHR, CHL list, CPHI, and the BERD listings for Alameda County were also reviewed to determine the existence of previously documented local historical resources.

Results from the NWIC, located at Sonoma State University in Rohnert Park, indicate that 17 historic resources are on file within a 0.5-mile radius, one of which (the I-238 Bridge) is located near the northern section of the project site. In addition, 19 area-specific survey reports are on file with the NWIC for the 0.5-mile search radius, three of which address the Langton site specifically, indicating that the immediate area has previously been surveyed for cultural resources. A copy of the NWIC records search results can be found in Appendix D.

As part the evaluation of prior billboard project, FCS sent a letter to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File in proximity to the project site. A response from the NAHC was received on May 29, 2018, indicating that the Sacred Lands File search failed to indicate the presence of Native American cultural resources in the immediate vicinity. The NAHC included a list of six local tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the proposed project, a letter containing project information and requesting any additional information was sent to each tribal representative on June 7, 2018. No responses have been received to date. A copy of the NAHC and Tribal Correspondence can be found in Appendix D.

Removal Sites

As discussed in Section 1, the billboards slated for removal would have their poles cut at ground level; only the aboveground portion of the billboard structures would be removed, while the subsurface foundation would remain. As such, any historic or prehistoric cultural resources present in the ground beneath the existing billboards would not be disturbed as part of the billboard removal process and do not need to be considered further in this section.

Tribal Cultural Resources

This section describes the existing TCRs setting and potential effects from project implementation on the project sites and their surrounding areas. Conclusions are based on initial consultation with the NAHC and subsequent consultation with tribal representatives identified by the NAHC who may have interest in or additional information on TCRs that may be impacted by project development. Copies of all consultation conducted by FCS can be found in Appendix D. The review presents the methods employed to identify TCRs, assesses potential impacts to those resources, and presents recommendations to address potential impacts.

Regulatory Framework

California Assembly Bill 52

AB 52 was signed into law on September 25, 2014, and provides that any public or private "project with an effect that may cause a substantial adverse change in the significance of a tribal cultural

resource is a project that may have a significant effect on the environment." TCRs include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the CRHR or included in a local register of historical resources." Under prior law, TCRs were typically addressed under the umbrella of "cultural resources," as discussed above. AB 52 formally added the category of "tribal cultural resources" to CEQA, and extends the consultation and confidentiality requirements to all projects, rather than just projects subject to Senate Bill 18 (SB 18).

The parties must consult in good faith, and consultation is deemed concluded when either: (1) the parties agree to measures to mitigate or avoid a significant impact on a TCR (if such a significant impact exists); or (2) when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include:

- Preservation in place
- Protecting the cultural character and integrity of the resource
- Protecting the traditional use of the resource
- Protecting the confidentiality of the resource
- Permanent conservation easements with culturally appropriate management criteria

In compliance with AB 52, Alameda County mailed notices containing a project map and information to all the tribes identified by the NAHC who are geographically, traditionally, and culturally affiliated with the project area on October 20, 2021. Responses from Confederated Villages of Lisjan Tribe and Wilton Rancheria Tribe were received. At the time of this publication, the County is actively coordinating with both tribes to discuss the proposed project.

Thresholds of Significance

According to Appendix G, Environmental Checklist, of the CEQA Guidelines, TCR impacts resulting from the implementation of the proposed project would be considered significant if the proposed project would cause a substantial adverse change in the significance of a TCR, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Cde Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

Less than significant impact with mitigation incorporated. The results of the NWIC records search indicated that 17 historic era resources have been recorded within a 0.5-mile radius of the project area, one of which addresses the northern section of the project site. A portion of the I-238 historic bridge is located within the 0.5-mile radius just south of the new billboard site. The bridge was built in 1956 and widened in 1991. It was determined that the bridge was not significant and has suffered loss of integrity due to the widening, nor is it associated with significant persons or events in local, regional history, thus it does not meet the criteria for the NRHP. The architectural assessment also makes a note that the bridge is not considered a historical resource for the purposes of CEQA. For these reasons, along with the small project footprint, the potential for the proposed project to have an adverse effect on historic resources is considered low.

While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered historic era resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. As such, with the implementation of MM CUL-1, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts would be less than significant with mitigation incorporated.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than significant impact with mitigation incorporated. The results of the NWIC records search indicated that 17 historic era resources have been recorded within the 0.5-mile radius of the project area, where this radius encompasses the northern section of the project site (as discussed above). No TCRs were identified as part of the NAHC Sacred Lands File search or through subsequent outreach and correspondence with Native American representatives. Previous surveys also failed to identify additional archaeological resources in the project area. For these reasons, along with the limited area of excavation, the potential for the proposed project to have an adverse effect on archaeological resources is considered low.

While unlikely, there is always a possibility that subsurface excavations may encounter previously undiscovered archaeological resources during project construction. Such resources could include stone, bone, wood, or shell artifacts or features, including hearths and structural elements. This would be considered a significant impact. However, implementation of MM CUL-1 would reduce this impact to a less than significant level.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact with mitigation incorporated. No human remains or cemeteries are known to exist within or near the project area. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains, which would

be considered a significant impact. Implementation of MM CUL-2 would reduce this impact to a less than significant level.

Tribal Cultural Resources

Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

Less than significant impact with mitigation incorporated. Reviews of the records search and the NAHC Sacred Lands File search did not indicate the presence of TCRs located in the immediate vicinity of the project sites. As such, no known eligible or potentially eligible TCRs would be adversely affected by the proposed project. Furthermore, implementation of MM CUL-1 would ensure any impacts to undiscovered TCRs encountered during project construction would be reduce to a less than significant level.

e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than significant impact with mitigation incorporated. No TCRs significant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 have been identified by the Lead Agency. FCS conducted tribal outreach with the six tribal representatives identified by the NAHC.

In compliance with AB 52, the County distributed letters to Native American tribes that have previously requested notification for AB 52 consultation, notifying each tribe of the opportunity to consult with the County regarding the proposed project. Consultation letters were mailed on October 20, 2021. Responses from Confederated Villages of Lisjan Tribe and Wilton Rancheria Tribe were received. At the time of this publication, the County is actively coordinating with both tribes to discuss the proposed project.

Furthermore, implementation of MM CUL-1 would ensure any impacts to undiscovered TCRs encountered during project construction would be reduced to a less than significant level.

Mitigation Measures

MM CUL-1 In the event a significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology has evaluated the situation. The applicant shall include a standard

inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified Archaeologist. Significant cultural resources include stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined significant under CEQA, the qualified Archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The Archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources. The report shall be submitted to Alameda County, the Northwest Information Center (NWIC), and the California Office of Historic Preservation (OHP), if required.

MM CUL-2 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; and Public Resources Code Sections 5097.94 and 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance within 100 feet of the remains until the County Coroner is contacted to determine whether the remains are Native American and whether an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.
2. Where the following conditions occur, the landowner or their authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project site in a location not subject to further subsurface disturbance:
   - The NAHC is unable to identify an MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission.
   - The MLD identified fails to make a recommendation.

- The landowner or his authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner.

Additionally, Public Resources Code Section 15064.5 requires the following relative to Native American remains:

- When an initial study identifies the existence of, or the probable likelihood of, Native American remains within a project footprint, the Lead Agency shall work with the appropriate Native Americans as identified by the NAHC as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the NAHC.

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

Environmental Evaluation

Setting

Energy Basics

Energy use, especially through fossil fuel consumption and combustion, relates directly to environmental quality since it can adversely affect air quality and generate GHG emissions that contribute to climate change. Electrical power is generated through a variety of sources, including fossil fuel combustion, hydropower, wind, solar, biofuels, and others. Natural gas is widely used to heat buildings, prepare food in restaurants and residences, and fuel vehicles, among other uses. Fuel use for transportation is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes, and generally based on petroleum-based fuels such as diesel and gasoline. Electric vehicles may not have any direct emissions but do have indirect emissions via the source of electricity generated to power the vehicle. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

2.1.1 - Regulatory Framework

Local

County of Alameda

Alameda County (Unincorporated Areas) Community Climate Action Plan

The Alameda County Community Climate Action Plan was adopted in 2014 to reduce GHG emissions generated within the unincorporated areas of the County. The Community Climate Action Plan includes specific measures to be implemented that the County estimates will reduce GHG emissions by 80 percent by 2050.[22] These reductions would come in part from reductions in Vehicle Miles Traveled (VMT) and energy consumption, with the relevant sustainability measures listed below.

[22] County of Alameda. 2014. Community Climate Action Plan (Unincorporated Areas): Element of the Alameda County General Plan. Page 1.

Sustainability Measures

E-1 Work with Pacific Gas and Electric Company (PG&E) and Alameda County cities to accelerate smart grid integration.

a. Partner with PG&E and develop a community smart grid integration plan.

b. Develop an outreach program that informs property owners and businesses about benefits of smart grid and smart applications.

c. Adopt ordinance that requires smart grid energy management system and compatible heating, ventilation, air conditioning and lighting in new construction.

E-2 Evaluate the potential for district energy systems in mixed-use and higher density areas of the community and develop an implementation plan for cost-effective systems.

a. Conduct an analysis of district heating potential in the Central Business District Specific Plan area, the San Lorenzo Specific Plan Area, and other neighborhood commercial centers.

b. Develop an implementation plan for cost-effective systems.

E-3 Develop a comprehensive outreach program to facilitate voluntary home energy efficiency improvements.

a. Work with PG&E and other community organizations to develop energy efficiency outreach programs for residents and multi-family property owners.

b. Develop and maintain a website describing energy efficiency rebates, incentives, and case studies.

E-4 Identify and develop low-cost financing products and programs that encourage investment in energy efficiency for existing residential buildings.

a. Evaluate financing programs including AB 811 that are being developed by regional/State agencies and select the appropriate programs.

b. Develop capacity to administer energy efficiency financing program.

c. Develop monitoring website and publicity strategy with local contractors, building supply companies, and PG&E.

E-5 Expand outreach to low-income homeowners in order to encourage participation in federally funded energy efficiency and weatherization programs.

a. Apply for funding from the Federal Recovery Act and other sources to fund expanded community participation in the Weatherization Assistance Program (WAP).

b. Develop an outreach program to encourage participation in WAP by eligible low-income households.

E-6 Identify and implement opportunities to improve efficiency of rental units.

a. Conduct a review of various municipalities' multi-family energy efficiency improvement programs.

b. Develop rental property energy efficiency outreach and incentive program.

c. Create and publicize a web-based database of energy-efficient rental properties in the community.

d. Develop monitoring website and publicity strategy with local contractors, building supply companies, and PG&E.

E-7 Develop and implement an outreach and financial assistance program that encourages businesses to invest in efficiency improvements.

a. Work with PG&E and East Bay Municipal Utility District (EBMUD) to expand energy and water efficiency outreach programs for commercial and industrial businesses.

b. Provide commercial energy efficiency and renewable energy financing products to business.

c. Develop tools that demonstrate the financial benefits of the efficiency upgrades.

d. Develop monitoring website and publicity strategy with local contractors, building supply companies, and PG&E.

E-8 Renew the County Green Building Ordinance.

a. Amend the County's Green Building Ordinance (GBO) to comply with 2010 California Green Building Code, and readopt County GBO without future sunset clause(s).

E-9 Provide incentives, such as priority permitting for buildings that exceed the current California Title-24 standards for energy efficiency by 30 percent.

a. Evaluate and select incentives for projects that exceed 2010 Title-24 energy efficiency requirements by 30 percent (Tier 2).

E-10 Require or provide incentives for new construction to use building materials containing recycled content.

a. Adopt an ordinance that requires or develop an incentive program to encourage the use of recycled materials for 10 percent of building materials in new construction.

b. Develop an outreach program to design and building professionals about the availability of recycled building materials in construction.

E-11 Require new commercial parking lots with over 200 spaces to mitigate heat gain through the use of shade trees, solar arrays, or cool pavement.

a. Amend the Zoning Code to require one out of three following elements for new parking lots with 200 or more parking spaces:

   i. 50 percent of the parking lot to be shaded by tree canopy,
   ii. Solar photovoltaic panels,
   iii. Or the use of cooling pavements or pavement coatings with albedos greater than 40 percent if trees and solar panels are impractical due to site considerations.

b. Develop parking lot heat gain mitigation design guidelines to facilitate construction and review process.

E-12 Require all new construction and major renovation of multi-unit buildings to be "sub-metered" to enable each individual unit to monitor energy consumption.

a. Amend the building code to require each new and major renovation of multi-family development to install electricity and gas meters for each unit.

E-13 Establish Solar EmPowerment Districts that remove barriers to and facilitate the installation of solar photovoltaic systems on eligible commercial and industrial buildings and parking lots.

a. Identify commercial and industrial areas with optimal solar orientation, building structure, and land ownership/management conditions.

b. Adopt ordinance that establishes Solar EmPowerment Districts in high potential areas.

c. Conduct analysis of potential regulatory, structural, and market barriers to installation of photovoltaic systems on commercial buildings and parking lots with defined districts.

d. Minimize barriers and streamline permitting for solar photovoltaics (PV) installation in EmPowerment Districts.

e. Develop outreach and technical assistance programs to encourage the installation of solar PV systems.

E-14 Facilitate the installation of solar hot water heating systems on large commercial buildings.

a. Create outreach program that promotes solar water heating (SWH) systems and educate business owners about the California Solar Initiative's Thermal Program and related federal incentives.

b. Remove unnecessary regulatory barriers to SWH system installation and streamline permitting processes.

E-15 Develop a comprehensive residential renewable energy program that provides outreach, financing, and other forms of assistance.

a. In partnership with ABAG and/or the State, develop a financing program to fund residential investment in renewable energy (see Measure E-4).

b. Develop a targeted outreach program to maximize residential installation of solar hot water systems.

c. Streamline permitting for photovoltaic and solar hot water system installation.

E-16 Develop a green jobs program for the unincorporated areas of Alameda County.

a. Partner with local organizations and community colleges, as appropriate to develop a green jobs program for the unincorporated areas of Alameda County.

T-1 Improve bicycle infrastructure near community activity areas.

a. Amend existing Bicycle Master Plan to prioritize bicycle infrastructure improvements that increase resident access to community activity centers.

b. Implement bicycle infrastructure improvements serving schools, transit stations, employment centers, neighborhood commercial centers, and downtown business districts.

T-2 Develop appropriate bicycle infrastructure for high traffic intersections and corridors.

a. Conduct analysis of bicycle network segments on streets with 7,000 ADT or average speeds greater than 30 MPH and evaluate the potential for Class I bike paths and cycletracks.

b. Construct Class I bike paths (cycletracks) on all qualifying street segments.

c. Create criteria for the installation of bicycle boxes and bicycle priority signals at bicycle route/major street intersections. Construct where appropriate.

d. Identify and redesign problem intersections for improved pedestrian and bicycle travel.

T-3 Retrofit bicycle racks and parking facilities in underserved civic and commercial areas.

a. Conduct bicycle parking analysis in County's commercial and civic areas.

b. County shall install bicycle parking facilities in underserved areas.

T-4 Enhance pedestrian infrastructure within easy walking distance from community activity centers.

a. Conduct a pedestrian obstacle study.

b. Develop pedestrian improvement plan for the unincorporated County that prioritizes investments that enhance access to community activity centers.

c. Construct pedestrian improvements identified in the pedestrian obstacle study and improvement plan.

T-5 Expand the traffic calming program to improve pedestrian safety.

a. Expand funding for the Traffic Calming Program to provide increased community outreach and implementation.

T-6 Improve pedestrian connectivity and route choice in neighborhoods.

a. Conduct analysis of pedestrian network, and identify areas of low connectivity and route choice.

b. Where possible, use public rights of way and easement acquisition to develop pedestrian alleys, punch-throughs, and similar design features.

c. Adopt a General Plan Circulation Element amendment that requires pedestrian connectivity features in all new development, when feasible.

T-7 Work with school districts to develop a School Alternative Transportation Plan by improving/expanding walking school bus, safe routes to school program, and school bus services.

a. Work with school districts to develop outreach program that promotes alternative travel modes for school-related trips.

b. Work with school districts to develop educational modules that promote safe bicycle travel.

T-8 Conduct a public transit study and implement ridership enhancement program.

a. Conduct public transit study in partnership with transit agencies.

b. Develop and implement County-led inter-agency public transit ridership enhancement program.

T-9 Work with AC Transit to increase service frequency on select bus routes.

a. Request that AC Transit evaluate the potential for increasing service frequency on key routes.

b. Prepare formal request for AC Transit to extend Bus Rapid Transit (BRT) bus service to the unincorporated County. Determine the conditions necessary for BRT route expansion.

T-10 Provide transit buses with signal prioritization devices to facilitate time effective public transit service.

a. Work with AC Transit to evaluate key bus routes for transit signal prioritization (TSP) integration.

b. Work with AC Transit to install TSP infrastructure at intersections and in buses.

c. Evaluate need for queue bypass lanes and implement any necessary intersection redesigns.

T-11 Work with AC Transit to provide transit with essential improvements including shelters, route information, benches, and lighting.

a. Consult with AC Transit to ensure that bus stops provide shade, weather protection, seating, lighting, and route information.

T-12 Work with public transit agencies to better accommodate bicycles.

a. Install Class I bike storage lockers at heavily used bus stops.

b. Formally request Bay Area Rapid Transit (BART) to develop Class I bicycle storage at the Castro Valley and Bay Fair stations and to provide special bicycle train cars for cross bay travel.

T-13 Enhance rideshare infrastructure and services to increase community participation in this important travel mode.

a. Work with Alameda County Congestion Management Agency (ACCMA) and Metropolitan Transportation Commission (MTC) to develop a plan and schedule for updating ride-match systems to the most advanced technologies.

b. Work with ACCMA to encourage employers to create rideshare databases for their employees and employees of adjacent businesses.

c. Identify locations for community rideshare stations and develop appropriate infrastructure.

d. Adopt an ordinance that requires new offices with 50 or more employees to provide preferential parking spaces for rideshare commuters.

T-14 Reduce minimum parking requirements for mixed-use, pedestrian and transit-oriented development (TOD).

a. Conduct an evaluation of the County's parking policies and their effects on mixed-use, TOD, and similar development.

b. Reduce parking requirements in areas targeted for mixed-used and TOD development, while ensuring that neighborhoods are not adversely affected. The actual requirements for mixed-use parking should be accurately evaluated.

c. Evaluate potential for shared parking strategies in the unincorporated County.

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than significant impact. A discussion of the proposed project's energy use is presented below. Energy use consumed by the proposed project is primarily based on comparison with similar digital billboard development projects and empirical studies which are publicly available. For the purpose of this energy analysis, the anticipated operational electricity consumption relies on Digital Billboard Energy Use in California, a study prepared for San Diego Gas and Electric Company for the estimation of typical electricity demand for digital billboards in California.[23] Energy calculations and supporting information are included as part of Appendix B of this Draft IS/MND.

Construction

During construction, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. No natural gas would be utilized as part of construction. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, paving, and building construction activities. The types of equipment could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Other equipment could include electrically driven equipment such as pumps and other tools.

Based on CalEEMod estimates for the proposed project, (see modeling output files in Appendix B), construction-related worker vehicle trips would consume an estimated 222 gallons of diesel and gasoline, combined, and construction-related equipment would consume an estimated 1,506 gallons of diesel and gasoline, combined, during project construction.

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. In addition, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Because of the temporary nature of construction and the financial incentives for developers and contractors to implement energy-efficient practices, project construction activities would not result

[23] San Diego Gas and Electric Company. 2014. Digital Billboard Energy Use in California. July. Website: https://www.etcc-ca.com/sites/default/files/reports/et14sdg8011_digitalbillboardreport_2014-7.pdf. Accessed June 3, 2021.

in wasteful, inefficient, and unnecessary consumption of energy. Therefore, the construction-related impact related to fuel and electricity consumption would be less than significant.

Operation

Electricity and Natural Gas

Building operations for the proposed project would involve energy consumption for lighting and cooling fans. Based on applicant-provided information, the proposed two-sided LED billboard would be operated 24 hours per day, 365 days per year, which would result in an estimated 52,900 kilowatt-hours (kWh) The proposed project is not anticipated to result in wasteful, inefficient, or unnecessary electricity consumption as the electronic billboard would require electricity to operate and would not facilitate greater electricity consumption beyond that required for their passive operative design. Moreover, the electronic billboard would not consume natural gas and as detailed below, would rely upon renewable energy sources consistent with California law. Therefore, the operational impact related to building electricity and natural gas consumption would be less than significant.

Fuel

Long-term operational energy consumption related to fuel consumption would be very minimal because the only vehicle trips would be from irregular and infrequent maintenance vehicle trips. Maintenance vehicle trips associated with the proposed project are anticipated to occur once every 1 to 2 months at most and would not result in wasteful, inefficient, or significant energy use. It is important to note the proposed sign is associated with the removal of 10 sign faces, and therefore trips associated with the proposed sign would likely be significant less than trips associated with the existing signs that will be removed. This impact would be less than significant.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than significant impact. A discussion of the proposed project's potential to conflict with or obstruct a State or local plan for renewable energy or energy efficiency is presented below.

Construction

As described above, construction activities would involve energy consumption in various forms and would be limited by California regulations such as California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 which limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. The proposed project would be required to comply with these regulations. There are no renewable energy standards applicable to construction activities for the proposed project.

Thus, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, impacts would be less than significant.

Operation

Additionally, California's Renewables Portfolio Standard (RPS) requires that 33 percent of electricity retail sales be served be renewable energy sources by 2020. PG&E would provide the delivery of

electricity to the proposed project through the existing grid. SB 32 mandates a Statewide GHG emissions reduction goal to 40 percent below 1990 levels by the year 2030. PG&E's current power mix already exceeds State requirements for 2020.[24] Therefore, the proposed project would receive electricity from a utility company that meets California's RPS requirements as well as the State requirements for 2020.

In addition, the proposed project would be designed and constructed in accordance with the applicable State's Title 24 energy efficiency standards. Part 11, Chapter 4 and 5 of the State Title 24 energy efficiency standards establishes mandatory measures for nonresidential buildings, including material conservation and resource efficiency. The proposed project would be required to comply with these mandatory measures and would be constructed in accordance with County standards. Thus, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. This impact would be less than significant.

Mitigation Measures

None required.

[24] Pacific Gas and Electric Company (PG&E). 2021. PG&E Surpasses California's 2020 Renewable Energy Goal. https://www.pge.com/en/about/newsroom/newsdetails/index.page?title=20210309_pge_surpasses_californias_2020_renewable_energy_goal_electricity_delivered_to_customers_is_more_than_88_greenhouse_gas-free_and_among_the_cleanest_in_the_nation. Accessed June 09, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.7 Geology and Soils *Would the project:*				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Setting

This analysis is based, in part, on the Summary of Soil and Groundwater Sampling Activities prepared by Terracon Consultants, Inc. (Terracon) on May 7, 2021 (Appendix E).

Regionally, Alameda County is situated in the eastern portion of the San Francisco Bay Area within the Coast Range Geomorphic Province of California. The Coast Range Geomorphic Province is

characterized by a series of northwest-trending mountain ranges and intervening valleys that align subparallel with the San Andreas Fault System. The Northern California region contains a number of active, potentially active, and inactive faults, and it is considered a region of high seismic activity. The Hayward Fault, one of the 10 major faults that make up the San Andreas Fault Zone, runs through the western part of Castro Valley, crossing I-238 west of the I-580 interchange.

The Hayward Fault is approximately 1.5 miles from the new digital billboard site. This site is underlain by Yolo silt loam.[25] The new digital billboard site and removal sites are described in Section 1.4.

Environmental Evaluation

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than significant impact. There are no mapped faults within the proposed new digital billboard site. The site is not located in an Alquist-Priolo Earthquake Fault Zone, although it is approximately 1.5 miles from the Alquist-Priolo Earthquake Fault Zone.[26] To ensure the billboard is constructed safely, construction and design would be undertaken using standard engineering and seismic safety design techniques in accordance with the 2019 California Building Standards Code (CBC). Therefore, the impact related to potential rupture of a known earthquake fault would be less than significant.

ii) Strong seismic ground shaking?

Less than significant impact. The proposed new digital billboard site is located within a seismically active region, and strong shaking would be expected during the lifetime of the proposed project, which could damage future improvements on the site and expose people to injury. According to the Eden Area General Plan, the fault system that includes the Hayward and Rodgers Creek faults has a 2 percent probability of generating an earthquake with a magnitude equal to or greater than 6.7 within the next 30 years.[27] Separately and independently, to avoid or minimize potential damage from seismic shaking and liquefaction, the proposed project shall be built using standard engineering and seismic safety design techniques in accordance with the 2019 CBC. Therefore, the impact would be less than significant.

[25] United States Department of Agriculture. Web Soil Survey. Website: http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm. Accessed June 20, 2021.
[26] California Department of Conservation (DOC). 2012. California Geological Survey: Earthquake Zones of Required Investigation, Hayward Quadrangle. September. Website: http://gmw.consrv.ca.gov/shmp/download/quad/HAYWARD/maps/Hayward_EZRIM.pdf.
[27] Alameda County. 2010. Eden Area General Plan.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. According to the USGS Susceptibility Map of the San Francisco Bay Area,[28] the proposed new digital billboard site is located in a moderate Liquefaction Hazard Zone. Liquefaction is the result of seismic activity and is characterized as the transformation of loosely water-saturated soils from a solid state to a liquid state after ground shaking. Variables that contribute to liquefaction include age of the soil, soil type, soil cohesion, soil density, and groundwater level. Soils most susceptible to liquefaction are loose sandy soils or low plasticity fine-grained soils that exist below groundwater levels. A liquefaction hazard evaluation was prepared by Terracon to determine the potential for liquefaction to occur on the project site. The project site is generally characterized by consolidated "clay-like" soils to a depth of 32 feet below ground surface (bgs), which are described as non-liquefiable. Due to their cohesive nature and depth, the potential for liquefaction to manifest at the surface is low to moderate. Potentially liquefiable silty sand/sandy soils were found to occur approximately 32-42 feet bgs. The column foundation for the billboard would either be constructed to a depth of less than 32 feet with spread footing at grade or extend to a depth of 50 feet outside the range of liquefiable soils minimizing the potential for liquefaction-induced settlement.

The site is in an urban environment with substantial development having occurred on the site itself and adjacent parcels. In addition, the proposed project would not construct structures intended for human occupancy. With adherence to the 2019 CBC, this impact would be less than significant.

iv) Landslides?

Less than significant impact. The proposed new digital billboard site is relatively flat; therefore, the probability of landslides occurring during a seismic event is low. Therefore, this impact would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Less than significant impact. Neither construction of the new digital billboard nor removal of the existing billboards would not result in substantial soil erosion or loss of topsoil. The project's earth-disturbing activities consist of only drilling a hole (5 feet in diameter and up to 60 feet deep) for the foundation of the proposed billboard. Therefore, this impact would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than significant impact. Lateral spreading typically occurs as a form of horizontal displacement of a relatively flat-lying alluvial material toward an open or "free" face such as an open body of water, channel, or excavation. The project site and surrounding area are relatively flat and there are no creeks or open bodies of water, i.e., "open faces," adjacent to the proposed new digital billboard

[28] United States Geological Survey (USGS). Susceptibility Map of the San Francisco Bay Area. Website: https://geomaps.wr.usgs.gov/sfgeo/ liquefaction/susceptibility.html. Accessed June 20, 2021.

site for lateral spreading to occur; therefore, the potential for lateral spreading to affect the site is low.

As previously addressed, the proposed project would be implemented using standard engineering and seismic safety design techniques in accordance with the 2019 CBC. As such, the proposed project would be compliant with all applicable State and local requirements. Therefore, the impact associated with unstable geologic unit would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than significant impact. According to the Web Soil Survey by United States Department of Agriculture, the proposed new digital billboard site is not located on expansive soil.[29] Therefore, the proposed project would not create substantial direct or indirect risks to life or property. The impact would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No impact. The project does not propose to use septic tanks or alternative wastewater disposal systems. There would be no impact.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than significant impact with mitigation incorporated. As discussed in the Paleontological Record Search (Appendix D), the site is located on undivided surficial deposits (Qu), which, if Pleistocene, are potentially fossiliferous. However, the overall paleontological potential of these deposits appears very low.

Although not anticipated, subsurface construction activities associated with the proposed project, could result in a significant impact to paleontological resources, if encountered. Paleontological resources may include fossils from mammoths, saber-toothed cats, rodents, reptiles, and birds. However, implementation of MM GEO-1 would reduce this impact to a less than significant level.

Mitigation Measures

MM GEO-1 In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The Paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the

[29] United States Department of Agriculture. Web Soil Survey. Website: http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm. Accessed June 20, 2021.

criteria set forth in CEQA Guidelines Section 15064.5. The Paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities can resume at the location of the find. If the applicant determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the County of Alameda for review and approval prior to implementation, and the applicant shall adhere to the recommendations in the plan.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.8 Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than significant impact. The proposed project is located in the San Francisco Bay Area Air Basin, which is regulated by the BAAQMD. Projects generate GHG emissions during construction and operation (e.g., mobile emissions, emissions from generation of electricity for operations, and emissions of from the manufacturing and transport of building materials). The BAAQMD's project-level significance threshold for operational GHG generation was deemed appropriate to use when determining the proposed project's potential GHG impacts. The thresholds suggested by the BAAQMD for project-level operational GHG generation are as follows:

- Compliance with a qualified GHG Reduction Strategy,
- 1,100 metric tons (MT) carbon dioxide equivalent (CO_2e) per year, or
- 4.6 MT CO_2e per service population (residents + employees) per year.

This analysis is restricted to GHGs identified by AB 32, which include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Construction and operation of the proposed project are addressed separately below.

Construction GHG Emissions

During project construction, GHGs would be generated by construction activities such as site clearing, operation of heavy-duty construction vehicles, materials and debris hauling, paving, and construction worker vehicle trips. These emissions would be considered short-term in duration. The BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions; however, the BAAQMD does recommend that lead agencies quantify, disclose, and provide a significance determination for construction-related GHG emissions. Therefore, the operational emissions bright-line threshold of 1,100 MT CO_2e per year is used for this analysis to determine significance of the proposed project's construction-related emissions.

Construction emissions were estimated using CalEEMod (Version 2016.3.2). Construction assumptions used to estimate GHG emissions are consistent with those used to estimate air pollutant emissions, as described under Impact 3(b). Table 10 shows that GHG emissions generated by project construction were estimated to be 16.2 MT CO_2e, which is below the 1,100 MT CO_2e per year threshold. Therefore, construction-related GHG emissions would be less than significant.

Table 10: Construction GHG Emissions

Construction Phase	Total MT CO_2e/year
Proposed New Digital Billboard Site	
Grading	0.9
Building Construction (Installation of Billboard)	4.6
Paving	0.1
Langton Site Total	*5.6*
Removal Sites	
Demolition	10.6
Removal Sites Total	*10.6*
Total Construction Emissions	**16.2**
Threshold of Significance	**1,100**
Does project exceed threshold?	**No**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalents
Due to rounding, total MT CO_2e may be marginally different from CalEEMod Output.
Source: CalEEMod Output (Appendix B).

Operational GHG Emissions

Operational or long-term GHG emissions occur over the life of the proposed project. Sources for operational emissions include:

- Motor Vehicles: These emissions refer to tailpipe exhaust from the cars and trucks that would travel to and from the project site.
- Indirect Electricity: These emissions refer to those generated by off-site power plants to supply electricity required for the proposed project.
- Water Transport: These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- Waste: These emissions refer to the GHG emissions produced by decomposing waste generated by the proposed project.

Motor vehicle, water, and waste sources of GHG emissions would be negligible during operation. LED digital billboards (programmable electronic signs) are subject to energy efficiency requirements under Title 24 of the California Code of Regulations. The billboard is required to be dimmable, which would reduce energy use and GHG emissions associated with the generation of electricity. The

proposed new digital billboard would be illuminated 24 hours per day, 365 days per year. The light levels emitted from the billboard would be set to adjust based on ambient light conditions at any given time (i.e., nighttime versus daytime). According to applicant-provided information, a typical Outfront Media billboard would result in an estimated annual electricity demand of 26,200 kWh/year per LED facing. Therefore, it is assumed that the billboard, which consists of two facings, would use up to a total of 52,400 kWh, or 52.4 megawatt-hours (MWh) per year. The PG&E would supply the electrical energy needed to illuminate the billboard. Each of the billboards that would be removed are illuminated during nighttime hours, but total energy usage is less than 3,000 kWh per year; however, existing energy usage is not factored into the environmental baseline, which presents a conservative assessment.

When this analysis was originally prepared, the proposed project was anticipated to consume an estimated 94 MWh per year. Based on the previously anticipated annual electricity consumption of 94 MWh for the proposed billboard, the proposed project's electronic billboard would generate approximately 9 MT CO_2e/year. See Appendix B for calculations and detailed assumptions.

Billboards require occasional upkeep and maintenance activities, which generate vehicle trips and resulting GHG emissions. The removal of five billboard structures in exchange for one, however, would not likely increase the overall VMT; for this reason, GHG emissions related to the maintenance and upkeep of the new billboard would not increase.

The project's expected net annual GHG emissions of approximately 9 MT CO_2e/year would not exceed the 1,100 MT CO_2e/year threshold, and therefore GHG impacts related to the operation of the proposed project would be less than significant.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Less than significant impact. The Alameda County (Unincorporated Areas) Community Climate Action Plan was approved and adopted as an element of the Alameda County General Plan on February 4, 2014. The Climate Action Plan outlines actionable items that, if successfully implemented, would reduce GHG emissions generated within unincorporated areas of Alameda County to 15 percent below 1990 levels by 2050. There are several implementation action items related to energy, most of which relate to energy use in commercial or residential buildings. None of the implementation action items would be directly applicable to operation of the proposed new digital billboard.

The proposed project would not conflict with the policies, regulations, or guidelines in the County's Community Climate Action Plan, Bay Area Clean Air Plan, or any other applicable plan and/or regulations adopted for the purposes of reducing GHG emissions. Furthermore, as discussed in Impact 7(a), the proposed project would not generate substantial GHG emissions during construction or operation. Therefore, this impact would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.9 Hazards and Hazardous Materials *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Environmental Setting

This analysis is based, in part, on the Summary of Soil and Groundwater Sampling Activities prepared by Terracon on May 24, 2021, revised on June 18, 2021 (Appendix F).

The project area contains residential and commercial land uses as well as transportation corridors. The land uses may utilize some hazardous materials through use of cleaning products, and trucks may transport hazardous materials along the transportation corridors. No known Cortese list sites are located near the project site. The project area is also not located within the vicinity of a public or private airport, and it is not proximate to wildlands.

The existing billboards that are to be removed were constructed before or in the 1970s and may contain asbestos-containing materials and/or lead-based paint.

A gas station at 17715 Mission Boulevard (up-gradient from the proposed new digital billboard site) was identified as having leaking underground gasoline storage tanks.[30] The cleanup status with the Regional Water Quality Control Board (RWQCB) is open, and residual petroleum hydrocarbons may have migrated, and may be present in, on-site soils. These soils and groundwater could be encountered where the foundation is drilled below the existing pavement on the site.

Soil and groundwater samples were taken to evaluate the presence or absence of regulated environmental chemicals that may be encountered during foundation construction of the new digital billboard. The samples were analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPH-g), TPH as diesel (TPH-d), TPH as motor oil (TPH-mo), and VOCs.

- **Soil:** TPH-d was detected in the soil at a concentration of 1.02 milligrams per kilogram. No TPH-g, TPH-mo, or VOCs were detected. The concentration of TPH-d detected in the soil sample is below the Environmental Screening Levels for Direct Exposure Human Health Risk for residential, commercial/industrial, and construction worker scenarios adopted by the RWQCB, San Francisco Bay Region.
- **Groundwater:** Groundwater was encountered at 35 feet bgs. Levels of VOCs detected in the groundwater sample are shown in the table below. Methyl tert-butyl ether (MTBE) is the only VOC that exceeds the California Maximum Contaminant Level of 5.0 µ/L.

VOC	micrograms/liter (µ/L)
benzene	0.133
methyl tert-butyl ether (MTBE)	9.52
tetrachloroethene (PCE)	0.665
toluene	0.292
trichloroethylene (TCE)	0.231

Environmental Evaluation

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than significant impact with mitigation incorporated. Project construction activities may involve the use, transport, and disposal of hazardous materials such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints, solvents, glues,

[30] California State Water Resources Control Board (State Water Board). 2021. GeoTracker - ABE PETROLEUM (T0600102154). Website: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600102154. Accessed June 20, 2021.

and other substances used during construction. Construction of the proposed project would also require the use of gasoline- and diesel-powered heavy equipment, such as bulldozers, backhoes, water pumps, and air compressors. If not appropriately managed, accidental spills of these hazardous materials could result in a significant impact.

All construction activities would be required to conform to Title 49 of the Code of Federal Regulations, United States Department of Transportation (USDOT), State of California, and local laws, ordinances, and procedures. Finally, operation of the proposed project would require sporadic maintenance by a negligible number of workers and trucks, and would not involve the use of any hazardous materials with the potential to significantly impact the public. Therefore, with adherence to applicable State, local, and federal requirements, impacts would be less than significant.

For the existing billboards that would be removed, only the above-grade portion of the structures would be removed; the below-surface foundations would remain. Disposal of the billboard structures would comply with local and State regulations. The existing structures were constructed before or in the 1970s and could contain asbestos-containing materials and/or lead-based paint. However, the impacts related to asbestos-containing materials and lead-based paint would be less than significant with the implementation of MM HAZ-1.

Finally, operation of the proposed project, which entails the changing of messages on electronic billboard faces and sporadic maintenance by a *de minimis* number of workers and trucks, would not involve the use of any hazardous materials with the potential to significantly impact the public. Maintenance and operation of the existing billboards entails a greater degree of maintenance, so it is anticipated that operation of the proposed project would be associated with less risk to the public than maintaining the current sign inventory.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than significant impact with mitigation incorporated. As explained above, construction activities would require the use and transport of potentially hazardous materials, including oils and combustible fuels, but these materials would not be stored in large quantities on-site. The applicant and its contractors must comply with all relevant local, State, and federal regulations related to the handling, transport, and storage of hazardous materials.

Disturbance of on-site soils would be limited to removal of soil in the immediate area of the proposed new billboard site required to install a foundation for the billboard. The foundation at the site would be 5 feet in diameter and up to 60 feet deep.

Project Construction

A gas station at 17715 Mission Boulevard (up-gradient from the project site) was identified as having leaking underground gasoline storage tanks.[31] The cleanup status with the RWQCB is open, and residual petroleum hydrocarbons may have migrated and may be present in on-site soils.

[31] California State Water Resources Control Board (State Water Board). 2016. GeoTracker. ABE Petroleum 17715 Mission Boulevard Alameda County Case Summary.

Construction of the billboard foundation is expected to generate excess soils and groundwater that may require special handling. Based on the deepest foundation design scenario (60 feet), approximately 58 loose cubic yards of soil may be generated, and approximately 25 gallons of static groundwater may be displaced.

- Soil: The only potential contaminant detected in the soil sample was TPH-d at a concentration of less than the Environmental Screening Levels for Direct Exposure Human Health Risk for residential, commercial/industrial, and construction worker scenarios. As such, the soils would be classified as non-hazardous waste. The potential for project construction to create a significant hazard with respect to soil removal is less than significant. Nevertheless, MM HAZ-2 requires exhumed soils to be placed into roll-off bins for additional sampling prior to disposal, unless a licensed receiving facility accepts the soil without further testing.
- Groundwater: The groundwater would be classified as a non-hazardous liquid because the reported concentrations of benzene, PCE, and TCE are well below the regulatory levels established by the United States Environmental Protection Agency (EPA). Toluene and MTBE are not listed wastes. The potential for project construction to create a significant hazard with respect to displacement of groundwater is less than significant. The contractor performing dewatering activities would utilize 10,000-gallon trucks to contain any extracted water volumes for disposal at an off-site location in accordance with appropriate regulations depending on water quality, as set forth in MM HAZ-2.

Therefore, any potential for project construction to create a significant hazard with respect to soils or groundwater would be rendered less than significant with the implementation of MM HAZ-2.

For the billboards that would be removed as part of the proposed project, only the above-grade portion of the existing structures would be removed; the below-surface foundations would remain. Disposal of the structures would comply with local and State regulations. The existing billboard structures were constructed in the 1970s and therefore could contain asbestos-containing materials and/or lead-based paint. However, the impacts related to asbestos-containing materials and lead-based paint would be less than significant with the implementation of MM HAZ-1.

Project Operation

Operation of the proposed project, which entails the changing of messages on electronic billboard faces and sporadic maintenance by a *de minimis* number of workers and trucks, would not involve the use of any hazardous materials with the potential to significantly impact the public. Maintenance and operation of the existing billboards in fact entails a greater degree of maintenance, so it is anticipated that operation of the new digital billboard would be associated with less risk of a release of hazardous materials than maintaining the current sign inventory. Therefore, impacts from operation of the signs would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No impact. The proposed project would not emit hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. The nearest school is approximately 3,100 feet, or 0.58 miles away from the project area. Therefore, the implementation of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school, and no impact would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than significant impact. The proposed new digital billboard site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, the site is near a listed hazardous materials site, as described previously in Impacts 8(a) and 8(b). The impact would be less than significant.

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

Less than significant impact. The closest airport to the project sites is Hayward Executive Airport, located approximately 2 miles to the southwest. Although the new digital billboard may be visible to aircraft taking off or landing at Hayward Executive Airport and from the air traffic control tower, it would not conflict with Federal Aviation Administration (FAA) requirements. According to the FAA Federal Aviation Regulations Part 77 and the Hayward Airport Land Use Compatibility Plan (ALUC) regulations, the maximum height allowed for structures at the site is 116 feet above the ground surface.[32] The proposed billboard would be 80 feet in height and therefore would be consistent with FAA Federal Aviation Regulations Part 77 and ALUC regulations. Also, the FAA reviewed the project specifications for the previously proposed location of the digital billboard (at the end of the Langton Way cul-de-sac, approximately 185 feet away from the new location) in November 2017 and determined that the sign would present no hazards to air navigation. The proposed billboard would also be reviewed by the FAA. Therefore, the impact would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. The proposed project would not interfere with any adopted emergency response plan or emergency evacuation plan, including the Multi-Jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area.[33] The Multi-Jurisdictional Local Hazard Mitigation

[32] California State Water Resources Control Board (State Water Board). 2016. GeoTracker. ABE Petroleum 17715 Mission Boulevard Alameda County Case Summary.

[33] Association of Bay Area Governments (ABAG). 2010. Multi-Jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay

Plan does not identify evacuation routes. The Alameda County Fire Department would review the project plans to ensure continued through access to surrounding roadways during construction. Due to the nature of the proposed project, once operational, the new billboard would not have impacts related to emergency evacuation or conflict with an emergency evacuation plan. Impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No impact. The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires because there are no wildlands on or surrounding the project area. The area has an extensive history of development, including residential and commercial buildings with minimal landscaping. There would be no impact.

Mitigation Measures

MM HAZ-1 The following measures shall be implemented during billboard removal activities to reduce potential impacts to construction workers associated with lead-based paint or other hazardous building materials (e.g., Universal Wastes):

- In conformance with State and local laws, including California Health and Safety Code Section 19827.5, a visual inspection and possible sampling shall be completed prior to the removal of the billboard structures to determine the presence of asbestos, lead-based paint, or other hazardous building materials.
- If this assessment finds presence of such materials, the applicant shall create and implement a health and safety plan to ensure workers are not exposed to contaminants in excess of Occupational Safety and Health Administration (OSHA) and other applicable State and federal standards and associated risks associated with hazardous materials during demolition, renovation of affected structures, transport, and disposal.
- During billboard removal activities, all materials containing lead-based paint shall be removed in accordance with California Occupational Safety and Health Administration (Cal/OSHA) Lead in Construction Standard, Title 8, California Code of Regulations 1532.1, including employee training, employee air monitoring, and dust control.
- During billboard removal activities, all materials containing asbestos shall be handled and removed by qualified professionals in accordance with applicable regulations, including Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2; Title 22, California Code of Regulations, Section 66261.24; Title 8, California Code of Regulations, Section 1532.1; and Title 40, Code of Federal Regulations, Part 745.
- Any debris or soil containing asbestos, lead-based paint, or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

Area. Taming Natural Disasters. Website: https://lhmp.acgov.org/documents/County%20of%20Alameda%20Annex%202010.pdf. Accessed July 2, 2021.

MM HAZ-2 The soil excavated from the site will be placed in roll-off bins and additional sampling will be conducted (at a rate of one composite sample per 250 cubic yards) to develop a waste profile for special handling and disposal, unless a licensed receiving facility accepts the soil without further testing. Prior to disposal, additional sampling of groundwater extracted during dewatering activities will be completed to develop a waste profile for special handling and disposal. If contamination in excess of regulatory levels is detected, soil materials and groundwater will be disposed of in accordance with State regulations for hazardous waste.

Soil and other hazardous materials removed from the site shall be characterized and disposed of according to the Alameda County Waste Management Authority. Contaminated soil and groundwater that exceeds regulatory thresholds shall be handled by trained personnel using appropriate protective equipment and engineering and dust controls, in accordance with local, State, and federal laws. If soil or groundwater to be removed from the site is found to be contaminated, it shall be hauled off-site and disposed of at a licensed hazardous materials disposal site.

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

Environmental Setting

The project area is in an urban area that is primarily covered with impervious surfaces in the form of buildings and paved roadways. The existing local stormwater network collects precipitation and drainage in the project area. No surface bodies of water exist within the project area; the closest is San Francisco Bay, approximately 3.5 miles west of the project area. The proposed new digital billboard site is mostly paved (and therefore a mostly impervious surface), and the billboards to be removed are generally located over rooftops and other impervious surfaces.

Environmental Evaluation

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than significant impact. Ground disturbance involved with the proposed project would consist of excavation of a new foundation for the new billboard. The project area is mostly paved and contains some ruderal vegetation, and most properties are fully paved and/or built out with structures. The billboards slated for removal would have their poles cut at ground level; only the aboveground portion of the billboard structures would be removed, while the subsurface foundation would remain. Once the foundation has been excavated for the new billboard, the pole or other support structure would be installed and cemented into place. Excavated soils would be hauled to a landfill and no exposed soils would remain on-site. As such, a limited amount of soil would be exposed during the brief construction period associated with excavation activities. Construction of the proposed project would result in less than significant impacts related to water quality standards.

Once constructed, the proposed project would not affect water quality or result in a violation of waste discharge requirements. Proper operation and maintenance of the billboard would continue to ensure that such structures do not contribute pollutants to stormwater runoff. Impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than significant impact. The proposed project would not utilize groundwater sources, and there would be no need to drill wells to supply water for the proposed project. In terms of impervious surface, the proposed new digital billboard would not add impervious surface to the project vicinity because the site is currently paved. However, it is possible that, for this site, the groundwater table could be encountered during excavation to 40 to 60 feet and would require dewatering. Because of the small size of the site, it is anticipated that dewatering would be necessary for only a single day while the applicant's contractor drills into the sites and installs the foundation. Given the very short duration in which dewatering would take place, it is not expected this activity would substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

Meanwhile, demolition of the five existing billboard structures would involve the removal of the signs to grade level, and no disruption or change to impervious surfaces. Therefore, no impact would occur regarding groundwater supplies or groundwater recharge.

Likewise, operation of the proposed project is unlikely to affect groundwater supplies or interfere with groundwater recharge or groundwater management. The advertising of goods and services on the proposed digital signs does not affect the volume, movement, or recharge of groundwater.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

Less than significant impact. The proposed new digital billboard site is currently mostly paved and contains some ruderal vegetation. Construction of the billboard's foundation structure would result in a small footprint that would not result in substantial erosion or siltation compared to existing conditions. No ground disturbance would occur during operational activities associated with the new billboard.

The removal sites are in urbanized areas, generally over rooftops and other impervious surfaces. Removal of the signs would not affect the amount of impervious surface on any of the removal sites, or result in substantial erosion or siltation on- or off-site. The impact would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than significant impact. The proposed new digital billboard site is currently mostly paved and contains some ruderal vegetation. Construction of the billboard's foundation structure would result in a small footprint that would not substantially impact the amount of runoff from the site or increase impervious surfaces compared to existing conditions. The proposed project would not substantially contribute to runoff water that would exceed the capacity of existing drainage systems or provide sources of polluted runoff.

The removal sites are in urbanized areas, generally over rooftops and other impervious surfaces. Removal of the signs would not affect the amount of impervious surface on any of the removal sites, or substantially contribute to runoff water that would exceed the capacity of existing drainage systems or provide sources of polluted runoff. The impact would be less than significant.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than significant impact. As discussed in the previous question, the proposed project would not exceed the capacity of existing or planned drainage systems or provide sources of polluted runoff. Impacts would be less than significant.

(iv) impede or redirect flood flows?

Less than significant impact. The Federal Emergency Management Agency (FEMA) flood maps identify areas that are prone to flooding. According to the FEMA Flood Insurance Rate Maps Number 06001C0278G, the proposed new digital billboard site is designated Zone X, Area of Minimal Flood

Hazard.[34] Therefore, the proposed project is not in an area that is at risk of flooding and would not impede or redirect flood flows. Impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than significant impact. The proposed new digital billboard site is designated Zone X, Area of Minimal Flood Hazard.[35] Additionally, no housing on the project site is proposed, which precludes the possibility of structures being placed within a flood hazard area.

A seiche is a seismically or wind-induced wave on an enclosed body of water such as a lake or reservoir. There are no lakes or reservoirs in the vicinity, so there would be no seiche hazard. The proposed new digital billboard site is approximately 3.5 miles from San Francisco Bay, where tsunami inundation is unlikely. The site located in a relatively flat area, so mudflows are unlikely to occur. No impact related to seiches or tsunamis would occur.

e) Conflict with or obstruct implementation of a water the quality control plan or sustainable groundwater management plan?

No impact. The installation of the proposed new digital billboard would result in minimal ground disturbance. The footprint of the support structures would be minimal (one column measuring 5 feet in diameter) and would not lead to a substantial amount of new impervious surfaces. In addition, the digital billboard would not use any materials or equipment that could lead to surface water pollution. Also, removal of the five existing billboard structures would not involve ground disturbance because the poles would be cut at ground level. Therefore, the proposed project would not conflict with or obstruct implementation of a water the quality control plan or sustainable groundwater management plan.

Mitigation Measures

None required.

[34] Federal Emergency Management Agency (FEMA). 2009. National Flood Insurance Rate Map 06001C0278G. May.
[35] Ibid.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.11 Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Environmental Setting

The project area is an established urban community that has an extensive history of development. The proposed new digital billboard site and removal sites are described in Section 1.4. The removal sites are located in urbanized areas, generally over rooftops and other impervious surfaces. The proposed project entails the removal of a land use from these sites (i.e., signs), and it is not expected these removal activities would have any adverse land use effects. The removal of signs is viewed by the County, in fact, as a project benefit. Therefore, removal of the signs is not discussed further in this section.

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The physical division of an established community typically refers to the construction of a physical feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impair mobility within an existing community or between a community and outlying area. The proposed new digital billboard site is surrounded by an established urban area and has extensive history of development. Therefore, implementation of the proposed project would not disrupt or divide an established community. There would be no impact.

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

Less than significant impact. Both the County and Caltrans have jurisdiction because of the proximity to the freeway. Alameda County's Billboard Ordinance, adopted in 2008, prohibits new billboards unless they are part of the County's Billboard Consolidation and Relocation Program. The proposed project would comply with this Program and Alameda County Code Section 17.52.515(A)(3). Section 17.52.515(A)(3) provides that billboards and advertising signs may be installed, moved, altered, expanded, modified, replaced, or otherwise maintained and operated pursuant to a Relocation Agreement, provided that every subject billboard or advertising sign shall

fully comply with County's site development review process and criteria, as set forth under Sections 17.54.220 and 17.54.226. The relocation also complies with Section 5412 and 5443 of the Outdoor Advertising Act.

The County has no formal requirements regarding brightness, dwell times, or light intensity of advertising signs. However, the proposed project would be subject to the Caltrans Outdoor Advertising Act and Section 21466.5 of the California Vehicle Code. The project's compatibility with these standards is discussed extensively in Section 1.d, and that discussion is incorporated by reference into this section.

There is a residence located more than 180 feet from the Langton sign. The height of the sign and the orientation of its sign faces were designed with these residences in mind, and a light study prepared for the previous billboard location (Appendix A) demonstrates that no nearby off-site home would experience excessive light at the home or in any associated yard. Light levels at these locations would be at approximately 300 nits, meaning that the signs would always operate at one-sixth of the maximum brightness level set forth by California State Law. The new digital billboard, meanwhile, would be located in an urban environment characterized by highway infrastructure, sound walls, utility poles, commercial structures, and paved streets and parking lots.

Consistency with Airport Land Use Plans

The proposed project would not conflict with any applicable land use plan, or local regulations. Hayward Airport is located approximately 2 miles southwest of the proposed new digital billboard site. The site is not located within Hayward Airport's Influence Area. Although the new digital billboard may be visible to aircraft taking off or landing at the Airport and from the air traffic control tower, it would not conflict with FAA requirements. Based on the FAA Federal Aviation Regulations Part 77 and the Hayward ALUC regulations, the maximum height allowed for structures at the proposed new digital billboard site is 116 feet above the ground surface. The proposed billboard would be 80 feet in height, so it would not exceed this height; therefore, it would be consistent with FAA Federal Aviation Regulations Part 77 and ALUC regulations. Also, the FAA reviewed the project specifications for the previously proposed location of the digital billboard (at the end of the Langton Way cul-de-sac, approximately 185 feet away from the new location) in November 2017 and determined that the sign would present no hazards to air navigation. The proposed billboard would also be reviewed by the FAA. Therefore, the proposed project would not conflict with any airport land use plans. Impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Setting

The project area, including the new billboard site and removal sites, does not support mineral extraction activities, and no known mineral deposits exist in the project area.

Environmental Evaluation

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No impact. The project area does not support mineral extraction activities and no known mineral deposits exist in the project area. Therefore, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. There would be no impact.

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

No impact. The project area does not support any mineral extraction activities, and no known mineral deposits exist in the project area. Therefore, implementation of the proposed project would not result in the loss of availability of a locally important mineral recovery site delineated in a local general plan, specific plan, or other land use plan. There would be no impact.

Mitigation Measures

None required.

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

Environmental Setting

The project area contains major highways and other roadways. The consistent use of these roadways by vehicles results in steady ambient noise levels. The proposed new digital billboard site is located adjacent to I-238 and near SR-185, where there is ambient noise from regular vehicle trips.

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level (L_{dn}) and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive

to sound at night. In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and L_{max} is the maximum instantaneous noise level occurring over a sample period.

Environmental Evaluation

Would the project result in:

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

Less than significant impact with mitigation incorporated.

Short-Term Construction Noise Impacts. For purposes of this analysis, a significant impact would occur if construction activities would result in generation of a substantial temporary increase in ambient noise levels in excess of established standards that could result in nighttime annoyance or sleep disturbance of nearby sensitive receptors.

Policy P4 of the County's General Plan Noise Element provides that "all construction in the vicinity of noise-sensitive land uses, such as residences, hospitals or convalescent homes, shall be limited to 7:00 a.m. to 7:00 p.m. Monday through Friday, and to 8:00 a.m. to 5:00 p.m. Saturday and Sunday." It further states that these "noise source standards may be exceeded as specified in the Alameda County Noise Ordinance in order to allow for temporary construction, demolition or maintenance noise and other necessary short-term noise events." The County's Noise Ordinance (found in Chapter 6.60 of the Code of Ordinances), in turn, provides that quantitative noise limits do not apply to temporary construction activities so long as they do not take place before 7:00 a.m. and 7:00 p.m. Finally, Policy P5 of the County's General Plan Noise Element provides that mitigation measures to reduce noise must be included in the appropriate environmental review document and required as a condition of any permit approval. Consistent with the above, the following impacts and mitigation measures are identified.

Removal of the five existing billboards would take approximately 20 days (with 1 to 2 days needed to remove each sign) and involve the use of hand tools and small crane rigs. Construction of the proposed new digital billboard would involve similar tools in addition to a drill-rig to install the foundation. The new digital billboard would require approximately 2 to 4 weeks to construct.

Although there could be a relatively high single event noise exposure potential causing an intermittent noise nuisance, the effect of construction activities on longer-term (hourly or daily) ambient noise levels would be small but could result in a temporary increase in ambient noise levels in the project vicinity that could result in annoyance or sleep disturbance of nearby sensitive receptors. However, compliance with the County's permissible hours of construction would ensure that construction noise would not result in a substantial temporary increase in ambient noise levels that would result in nighttime annoyance or sleep disturbance of nearby sensitive receptors. Therefore, compliance with the City's permissible hours of construction, as well as implementing the best management noise reduction techniques and practices outlined in MM NOI-1, would ensure

that construction noise would not result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors. With implementation of MM NOI-1, temporary construction noise impacts would be less than significant.

Long-Term Operational Noise Impacts. The proposed new digital billboard is not designed to emit any sound, and the proposed project would not generate regular vehicle trips. Therefore, the proposed project would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project. No impact would occur.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The County has not established a standard for excessive groundborne vibration levels resulting from construction activities. However, the Federal Transit Administration (FTA) has established industry-accepted standards for vibration impact criteria and impact assessment in its Transit Noise and Vibration Impact Assessment Manual.[36] The FTA guidelines include thresholds for construction vibration impacts for various structural categories.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving, and operating heavy earthmoving equipment. Construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes of this analysis, project-related impacts are expressed in terms of PPV.

Short-term Construction Vibration Impacts. Of the variety of equipment that would be used during construction, cranes would produce the greatest groundborne vibration levels. Cranes can produce groundborne vibration levels ranging up to 0.051 inch per second (in/sec) PPV at 25 feet from the operating equipment.[37] Impact equipment (e.g., pile drivers) is not expected to be used during construction of the proposed project.

For the construction of the new digital billboard the crane equipment could potentially operate as close as 25 feet from nearest sensitive structure, the residence to the west of the site. For the removal of the existing billboards, the crane could operate as close as 20 feet from the nearest sensitive structure. At this distance, groundborne vibration levels from operation of the heaviest piece of construction equipment (the crane) would attenuate to less than 0.07 in/sec PPV from the operation of the crane. This is well below the FTA's damage threshold criteria of 0.12 in/sec PPV for the most sensitive type of structures: buildings extremely susceptible to vibration damage. Therefore, impacts resulting from construction-related groundborne vibration levels would be less than significant.

Operational Vibration Impacts. Implementation of the proposed project would not result in any permanent sources that would expose persons in the project vicinity to groundborne vibration levels

[36] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.
[37] Federal Highway Administration (FHWA). 2006. Highway Construction Noise Handbook. August.

that could be perceptible without instruments at any existing sensitive land use in the project vicinity. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity to which the proposed project would be exposed. Therefore, operational groundborne vibration impacts would be considered less than significant.

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

No impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels for a project located in the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.

The closest airport to the proposed new digital billboard site is Hayward Executive Airport, located approximately 2 miles southwest of the site. This billboard would not be located within the Airport's 65 dBA CNEL noise contours. Construction of this new digital sign would not introduce any new permanent noise source or any new sensitive receptor to the existing environment and would therefore not expose persons residing or working in the project site to excessive noise levels associated with private airstrip or public airport noise. No impact would occur.

Similarly, the closest sign removal site to Hayward Executive Airport is located over 2 miles to the northeast of the nearest runway. None of the sign removal sites would be located within the Airport's 65 dBA CNEL noise contours. Removal of these signs would not introduce any new permanent noise source or any new sensitive receptor to the existing environment and would therefore not expose persons residing or working in the project site to excessive noise levels associated with private airstrip or public airport noise. No impact would occur.

Mitigation Measures

MM NOI-1 Implementation of the following multi-part mitigation measure is required to ensure reduction of potential construction period noise impacts:

- Limit construction activities on the project site to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and to 8:00 a.m. to 5:00 p.m. Saturday and Sunday. Construction shall not occur on holidays.
- The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers that are in good condition and appropriate for the equipment.
- The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes) is prohibited.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.

- At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from adjacent residences.
- The construction contractor shall ensure that the construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the project site.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.14 Population and Housing *Would the project:*				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Setting

According to the California Department of Finance, Alameda County's estimated population for 2020 was approximately 1,671,855 and is expected to grow to 1,785,496 by 2030.[38]

The new digital billboard site and removal sites are located among a mix of land uses, as described in Section 1. A single-family residence is located on the new digital billboard site, adjacent to the proposed billboard location.

Environmental Evaluation

Would the project:

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

No impact. The proposed project would install a new digital billboard and remove five traditional static billboards at the locations specified in Section 1. It does not propose new homes or businesses, roadways or infrastructure expansion, or any other growth-inducing elements. Therefore, the proposed project would not induce unplanned population growth directly or indirectly. There would be no impact.

[38] California Department of Finance. 2019. P2-A: Total Population for California and Counties. Available: https://www.dof.ca.gov/forecasting/demographics/projections/. Accessed: June 2021.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No impact. The proposed project would not displace any existing housing or people. The single-family residence on the new billboard site would remain in place. Therefore, no construction of replacement housing is necessary. There would be no impact.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.15 Public Services *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Environmental Setting

Fire service for the project area is provided by the Alameda County Fire Department (ACFD). Law enforcement services are provided by the Alameda County Sheriff's Office. The project area is served by the San Lorenzo and Hayward Unified School Districts.

There are no fire, police, schools, or other governmental service facilities on the proposed new digital billboard site. However, there is one single-family residence adjacent to the new digital billboard location, as well as several commercial buildings just to the south, which could require emergency fire and police service access.

Environmental Evaluation

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

a) Fire protection?

Less than significant impact. The Cherryland Station No. 2 is the closest station to the project site, located approximately 0.95 mile south from the Langton site. The proposed new digital billboard would be constructed in conformance with current codes and regulations that would reduce potential fire hazards. Although the proposed project may increase the need for fire protection services at the new digital billboard site, fire service demand would be reduced overall because the five billboards that would be removed, which were built under older building code provisions, would no longer be operating. Therefore, there would be no need for new or expanded fire protection facilities. This impact would be less than significant.

b) Police protection?

Less than significant impact. The Alameda County Sheriff's Office is staffed with 140 sworn officers. The Eden Township Substation, staffed with 70 officers, is the closest station to the project site. The station is located at 15001 Foothill Boulevard, approximately 1.75 miles northwest from the proposed new digital billboard site. The proposed project would not increase the population of the area and therefore would not increase demand for police protection. Although the construction of the new sign could create a target for graffiti, the proposed project would remove five other billboard structures, so the overall risk of property crime would be reduced. This impact would be less than significant.

c) Schools?

No impact. The project area is served by the San Lorenzo and Hayward Unified School Districts. The proposed project would not increase the population of the area and therefore would not increase demand for school facilities. There would be no impact.

d) Parks?

No impact. Implementation of the proposed project would not result in an increase in population or in demand for existing parks and recreational facilities. The closest recreational facility to the proposed new digital billboard site is Meek Park, approximately 0.4 mile to the southwest. There would be no need for the construction of new parks and recreational facilities. There would be no impact.

e) Other public facilities?

No impact. The implementation of the proposed project would not result in an increase in population or in demand for other public facilities. Therefore, there would be no need for the construction of new public facilities. There would be no impact.

Mitigation Measures

None required.

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

Environmental Setting

The closest recreational facility to the new billboard site is Meek Park, which is located approximately 0.38 mile southwest.

Environmental Evaluation

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

No impact. The proposed project would not result in an increase in residents that could increase the demand for and use of nearby parks or recreational facilities. Therefore, the proposed project would not result in any physical deterioration of recreational facilities. There would be no impact.

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

No impact. The proposed project does not propose recreational facilities, and it would not result in an increase in residents that could increase the demand for and use of nearby parks or recreational facilities. Therefore, construction or expansion of recreational facilities would not be required. There would be no impact.

Mitigation Measures

None required.

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

Environmental Setting

The project area is urban and traversed by several roadways and major highways, including I-238 and I-880. The proposed new digital billboard site is located 100 feet south of I-238. There are four billboard structures to be removed located along East Lewelling Boulevard and SR-185, and one structure to be removed located along Castro Valley Boulevard.

Environmental Evaluation

Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No impact. The long-term operation of the proposed digital billboard would include vehicle trips with minimal and irregular maintenance activities, occurring only as needed (less than once per month and likely only one vehicle). Therefore, the proposed project would not increase traffic congestion on the surrounding roadways or freeways, or affect level of service standards at nearby intersections. Construction-related traffic, including truck and construction worker trips, would not substantially affect traffic conditions during the short duration of project construction of the new billboard and removal of the existing billboards. Once constructed, the proposed new digital billboard would be located on a private property and would not conflict with public transit, bicycle, or pedestrian policies. There would be no impact.

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

No impact. Due to the nature of the proposed project, there would not be any change in traffic distribution over the existing conditions. The proposed project entails the construction of a new digital billboard and removal of five existing billboards. Construction and demolition activities would involve negligible traffic, generated largely during off-peak hours, and is not expected to affect traffic congestion on an individual or cumulative basis. In terms of operations, irregular maintenance of the new digital billboard would be required, although the removal of the five existing billboards would eliminate related maintenance activities, resulting in an overall decrease in traffic. Therefore, there would be no impact on VMT.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than significant impact. The proposed project would not create a hazard as the constructed billboard would be required to adhere to all Caltrans regulations for placement, reflection, and visibility. The proposed digital billboard would be visible primarily from 1-238, to which it would be oriented, but would also be visible from surrounding public streets. State and federal law also establish a minimum spacing distance between digital billboards of 1,000 feet, which the proposed billboard would comply with. No changes in roadway configuration are proposed with conversion and operation of the new digital LED billboard. Furthermore, the County would review all site plan designs and the developer architect would submit the approved site plan configuration to Caltrans for review and approval. With adherence to existing federal, State, and local regulations regarding billboard signs, impacts will be less than significant.

d) Result in inadequate emergency access?

Less than significant impact. The proposed project would have no impact with regard to emergency access. The proposed project would involve the construction of a digital billboard adjacent to I-238, but it would not be located such that it would in any way block or imped vehicle accessibility. The ACFD would review the project plans to ensure continued through access to surrounding roadways. Due to the nature of the proposed project, once operational, the new billboard would not have impacts related to emergency access. Impacts would be less than significant.

Mitigation Measures

None required.

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

Environmental Setting

The Oro Loma Sanitary District provides wastewater service within the project area, and EBMUD provides water service. In addition, both the Altamont and Vasco Road Landfills in Livermore serve the project area.

The proposed new digital billboard site does not contain water or wastewater infrastructure and does not generate a demand for water supply, wastewater collection, or solid waste disposal. The removal of the signs to grade would not involve any interference with these services.

Environmental Evaluation

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No impact. The proposed digital billboard would use electrical power service that is currently provided by PG&E. The proposed digital billboard would be installed pursuant to current electrical codes, including Title 24 of the State Building Code. These standards would ensure that electrical energy would be used efficiently, and would replace five existing signs. Operation of the proposed project would not generate any solid waste or wastewater, nor would the project require a supply of potable water. All waste materials associated with the conversion of the billboard would be recycled or deposited in landfills in compliance with State and local laws. No new or expanded electrical, natural gas, or telecommunications facilities would be required as a result of the proposed project. Therefore, there would be no impact.

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

No impact. The proposed project would not generate demand for water. Construction and operation of the proposed project would not result in existing water systems exceeding capacity during normal, dry, or multiple dry years, or require the construction of new facilities or expansion of existing facilities. Therefore, there would be no impact.

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

No impact. The proposed project would not generate demand for wastewater services. Therefore, it would not require the construction of new wastewater treatment facilities or expansion of existing facilities. There would be no impact.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than significant impact. Two landfills serve Alameda County: the Altamont and Vasco Road Sanitary Landfills in Livermore. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Altamont Landfill has a maximum permitted capacity of 124.4 million cubic yards and a maximum permitted throughput of 11,150 tons per day,[39] while the Vasco Road Sanitary Landfill has a maximum permitted capacity of 32.97 million cubic yards and a maximum permitted throughput of 2,518 tons per day.[40]

[39] California Department of Resource Recycling and Recovery (CalRecycle). 2021. Solid Waste Information System Facility/Site Activity Details - Altamont Landfill & Resource Recovery (01-AA-0009). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/7?siteID=7. Accessed June 21, 2021.

[40] California Department of Resource Recycling and Recovery (CalRecycle). 2021. Solid Waste Information System Facility/Site Activity Details - Vasco Road Sanitary Landfill (01-AA-0010). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/9?siteID=8. Accessed June 21, 2021.

The removal of five existing billboard structures would generate some solid waste materials that would generate a *de minimis* amount of construction waste be disposed of at landfills that accept demolition waste from contractors. There is sufficient capacity at the aforementioned landfills to receive solid waste materials that have not been diverted for resource recovery. Project construction activities would generate minimal solid waste associated with excess construction materials. Disposal of waste would comply with all applicable regulations. Therefore, the proposed project would have a less than significant impact.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than significant impact. Solid waste disposal would follow the requirements of the franchised waste hauler, which must adhere to federal, State, and local statutes and regulations related to the collection of solid waste. The proposed project would comply with all State and local waste diversion requirements. Therefore, the proposed project would have a less than significant impact.

Mitigation Measures

None required.

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

Environmental Setting

According to CAL FIRE's Fire Hazard Severity Zones Maps for Alameda County, the project area is in a local responsibility area (not a State Responsibility Area) and is not classified as a very high fire hazard severity zone.[41] The nearest such areas are at Lake Chabot Regional Park, approximately 2 miles north of the proposed new digital billboard site.

Environmental Evaluation

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. The proposed project would not interfere with any adopted emergency response plan or emergency evacuation plan, including the Multi-Jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area.[42] The location of the proposed new digital billboard was changed from public right-of-way end of Langton Way cul-de-sac to private property (a parking lot behind the single-family residence at 17338 Langton Way), approximately 185 feet to the

[41] California Department of Forestry and Fire Protection (CAL FIRE). 2007. Alameda County: Fire Hazard Severity Zones in SRA. Available: https://osfm.fire.ca.gov/media/7271/fhszs_map1.pdf. Accessed: June 21, 2021.

[42] Association of Bay Area Governments (ABAG). 2010. Multi-Jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area. Taming Natural Disasters. (update).

southeast, for this Draft IS/MND. The ACFD would review the project plans to ensure there is appropriate fire access. Impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No impact. The project area is not located within an area prone to wildfires. The project sites are located in a flat surface area with no steep hills or slopes. No native vegetation occurs on the project sites. In addition, the proposed project would not change the nature of the proposed new digital billboard site or removal sites. As a result, there would be no impact.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No impact. The project area is not located within an area prone to wildfires. In addition, the proposed project would not change the nature of the proposed new digital billboard site or removal sites, and would not require the installation or maintenance of associated infrastructure. As a result, there would be no impact.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No impact. Operation of the proposed digital billboard would not generate any known risk of wildfire. Furthermore, no residential uses are proposed. The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability or drainage changes. Therefore, no impact would occur.

Mitigation Measures

None required.

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

Environmental Evaluation

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

Less than significant impact with mitigation incorporated. As described in Section 2.4, Biological Resources, the proposed project would not result in significant environmental impacts to wildlife or plant species. There are no known special-status species on the billboard construction or removal sites, though this analysis provides for mitigation in the event any nests are encountered. In addition, the proposed project would not adversely affect geology/soils or hydrology/water quality in any significant matter. The project includes mitigation and avoidance measures to reduce construction-related impacts related to archaeological and paleontological resources. Therefore, with implementation of MM BIO-1, MM CUL-1, MM CUL-2, and MM GEO-1, the proposed project would not substantially degrade the quality of the environment at a project- or cumulative-level in terms of biological resources, geology and soils, hydrology and water quality, or cultural resources. See analyses under Topic 18b for further discussion with regard to air quality and GHG emissions that can result in the potential degradation of the quality of the environment.

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

Less than significant impact with mitigation incorporated. The combined effects of past, current, and future projects in the project area in combination with the proposed project—installation of a new electronic billboard and removal of five traditional billboards in an urban area of Alameda County—would not result in significant cumulative impacts.

Operation of the proposed project would involve the display of messages on one electronic billboard (two sign faces) near I-238. Operation entails no noise production, minimal maintenance traffic (and less than currently occurs with maintenance of the 10 signs to be removed), and no emissions. The project's lighting would have the potential to cumulate with other reasonably foreseeable projects, but the proposed project's lighting specifications (limiting operation to a maximum of 0.3 foot-candle at 250 feet) takes account of existing ambient lighting. Moreover, the brightness of the LED sign faces would be dimmable to reflect ambient light conditions. Separately, there are no reasonably foreseeable development projects in the immediate vicinities of the project site that would have lighting impacts that could cumulate with the proposed project's lighting. With respect to electricity usage, the LED lighting used in the proposed billboard would meet Title 24 requirements for energy efficiency. While the signs electricity usage is associated with off-site emissions where power is generated, the Draft IS/MNDs analysis of greenhouse gases demonstrates the proposed project falls well below applicable BAAQMD thresholds, which account for cumulative impacts of climate change. Therefore, the proposed project, because of its size and utilization of energy-efficient lighting, would not make a cumulatively considerable contribution to cumulative GHG emissions or result in an overall impact to local and regional levels of GHG emissions.

With respect to construction, the construction activities necessary to construct the proposed billboard and demolish the five existing sign structures is de minimis, requiring very little equipment and occurring within a timeframe of four weeks. However, as detailed in this Draft IS/MND, equipment related to construction would result in dust, noise, risks related to the handling of hazardous materials, and potential impacts to cultural resources. Accordingly, the proposed project includes BAAQMD-recommended mitigation and avoidance measures to reduce temporary, construction-related impacts related to air quality; noise mitigation measures to reduce noise impacts to less than significance; protocols for handling hazardous materials so as to reduce risks to insignificant levels; and measures designed to ensure impacts to cultural resources are less than significant. These measures ensure not only that the proposed project, individually, would not have a significant impact, but that it would not make a considerable contribution to any cumulative impact. Meanwhile, the proposed project does not contemplate activities within close proximity of any reasonably foreseeable construction projects (i.e., at least 1,000 feet), and so the potential for cumulative impacts to occur is low to non-existent. Therefore, with implementation of the foregoing mitigation measures, the proposed project would not result in adverse impacts at a project- or cumulative-level in terms of air quality or GHG emissions. See analyses under Impact 18(a) and Impact 18(c) for further discussions with regard to cumulative impacts.

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

Less than significant impact with mitigation incorporated. The proposed project would be consistent with the County's goals set forth in the Municipal Code such as the No New Billboard Policy (Municipal Code § 17.52.515(A)(3)).

Removal of five billboard structures would improve aesthetics/visual quality along Lewelling Boulevard, East 14th Street, and Castro Valley Boulevard. The proposed project would include mitigation measures to minimize light and glare and traffic hazards for vehicle drivers along I-238.

The proposed project also would not make sizable contributions to traffic or noise or substantially change land uses. In addition, the proposed project would not affect public services, utilities, recreation, mineral resources, agriculture/forestry resources, or population/housing balance. With implementation of the mitigation measures discussed in Section 2.8, Hazards and Hazardous Materials, the proposed project would also not expose human beings to significant risks related to hazards/hazardous materials. Therefore, with implementation of MM HAZ-1 and MM HAZ-2, the proposed project would not cause direct or indirect substantial adverse effects on human beings at a project- or cumulative-level in terms of aesthetics/light-glare, traffic/traffic safety, noise, land use, public services, utilities, recreation, mineral resources, agriculture/forestry resources, population/housing, or hazards/hazardous materials. See analyses under Impact 18(a) and 18(b) for further discussions with regard to aesthetics, geology/soils, hydrology/water quality, air quality, and GHG emissions that can result in indirect substantial adverse effects on human beings.

Mitigation Measures

See MM AES-1, MM AES-2, MM AQ-1, MM BIO-1, MM CUL-1, MM CUL-2, MM GEO-1, MM HAZ-1, MM HAZ-2, and MM NOI-1.

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