

May 8th, 2020

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244 W. Winton Avenue, Room 111
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RE: RESPONSE TO COMMENTS – EDEN HOUSING, RUBY STREET APARTMENTS PROJECT

Dear Nisha:

During the planning and environmental process for the proposed Ruby Street Apartments Project (herein referred to as the “project”), the Alameda County Community Development Agency (County) received numerous comments from organizations and the public-at-large. Several of these comments specifically pertained to the analysis conducted in the Ruby Street Apartments Project Environmental Checklist for Community Plan Exemption (herein referred to as the “California Environmental Quality Act [CEQA] Exemption”), which was prepared by Urban Planning Partners and originally published in September of 2019.

In most instances, CEQA Exemptions, such as the one done for this project, do not require written responses to public comment; however, due to growing community concerns and the number of comment received, the County directed Urban Planning Partners to prepare a memo to respond to comments that were raised on multiple occasions and warranted a response. Unless explicitly stated, these responses do not introduce new concepts or analysis that were not already described in the CEQA Exemption.

This memo provides the following “Master Responses” to address the six primary concerns that were cited most often:

- Master Response 1: Potential Impact on Biological Resources
- Master Response 2: Potential Impact on Cultural Resources
- Master Response 3: Environmental Review and Sufficient Findings for CEQA Compliance
- Master Response 4: Size and Scale of Development Project
- Master Response 5: Traffic Discussion
- Master Response 6: Consistency with General Plan

The CEQA Exemption can be found online at:

<https://www.acgov.org/cda/planning/landuseprojects/documents/RubyStreet-Exemption.pdf>.

A. MASTER RESPONSE 1: POTENTIAL IMPACT ON BIOLOGICAL RESOURCES

This master response addresses commenter concerns relating to biological resources and the potential impacts to the meadow; wildlife in the meadow; bats (including three bat species detected during acoustical surveys); trees; riparian corridor; and potential cumulative impacts to biological resources.

1. Meadow

As stated on **pages 53 and 54** of the CEQA Exemption, the meadow (described as “grassland” in the CEQA Exemption) with its associated non-native annual grassland is not considered sensitive habitat or a sensitive plant community under CEQA. The meadow is dominated by non-native, weedy plants, such as non-native annual grasses and weeds (e.g., poison hemlock).

The feasibility of the project site to be restored as improved habitat is not the proposed project and was not analyzed as part of CEQA. The CEQA Exemption for the project analyzed potential impacts to biological resources strictly resulting from the proposed project, and alternatives are not required to be analyzed as part of a Community Plan Exemption.

2. Wildlife in the Meadow

Deer, foxes, coyotes, and non-native wild turkeys are not considered special-status species covered under CEQA. Although foraging habitat in the meadow will be affected, deer and other wildlife will continue to inhabit the creek and riparian habitat. The list of wildlife observed during the reconnaissance survey is noted on page 3 of the Biological Assessment Letter (Appendix B of the CEQA Exemption).

As described on **page 48** of the CEQA Exemption, the project would implement several pre-construction surveys for sensitive wildlife which would reduce potential impacts to special-status wildlife, nesting birds, and roosting bats (including roosts for the three bat species that were detected during the 2019 acoustical bat surveys).

As stated on **page 55** of the CEQA Exemption, the on-site grassland is not part of an essential wildlife movement corridor and does not provide a connection from San Lorenzo Creek to other open space, such as the Hayward Hills. The project site is surrounded to the north, east, and south by fencing and urban development. The riparian corridor would be protected by an established setback and will provide a connection for wildlife to move upstream and downstream of the Project area, as they currently do. As stated on **page 54** of the CEQA Exemption, wildlife that occupies the site are urban adapted species that will continue to move through the site. Deer will be able to continue to forage within the established creek setback. Wildlife, such as birds, striped skunks, raccoons, and Virginia opossums would continue to move through or around the project site.

3. Bats

Bat Avoidance Measure

As described beginning on **page 47** of the CEQA Exemption, various bat species could roost on or adjacent to the project site and active bat roosts would be protected by implementation of the existing proposed avoidance measure (shown below). According to the comment letters, three bat species, the western red bat, Yuma myotis, and Mexican free-tailed bat, were detected in the project area during acoustical surveys conducted in 2019.

Page 47 of the CEQA Exemption specifically mentions three special-status bat species (Townsend's western big-eared bat, western mastiff bat, and pallid bat) and page 4 of the Biological Resources Assessment mentions an additional four other myotis bat species (yuma myotis, western small-footed myotis, long-eared myotis, and fringed myotis). These myotis bat species are not considered special-status species under CEQA and therefore, are not addressed in the CEQA Exemption. These myotis species, however, are addressed in the Biological Resources Assessment, since this assessment mentions all species observed or detected at the site, including bat species that are not special-status species. While only these specific bat species are discussed in the CEQA Exemption and the Biological Resources Assessment, the avoidance measure described in **page 48** related to bat roosts applies to all bat roosts, including, but not limited to, the Yuma myotis, Mexican free-tailed bat, and the special-status western red bat. If these or other bat species are found roosting on or adjacent to the project site, their roosts will be avoided according to the requirements of the California Department of Fish and Wildlife (CDFW). The proposed measure as detailed on **page 48** of the CEQA Exemption is below:

- **Roosting Bats:** A qualified biologist shall conduct a pre-construction survey for roosting bats at all suitable bat roosting habitat (i.e., trees, the barn/outbuilding and other structures, etc.) within the project area no more than 14 days prior to the beginning of project-related construction activities. If active bat roosts are discovered or if evidence of recent occupation is established, a buffer shall be established around the roost site and maintained until the roost site is no longer active. If an active bat roost needs to be removed as part of the project, the project biologist shall consult CDFW to determine appropriate methods for the removal of the roost. As part of CDFW's approval, a new roost site may need to be created on the project site as mitigation.

While commenters raised concern about the adequacy of this avoidance measure, the specific and applicable actions that would be required as a result of consultation with CDFW have yet to be established. While not explicitly stated in the CEQA Exemption, the following bullet points are provided to display potential measures that *could* be required of the project developer:

- Maternity roosts shall not be removed until the young have left the roost and are foraging independently. Active day roosts likewise shall be avoided until the roost is no longer active. Roosts may only be removed once the bats are no longer occupying the roost, at which time, a plan approved by CDFW may be implemented for removal of the roost. The plan shall describe appropriate methods for the removal of the roost. As part of CDFW's approval, a new roost site may be required to be created on the project site.
- If feasible, trees planned for pruning or removal as a part of the project, should be pruned or removed during the fall to avoid the maternity roosting period of resident bats (mid-April to

August season). Western red bats are less likely to be present and roosting in the trees and shrubs on and adjacent to the project site during the spring and summer, but other bats may be roosting during this period. Because bats may be present at any time, a pre-construction survey by a qualified biologist shall be required as outlined above regardless of timing of tree removal and a suitable buffer zone established around the roost. No trees beyond those described on **page 14** of the CEQA Exemption would be pruned or removed.

- Pruned limbs or cut trees must be left on the ground in place for at least 24 hours after cutting to allow any bats that may be roosting in the trees to leave the roosts prior to chipping the branches or removing the cut material from the site. Before any construction activities begin in the vicinity of the identified bat roosts on the project site, an approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the bats and their habitat, the specific measures that are being implemented to conserve the bat roosts for the current project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session. A qualified biologist will conduct the training session.

Western Red Bat

The following information is provided as supplementary research to compliment the findings of the CEQA Exemption and address comments and concerns raised by the public related to western red bats.

Western red bats breed in the Central Valley, roughly from mid-May through August, and migrate in the spring from March through May and in the fall from late August through October. Western red bats are less likely to be present from mid-April to August, when the red bats typically reside away from the San Francisco Bay region within the Central Valley. However, some western red bats, especially males, may remain within the San Francisco Bay Area during the breeding season (Pierson et al. 2006).

The western red bat study completed by Pierson, Rainey, and Corben in 2006 uses a study area that focused on breeding western red bats in the California Central Valley. In this study, they obtained significantly more acoustic activity in stands of trees that were dominated by mature trees and were greater than 50 meters (164 feet) wide suggesting that red bat populations require fairly extensive stands of riparian forest. Although the Central Valley study resulted in no direct observations of red bats roosting in this habitat, they repeatedly observed them (acoustically and occasionally visually) active at dusk in the vicinity of large cottonwoods, sycamores, and/or valley oaks.

The Pierson (2006) study looked at riparian habitat during the breeding season in the Central Valley, while the Ruby Street project site comprises potential roosting habitat during the migration period. Since these habitats are used by western red bats for different purposes at different times of year, they may not have the same requirements in terms of riparian canopy width.

The riparian corridor studied in the Central Valley is wider than the relatively narrow riparian woodland corridor present along San Lorenzo Creek in the vicinity of the project site, which averages approximately 125 feet in width. If the additional upland trees at the project site, mapped outside of the riparian corridor, were counted as riparian trees, the width of the riparian habitat would be considered larger at the project site. Trees outside the riparian corridor, however, are not considered riparian trees

because they are upland trees, not adjacent to the creek. Given that the proposed project would not remove any trees in the riparian corridor, it would not reduce the width of the riparian corridor. While the bats may occasionally roost in the upland trees outside the riparian corridor, it is not expected that these trees' removal would substantially alter bat use of the project vicinity because the riparian corridor would remain protected.

Foraging Habitat

The following supplementary information is provided to compliment the findings of the CEQA Exemption and addresses comments and concerns raised by the public related to foraging habitat for bats.

Bats that are using the urban segment of the San Lorenzo Creek corridor near the project site have been foraging in a much narrower riparian corridor than the one studied in the Central Valley study site (Pierson, et al., 2006). Bats, including western red bats, would be able to continue to roost and forage within the protected riparian corridor onsite. Western red bats are usually solitary, roosting in the foliage of large shrubs and trees. Bats could roost in the trees that extend beyond the mapped riparian corridor and would be able to continue to roost in the protected riparian trees within the established protected corridor. Active roosts would be protected by the avoidance measure. Western red bats are not federally listed and critical habitat has not been designated for the species. Therefore, no impact to critical habitat would occur. The incremental loss of foraging habitat at the project site and the loss of potentially suitable roosting habitat for the western red bat is not considered a significant impact under CEQA.

Human Disturbance

The following supplementary information is provided to compliment the findings of the CEQA Exemption and addresses comments and concerns raised by the public related to human disturbance to bats.

The human disturbances from the project and trail would not likely impact roosting bats or cause them to roost elsewhere. The portion of San Lorenzo Creek within the project site is situated within an urban area surrounded by development and is already exposed to anthropogenic impacts due to the existing houses and development along the creek. Wildlife that currently inhabit the creek and associated riparian corridor are likely habituated to human development and will continue to use the creek and riparian corridor after development of the project.

4. Trees

Tree Removal

As stated on **page 14** of the CEQA Exemption, approximately 42 of the 58 existing trees on the site are proposed to be removed (none of which are within the creek setback area). As described in the CEQA Exemption, the impacted mature trees are not protected under CEQA since they are not considered sensitive habitat under CEQA (**pages 48 through 53**); are located outside of the riparian zone (**page 53**); and are not street trees protected by the County tree ordinance (which only applies to trees within the

County's public right-of-way) (**page 55**). The County does not have a heritage tree ordinance and thus no trees classified as "heritage trees". As stated on **page 55** of the CEQA Exemption, the County tree ordinance only applies to trees in the public right-of-way. Although they provide habitat, the impacted mature oak trees are not considered protected under CEQA for above-mentioned reasons.

Oak Woodland

The following provides a response to comments regarding whether or not the on-site coast live oak trees constitute an oak woodland. As stated on **page 53** of the CEQA Exemption, Coast Live Oak Woodland (*Quercus agrifolia* Woodland Alliance), as listed in A Manual of California Vegetation (Second Edition; Sawyer et al. 2009), has a State Ranking of S₄, which are not considered sensitive plant communities under CEQA. In A Manual of California Vegetation, Coast Live Oak Woodland is characterized as having greater than 50 percent relative cover in the tree canopy, and 33 percent of the tree canopy if California bay (*Umbellularia californica*) trees are present (Sawyer et al. 2009). The mature oaks and California bay outside of the riparian corridor do not provide 50 percent relative cover and occur within a disturbed, nonpristine environment with several non-native trees (e.g., coast redwood, palm, acacia, fruit trees, etc.) planted among the oaks and bays. The Oak Woodlands Conservation Act (California AB 242) is not a regulatory program, but instead acknowledges the importance of oak woodlands and provides grants to cities, counties, and other local and state agencies for the protection of woodlands and the general reporting requirements for how the grants were spent. This act has no bearing on the CEQA review of this project.

5. Riparian Corridor

As stated on **pages 22, 69, and 98**, of the CEQA Exemption, the creek and riparian woodland, which are considered sensitive habitat under CEQA, will be protected within an established setback according to the Alameda County General Ordinance Code 13.12.320. **Page 6** of the CEQA Exemption states a minimum 20-foot creek setback is required along the eastern bank of San Lorenzo Creek and that the creek setback is calculated by creating an imaginary 2:1 (horizontal to vertical) slope line from the creek toe, following it until intersects the natural grade beyond the top of the bank, and adding 20 feet by General Ordinance Code 13.12.320. As stated on **page 8** and shown in Figures I-6 (**page 10**) and III.B-2 (**page 52**) of the CEQA Exemption, the Project is designed not to intrude into any of the required setbacks along San Lorenzo Creek or the Caltrans conservation easement onsite and in most areas, more than the minimum setback is provided.

6. Cumulative Impacts to Biological Resources

As stated on **pages 40 and 41** of the CEQA Exemption:

The Castro Valley General Plan EIR found all biological resources impacts to be less than significant with the implementation of General Plan policies and did not include any mitigation measures, although it is noted that appropriate measures for protection of biological resources would be imposed on a project-by-project basis according to the County's environmental review process and consultation with appropriate State and federal regulatory agencies.

The General Plan includes a biological resource overlay zone to protect areas with substantive biological resources by requiring special review of proposed development. The special review process is required on all sites with high priority biological resources and on sites over two acres with moderate- or low-priority biological resources. Action 7.1-2 of the General Plan states that "on lands with biological resources (...) an environmental assessment may be required, prepared by a qualified biologist, which shall be the basis for establishing development constraints specific to the property in question".

This special review process as well as compliance with General Plan policies and applicable federal or State permits were found adequate to reduce such impacts to a less-than-significant level. Therefore the project would not contribute to cumulatively considerable significant impact.

B. MASTER RESPONSE 2: POTENTIAL IMPACT ON CULTURAL RESOURCES

This master response addresses commenter concerns relating to the potential presence of archaeological deposits in the project site; the qualifications of the cultural resource professionals who conducted the analysis; and a description of the potential for historical associations between the project site and notable figures and themes in California history.

1. Potential Presence of Archaeological Deposits Associated with CA-ALA-566 and the Haywards Steam Laundry

Issue: Commenters noted the potential occurrence of pre-contact archaeological deposits associated with CA-ALA-566 (described later) in the project site southeast of Crescent Avenue; and further that the current identification methods were not sufficient to identify potentially more deeply buried archaeological deposits.

Explanation: The project site has undergone archaeological study, including test excavation, to identify the presence of archaeological deposits associated with site CA-ALA-566 as discussed from **pages 58-61** of the original CEQA document.

Archaeological site CA-ALA-566 has been documented in multiple reports. The Caltrans report (2014) is briefly summarized on **page 59** of the CEQA Exemption, but the full description is provided here for further informational purposes:

CA-ALA-566 (P-01-001795) exists adjacent to the APE in the parcel directly north (Figure 4). The site was first identified when a local resident alerted Caltrans staff to family oral history that told of a burial on her grandfather's property at Knox and North 3rd Streets. In response to the proposed Route 238 Hayward Bypass project, test excavations and significance evaluation was conducted in 1997 by Caltrans archaeologists (Gmoser et al. 1998). Geoarchaeological and artifact analysis corroborated by radiocarbon dating revealed a site consisting of two components: a deeply buried mid-Holocene stratum consisting of fire-affected rock and scattered artifacts within a developed soil horizon, and a Late period stratum close to the surface containing two hearth features and an artifact scatter . . . The site was determined to be eligible for the NRHP under Criterion D: potential to yield information important to understanding prehistory.

The Haywards Steam Laundry was identified by Caltrans and documented in the Archaeological Survey Report prepared in 2014, which is summarized on **page 59** of the CEQA Exemption, but the full description is provided here for further information purposes:

The concrete foundation and oil tank of the Haywards Steam Laundry was found in the eastern portion of the APE along Ruby Street. The establishment is depicted on Sanborn Fire Insurance maps dated from 1896 until the May 1923-September 1950 series. The corrugated metal roof of the main structure is visible in 1938 aerial photographs. When the building was demolished remains unknown, but this was presumably completed upon Caltrans' acquisition of the property. As a foundation without associated artifacts and little potential for subsurface deposits, this resource meets the criteria of Attachment 4 of the PA (Properties Exempt from Evaluation) under Archaeological Property Type "Foundations and mapped locations of buildings or structures more than 50 years old with few or no associated artifacts or ecofacts, and with no potential for subsurface archaeological deposits."

The Extended Phase I test excavation conducted by Caltrans (Blake 2014) was specifically designed to identify the presence of archaeological deposits in the project site that may be associated with CA-ALA-566 and the Haywards Steam Laundry. As described on **page 59** of the CEQA Exemption, the results of all of the previous project site surveys and the test excavation were negative with respect to archaeological deposits. The full description of the Extended Phase I report (2014) is provided here for further information purposes:

Every effort was made to confirm that the adjacent CA-ALA-566 did not extend into the present project area. Test trenches and augers placed near the recorded boundary of CA-ALA-566 did not yield any cultural materials. In addition, shallow scraping with the backhoe in the vicinity of the concrete foundation of the Haywards Steam Laundry did not reveal any potentially significant cultural deposits. It is the conclusion of this study that the proposed undertaking has extremely low potential to affect archaeological resources.

As discussed on **pages 59 through 61** of the CEQA Exemption, based on the conclusions of the previous archaeological study of the project site, including extensive test excavations, the identification conducted for possible archaeological deposits in the project site are adequate as the basis for the technical conclusions drawn in the CEQA document. However, the County has required, out of an abundance of caution and considering the proximity of CA-ALA-566, that archaeological construction monitoring be conducted during project-related ground disturbance in the project site, which is provided on **pages 62 through 63** of the CEQA Exemption. Based on the adequacy of identification efforts, and the provisions for monitoring that will be implemented during project construction, potential impacts to cultural resources associated with CA-ALA-566 and the Haywards Steam Laundry have been considered and assessed to current professional archaeological standards.

2. Qualifications of Archaeologist Conducting the Cultural Resources Analysis

Issue: Commenters noted that the analysis did not identify the archaeologist who conducted the analysis, nor their credentials. The following supplementary information is provided to address these comments and concerns.

Explanation: The technical staff who conducted the cultural resources analysis meet contemporary professional standards in cultural resources management. The author of the technical study, LSA Associate/Cultural Resources Manager Neal Kaptain, has a B.A. in Anthropology from the University of California, Los Angeles; an M.A. in Archaeology and Heritage (with honors) at the University of Leicester, England; and is Registered Professional Archaeologist No. 3799700. He has more than 20 years of experience conducting and directing archaeological field surveys, archaeological monitoring, prehistoric and historical excavation, cultural resources management, illustration, photography, and report preparation throughout California. An important component of Mr. Kaptain's work has been assessing the archaeological sensitivity of project sites throughout the San Francisco Bay Area using in-field observations, data available from the California Historical Resources Information system and local archives, and in consultation with local Native Americans and other interested parties. These assessments have been reviewed and approved by numerous local, state, and federal agencies. He meets the Secretary of the Interior's *Professional Qualifications Standards* for Archeology (36 CFR Part 61).

3. Historical Associations of the Knox Tract and Anza Camp #98

Issue: Commenters noted that the tract within which the project site is located has historical associations with William Knox, Sr., and his family, and the past presence of the Haywards Water Pumping Station. In particular, the commenters noted the presence (in the creek) of concrete rubble, the remains of a road, and fragments of pipes that could have been associated with the prior water facilities.

Knox Tract

Explanation: The history of the Knox Tract is described on **page 60** of the CEQA Exemption. No additional documentation of this association is necessary to characterize the potential for impacts to cultural resources because the presence of fragmentary and disarticulated remnants of pipes and concrete in San Lorenzo creek near Ruby Meadow (whether or not these remnants are associated with the water pumping station) does not substantiate a conclusion of potential impacts. These materials are the result of the demolition and removal of built environment features and infrastructure (again, if such remains are associated with the pumping station) and do not have the potential to qualify as a historical resource under PRC Section 21084.1; they lack archaeological "integrity," which refers to a deposit's ability to be meaningfully interpreted to extract information important in history. For these reasons, the extent of documentation of these historical associations is sufficient to qualify the potential for impacts to historic-period archaeological deposits in the project site.

Anza Camp #98

Explanation: **Page 60** of the CEQA Exemption describes the location of the Anza Trail corridor and Anza Camp #98 as approximately 0.6 miles southwest and 0.85 miles southeast of the project site, respectively. As such, comments do not inform a likely impact scenario due to the distance of the corridor and reported camp location, and no visual intrusion on the views from the trail corridor occur due to intervening obstructions, vegetation, and built environment.

C. MASTER RESPONSE 3: ENVIRONMENTAL REVIEW AND SUFFICIENT FINDINGS FOR CEQA COMPLIANCE

This master response describes the level of analysis performed and the findings that support an exemption as the appropriate form of environmental analysis. This is in response to public comment calling for further environmental review.

1. Environmental Review Performed and Compliance with CEQA

As described on **page 20** of the CEQA Exemption, Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 (Projects Consistent with a Community Plan or Zoning) states that projects that are “consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project specific significant effects which are peculiar to the project or its site”.

During pre-application meetings for this project, it was determined that the project qualified for streamlined environmental review under a community plan exemption under CEQA Guidelines 15183 using the Castro Valley General Plan.¹

As demonstrated in Chapter III, CEQA Checklist, beginning on **page 25** of the CEQA Exemption, every topic evaluated for the project was determined to have equal or less severe impact when comparing the project impacts with the expected projections of the General Plan 2005-2025 EIR. Due to the equal or less severe impact of each environmental topic, the project qualifies to be exempt from further CEQA review and an EIR is not required.

D. MASTER RESPONSE 4: SIZE AND SCALE OF DEVELOPMENT PROJECT

This master response describes how the project complies with zoning and development standards. Concerns regarding the project’s size, massing, and effect on the character of the neighborhood were most common and the discussion below provides evidence for the project’s consistency with code requirements and provides design information for consideration. The majority of this information can also be found in the CEQA Exemption in *Section V.I, Land Use and Planning*, beginning on **page 96**.

1. Consistency with Development Standards and Zoning

As described in *Section V.I, Land Use and Planning*, beginning on **page 98** of the CEQA Document, the project is entitled to a by-right density of 64 units. However, due to the proportion of units set aside for affordable housing, the project is able to utilize the state of California Density Bonus (SB 1818) program incentives, including a 35 percent increase in allowable density and three further

¹ Alameda County Community Development Agency, 2012. Castro Valley General Plan. March.

incentives/concessions. With an increase of 35 percent in allowable density, the project is technically entitled to 86 units on the project site (an additional 22 units) making the proposed 72 residential units consistent with applicable land use plans and policies.

As described on **pages 98 and 99**, the R-S zoning district allows a maximum height of 30 feet and three (3) stories.² However, because the project is utilizing the California Density Bonus, the project is entitled to a maximum of three waivers/concessions of applicable development standards that would otherwise preclude the construction of the project with density bonus units. The project would utilize one of these concessions/waivers to permit a height concession for an allowable maximum height of 55 feet (4 stories).

All other development standards (i.e. floor area ratio [FAR], building setbacks) are met and no further concessions or waivers were requested as part of the proposed project and development application. Further, while these issues are land planning issues, they are not CEQA environmental impact thresholds.

2. Aesthetics, Design, and Neighborhood Character

Several comments brought to light concerns regarding the project's influence on the character of the surrounding neighborhood.

As described in *Section V.A, Aesthetics*, beginning on **page 26** of the CEQA Exemption, the project is not located on or near a designated scenic route. Also, given the site topography and location in the "flatlands" of Castro Valley, there are no significant views of or through the site from public scenic vistas. The current views through the project site are from private property onto another private property and are not considered protected scenic vistas under CEQA.

The project's design and relationship to the surrounding neighborhood are also discussed in the CEQA Exemption on **pages 27 and 28**. In summary, while the proposed building will result in a visual change to the neighborhood, it is consistent with existing conditions of multi-story structures and tree-covered open space which is maintained in areas of the project site (see Master Response 1 regarding comments related to Biological Resources).

E. MASTER RESPONSE 5: TRAFFIC DISCUSSION

This master response provides background to contextualize some of the comments and concerns regarding potential traffic impacts on the surrounding neighborhood.

² Alameda County Community Development Agency, 2014. Residential Design Standards and Guidelines for the Unincorporated Communities of West Alameda County. Table 2.5-1: Multi-Family Residential Standards.

1. Traffic Impacts

As discussed in *Section V.M, Transportation/Traffic*, beginning on **page 119** of the CEQA Exemption, the CEQA Exemption analyzed transportation impacts, and in particular to Level of Service (LOS), which is a qualitative description of traffic flow based on factors such as speed, travel time, delay, and freedom to maneuver at intersections (a metric best used to describe the impact a project will have on surrounding traffic). As detailed beginning on **page 127** of the CEQA Exemption in *Section V.M, Transportation/Traffic*, the project would not result in any significant impacts related to LOS at the following nearby intersections:

- Ruby Street/Crescent Avenue
- A Street/4th Street-Rockaway Lane
- A Street/Ruby Street
- A Street/Crescent Avenue
- Redwood Road/Grove Way

As part of a project's approval, the County General Plan requires new development to be conditioned with certain development fees such as a cumulative traffic impact fee, which the project would be required to pay. This fee would be used to accommodate any changes in transportation infrastructure required for the project. However, no mitigation measures are required for project approval given that the transportation and traffic impacts were found to be less than significant.

In addition, as stated on **page 120** of the CEQA Exemption, "Research on transportation impacts of affordable housing shows that for any given home location and housing type, lower income households generate fewer automobile trips than moderate- and high-income households.³ Since the project would be income-restricted, it is likely that project residents would drive less and be more likely to use non-automobile modes to meet their transportation needs". However, the project analysis did not take this research into account and therefore presents a more conservative and comprehensive approach to potential project impacts than would likely occur.

F. MASTER RESPONSE 6: CONSISTENCY WITH GENERAL PLAN

Many commenters expressed concerns with the project's relationship with the area General Plan. The discussion below presents information showing compliance and consistency with the General Plan and its accompanying EIR.

³ Howell, A., Currans, K., Norton, G., & Clifton, K., 2018. Transportation impacts of affordable housing: Informing development review with travel behavior analysis. *Journal of Transport and Land Use*, 11(1). doi:10.5198/jtlu.2018.1129. Available at: <https://www.jtlu.org/index.php/jtlu/article/download/1129/986>, and *Commuting in America 2013: The National Report on Commuting Patterns and Trends*, October 2013. Available at: <http://traveltrends.transportation.org/Documents/CA10-4.pdf>.

1. General Plan Consistency

As mentioned in Master Response 3: Environmental Review and Sufficient Findings for CEQA Compliance, the project qualified for a streamlined environmental review because of its consistency with the Castro Valley General Plan and accompanying Environmental Impact Report. Concerns regarding the Biological Resources Overlay Zone are addressed in Master Response 1.

As stated on **page 22**, the implementation of the General Plan would result in a net increase from years 2005 to 2025 of 2,090 housing units and 4,735 residents. The project would develop a total of 72 units and increase Castro Valley's population by approximately 181 residents.⁴ The total increase provided by the project represents approximately 3.4 percent of the anticipated growth of housing units, and 3.8 percent of the anticipated growth of overall residents. The overall impact is compliant with the anticipated development envisioned in the General Plan and General Plan EIR.

Comments with concerns regarding the relevancy of the current General Plan need note that the existing plan extends from 2005-2025 and is exhaustive in considering significant possibilities and impacts from development and growth within the Castro Valley plan area over a 20-year period.

⁴ Based on average of 2.52 persons per household of renter-occupied units in Alameda County