EAST BAY MUNICIPAL UTILITY DISTRICT

Walnut Creek Water Treatment Plant Pretreatment Project

Final Environmental Impact Report

SCH # 2022020573

Volume IV – Final EIR

Prepared By:

Woodard & Curran

May 2024

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East Bay Municipal Utility District

Walnut Creek Water Treatment Plant Pretreatment Project

Final Environmental Impact Report
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May 2024

Prepared for:
East Bay Municipal Utility District
Water Distribution Planning Division
375 11th Street
Oakland, CA 94607

Prepared by:
Woodard & Curran
2175 North California Boulevard, Suite 315
Walnut Creek, CA 94596

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Chapter 7 Introduction to Final EIR

7.1 Project Background

The East Bay Municipal Utility District (EBMUD), as the California Environmental Quality Act (CEQA) lead agency, prepared a Draft Environmental Impact Report (Draft EIR) for the Walnut Creek Water Treatment Plant Pretreatment Project (Project). The Draft EIR was developed to provide the public and responsible and trustee agencies reviewing the Project with an analysis of the potential effects on the local and regional environment associated with construction and operation of the Project.

The proposed Project involves enhancing the existing Walnut Creek Water Treatment Plant (WTP), built in 1967, and making improvements at the Lafayette WTP, constructed in 1953. These water treatment plants are situated on EBMUD-owned property in Walnut Creek and Lafayette, California, respectively. The Walnut Creek WTP serves approximately 225,000 people in EBMUD's East-of-Hills service area, which includes portions of Pleasant Hill, Walnut Creek, Alamo, Lafayette, Danville, Blackhawk, and San Ramon Valley communities. The Walnut Creek WTP primarily treats Mokelumne River water stored in the Sierra foothills at Pardee Reservoir, but also treats untreated water stored locally in EBMUD's Briones Reservoir. The Walnut Creek WTP lacks pretreatment and ozone facilities which limits its ability to treat water EBMUD received via the Freeport Regional Water Project (Freeport) on the Sacramento River and water received from neighboring water agencies via interties during planned and unplanned outages, as well as during droughts.

The Project would add pretreatment facilities to the Walnut Creek WTP that would allow EBMUD to more reliably treat a broader range of untreated Pardee and Briones Reservoirs water resulting from high rainfall runoff, wildfires, algae blooms, climate change and emerging contaminants, and improve the ability to treat supplemental supplies from Freeport or the interties during planned and unplanned outages and future droughts. The Project would also improve treated water quality, taste, and odor by removing organics and by adding ozone treatment and increase the Walnut Creek WTP capacity to meet planned future demands, improve water system reliability and operational flexibility, and allow for the potential decommissioning of the Lafayette WTP.

The Project includes construction of staging areas, removal of vegetation including tree removal, grading, construction of new pretreatment facilities, ozone facilities, consolidated maintenance building, buried pipelines, outdoor lighting, stormwater facilities, security fencing, and paving, redirection of social footpaths, demolition of existing facilities and maintenance facilities, and site restoration including new trees at the Walnut Creek WTP. The Project also includes removal of vegetation including tree removal, grading, construction of new weir structures, buried pipelines, paving, demolition of an existing weir structure, and site restoration including new trees at the Lafayette WTP. The Project would be constructed in two phases. Phase 1 involves construction at both WTP sites and would allow the Walnut Creek WTP to treat a broader range of untreated water quality and increase the capacity from 115 million gallons per day (MGD) to 125 MGD. Phase 2 involves construction at the Walnut Creek WTP and would allow the Walnut Creek WTP to further improve the ability to treat a broader range of untreated water quality and would increase the capacity to 160 MGD. Increasing the capacity would allow the Walnut Creek

WTP to serve planned land use changes and redevelopment projects disclosed and incorporated into relevant land jurisdiction general plans.

7.2 Draft EIR Public Review Process

On September 28, 2023, EBMUD released the Draft EIR for the Project for public review and filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research to begin a 45-day public review period (Public Resources Code Section 21161). Concurrent with issuance of the NOC, the Notice of Availability (NOA) was released informing the public that the Draft EIR was available to responsible and trustee agencies, other affected agencies, and interested parties, as well as all parties requesting a copy of the Draft EIR in accordance with Public Resources Code Section 21092(b)(3). During the public review period, the Draft EIR was available for review at the following locations:

East Bay Municipal Utility District	Walnut Creek Library	Lafayette Library
375 Eleventh Street	644 North Broadway	3491 Mt. Diablo Boulevard
Oakland, CA 94607	Walnut Creek, CA 94596	Lafayette, CA 94549

The public notice of the NOA was made in accordance with CEQA Guidelines Section 15087 by mailing the notice to the last known name and address of all organizations and individuals who previously requested such notice in writing, posting at two City of Walnut Creek trailhead kiosks located at Camino Verde Circle and at Sousa Drive, publication in the Contra Costa Times newspaper, posting at the Contra Costa County clerk office, posting on the EBMUD website and on NextDoor, emailing all customers and residents registered in EBMUD's Customer Management System in the cities of Lafayette and Walnut Creek totaling over 16,000, and direct mailing of over 750 postcards to nearby residents and homeowners. A virtual public meeting was held on October 19, 2023, to receive comments on the Draft EIR. The 45-day public review period ended on November 13, 2023. Additional in-person and virtual meetings were held on November 27, 2023, March 28, 2024, and April 2, 2024 with neighbors from the Quail Ridge Homeowners Association and on December 15, 2023 and March 22, 2024 with neighbors adjacent to the entrance to the Walnut Creek WTP to clarify the comments provided on the site plan and proposed mitigation measures. Neighbor feedback received in these meetings on the site plan and Project are also set forth in the Final EIR.

7.3 Purpose of the Final EIR

This Responses to Comments document has been prepared to accompany the Draft EIR and is being issued by EBMUD as part of the Final EIR for the Project. CEQA requires lead agencies that have completed a Draft EIR to consult with and request comments on the environmental document from responsible, trustee, and other agencies with jurisdiction over the resources that could be affected by the Project. The public must also be afforded the opportunity to comment on the Draft EIR. This Final EIR has been prepared to respond to comments on the Draft EIR made by agencies and members of the public.

The Final EIR for the Project consists of the Draft EIR and appendices (Volumes I, II and III) and this document containing Comment Letters and Responses to Comments, including the updated Mitigation Monitoring and Reporting Program (Volume IV). The EBMUD Board of Directors will consider the Final EIR before deciding whether to approve the Project**.**

7.4 CEQA Requirements

EBMUD has prepared this document pursuant to Section 15132 of the *CEQA Guidelines*, which specifies that "*The Final EIR shall consist of:*

a) The Draft EIR or a revision of the draft.

b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

e) *Any other information added by the Lead Agency.*"

7.5 Consideration of Recirculation

If significant new information is added to an EIR after release of the Draft EIR for public review, the lead agency is required to recirculate the revised document (CEQA Guidelines Section 15088.5). Significant new information includes, for example, a new significant environmental impact or a substantial increase in the severity of an impact. New information is not considered significant unless the document is changed in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project or comment on feasible mitigation that the proponent has declined to implement.

No new impacts or substantial increases in the severity of impacts have been identified as a result of information presented in the comments on the Draft EIR for the Project. Recirculation of the Draft EIR was thus not deemed to be necessary.

7.6 Future Steps in Project Approval

The Draft EIR was circulated for review, and opportunities for public and agency review and comments were made available in accordance with CEQA. The Final EIR is being made available to commenters for a minimum 10-day period before its consideration for certification.

The EBMUD Board of Directors will consider Final EIR certification and Project approval at the regularly scheduled Board Meeting on June 11, 2024. EBMUD public Board meetings are conducted in person at the EBMUD Boardroom at 375 11th Street, Oakland, CA 94607, and accessible via Zoom. The meetings are recorded, live-streamed, and posted on the EBMUD website. Links to view and participate in EBMUD Board meetings are available at https://www.ebmud.com/index.php/about-us/board-directors/board-meetings.

7.7 Organization of this Document

The Final EIR consists of the Draft EIR and appendices (Volumes I, II and III) and Comment Letters and Responses to Comments, along with the updated Mitigation Monitoring and Reporting Program (Volume IV).

This document is Volume IV of the EIR for the Project, which contains five chapters: Chapter 7 is the introduction to the Final EIR, Chapter 8 presents the responses to comments on the Draft EIR, Chapter 9 contains the complete comments, Chapter 10 shows revisions to the Draft EIR,

and Chapter 11 contains the Final EBMUD Practices and Procedures Monitoring and Reporting Plan and the Mitigation Monitoring and Reporting Program.

Each comment received is listed in Table 7-1 and identified by comment title, comment author, and date. Comments include letters, emails, and materials submitted during the comment period and verbal comments provided at the October 19, 2023, public meeting on the Draft EIR. The full text of all written comments is included in Chapter 9, following the responses to comments. Each submittal is identified by an acronym of the agency or organization, or last name of the individual commenter (as shown in Table 7-1), and each comment is identified by a comment number in the margin; responses then use the same numbering system. For example, Comment 1 in the comment letter submitted by the Contra Costa County Flood Control and Water Conservation District (CCCFCWCD) is designated Comment CCCFCWCD-1 and is addressed in Response to Comment CCCFCWCD-1. In addition, global responses have been prepared to address comments regarding use of the existing parking area at the entrance to the Walnut Creek WTP for construction staging, visibility of Project facilities from Briones to Mt. Diablo Regional Trail, need for the Project and Project sizing at the Walnut Creek WTP, use of Larkey Lane as an access route, chemical handling and storage safety measures, community communication during construction, and community evacuation process.

As noted above, in addition to the written comments received by EBMUD during the comment period, staff noted questions and comments at the October 19, 2023, public meeting for the Project during the comment period and during neighbor feedback after the close of the comment period, and responses are provided in Sections 8.5 and 8.6.

Table 7-1: List of Commenters

Comment Title	Comment Author	Date
Agency Comments		
CCFCWCD	Contra Costa County Flood Control and Water Conservation District	November 6, 2023
EBRPD	East Bay Regional Park District	November 6, 2023
Organization Comments		
QRHOA 1	Quail Ridge Homeowners Association	November 4, 2023
QRHOA 2	Quail Ridge Homeowners Association	November 13, 2023
Individual Comments		
Jackson 1	Julia Jackson 1	October 19, 2023
Jackson 2	Julia Jackson 2	November 11, 2023
Katzki	Dan Katzki	November 7, 2023
Mallya	Arvind Mallya	November 8, 2023
Threlkeld	Cliff Threlkeld	November 10, 2023
Clark	Stephen Clark	November 10, 2023
Greene	Ashley and Peter Greene	November 12, 2023
Taaning	Sabrina Taaning	November 13, 2023
Public Meeting Comments		
PM	Public Meeting	October 19, 2023

Chapter 8 Responses to Comments

8.1 Global Responses

Some comments on the Draft Environmental Impact Report (EIR) raised concerns or questions regarding use of the existing parking area located near the entrance to the Walnut Creek Water Treatment Plant (WTP) close to the intersection of Larkey Lane and Alfred Avenue for construction staging. Comments expressed concerns regarding visibility of facilities constructed as part of the Walnut Creek WTP Pretreatment Project (Project) from the Briones to Mt. Diablo Regional Trail. Comments also raised questions about the need for the Project and size of the Project, use of Larkey Lane as an access route, chemical handling and storage safety measures, communication during construction, and the community evacuation process. These comments are most appropriately addressed in seven comprehensive, or "global," responses.

8.1.1 Global Response 1 – Use of the Existing Parking Area at the Entrance to the Walnut Creek WTP for Construction Staging

Several commenters objected to the use of the existing parking area located near the entrance to the Walnut Creek WTP close to the intersection of Larkey Lane and Alfred Avenue for construction staging and suggested that staging should be located elsewhere within the Walnut Creek WTP close to where construction would occur. Residents also expressed concerns about the need for and appearance of the sound barrier that is proposed as mitigation for potential noise generated at the staging area and the disruption of wildlife associated with use of the staging area. The responses to these concerns are described below and address all or part of the following comments:

- Jackson1-1 through Jackson1-4
- Jackson2-1 through Jackson2-4
- Mallya-8
- Greene-1
- Taaning-1 through Taaning-5
- PM-7
- PM-9
- PM-21
- Neighbor feedback on December 15, 2023, and March 22, 2024

Need for Staging Area 4 During Construction

The parking area is described as Staging Area 4 on page 2-25 in Draft EIR Section 2.5.22 (Staging Areas).

The existing parking lot was constructed to provide necessary construction staging for the last major construction project at the Walnut Creek WTP, which was completed in 2006, and has since been designated for emergency use during normal operations at the Walnut Creek WTP. The proposed Project is a large construction project that is substantially outside the scope of normal operations. EBMUD carefully evaluated all of the existing space within the Walnut Creek WTP and would use every available space within the Walnut Creek WTP for stockpiling,

storage of materials, construction trailers and other activities that must take place during construction. These include temporary stockpile areas spread around the Project site in existing areas adjacent to sites where construction would occur and contractor equipment and crew parking, office trailers located at the new Staging Areas 1 through 3, which will be developed for the Project. Additional staging areas beyond the existing available space within the Walnut Creek WTP are needed, as described in the Draft EIR, Section 2.5.22 (Staging Areas) and Section 2.6.1 (Staging and Stockpile Areas).

Staging Area 4 Use During Construction

As explained in the Draft EIR, on page 2-30 of the Project Description, "Staging Area 4 would be used for material and equipment storage on the western half and for worker parking on the eastern half – no aggregate material stockpiling (soil, gravel etc.) or construction trailers would be allowed" and this is depicted in **Figure 8-1** below, which shows a zoomed in view of Staging Area 4. Limiting the activities at Staging Area 4 would reduce the potential for noise-generating activities at Staging Area 4 because no aggregate materials handling would take place there. Staging Area 4 would not be lighted, and no new security fencing would be installed.

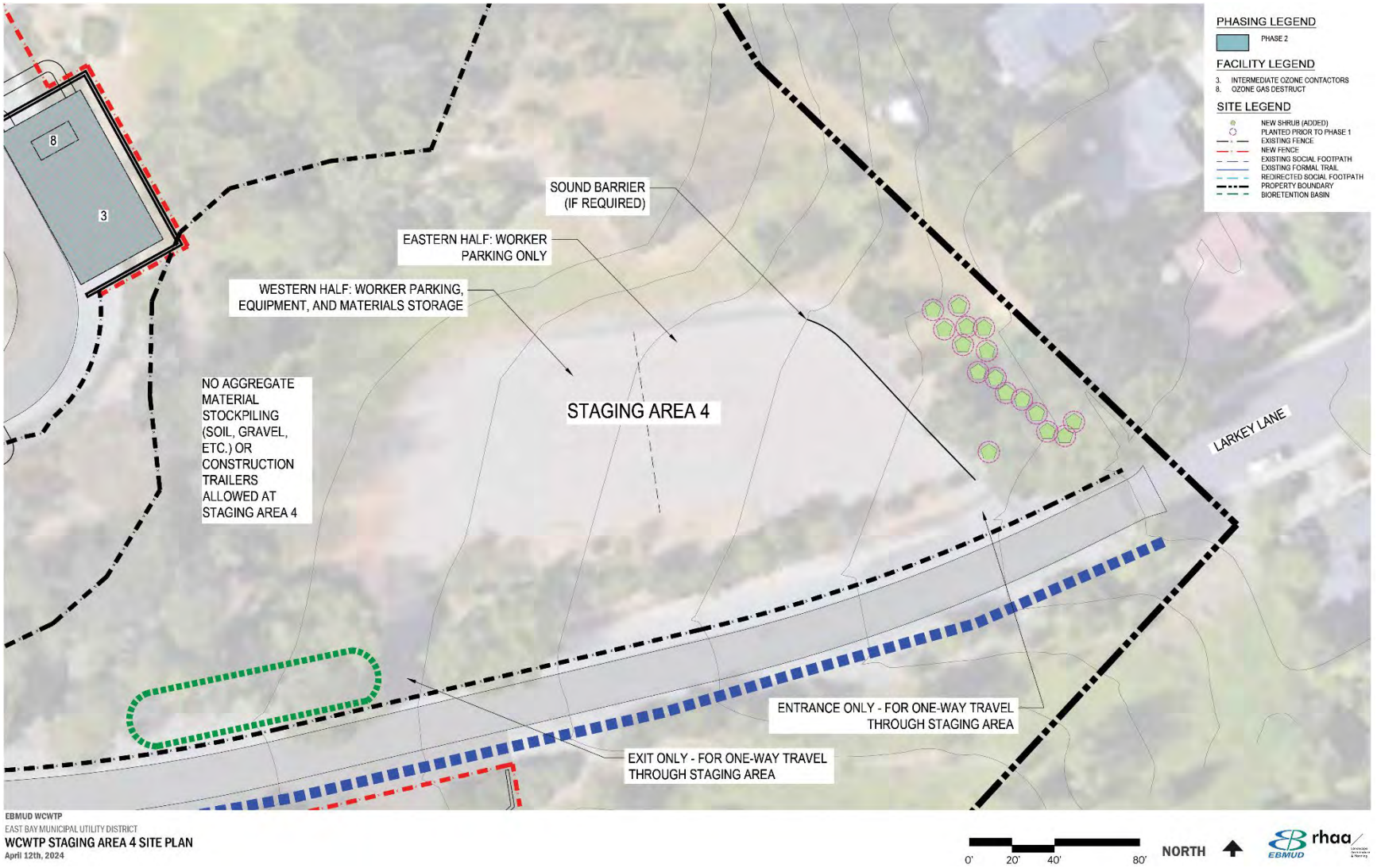
To further clarify material and equipment storage activities that would take place at Staging Area 4, the Draft EIR, page 2-30, at the end of Section 2.6.1, Staging and Stockpile Areas, has been revised as follows:

> Staging Area 4 would be used for material and equipment storage on the western half and for worker parking on the eastern half – no aggregate material stockpiling (soil, gravel etc.) or construction trailers would be allowed. Material and equipment, such as electrical panels, pumps, and skids (support platforms), may be stored in secure storage containers. Vehicles including front loaders, forklifts, excavators and standard telehandlers (also known as reach forklifts) would be used to offload and handle equipment and materials from delivery trucks. Staging Area 4 would also have a one-way access route for ingress and egress.

EBMUD recognizes the concerns of the community, and as described in the Draft EIR, Section 2.6.1, under Staging and Stockpile Areas, on page 2-30 of the Project Description, EBMUD has committed to limiting construction equipment and material storage to the western half of the area because construction worker parking is expected to result in more limited activity throughout the construction workday, which would minimize the effect of construction staging. EBMUD would also require the contractor to include training and post signage in Staging Area 4 that restricts workers from idling their vehicles, playing loud music while in their vehicles, or congregating outside of their vehicles in Staging Area 4 and EBMUD will enforce these restrictions.

Also, as noted in Section 2.8.2, Permanent Staging Area Use, on page 2-37 of the Draft EIR, after construction is completed, Staging Area 4 would revert back to emergency parking and would not be used under normal operations.

Figure 8-1: Site Plan of Staging Area 4



Potential Alternatives to Staging Area 4

In response to the comments objecting to the use of Staging Area 4 for the designated construction activities, EBMUD evaluated whether it would be possible to use Walnut Creek WTP parking spaces, expand the size of Staging Areas 1 through 3, construct additional staging areas further from the entrance, or stage on EBMUD's Mokelumne Aqueduct right-of-way to the north of the site or at an off-site location instead of using Staging Area 4 for equipment and material staging or construction worker parking. EBMUD determined that these other options would not be feasible. Small parking areas within the Walnut Creek WTP are scattered throughout the property, utilized by Walnut Creek WTP staff, and are adjacent to the individual Walnut Creek WTP buildings to which staff report. There is no single large employee parking lot comparable in size to the parking area designated as Staging Area 4. Staging construction equipment and materials over multiple small parking areas each consisting of 4 to 12 parking spaces would not be feasible for access and maneuverability and does not provide enough space for larger equipment and materials that are proposed to be accommodated in the larger Staging Area 4. Expanding the size of Staging Areas 1 through 3 or constructing an additional staging area elsewhere on site also would not be feasible because the footprints for these staging areas are confined by steep topography and natural drainages. Staging on EBMUD's Mokelumne Aqueduct right-of-way is not feasible because the existing gravel road on top of the Mokelumne Aqueducts is not suitable for heavy truck use and does not have a sufficient turning radius for large trucks delivering equipment and materials. Similarly, an off-site location would not be feasible because equipment and materials that would be stored at Staging Area 4 are needed regularly and frequent on-site access to that equipment and materials would be required. Also, construction workers would include multiple trades that may need to arrive and leave the site at different times of the day depending on the specific construction activities of the day, which makes off-site construction worker parking with shuttling infeasible. The utility of Staging Area 4 for construction staging is due in part to its size and open layout for maneuverability and accessibility, which cannot be replicated over multiple, smaller areas within the property or off-site, and therefore relocation of construction staging from Staging Area 4 to another location is not feasible.

Need for a Sound Barrier at Staging Area 4

As shown in Table 3.11-12 on page 3.11-33 of the Draft EIR, the noise levels at the nearest residential receptors at Larkey Lane and Alfred Avenue during early morning concrete work before 7:00 am are expected to be 48-59 dBA, which does not exceed the 60 dBA threshold for sleep disturbance and therefore does not exceed the threshold for significance that would require mitigation to reduce noise levels. The noise analysis in the Draft EIR accounted for noise levels of concrete trucks and equipment to support the concrete pours but did not quantify the effect of early morning worker activity at Staging Area 4 to support the concrete pours. Although the additional noise generated by the workers in Staging Area 4 was expected to be small, a temporary sound barrier was included in Mitigation Measure NOI-1 on page 3.11-42 of the Draft EIR as a precaution to ensure noise levels would not exceed the 60 dBA threshold.

Residents near Staging Area 4 expressed concerns about the sound barrier, and to address these concerns, a refined analysis was conducted to evaluate the potential noise impacts associated with using Staging Area 4 for material and equipment storage and worker parking. This analysis more fully considered the activities that would occur at Staging Area 4, including daytime

construction activities and early morning worker vehicle arrivals. As shown in Table 3.11-11 below, Scenarios 1C, 1D and 2A were selected for additional analysis because they are representative of the construction periods with the highest noise levels at the receptor at Larkey Lane and Alfred Avenue, immediately adjacent to Staging Area 4.

Three entries within Table 3.11-11 on pages 3.11-30 and 3.11-31 of the Draft EIR shown below have been updated to include information that adds daytime construction activities at Staging Area 4 for the receptor at Larkey Lane and Alfred Avenue. Table 3.11-12 on page 3.11-33 of the Draft EIR has also been updated to include information that adds early morning worker arrivals at Staging Area 4 for the receptor at Larkey Lane and Alfred Avenue. The refined analysis shows slightly higher noise levels than estimated in the Draft EIR, but the daytime activities still do not exceed the speech interference indicator of 70 dBA as shown in Table 3.11-11 below and the early morning activities occurring before 7 a.m. do not exceed the sleep interference indicator of 60 dBA as shown in Table 3.11-12 below.

Based on the refined analysis, the Project noise levels with the addition of early morning hour worker arrivals would contribute less than 1 dBA to the noise levels at the nearest residential receptors and therefore the 60 dBA threshold would still not be exceeded; mitigation, and in particular a temporary sound barrier is not required at Staging Area 4 to mitigate exceedance of noise thresholds. Mitigation Measure NOI-1 is revised to remove the temporary sound barrier requirement at Staging Area 4 and instead require noise monitoring such that if noise thresholds are exceeded, a redwood fence will be installed at that time to act as a more aesthetically pleasing sound barrier that would reduce noise levels to less than the threshold.

Table 3.11-11: Walnut Creek WTP Project Construction On-Site Hourly L_{eq} Noise Levels[1] – Applicable to Hours 7:00 a.m. to 6:00 p.m.

Scenario	Receptor	Existing Conditions Noise Levels (dBA L_{eq})	Existing + Maximum Project Noise Levels[2] (dBA 1-hr L_{eq})	Speech Interference Indicator (dBA 1-hr L_{eq})	Exceeds Speech Interference Indicator? (Y/N)	
					Without Mitigation Measures	With Mitigation Measures[4]
1.C: Scenario 1.B + add Ballasted Flocculation + add Hydrogen Peroxide (Backhoes, bobcats, compactors, compressors, concrete saws, concrete pumps, concrete trucks, dozers, dump trucks, excavators, forklifts, form building, loaders, rooftop work, welding)						
	Larkey Ln & Alfred Ave	47	59 ~~52-53~~	70	N	N/A
1.D: Scenario 1.C + add Solids Transfer PP (Backhoes, bobcats, compactors, compressors, concrete saws, concrete pumps, concrete trucks, dozers, dump trucks, excavators, forklifts, form building, loaders, rooftop work, welding)						
	Larkey Ln & Alfred Ave	47	59 ~~52-53~~	70	N	N/A
2. A: Gravity Thickeners (S) + Ballasted Flocculation + Pre-Ozone pumping plant (with Phase 1 operations and Backhoes, bobcats, compactors, compressors, concrete saws, concrete pumps, concrete trucks, dozers, dump trucks, excavators, forklifts, form building, loaders)						
	Larkey Ln & Alfred Ave	47	62-63 ~~60-62~~	70	N	N/A

Table 3.11-12: Walnut Creek WTP Project Construction On-Site Hourly L_{eq} Noise Levels – Early Morning Concrete Work[1,2] (6:00 a.m. to 7:00 a.m.)

Receptor	Scenario and Building[3]: with Highest Noise from Concrete Work	Existing Conditions Noise Levels (dBA L_{eq})	Existing + Project Noise Levels[2] (dBA 1-hr L_{eq})	Sleep Disturbance Criterion 6:00 a.m. to 7:00 a.m. (dBA 1-hr L_{eq})	Exceeds Non-Daytime Criterion? (Y/N)	
					Without Mitigation Measures	With Mitigation Measures[4]
Larkey Ln & Alfred Ave	2.A Intermediate Ozone Contactors (3)	48	50-59 ~~48-59~~	60	N	N/A

Mitigation Measure NOI-1 on page 3.11-42 of the Draft EIR is revised as follows to refine the approach for mitigating potential noise impacts associated with the use of Staging Area 4:

Mitigation Measure NOI-1: Additional Noise Control and Monitoring Plan Measures at the Walnut Creek WTP

The Noise Control and Monitoring Plan required in the Project specifications would include specific measures to reduce noise to ensure that noise at residential receptors does not exceed 60 dBA L_{eq} before 7:00 a.m. in Walnut Creek. The following measures, or their equivalent, would be used in combination to meet the noise limits:

- Coordinate worksite activities to minimize or eliminate non-essential noise-generating activities between 6:00 a.m. and 7:00 a.m.
- Install temporary sound barriers achieving a minimum sound transmission class (STC) 25 to block the line of sight from concrete activities to nearby residences (**Figure 3.11-5**) for the duration of the applicable construction phase(s).
  - To reduce noise by at least 8 dBA from concrete trucks at the Hydrogen Peroxide Station during Phase 1, sound barriers would need to be at minimum 8 feet high and located on the northeast side of the Hydrogen Peroxide Station.
  - To reduce noise by at least 5 dBA from concrete trucks at the Combined Reclaimed Metering Vault during Phase 1, sound barriers would need to be at minimum 9 feet high, and located on the north, northeast, and northwest sides of the vault.
  - To reduce noise by at least 3 dBA from concrete trucks at the Thickened Solids Pumping Plants and Gravity Thickeners during Phases 1 and 2, sound barriers would need to be at minimum 9 feet high and located on the northeast side of the work area.
  - ~~To reduce noise by at least 5 dBA from early morning worker arrivals and parking at Staging Area 4 during Phases 1 and 2, sound barriers would need to be at minimum 6 feet high and located on the east side of the staging area.~~
  - The Noise Control and Monitoring Plan will include daily noise monitoring at the EBMUD property line east of Staging Area 4 during construction of Phases 1 and 2. If noise thresholds are exceeded and expected to continue to

be exceeded, a 6-foot high redwood fence would be installed at that time at Staging Area 4. In anticipation of the possibility that a fence would be needed, 16 5-gallon shrubs will be planted in the area east of Staging Area 4 prior to construction to provide visual screening for the fence.

Visual Concerns for the Sound Barrier at Staging Area 4

As discussed above, a sound barrier would only be installed if noise monitoring determines that the noise threshold is exceeded. To address visual concerns with the sound barrier, a redwood fence would be employed instead of a k-rail mounted temporary barrier and additional vegetation would be planted at the beginning of construction on the east side of the parking lot as part of Mitigation Measure NOI-1 to screen views of the redwood fence from adjacent residences. The shrubs would be planted in anticipation of the possible need for the fence, but the fence would only be implemented if noise monitoring determines the fence is needed. Proposed plantings are shown in **Figure 8-1** and reflect wildfire considerations for planting locations, given existing tree canopies and shrub heights. Plantings would include native shrubs, which would be planted before construction begins.

To screen views of the redwood fence from adjacent residential areas, as part of Mitigation Measure NOI-1 16 5-gallon shrubs would be planted in the vegetated area between the east end of the existing parking lot and the back yards of homes on Alfred Avenue. New shrubs would be a combination of native shrubs such as coffeeberry (*Frangula californica*), flannel bush (*Fremontodentron californicum*), toyon (*Heteromeles arbutifolia*) and hollyleaf cherry (*Prunus ilicifolia*), all of which are drought tolerant evergreen California native species. The shrubs would be planted before the start of construction and would grow to a height of between 6 and 20 feet at maturity, with a mature spread of 6 to 15 feet. Irrigation would be provided until the vegetation is well-established. When combined with existing trees at the east end of the parking lot, the new shrubs are expected to provide screening to reduce visibility of the redwood fence from public views and from the view of adjacent residents.

To assess the efficacy of shrub plantings at providing screening of the redwood fence that may be installed to attenuate sound from Staging Area 4, views of the new redwood fence location from the end of Larkey Lane looking into Staging Area 4 were evaluated (see **Figure 8-2**).

Figure 8-2: Walnut Creek WTP Staging Area 4 Viewpoint Location

Figure 8-3 shows visual simulations demonstrating the screening of the redwood fence that would be provided by the shrub plantings. Although the need for the fence would be determined based on noise monitoring during construction, the shrubs would be planted before the start of construction so as to provide screening in case the redwood fence is determined to be needed for sound attenuation. As shown in **Figure 8-3**, within 5 years of planting, the shrubs would provide substantial screening of the redwood fence that might be installed during construction if needed to attenuate noise from Staging Area 4. Because shrubs would be planted before the start of construction, most of the redwood fence would be screened from view by about mid-way through construction.

Representatives from EBMUD met with neighbors near the entrance to the Walnut Creek WTP immediately next to Staging Area 4 on December 15, 2023 and March 22, 2024 to obtain input into the refinements to the mitigation measure and visual simulations and received no comments specific to the refinements to the mitigation measure and visual simulations.

Figure 8-3: Walnut Creek WTP Staging Area 4 Visual Simulations – Before and After Construction

Before Construction – Existing View

After Planting

5 Years After Planting - Redwood Fence (if needed) visible

20 Years After Planting

Biological Concerns about Use of Staging Area 4 for Construction

The existing parking area is an empty graveled lot, which does not, in and of itself, provide any wildlife habitat. The gravel parking lot is intended for use as parking and does not technically fit the land use definition of open space, which is land that is not developed for residential, commercial, industrial or institutional use. Vegetation surrounding the parking area would not be removed and EBMUD standard construction specifications would be implemented to protect birds that may use the area surrounding the existing parking area. As noted above, native shrubs are proposed to be planted at the east end of Staging Area 4 to screen the potential views of the redwood fence. The native shrubs that would be planted all have substantial habitat value for native wildlife, so the Project would enhance the area surrounding Staging Area 4 for wildlife.

As described in Section 3.3 (Biological Resources) of the Draft EIR on page 3.3-48, the Walnut Creek WTP study area is not considered a wildlife corridor and the Project would not interfere substantially with the movement of any native wildlife species or established wildlife corridors. However, EBMUD would comply with requirements of the Migratory Bird Treaty Act, which protects all birds native to North America from the purposeful killing, possessing, or trading of migratory birds, nests, and egg and also to comply with California Fish and Game Code Section 3503, which states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird.

Section 3.3 (Biological Resources) of the Draft EIR includes EBMUD Standard Construction Specification 01 35 45 Section 3.2, which requires protection of nesting birds and includes the requirement that, "If construction commences between February 1 and August 31, during the nesting season, EBMUD will conduct a preconstruction survey for nesting birds within 7 days prior to construction to ensure that no nest will be disturbed during construction. If active nests of migratory bird species (listed in the MBTA) are found within the Project site, or in areas subject to disturbance from construction activities, an avoidance buffer to avoid nest disturbance shall be constructed."

It is acknowledged that residents have observed a variety of wildlife in the area near the parking area, and EBMUD recognizes that the vegetated areas surrounding the parking area provide habitat for a wide variety of common urban wildlife that inhabit the environs of the Walnut Creek WTP. However, as described in Section 3.3 (Biological Resources) of the Draft EIR on page 3.3-14, the biological survey conducted of the Walnut Creek WTP identified no special-status wildlife species. The existing parking area was used for construction staging during previous work at the Walnut Creek WTP, and after these projects concluded, the surrounding environs were successfully inhabited by common urban wildlife that has been observed by the residents. The vegetation surrounding the parking area is not habitat for any rare, threatened or endangered species and there is ample wildlife habitat in the surrounding area that will remain undisturbed, including substantial undisturbed open space in the Acalanes Ridge Open Space Area just to the west of the Walnut Creek WTP. The Draft EIR concluded that construction of the Project would not have a significant impact based on any of the California Environmental Quality Act (CEQA) significance criteria identified in the Draft EIR.

8.1.2 Global Response 2 – Visibility from Briones to Mt. Diablo Regional Trail

Several comments on the Draft EIR raised concerns or questions regarding long-term visibility of Project facilities from the Briones to Mt. Diablo Regional Trail. Comments suggested that the analysis of visual impacts did not adequately address the changes in views and that proposed tree plantings were inadequate to screen proposed facilities from view. The responses to these concerns are described below and address all or part of the following comments:

- QRHOA1-1
- QRHOA1-3
- QRHOA2-2
- Katzki-1
- Clark-2 and Clark-3
- Neighbor feedback on November 27, 2023, March 28, 2024, and April 2, 2024

EBMUD considered measures to reduce the visual impacts of the new gravity thickeners, thickened solids pumping plants, dewatering building, and associated retaining wall, which, without screening, would be partially visible from the Briones to Mt. Diablo Regional Trail and the Quail Ridge residential area north of the trail.

Burying or Partially Burying the Facilities

One comment suggested that "earth be graded up the side of the structures to hide/camouflage them;" however, it is not feasible to bury the structures or undertake this grading. The inside of the thickened solids pumping plants require frequent visual inspections and routine cleaning and maintenance. For worker safety and due to the high frequency of access required, these structures would not be fully buried, as buried structures become confined spaces for workers and create safety risks. Associated critical equipment, including electrical panels for the pumping plants, would also be stored in above ground buildings for protection against flooding and to provide easy means of access and exit in case of emergencies. In addition, the gravity thickeners are already mostly buried to the extent practicable to minimize excessive excavation and earth movement, which would result in additional construction disturbance and impacts encroaching into the existing adjacent riparian zone and waterway. The dewatering building houses centrifuges that remove water from solids before they are off hauled by truck. The dewatering building cannot be buried because its aboveground design and height relative to the adjacent roadway are required for the conveyance of the dewatered solids directly into trucks for transport off-site. The retaining wall cannot be lowered or removed because it is required to ensure the gravity thickeners and thickened solids pumping plants are accessible by vehicle from the rest of the site for inspections and maintenance. Although the comment suggests that burying structures should be possible because this was done for the chlorine contact basin and clearwell (referred to in the comment as "Rocky" and "Bullwinkle") the existing and proposed structures are very different in design and purpose. It was feasible to bury the chlorine contact basin and clearwell mostly belowground because these facilities are simply large water tanks that do not require regular entry, do not house associated critical electrical and mechanical equipment, and do need to convey dewatered solids to trucks.

As noted in Section 3.1 (Aesthetics) of the Draft EIR, on page 3.1-37 "new structures completed for the Project would be consistent in size, design and look with existing Walnut Creek WTP structures and would not be a departure from the existing visual character of the area. Therefore, operations of the Walnut Creek WTP would not substantially alter the existing visual character of the public views of the site." Although comments have not presented any additional information to change this conclusion, EBMUD acknowledges that it is the desire of the public to have new facilities screened from view to the maximum extent feasible and has considered comments requesting additional plantings to improve screening of the new structures.

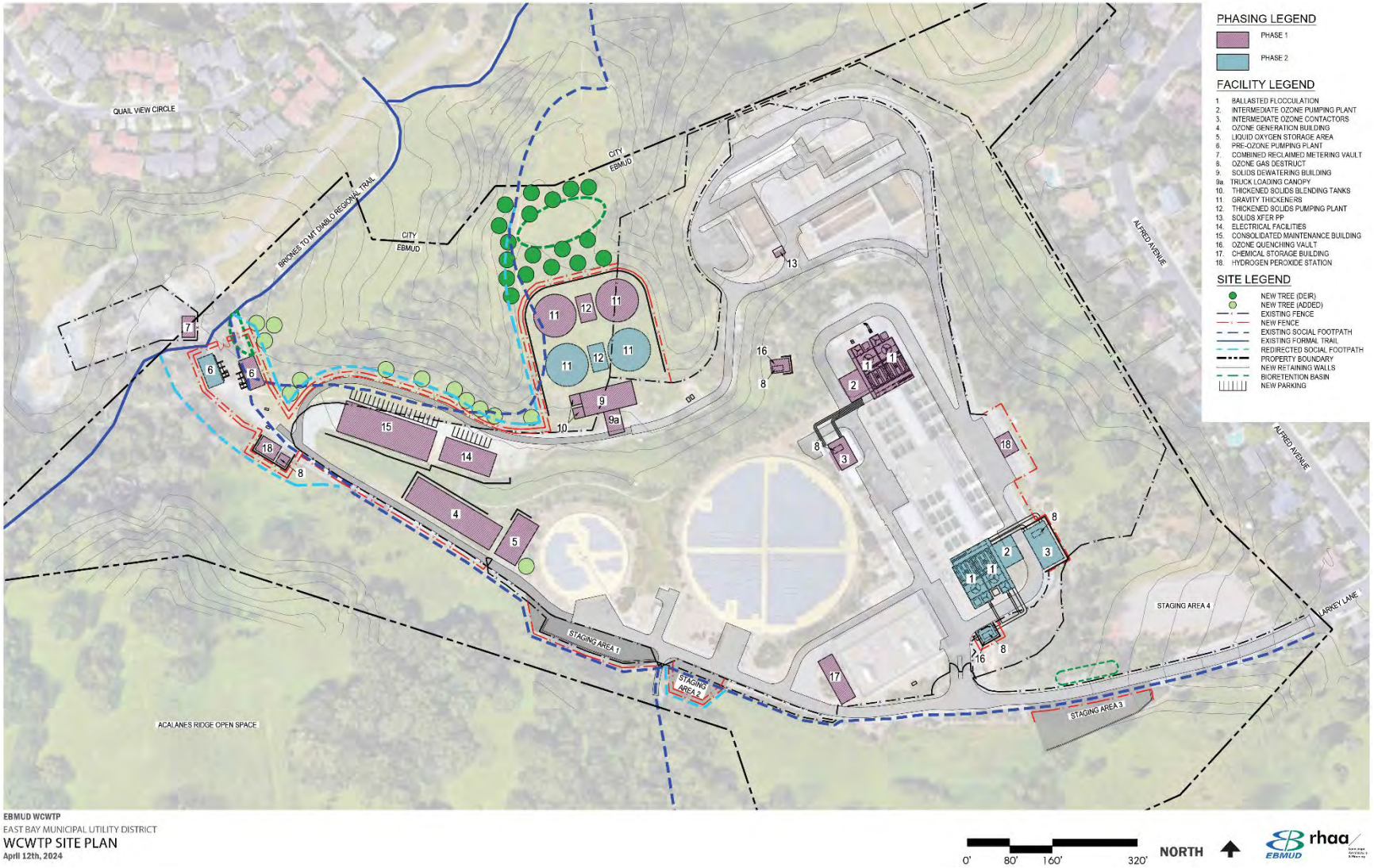
Additional Trees and Planting Trees Earlier

Some of the comments suggested additional plantings and requested that trees be planted before the start of construction to provide increased height and density of trees sooner. One of the comments specifically requested additional tree plantings outside of the retaining wall on the western side of the gravity thickeners, and in front of the consolidated maintenance building and electrical building. EBMUD evaluated these comments and determined it is feasible to add additional trees along the northern side of the Walnut Creek WTP in front of the consolidated maintenance building and electrical building by adjusting the location of the consolidated maintenance building and a portion of the paved north access road. The updates to the site plan, including the additional tree locations are shown below in revised **Figure 2-3** below**.**

Based on the site plan, it is not currently feasible to add trees outside of the retaining wall on the western side of the gravity thickeners due to steep slopes, which would require significant grading that would impact an existing riparian area, which is a biologically sensitive area. However, prior to construction, during detailed design, EBMUD will further investigate the ability to add additional trees outside of the retaining wall prior to construction. During detailed design, the orientation, layout and sizing of the gravity thickeners, thickened solids pumping plants, and solids dewatering building and surrounding retaining wall will be optimized for efficient use of space, and if it is determined to be feasible, additional trees would be sited and planted outside of the retaining wall to further enhance screening of the new facilities. It is not, however, feasible to plant the trees shown in **Figure 2-3** and or any other potential trees before construction because the trees would fall within the construction envelope where grading is to occur.

In response to comments, EBMUD did consider planting trees prior to construction on City of Walnut Creek (City) property immediately south of the Briones to Mt. Diablo Regional Trail to provide screening of the new facilities as early as the start of construction and obtained the City's consent to plant, irrigate, and maintain trees on City property. However, upon follow up input from neighbors who are also trail users and had originally requested early tree planting, planting trees on City property was not considered further due to the neighbor's concerns about the City trees blocking existing long-distance views from the Briones to Mt. Diablo Regional Trail.

Figure 2-3: Revised Walnut Creek WTP Site Plan and Phasing



To reflect changes to proposed landscaping the text on page 2-27 of the Draft EIR, Section 2.5.30, "Screening and Landscaping", has been revised as follows:

> Most of the facilities at the Walnut Creek WTP would be screened by topography and existing vegetation and structures, so extensive plantings to screen structures would not be required. As shown in **Figure 2-3**, approximately eighteen 24-inch box trees would be planted north and northwest of the proposed gravity thickeners and approximately twelve 24-inch box trees would be planted east of the pre-ozone pumping plants and north of the consolidated maintenance building and electrical building to screen new facilities ~~them~~ from view from the Briones to Mt. Diablo Regional Trail and the neighborhood to the north of the site. One tree would be planted southeast of the liquid oxygen storage facility to screen the storage area from view from the social footpath south of the Walnut Creek WTP southern boundary. During detailed design, the orientation, layout and sizing of the gravity thickeners, thickened solids pumping plants, and solids dewatering building and surrounding retaining will be optimized for efficient use of space, and additional trees would be sited and planted to the extent feasible on the west side of the retaining wall to further enhance screening of the new facilities. New trees would be ~~a combination of~~ coast live oak (*Quercus agrifolia*) ~~and valley oak (*Quercus lobata*), both of~~ which are currently present at the site. ~~Both~~ Coast live oak ~~species~~ are drought tolerant California natives. Additionally, coast live oak is evergreen and would provide year-round screening. EBMUD's standard hydroseed mix of native grasses is proposed under the new tree plantings. The proposed landscaping would require minimal irrigation and maintenance, although temporary irrigation (up to about five years) would be required to establish trees. Tree locations shown in **Figure 2-3** are planning level, and tree locations may be adjusted to provide the most optimal screening of new facilities, accounting also for topography and to ensure tree survivorship. All trees planted for landscaping will be irrigated, monitored maintained, and replaced, as required, by EBMUD post-construction to guarantee the future health and survivorship of all landscaping trees.

Figure 2-3 on page 2-4 of the Draft EIR is revised as shown above to show additional trees that would be planted. Trees that have been added since publication of the Draft EIR are shown in light green. The revised figure is also included in Section 10.2 of Chapter 10, Draft EIR Revisions.

Updated visual simulations have been completed to demonstrate the screening provided by the additional trees to be planted along the Briones to Mt. Diablo Regional Trail.

Revised **Figure 3.1-14** is provided below and in Section 10.2 of Chapter 10, Draft EIR Revisions. When fully grown, the trees are expected to reach a height of about 24 feet. Height is estimated based on growth of trees previously planted on EBMUD property along the Briones to Mt. Diablo Trail southwest of the newly proposed tree plantings. The additional trees would all be coast live oaks to provide year-round screening.

Use of Wide-Angle Lense for Viewpoints

To address concerns about the viewpoints presented in the Draft EIR and the use of a wide-angle lens for the photographs showing existing views, EBMUD developed new photographs using a standard lens (not wide-angle). Views from Viewpoint 5 are shown in the updated **Figure 3.1-14** below. Although comments were focused on the views from Viewpoint 5, which is shown below, EBMUD also developed new existing conditions photographs and visual simulations for

the other viewpoints in the Draft EIR that were determined to have been taken with a wide-angle lens. Views from Viewpoints 1, 3, 5, and 6 have been updated using a standard lens. Revised viewpoints are shown in updated **Figure 3.1-1** and revised existing conditions photographs are provided in **Figures 3.1-3**, **3.1-5**, **3.1-6** and **3.1-7**. Section 3.1 (Aesthetics) of the Draft EIR has been revised to include these new photographs showing existing views of the Project site, and additional visual simulations have been completed using the updated photographs and the revised planting plan shown in **Figure 2-3** above. Revised visual simulations are shown in updated **Figures 3.1-10**, **3.1-12**, **3.1-13**, **3.1-14**, and **3.1-15.** While only updated Draft EIR views from Viewpoint 5 are shown in this chapter, all updated figures are included in Section 10.2 of Chapter 10, Draft EIR Revisions. These updates do not add any significant new information and are provided to respond to concerns about the use of a wide-angle lens in producing the images.

Additional Visual Simulation

Because of the concern expressed in comments about the visibility of new facilities from the Briones to Mt. Diablo Regional Trail, EBMUD also assessed views from another public location along the trail, slightly to the north of Viewpoint 5. This new Viewpoint, termed Viewpoint 7, is shown below in **Figure 8-4**, and was selected to better depict the trail user experience as users proceed along the trail**.** Trail users would experience fleeting views of the Project from Viewpoints 5 and 7 as they walk along the trail. Visual simulations of the Project from Viewpoint 7 showing the existing view and views after construction are provided in **Figure 8-5** below.

As noted above, EBMUD considered recommendations provided in comments and determined that it is feasible to plant additional trees in front of the consolidated maintenance building and electrical building. As shown in **Figure 8-5,** the additional trees would screen facilities visible from Viewpoint 7 and when fully grown in Year 20 would almost fully screen views of the liquid oxygen storage area and electrical building. The revised visual simulations did not result in identification of any new or more severe impacts. All visual impacts would remain less than significant.

Figure 3.1-14: Walnut Creek WTP Viewpoint 5 Visual Simulations – Before and After Construction

Before Construction – Existing View

After Construction - gravity thickeners, thickened solids pumping plant, and solids dewatering building partially visible

5 Years After Construction

20 Years After Construction

Figure 8-4: Viewpoint Locations Showing New Viewpoint 7

Figure 8-5: Walnut Creek WTP Viewpoint 7 Visual Simulations – Before and After Construction

Before Construction – Existing View

After Construction - Gravity thickeners, thickened solids pumping plant, solids dewatering building, liquid oxygen storage area and electrical building

5 Years After Construction

20 Years After Construction

8.1.3 Global Response 3 – Need for Project at the Walnut Creek WTP and Project Sizing at the Walnut Creek WTP

The following comments and inquiries were raised about the need for the Project and Project sizing at the Walnut Creek WTP:

- Why are improvements needed at the Walnut Creek WTP?
- Can the Project be constructed at the Bixler site instead?
- Can improvements at the Lafayette WTP be used to eliminate the need or reduce the size of improvements at Walnut Creek WTP?
- Would decommissioning Lafayette WTP affect the scale of improvements at the Walnut Creek WTP?
- A suggestion that a new water treatment plant be built in the San Ramon hills.

The responses to these comments are described below and address all or part of the following comments:

- Mallya-15
- Neighbor feedback on 3/22/2024

Need for Project

The Walnut Creek WTP provides the primary water supply for approximately 225,000 people within EBMUD's East-of-Hills service area, located in Contra Costa County. The Walnut Creek WTP operates year-round and serves EBMUD customers in portions of Pleasant Hill, Walnut Creek, and Lafayette, as well as the Alamo, Danville, Blackhawk and San Ramon Valley communities. The Walnut Creek WTP lacks pretreatment and ozone facilities, which limits its ability to treat a broader range of untreated water. Chapter 2.3 (Project Purpose and Objectives) of the Draft EIR explains that the primary purpose of the Project is to allow the Walnut Creek WTP to more reliably treat a broader range of untreated water from EBMUD's Pardee and Briones Reservoirs resulting from high rainfall runoff, wildfires, algae blooms, and supplemental supplies from the Freeport Regional Water Project or interties with Contra Costa Water District during planned and unplanned outages and future droughts, all of which are expected to increase in the future due to climate change. The Project would ensure EBMUD continues to meet existing drinking water and environmental regulations and can achieve internal long-term water quality goals, as well as address any potential future emerging contaminants. The Project would also increase the Walnut Creek WTP capacity to meet planned future demands, improve water system reliability and operational flexibility, and allow for the potential decommissioning of the Lafayette WTP.

Chapter 4.6 (No Project Alternative) explains that without the Project, Walnut Creek WTP would be less adaptive to on-going and future changes in source water quality, and therefore EBMUD customers may be required to ration more frequently and experience undesirable taste and odor during periods when untreated water quality is diminished in Pardee Reservoir, during droughts when supplemental supplies are entering EBMUD's water system, and during future high demand periods or during planned or unplanned outages when there is insufficient supply or treatment capacity to meet demands.

Project Alternatives

Chapter 4 (Alternatives) of the Draft EIR evaluates alternatives to the Project. Two off-site alternatives to adding pretreatment at the Walnut Creek WTP were identified - Pretreatment of Freeport Water near Camanche and Upcountry Pretreatment at Bixler. Both of the alternatives were removed from future consideration because they do not meet the Project objectives to pretreat water stored locally at EBMUD's Briones Reservoir or water from interties with the Contra Costa Water District, which are critical water supplies and both alternatives would locate pretreatment facilities at least 30 miles from Walnut Creek WTP, which would create chemical dosing risks such that the alternatives would not be able to consistently meet the Project objectives of increasing water treatment capacity to meet future demands and complying with drinking water regulations and EBMUD's internal quality goals. Additionally, the Freeport alternative would not be able to pretreat water stored in Pardee Reservoir. The Bixler alternative would increase risk of Mokelumne Aqueduct failures, would be prone to outages due to flooding potential, has high operational cost and energy use, and has a high capital cost. More detail on the Bixler alternative is discussed further below.

In addition to off-site alternatives, Chapter 4 (Alternatives) of the Draft EIR evaluates an on-site alternative called the No Dewatering Building Alternative that would include Pretreatment improvements at Walnut Creek WTP but without the new dewatering building and with smaller gravity thickeners. Because this alternative would reduce the number and size of new facilities constructed, this alternative would reduce the severity of the significant and unavoidable noise impacts and significant but mitigable construction traffic impacts and would reduce the severity of less-than-significant impacts related to aesthetics, biological resources, recreation and hydrology, but would not reduce the noise impact to less than significant. The No Dewatering Building alternative would generate a larger volume of wetter solids and therefore operational traffic would be incrementally greater because a greater volume of solids would be off hauled as compared to the Project. Because ongoing operational traffic impacts would be permanent and are acknowledged to be of concern to the neighborhood, these permanent impacts would outweigh reductions in construction impacts and the minor improvements in less than significant visual impacts and therefore the No Dewatering Building was not selected.

Bixler Pretreatment Facility Alternative

Since 1999, EBMUD has considered multiple alternatives for adding pretreatment facilities to address changes in untreated water quality. EBMUD considered both on-site alternatives for improvements at the Walnut Creek WTP and off-site alternatives for adding pretreatment at the Bixler Chlorination Facility (Bixler Facility) near Brentwood in Contra Costa County or further upstream at the Camanche Reservoir near Clements in San Joaquin County.

The Bixler Pretreatment Alternative was evaluated in the November 2018 Pretreatment Alternatives Technical Memorandum as an alternative to adding pretreatment to any or all three of EBMUD's inline WTPs: Walnut Creek WTP, Orinda WTP and/or Lafayette WTP (Carollo, 2018). The inline WTPs, as noted in prior analyses, were constructed to handle high-quality water from the Mokelumne River and currently use in-line filtration and lack conventional pretreatment used at EBMUD's other WTPs, which allows for treatment of a broader range of water quality. Pretreatment at Orinda WTP was determined not to be necessary at this time because there is sufficient pretreatment capacity from EBMUD's Sobrante and Upper San Leandro (USL) WTPs that overlap with the Orinda WTP service area. Because Lafayette WTP is

an aging WTP with limited treatment capacity, which would require significant capital investment to ensure reliability and meet regulatory requirements, pretreatment was also not considered because Lafayette WTP is ultimately planned to be decommissioned.

The Bixler Facility is located approximately 35 miles east of the Walnut Creek WTP and adjacent to EBMUD's Mokelumne Aqueducts, which deliver water from Pardee Reservoir to the inline WTPs and local reservoirs (i.e., San Pablo, Briones, and USL Reservoirs). Under the Bixler Pretreatment Alternative, untreated water in the Mokelumne Aqueducts would be pretreated at the Bixler Facility, which would require depressurizing the water from 190 pounds per square inch (psi) to atmospheric pressure for the pretreatment process and then repressurizing the water back to 190 psi so the pretreated water could be transported to EBMUD's inline WTPs and local reservoirs downstream. Because the Mokelumne Aqueducts are operated as a system, pretreatment at the Bixler Facility cannot be phased, and thus Bixler pretreatment facilities would need be constructed to handle a volume up to the capacity of the Mokelumne Aqueducts, which is 325 million gallons per day (MGD).

Pretreatment at the Bixler Facility would consist of traditional flocculation and sedimentation processes, pre-ozone, and intermediate ozone. New facilities would include lagoons for thickening solids, chemical storage and feed facilities, an operations building, a 30,000-horsepower pumping plant to pump the treated water back into the Mokelumne Aqueducts, and electrical facilities and backup generators to support these processes.

The following are reasons why the Bixler Pretreatment Alternative is not a feasible alternative:

A facility at Bixler cannot treat water stored in Briones Reservoir: Briones Reservoir is the primary local reservoir to supply EBMUD's inline WTPs. Briones Reservoir is also the largest of EBMUD's five local reservoirs and is a critical local supply during high summer demands and planned/unplanned infrastructure outages including outages on the Mokelumne Aqueducts, which are vulnerable to failure due to their age and flooding hazards in the California Delta. In recent years, Briones Reservoir water quality has degraded due to effects of climate change (increased temperatures and algal blooms) and is expected to continue to degrade; therefore, pretreatment of Briones Reservoir water will likely be necessary in the future. Because the Bixler Facility is located upstream of Briones Reservoir, a facility at Bixler could not pretreat water stored in Briones Reservoir. Although Briones Reservoir could be filled with water pretreated at Bixler, the water quality would degrade in the natural environment and therefore would need to be pretreated again at the Walnut Creek WTP.

A facility at Bixler cannot treat water from the Contra Costa Water District (CCWD) Intertie: The CCWD Intertie connects CCWD's Los Vaqueros Reservoir to EBMUD's Mokelumne Aqueducts and is a potential source of emergency supply to EBMUD in the event of a failure of one or more of the Mokelumne Aqueducts. The Los Vaqueros Reservoir water supply experiences a broad range of water quality and therefore pretreatment is necessary. A pretreatment facility at Bixler would not be able to pretreat water from Los Vaqueros Reservoir because the CCWD Intertie is downstream of the Bixler Facility.

Pretreatment at Bixler would increase risk of Mokelumne Aqueduct failures: Pretreated water at the Bixler Facility would need to be pumped into the Mokelumne Aqueducts, which would increase operating pressures above existing levels when the pumps turn on and off, and as a result the operating pressures may exceed allowable design pressures. The Mokelumne

Aqueducts are also vulnerable to failure due to their age and condition and the increased pressures have the potential to cause transients potentially causing a break to the Mokelumne Aqueducts impacting EBMUD's ability to supply water to its 1.4 million customers.

Pretreatment at Bixler involves chemical dosing risks due to remote response: Remote facilities have a high likelihood of operational disruptions, which would impact production at the Walnut Creek WTP. Due to the off-site, remote location of the Bixler Facility, it takes up to 17 hours for pretreated water to arrive at the Walnut Creek WTP. If any water quality issues are detected at the Walnut Creek WTP and modifications must be made at the Bixler Facility, it would take up to 17 hours for improved water quality to be delivered to the Walnut Creek WTP, which could impact water delivery. For example, during changing untreated water quality events such as high turbidity from heavy rainfall, the Walnut Creek WTP and other inline WTPs' filtration capacities may be impacted due to the extended response time to refine chemical dosing at the Bixler Facility.

A Bixler Pretreatment Facility would be prone to outages due to flooding potential: The Bixler Facility is located on the western edge of the California Delta, which is a large area below sea level islands that were reclaimed in the late 1800s and early 1900s by the construction of earthen levees that have a history of failing; potential for levee failures is expected to increase due to climate change induced sea level rise and increase in large winter storms. In addition, the California Department of Water Resources predicts that an earthquake could cause multiple levee failures resulting in flooding in the Delta for three to five years until the levees are repaired. If a levee failure occurred, the Bixler Facility would experience an outage of pretreatment facilities due to flooding of the facilities as well as roadway flooding that would prevent access for operation and maintenance staff, chemical deliveries, and solids off haul. Construction of a seawall to protect against flooding may not be feasible due to construction costs and permitting requirements and would not address the site access issues if the surrounding roadways are flooded.

A Pretreatment Facility at Bixler has a high operational cost and energy use: The Bixler Pretreatment Alternative annual operating cost would be approximately $11.2 million, which is significantly higher than the Walnut Creek WTP Pretreatment Project Phase 1 and 2 annual operating cost of approximately $3.3 million. EBMUD has a fiscal responsibility to maintain reasonable rates for its customers and the increased operational and energy use costs of the Bixler Alternative would impact EBMUD's ratepayers. In addition to increased costs, the additional energy use associated with pumping would result in increased greenhouse gas emissions and EBMUD would have to provide additional staffing to support the facility, further increasing operational costs.

A Pretreatment Facility at Bixler has a high capital cost: The Bixler Pretreatment Alternative total conceptual construction cost is approximately $1 billion, which is significantly higher than the Walnut Creek WTP Pretreatment Project Phase 1 and 2 construction cost of approximately $420 million. EBMUD has a fiscal responsibility to maintain reasonable rates for its customers and the higher capital costs of the Bixler Alternative would impact EBMUD's fiscal responsibility. Although the Bixler Facility could pretreat water for the Orinda WTP, as discussed above, pretreatment for the Orinda WTP is not currently needed and the pretreatment facilities at the Bixler Facility could not be phased to lower the costs.

In conclusion, the Bixler Pretreatment Alternative does not feasibly address the need to provide pretreatment facilities to address changes in untreated water quality and was eliminated from further consideration for the following reasons: critical water supply from Briones Reservoir or the CCWD Intertie could not be pretreated, the risk of Mokelumne Aqueduct failures due to higher pressures would increase, chemical dosing risks associated with a remote facility reduces the reliability of the Walnut Creek WTP capacity, the Bixler Facility is prone to outages due to potential flooding, and the Bixler Alternative has significantly higher operational and capital costs compared to pretreatment at the Walnut Creek WTP.

Improvements at the Lafayette WTP

Section 2.2.2 (Overview of Existing Water System Operations) of the Draft EIR describes the service areas for the Lafayette WTP and the Walnut Creek WTP. The Lafayette WTP site is approximately 24-acres compared to the Walnut Creek WTP site, which is 50 acres. The Lafayette WTP is EBMUD's smallest regularly operated WTP and primarily supplies the central part of the EBMUD service area in the Lafayette/Moraga/Orinda (Lamorinda) communities during periods of higher summer water demands only. During the lower water demand winter months, the Lafayette WTP is typically shut down when both the Walnut Creek and the Orinda WTPs can collectively serve the Lamorinda area customers. As shown in Figure 2-5 (EBMUD Water Service Area) of the Draft EIR, the service area for the Lafayette WTP is limited and thus the Lafayette WTP cannot supply the Walnut Creek WTP service area due to hydraulics and its smaller capacity and site size.

Some reliability improvements are planned at the Lafayette WTP; however, adding pretreatment and expanding the capacity of the Lafayette WTP to reduce the scale of improvements at Walnut Creek WTP or eliminate the need for pretreatment improvements at Walnut Creek WTP altogether is not feasible because the Lafayette WTP cannot supply the Walnut Creek WTP service area.

Potential Decommissioning of Lafayette WTP

Section 2.3.2 (Project Objectives) of the Draft EIR explains that the primary purpose of the Project is to allow the Walnut Creek WTP to more reliably treat a broader range of untreated water. The Project would also increase the capacity of the Walnut Creek WTP, allowing for the potential permanent decommissioning of Lafayette WTP. If Lafayette WTP were to be decommissioned, the Lafayette WTP service area would be supplied by a combination of the Walnut Creek WTP and the Orinda WTP. The decision to decommission Lafayette WTP would not affect the scale of improvements at the Walnut Creek WTP but could affect the timing for when Walnut Creek WTP Phase 2 is constructed, as discussed below.

The Walnut Creek WTP is designed with two separate treatment systems for reliability, allowing the water treatment plant to operate at half capacity during planned outages for maintenance or unplanned outages. Section 2.2.3 (Existing Water Treatment Plant Process) of the Draft EIR describes how the Walnut Creek WTP is split into a north half and a south half. Untreated water from EBMUD's Mokelumne Aqueducts is directed to the north rapid mix facility and four north filters via a 78-inch diameter pipeline routed along the north side of the facility and is directed to the south rapid mix facility and the four south filters via a 72-inch pipeline routed along the south side of the facility. Each half of the water treatment plant was hydraulically sized with a maximum capacity of 80 MGD for a total maximum hydraulic capacity of 160 MGD. The Project would be constructed in two phases with the Phase 1 improvements adding pretreatment

before the north filters and Phase 2 improvements adding pretreatment before the south filters. Similar to the existing water treatment plant facilities and pipelines, the Phase 1 and Phase 2 improvements would each be sized for half of the water treatment plant capacity and when both are completed, would improve reliability by supporting planned and unplanned outages of the pretreatment facilities. Therefore, the decision to decommission Lafayette WTP would not affect the sizing of the pretreatment facilities.

The schedule for implementing Phase 2 improvements is uncertain and depends on future untreated water quality and water demands. Specifically Phase 2 would be implemented if untreated water quality continues to decline such that the Phase 1 pretreatment capacity is not sufficient to support the demands on the Walnut Creek WTP or when demands on the Walnut Creek WTP exceed the overall Phase 1 capacity of the Walnut Creek WTP. As discussed above, the Walnut Creek WTP would supply a portion of the Lafayette WTP service area if Lafayette WTP is decommissioned, which would increase demands on the Walnut Creek WTP and therefore could accelerate the timing for the Phase 2 pretreatment improvements.

New Water Treatment Plant

EBMUD operates six water treatment plants that have a combined capacity to treat more than 375 million gallons of water daily and supply approximately 1.4 million customers in parts of Alameda and Contra Costa Counties. In addition to the Walnut Creek WTP, the water treatment plants are Upper San Leandro in Oakland, San Pablo in Kensington, Sobrante in El Sobrante, and water treatment plants located in and named for Orinda and Lafayette. EBMUD has invested resources in, and continues to invest in, constructing, operating, updating and maintaining its water treatment plants, which are sufficient to provide drinking water to EBMUD’s entire service area. Currently, major construction is occurring for reliability improvements at the Orinda WTP and Upper San Leandro WTP and EBMUD is in the planning phase for improvements for the Walnut Creek WTP, Lafayette WTP and the Sobrante WTP.

As discussed above, the existing Walnut Creek WTP pipelines and filters are sized to meet the existing and forecasted water demands for the communities it serves and the 50-acre site can accommodate the improvements needed to more reliably treat a broader range of untreated water. Constructing a new water treatment plant at a different location is not only unnecessary but also financially impractical and logistically challenging. As a public agency, EBMUD is committed to maintaining reasonable rates for our customers while ensuring a reliable and sustainable water infrastructure. Investing in the enhancement of our existing facilities, including the Walnut Creek WTP aligns with this commitment, allowing us to maximize the efficiency and lifespan of our infrastructure without imposing undue financial burdens on our ratepayers.

Moreover, embarking on the construction of a new water treatment plant elsewhere would entail exorbitant costs, specific siting requirements, and would add additional risk. These costs extend beyond the mere construction of new facilities, encompassing expenses such as real estate acquisition, installation of new water transmission pipelines, and integration of the new water treatment plant with EBMUD's existing water distribution system and associated pumping and storage facilities. Each water treatment plant has specific space, elevation, accessibility, utility infrastructure, topographical, and geological requirements to serve its designated customers as well as design considerations to minimize potential environmental impacts, and there is no known suitable place for a new water treatment plant to supply the same customers as the Walnut Creek WTP. Locations for the alignment of transmission pipelines also have specific elevation,

space, and maintenance accessibility requirements, and pipeline alignments must also include consideration of traffic impacts. In addition, if there was a feasible location for a new water treatment plant at another location, it would take significantly longer than the Project as it would require survey, site plan studies, pipeline alignment studies, hydraulic sizing studies, property acquisition, environmental studies and documentation, design studies, and construction contract drawings for facilities and pipelines all to support construction of more facilities. A treatment plant at a new location would require construction of a substantial amount of transmission pipeline, which would also take a significant amount of time. This extensive process would significantly prolong the timeline for project completion and adds to the risk that EBMUD would not have the pretreatment facilities needed to treat a broader range of water quality when it is needed.

8.1.4 Global Response 4 – Use of Larkey Lane as an Access Route

The following comments were raised about the need for access to the Walnut Creek WTP using Larkey Lane:

- Concerns about traffic, safety, and pavement condition due to large trucks using Larkey Lane, which includes a T-junction with San Luis Road.
- Can the Walnut Creek WTP be accessed through an alternative route?

The responses to these comments are described below and address all or part of the following comments:

- Mallya-4
- Mallya-9
- Neighbor feedback on 3/22/2024

Alternative Haul Routes

EBMUD discussed construction access to the Walnut Creek WTP with the City of Walnut Creek, and City staff have agreed that the most direct route is from Interstate 680, exiting at San Luis Road and then turning onto Larkey Lane. This route results in about one mile of travel on local streets after exiting the freeway.

A commenter suggested a potential alternative haul route to use EBMUD's Mokelumne Aqueducts right-of-way located to the north of the Walnut Creek WTP to access the site from San Luis Road. However, the existing gravel road on top of the Mokelumne Aqueducts is not suitable for heavy truck use, which could damage the aqueducts, and there are multiple above ground concrete access structures that are critical for the operation of the aqueducts and would be in the way of an access road for large concrete or hauling trucks. In addition, the entrance to the right-of-way is too narrow for large trucks. Ongoing construction traffic on the right-of-way could also impact EBMUD's ability to quickly respond to a failure of the Mokelumne Aqueducts, affecting 90 percent of the water supply to EBMUD's approximately 1.4 million customers. Lastly, portions of the right-of-way overlap with the Briones to Mt Diablo Regional Trail managed by the East Bay Regional Park District, which would need to be closed for pedestrian and cyclist safety if the right-of-way were to be used for access.

EIR Transportation Findings and Mitigation Measures

Section 3.13 (Transportation) in the Draft EIR evaluates potential traffic, safety and pavement condition impacts associated with haul truck traffic during construction and additional operational truck traffic and concludes that impacts are less than significant. Mitigation Measure TRA-1 on pages 3.13-25 and 3.13-26 of the Draft EIR includes measures to minimize impacts of heavy construction truck traffic to the Walnut Creek WTP. These measures include restricting soil and demolition off-haul and large equipment delivery to and from the Walnut Creek WTP to the hours of 9:00 a.m. to 3:30 p.m., which would avoid morning and afternoon high traffic (peak commute) periods. Mitigation Measure TRA-1 also requires a traffic control plan to include heavy construction vehicle traffic safety monitoring, written traffic safety instructions for heavy construction drivers with written acknowledgement and radar speed feedback signs on Larkey Lane to reduce vehicle speeds. Mitigation Measure TRA-1 would require the contractor to restore the pavement conditions to a structural condition equal to that which existed prior to construction on Larkey Lane and San Luis Road.

Mitigation Measure TRA-2 on page 3.13-29 of the Draft EIR requires that during extended workdays with large concrete pours and days with soil off-hauling, EBMUD would provide a flagger at the intersection of Larkey Lane and Alvarado Avenue during school start and dismissal times with a buffer before school starts and after school ends to ensure safety of children walking to and from school. However, there may be children crossing the intersection of Larkey Lane and San Luis Road to get the Contra Costa Christian Schools because the intersection is on the most direct route to the Contra Costa Christian Schools. Therefore, to further ensure the safety of children walking to and from school, Mitigation Measure TRA-1 is revised to add two radar speed feedback signs on San Luis Road to control vehicle speeds, and Mitigation Measure TRA-2 is revised to add an additional flagger at the intersection of Larkey Lane and San Luis Road.

Mitigation Measure TRA-1 on page 3.13-25 of the Draft EIR is revised as follows:

Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP

- Use of soil and demolition off-haul and large equipment delivery trucks to and from the Walnut Creek WTP will be restricted to between the hours of 9:00 a.m. to 3:30 p.m.
- The required Traffic Control Plan shall include the following measures:
    - EBMUD's Contractor shall distribute written traffic safety requirements to all Contractor heavy construction vehicle drivers. All drivers shall provide signed acknowledgement of having read and understood all traffic safety requirements and consequences of non-compliance.
    - Written traffic safety requirements shall include:
        - Construction work hours specifying when construction traffic would be allowed to access the Walnut Creek WTP and staging areas.
        - Construction haul routes and associated speed limits.
        - Designated parking and queuing locations.
    - Contractor shall provide Project sticker or equivalent to drivers who have provided written acknowledgement of traffic safety requirements.
        - Project sticker shall be made available upon request by EBMUD during the construction contract period.
    - Contractor heavy construction vehicle drivers shall conform to designated construction hours, including no driving, queuing, idling or parking on local roadways outside of designated construction hours as outlined in written traffic safety requirements.
    - Contractor heavy construction vehicle drivers shall use only designated construction traffic haul routes.
    - Contractor shall provide Radar Speed Feedback Signs along Larkey Lane <u>and San Luis Road</u> for the entire Project duration (four ~~two~~, one in each direction of

traffic on Larkey Lane and San Luis Road) to deter speeding by heavy construction vehicles on construction traffic routes.

- Contractor heavy construction vehicle drivers shall comply with roadway traffic safety rules as outlined in written traffic safety requirements, including, but not limited to:
  - Stoplight signals and stop signs.
  - Roadway speed limits (reduced speeds in construction zones and near schools).

- Prior to Project construction, EBMUD shall require the contractor(s) to video document pavement conditions on San Luis Road between Casa Way and Larkey Lane and on Larkey Lane between San Luis Road and Alfred Avenue that will be used by Project-related vehicles. Pavement conditions shall also be documented after Project construction is complete. If there is visible deterioration in the pavement condition, any pavement damaged by Project construction-related traffic shall be repaired to a structural condition equal to that which existed prior to Project construction activity.

Mitigation Measure TRA-2 on page 3.13-29 of the Draft EIR is revised as follows:

Mitigation Measure TRA-2: Additional Flagger Requirements at Larkey Lane for Walnut Creek WTP

Contractors shall implement the following measures as part of the Traffic Control Plan in Walnut Creek:

- On extended workdays with large concrete pours and days with soil off-hauling at the Walnut Creek WTP, provide a traffic control flagger at the intersection of Larkey Lane and Alvarado Avenue and the intersection of Larkey Lane and San Luis Road during school start and dismissal times with a buffer before school starts and after school ends.
- The construction contractor shall confirm with the Contra Costa Christian Schools (2721 Larkey Lane, Walnut Creek) and Buena Vista Elementary School (2355 San Juan Avenue, Walnut Creek) the typical start and dismissal times, school events, and irregular start and dismissal times prior to the beginning of each school year.

Although soil and demolition off-haul and large equipment delivery would be restricted to the hours of 9:00 a.m. to 3:30 p.m., concrete delivery trucks would be allowed to access the Walnut Creek WTP site from 6:00 a.m. to 6:00 p.m. to accommodate extended concrete pours. There would be approximately 40 extended concrete pour days during Phase 1, and approximately 15 extended concrete pour days during Phase 2. Table 3.13-4 on page 3.13-23 of the Draft EIR includes the results of a traffic analysis that evaluates the addition of Project-generated construction trips generated during the highest single day volume period, which occurs during Phase 2 when the Project would generate 22 worker trips and 75 truck trips to support a concrete pour at the Walnut Creek WTP. The level of service, which accounts for intersection delay, at the Larkey Lane and San Luis Road intersection during the highest single day volume would continue to be above City of Walnut Creek standards during the AM and PM peak hours for residential streets. In addition, Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP is revised to add two radar speed feedback signs on San Luis

Road, and Mitigation Measure TRA-2: Additional Flagger Requirements at Larkey Lane for Walnut Creek WTP is revised to include a flagger at the intersection of Larkey Lane and San Luis Road during large concrete pours and days with soil off-hauling at the Walnut Creek WTP, which would help manage vehicle speeds on San Luis Road and the flow of traffic through the intersection during school start and dismissal times with a buffer before school starts and after school ends.

Operational weekly truck trips could increase from approximately 2 per week to approximately 4 per week for chemical deliveries and solids handling truck trips could increase from approximately 2 per day to approximately 3 per day during typical periods of solids handling. As discussed on page 3.13-25 of the Draft EIR, these additional trips are not likely to worsen the intersection operating conditions along local roads, adversely affect pedestrian and bicycle circulation, or adversely affect pavement conditions on local roads.

8.1.5 Global Response 5 – Chemical Handling and Storage Safety Measures

The following comments were raised about the storage and transport of chemicals at the Walnut Creek WTP:

- Safety concerns about chemical use and transportation increasing as a result of the Project.
- Safety concerns about storing chemicals near a residential neighborhood and transporting WTP chemicals through a residential neighborhood.
- Safety concerns about a chemical gas leak and its dispersal into the neighborhood.

The responses to these comments are described below and address all or part of the following comments:

- Mallya-2
- Mallya-3
- Neighbor feedback on 3/22/2024

Water Treatment Plant Process Chemicals

As explained on page 2-34 of the Draft EIR, there are seven existing chemical systems currently in use at the Walnut Creek WTP that EBMUD would continue to use, including polyaluminum chloride, cationic polymer, sodium hypochlorite (i.e., concentrated liquid bleach), hydrofluorosilic acid (fluoride), caustic soda, aqueous ammonia, and solids conditioning (non-ionic) polymer. The Project would require new deliveries of alum, polymer, microsand, hydrogen peroxide, and liquid oxygen (to generate ozone) as necessary to treat the range of water quality entering the Walnut Creek WTP. These are chemicals that are typically used at water treatment plants throughout the United States and have been identified by the water treatment industry to provide essential water treatment and public health benefits. Although these chemicals are classified as hazardous materials, EBMUD follows all local, state and federal stringent handling and storage requirements for these chemicals, resulting in a low potential of an accidental spill or release of these chemicals. Design and operational features for chemical handling and storage discussed under Water Treatment Plant Handling and Storage Requirements below would minimize any risk for an accidental chemical release. Therefore, as described on page 3.8-21 of the Draft EIR, the operational activities associated with the Project would not expose the public or environment to hazardous materials.

EBMUD complies with all environmental and workplace health and safety regulations at the federal, state, and local levels and fire and building codes for the storage and handling of these hazardous materials and would continue to comply with these regulations and codes under the Project.

Hazardous Materials Business Plan (HMBP)

Because EBMUD is an entity that handles specified quantities of chemicals at the Walnut Creek WTP, EBMUD is required to prepare a Hazardous Materials Business Plan (HMBP), which details how hazardous materials are safely managed and supports emergency response in the event of a hazardous materials release. The HMBP, which is described on page 3.8-9 of the Draft EIR, includes the following:

- An inventory of hazardous materials with specific quantity data, storage or containment descriptions, ingredients of mixtures, and physical and health hazard information.
- Site and facility layouts that must be coded for chemical storage areas and others facility safety information.
- Emergency response procedures for a release or threatened release of hazardous materials.
- Procedures for immediate notification of releases to the administering agency.
- Evacuation plans and procedures for the facility.
- Descriptions of employee training in evacuation and safety procedures in the event of a release or threatened release of hazardous materials consistent with employee responsibilities, and proof of implementing such training on an annual basis.
- Identification of local emergency medical assistance appropriate for potential hazardous materials incidents.

EBMUD has submitted the HMBP for the Walnut Creek WTP to the Contra Costa County Health Services Department, the local enforcement agency responsible for overseeing hazardous materials compliance. The Contra Costa County Health Services Department uses the HMBP to provide critical information to emergency responders like fire departments in event of a chemical release. Based on the HMBP, the Contra Costa County Health Department has issued a permit to operate which allows the storage and handling of chemicals at the Walnut Creek WTP. The HMBP would be updated to address the proposed changes in the water treatment plant operations and EBMUD would provide the HMBP to the Contra Costa County Health Services Department.

Risk Management Plan (RMP)

Except for aqueous ammonia, all of the existing and proposed chemicals stored at the Walnut Creek WTP are liquids that have low vapor pressures and would not be expected to release a hazardous gaseous plume in the event of an accidental spill. There are no chemical gases stored on the Walnut Creek WTP site. Although ammonia can have a sufficient vapor pressure to cause a gaseous release in the event of an accidental spill, the amount of ammonia vapor released to the air would be low because the concentration of ammonia used at the Walnut Creek WTP is less than 20 percent and ammonia is stored within the chemical building, which would restrict the extent of the release.

Ammonia above certain threshold volumes is a regulated substance under the California Accidental Release Program (CalARP). As described on page 3.8-7 of the Draft EIR, EBMUD has prepared a Risk Management Plan (RMP) in compliance with CalARP regulatory requirements. The RMP includes a hazard assessment to evaluate the potential effects of an accidental release, a program for preventing an accidental release, and a program for responding to an accidental release. The RMP is filed with Contra Costa County Health Services Department, which ensures review by and distribution to other potentially affected agencies. Based upon the RMP prepared for the Walnut Creek WTP, hazardous fumes released from an on-site spill would be expected to remain confined within the immediate vicinity of the spill and well within the boundaries of the WTP and would not be expected to pose a health hazard to off-site receptors.

Water Treatment Plant Handling and Storage Requirements

Chemicals that are handled, stored and disposed of are described in safety data sheets that are kept at each water treatment plant in accordance with state and federal guidance. The water treatment plant operators receive deliveries of the chemicals at designated chemical loading/unloading stations located outside and adjacent to the chemical storage areas. These stations are designed so that leaks, spills or releases are contained within a secondary containment area. The loading/unloading areas are covered, and signs are posted to avoid mixing of incompatible chemicals.

As stated on page 3.8-6 of the Draft EIR, the California Fire Code, Article 80, includes specific requirements for the safe storage and handling of hazardous materials. These requirements reduce the potential for a release of hazardous materials and for the mixing of incompatible chemicals and specify secondary containment, separation of incompatible materials and spill response procedures to reduce the potential for a release of hazardous materials that could affect public health or the environment. These requirements have been implemented for existing chemicals and would be implemented for new chemicals stored on the site. The process chemicals are stored in above ground storage tanks with secondary containment sized to hold the entire contents in the event of a catastrophic failure and leak detection systems that will notify water treatment plant operators if there is a leak. Separate storage and separate secondary containment for the incompatible chemicals within the chemical building have been constructed to reduce the potential for mixing of incompatible chemicals. The chemical building also includes a fire alarm and fire suppression system, as well as fixed air analyzers that detect if there is an ammonia leak. The chemicals are transported to the point of application through pipelines that are contained within a trench that serves as secondary containment.

Liquid oxygen is not toxic or flammable. However, if released, ignition of combustible materials can occur more easily in the oxygen-enriched atmosphere. To ensure the safe storage of liquid oxygen and provide adequate separation between the storage facilities and combustibles, liquid oxygen would be stored in above-ground tanks, out of doors. The tanks would be underlain by noncombustible surfaces, and the systems would not be located beneath electrical power lines or within 50 feet of a combustible or flammable hazardous material.

The water treatment plant operators monitor and control the water treatment processes, including process chemical tank levels and feed rates, using computer terminals located in the operations building and by conducting periodic visual checks of the equipment. The water treatment plant operators also inventory the process chemical tanks on a daily basis and conduct visual inspections at the same time.

In addition, regulatory compliance staff conduct a wall-to-wall audit every year to ensure hazards are eliminated and ensure compliance with applicable local, state and federal health and safety regulations and requirements. Upon completion of the audit, a report is prepared to identify needed corrective measures and estimated completion dates.

Chemical Delivery Requirements

The transportation of water treatment plant chemicals to the Walnut Creek WTP involves a shipper who prepares the shipment and a carrier who transports the shipment from the shipper to the water treatment plant. As stated on Draft EIR pages 3.8-5 through 3.8-6, transportation of hazardous materials is regulated by the Federal Hazardous Materials Transportation Act

(HMTA) of 1974 and the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) of 1990. The HMTA was established to provide adequate protection against the risks to life and property inherent in the transportation of hazardous materials. Title 49 of the Code of Federal Regulations (CFR) Parts 171-180 covers transportation-related hazardous materials regulations in the United States and is enacted by various agencies, including the Federal Department of Transportation, to implement the requirements outlined in the HMTA. In addition to federal regulations, additional regulatory requirements for the transport of hazardous materials in California are specified in Title 13, California Code of Regulations, Sections 1160-1167 and Section 353 of the California Vehicle Code. The state and federal regulations collectively contribute to the goal of public safety in the transportation of hazardous materials through shipper certifications, carrier license requirements, vehicle safety standards, carrier driver routine training, carrier routine self-inspection and documentation requirements, appropriate packaging, labeling, and placarding shipments, carrier requirements to maintain rapid response plans for emergencies, and enforcement.

The process for the delivery of water treatment plant chemicals to the Walnut Creek WTP is described as follows. In accordance with the regulatory requirements, hazardous materials are categorized into hazard classes that identify the nature of the hazardous materials and packing groups that categorize relative level of risk. Shippers are required to classify the hazardous material for each shipment in accordance with the hazard classes and packing groups and are required to package the hazardous material in the appropriate container according to its classification. Further, the regulations require the shipper to communicate the hazard class, packing group, and proper shipping name on the shipping paperwork, using labels on the shipping containers, and using placards on the outside of the transport vehicle. The carrier takes the shipment from the shipper and transports the shipment to its destination and is responsible for confirming that the shipment is correctly described, marked, labeled, and has otherwise prepared the shipment for transportation.

In the event of a transportation incident, the necessary information is available in the shipping paperwork, labels, and placards for emergency responders to appropriately mitigate any potential hazards associated with a chemical release. Information contained in the Emergency Response Guidebook published by the Department of Transportation provides guidance on hazards and emergency actions specific to individual classes of hazardous materials. The Emergency Response Guidebook includes specific instructions for hazardous materials classified as an inhalation hazard by the federal government under Title 49 of CFR for the purpose of protecting the public from vapors resulting from an accidental spill. However, none of the chemicals transported to the Walnut Creek WTP meet the federal definition for being an inhalation hazard.

8.1.6 Global Response 6 – Community Communication During Construction

Commenters asked if the noise monitoring data can be posted to the Project website during construction and expressed concerns about not having someone to call with construction noise, dust, or vehicle idling complaints. The responses to these comments are described below and address all or part of the following comments:

- PM-13
- PM-16
- PM-18
- PM-21
- Neighbor feedback on 3/22/2024

General Communication During Construction

As explained on page 3.11-16 of the Draft EIR, EBMUD procedures require advance notice to residents about potentially disruptive construction activities and provide mechanisms for the public to get concerns and questions addressed.

EBMUD designates a Community Affairs liaison to respond to construction-related issues and coordinate with the construction project manager/engineer and any contractors to resolve any issues. Contact information for the Community Affairs liaison (i.e., phone number and email address) and Bay Area Air Quality Management District contact information will be provided on conspicuous signage at the construction site. Residents can contact EBMUD if there are any concerns about construction noise or if the contractors are not abiding by any idling limits or dust control measures.

EBMUD is committed to ensuring timely notification to neighbors approximately two weeks in advance of potentially disruptive construction activities. These would include days when there are extended workdays with large concrete pours that require truck trips during early commute hours and days with soil off-hauling when regular truck trips would occur between the hours of 9:00 a.m. to 3:30 p.m. The Community Affairs liaison will provide advanced notification via email, mailed notices, door-hangers, social media or other means as appropriate and would discuss notification procedures during the pre-construction meeting with neighbors.

Noise Control and Monitoring Communication

As described on page 3.11-16 of the Draft EIR, prior to construction, the contractor would submit a Noise Control and Monitoring Plan to EBMUD for review and approval, which would include the type and location of noise monitoring equipment that would be deployed at the Walnut Creek WTP site. The noise monitoring equipment would include a high accuracy noise monitoring system used to continuously monitor noise levels and would consist of a calibrated microphone and data logger. After the draft plans are submitted, EBMUD would hold a pre-construction meeting with neighbors to present and obtain input on the plans. EBMUD would consider the input received from the community when reviewing the draft plans.

At the request of the community, EBMUD would post bi-weekly noise monitoring reports that would summarize the noise monitoring results on the Project website. These reports would show how the noise monitoring results relate to applicable noise thresholds for the Project.

8.1.7 Global Response 7 – Community Evacuation Process

The following comments were raised about the emergency response process to protect the neighborhood near the Walnut Creek WTP:

- Concern about the potential effect of a wildfire on the chemicals stored on the site.
- Request for information about the evacuation plan and community notification process in the event the community is exposed to chemicals.

The responses to these comments are described below and address all or part of the following comments:

- Mallya-3
- Neighbor feedback on 3/22/2024

Wildfire Risks

Section 3.15 (Wildfire) of the Draft EIR describes the physical, environmental, and regulatory setting for wildfire hazards and impact analysis for the Project and concludes that impacts are less than significant.

As discussed on page 3.15-2 of the Draft EIR, vegetation at the Walnut Creek WTP and surrounding areas consist of a variety of vegetation communities, including primarily non-native grassland, non-native grassland/ruderal, mixed oak/Aleppo pine, mixed oak woodland, riparian woodland, and developed areas with ornamental landscaping. EBMUD deploys goats on the Walnut Creek WTP property for weed control and fire safety, as well as arborists for the removal of trees, as needed. The majority of low-lying vegetation (annual non-native grassland) is mowed or maintained by use of goats through the summer season.

As discussed on pages 3.15-2 through 3.15-3 of the Draft EIR, the California Department of Forestry and Fire Protection (CAL FIRE) has developed a fire hazard severity scale based on specific fire hazard criteria: vegetation (fuels), fire weather (winds, temperatures, humidity levels, and fuel moisture contents) and topography. Areas are classified as Very High, High, or Moderate Fire Hazard Severity Zones (FHSZs). The Walnut Creek WTP is not located in a designated FHSZ zone. However, Very High FHSZs exist in surrounding areas, including to the west of the Walnut Creek WTP site (west of Pleasant Hill Road), near Briones Regional Park, and to the south of the Walnut Creek WTP site, to the south of the Acalanes Ridge Open Space Area as shown in Figure 3.15-1 on page 3.15-4 of the Draft EIR. The City of Walnut Creek General Plan, however, identifies the “threat to people from wildland fire” at the Walnut Creek WTP site as “Very High” (Walnut Creek General Plan, 2006 – Figure 7 Wildland-Urban Interface Fire Threat), because of the proximity to wildland areas in the Acalanes Ridge Open Space (City of Walnut Creek, 2006).

CAL FIRE designates Walnut Creek WTP and surrounding area as a Local Responsibility Area, where fire wildfire prevention and suppression are typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract. The Walnut Creek WTP site is within the Contra Costa County Fire Protection District (CCCFPD) service area. The CCCFPD is responsible for providing emergency fire-protection, first-responder emergency and medical services, and fire prevention services to the city of Walnut Creek.

As discussed on pages 3.15-13 through 3.15-14 of the Draft EIR, Project construction activities would not exacerbate wildfire risks due to implementation of EBMUD standard practices and procedures including preparation of an Emergency Action Plan that includes responses to unplanned events such as fires during construction and includes requirements for the contractor to maintain adequate firefighting equipment on site, properly maintain construction equipment including spark arrestors on earthmoving and portable equipment, maintain defensible space around the construction site including vegetation management, locate combustible materials away from structures and combustible growth, restrict certain activities during periods of high fire danger, and adhere to the California Fire Code regulations for the safe storage and handling of flammable and combustible liquids or hazardous materials.

As discussed on pages 3.15-14 through 3.15-15 of the Draft EIR, Project operation and maintenance would also not exacerbate wildfire risks due to implementation of the combined Emergency Action Plan and Fire Prevention Plan (SSEAP) for the Walnut Creek WTP that requires specific maintenance and inspection activities for fire prevention, maintaining EBMUD's ongoing program for vegetation management at the site, keeping the site clean and free of debris, and trimming shrubbery and trees for both fire prevention and public safety. Existing fire hydrants also exist within the Walnut Creek WTP property that can be used for both fire protection and public safety. In addition, any new chemical and fuel storage facilities would be operated, maintained, and tested in accordance with applicable regulations and designed in accordance with California Fire Code, Article 80, which includes specific requirements for the safe storage and handling of flammable and combustible liquids.

EBMUD Emergency Response Procedures

EBMUD has prepared an Emergency Operations Plan (EOP) outlining procedures to be followed in the event of natural disasters, severe storms, major system failures, or terrorist attacks. EBMUD prepared a site-specific emergency response plan for individual facilities, using the systemwide EOP as a guide; the EOP identifies staff who will perform emergency duties and lists the resources needed to accomplish emergency tasks.

As described on page 3.15-9 of the Draft EIR, EBMUD maintains a combined site-specific SSEAP for the Walnut Creek WTP. The SSEAP describes specific features of the Walnut Creek WTP that prevent or mitigate hazards and establish initial responsibilities and actions to be taken to protect health and safety in the event of an emergency (e.g., fire, chemical leak and spill). The SSEAP includes information such as evacuation routes and assembly areas for staff, procedures to follow for reporting fires and other emergencies, staff responsible for controlling accumulation of flammable materials, chemicals, and hazardous waste, and staff responsible for maintaining fire prevention systems. In compliance with the Contra Costa County Health Services Hazardous Materials Programs Hazardous Materials Incident Notification Policy, the SSEAP also includes immediate emergency notification to the Contra Costa County Health Services Department, California Emergency Management Agency and the 911 system in the event of a major chemical spill. Notification procedures are posted at key locations throughout the Walnut Creek WTP. In addition, EBMUD personnel maintain a comprehensive inventory of emergency response equipment and the equipment is regularly inspected and maintained.

Contra Costa County Hazardous Materials Incident Response

As discussed above under EBMUD Emergency Response Procedures, EBMUD would notify the Contra Costa County Health Department in the event of a hazardous materials release that could

affect the community. As described on 3.8-9 of the Draft EIR, EBMUD has submitted a Hazardous Materials Business Plan (HMPBP) for the Walnut Creek WTP to the Contra Costa County Health Services Department to provide critical information to emergency responders like fire departments, law enforcement, and environmental protection agencies in event of a chemical release. The Contra Costa County Health Services Department maintains the Contra Costa Health Services Hazardous Materials Programs (CCHSHMP) Incidence Response Team, which is on call 24 hours per day to respond to notifications. The CCHSMP will take measures to mitigate the impacts of a hazardous materials release, such as:

- Dispatching of CCHSHMP emergency response teams quickly and with the appropriate equipment and personnel.
- Assessing the extent of the release or the potential extent of the release and whether neighboring communities are at risk of exposure.
- Determining whether the Community Warning System should be activated.
- Responding to inquiries from the public and the media.

Local Agency Evacuation Procedures

The police department handles evacuation routes, communicating the message and enforcement of evacuations and would work cooperatively with the CCCFPD and the Contra Costa County Health Services Department in response to a wildfire that threatens the residences near the Walnut Creek WTP. The police department uses a program called Genasys (previously Zonehaven) where the entire community is broken down into zones. The software program uses a routing algorithm that allows enforcement agencies to determine the most efficient evacuation routes for residents, accounting for various factors based on the pre-set zones including weather, street design, historical disaster data, geography, incident location, road closures, and real-time traffic conditions. The software is used to build a communitywide baseline digital map of evacuation zones. To search for Genasys zones by address, visit the Genasys website at https://protect.genasys.com/search.

In the event of an immediate threat to life, health, or safety, Contra Costa County's Community Warning System (CWS) will be activated. The CWS message will include basic information about the incident and what specific protective actions (shelter in place, lockdown, evacuate, avoid the area, etc.) are necessary to protect life and health. Depending on the urgency, severity, and certainty of the threat, some combination of the following alerting devices may be activated to provide you as much as notice as possible:

- Sirens in special safety zones
- Emergency Alert System on television and radio (KCBS 740 AM)
- Telephone Emergency Notification System
- Cell Phone Alerts
- National Oceanic and Atmospheric Administration Weather Radios
- Twitter and Facebook at CoCoCWS

For more information about these alerting devices and how to receive alerts directly, visit the Community Warning System website at https://cwsalerts.com.

As discussed on page 3.13-30 of the Draft EIR, Project activities at the Walnut Creek WTP would not substantially impair an adopted emergency response plan or emergency evacuation plan during construction or operations because construction and operation activities for the Project would be primarily confined to the Walnut Creek WTP site and would not cause any lane or roadway closures. In the event of emergencies, vehicles would continue to use the main entrance/exit off Larkey Lane at the Walnut Creek WTP. In addition, as described on pages 3.13-16 through 3.13-17 of the Draft EIR, a Traffic Control Plan would be prepared prior to construction and would include a description of emergency response vehicle access to the Walnut Creek WTP site to ensure that emergency responders have access during the construction period.

There are approximately 140 residential homes near the Walnut Creek WTP and currently 36 daily workers (32 workers between 8:00 a.m. and 4:00 p.m.) at the Walnut Creek WTP that would evacuate through a combination of Alfred Avenue and Larkey Lane to San Luis Road in the event of an emergency. Up to 22 additional construction workers would report at the Walnut Creek WTP during construction and up to an additional 4 workers would report to the Walnut Creek WTP post-construction during operation and maintenance. The additional number of workers during construction and during operation and maintenance is small relative to the existing number of homes and Walnut Creek WTP workers and therefore is not expected to significantly affect the time to evacuate the neighborhood around the Walnut Creek WTP if an evacuation is required.

8.2 Responses to Agency Comments

8.2.1 Contra Costa County Flood Control and Water Conservation District

Response to Comment CCCFCWCD-1

All existing aboveground watercourses at the Walnut Creek WTP are depicted in the Draft EIR Section 3.3 (Biological Resources) on Figure 3.3-3 on page 3.3-11. Figure 3.3-3 shows creeks, including culverted sections, ephemeral drainages and drainage ditches within the Walnut Creek WTP site. However, as discussed in the Draft EIR there would be no direct impacts on any of those watercourses. There are no water courses or man-made ditches within the portion of the Lafayette WTP that would be affected by construction.

As described in Draft EIR Section 3.9 (Hydrology and Water Quality) on page 3.9-19:

"Stormwater drainage at the Walnut Creek WTP site is currently collected on site, diverted through catch basins and storm drains, and discharged to the tributary creeks downstream of the site. … the Project would increase the amount of impervious surface area in Walnut Creek WTP by approximately 5.5 acres, which could alter the existing drainage pattern of the site or area. Bioretention basins would be constructed at the Walnut Creek WTP, and thus no off-site drainage system improvements would be required because runoff would be handled on site and the volume of drainage exiting the site would not increase. Because of these improvements, drainage changes that would increase off-site erosion or siltation would not be expected at the Walnut Creek WTP as result of the Project." The proposed bioretention basins are depicted in Figure 2.3 (Project Description) of the Draft EIR on page 2-4 and have been sized to store and infiltrate runoff from the additional approximately 5.5 acres of impervious surface that would be created by the Project.

With incorporation of the bioretention basins to retain and recharge the additional stormwater that would result from the increase of impervious surface at the Walnut Creek WTP, the amount of stormwater directed to existing natural water courses would not increase so an analysis of the capacity of those watercourses was deemed unnecessary.

The Draft EIR also determined that there would not be substantive change in runoff generated at the Lafayette WTP. As noted on page 3.9-19 of the Draft EIR: "The proposed work at the Lafayette WTP is expected to minimally increase impervious surface area because the replacement weir would be constructed in a currently undeveloped area and a similar impervious surface would be removed by demolition of the existing weir."

Response to Comment CCCFCWCD-2

As noted in Response to Comment CCCFCWDC-1, Section 3.9 (Hydrology) of the Draft EIR explains that additional runoff would be handled on site and the volume of drainage exiting the site would not increase. No additional analysis was deemed necessary.

Response to Comment CCCFCWCD-3

Section 3.9 (Hydrology) of the Draft EIR, page 3.9-23 explains that:

"Improvements at the Walnut Creek WTP would include installation of bioretention basins to capture and treat stormwater in accordance with applicable local and state water quality control plans.

Improvements at the Lafayette WTP could increase impervious surface area because a replacement weir would be constructed in a currently undeveloped area, though some impervious surface would be removed by demolition of the existing weir. Additional runoff could be produced, but the new impervious area is expected to be limited in extent.

New bioretention basins at the Walnut Creek WTP site would be vegetated with plantings that would allow infiltration of stormwater, which would reduce the amount of stormwater discharge, and thus, the capacity of the storm drains would not be exceeded." The new bioretention basins described in the Draft EIR would increase the amount of stormwater retention capability to prevent additional runoff generated from new impervious surface area from leaving the site and thus there would not be an increase in stormwater being discharged from the Walnut Creek WTP site. Responses CCCFCWCD-8 and CCCFCWCD-10 below describe the design of the bioretention basins in greater detail.

Response to Comment CCCFCWCD-4

Because additional runoff at the Walnut Creek WTP would be handled on site and minimal changes in runoff quantities are expected at the Lafayette WTP, as described in Draft EIR Section 3.9 (Hydrology), no adverse impacts to existing drainage facilities or downstream areas are expected.

Response to Comment CCCFCWCD-5

Because the facilities at the Walnut Creek WTP would not generate additional off-site runoff that would affect downstream facilities, as described in Draft EIR Section 3.9 (Hydrology), there would be no effects on existing or planned flood control facilities in the Grayson Creek/Murderer's Creek watershed.

Response to Comment CCCFCWCD-6

Because the facilities at the Lafayette WTP would generate minimal additional off-site runoff that would affect downstream facilities, as described in Draft EIR Section 3.9 (Hydrology), there would be no effects on existing or planned flood control facilities in the Lafayette Creek/Las Trampas Creek watershed.

Response to Comment CCCFCWCD-7

As noted in Responses to Comments CCCFCWDC-5 and CCCFCWDC-6, there would be no impacts to Contra Costa County Flood Control District facilities.

Response to Comment CCCFCWCD-8

Preliminary calculations for sizing of bioretention basins based on C.3 drainage management areas were performed using the Stormwater C.3 Guidebook (Contra Costa County 7th edition). As noted in the Draft EIR Project Description on page 2-31, "Stormwater facilities to serve the proposed improvements would be designed to be consistent with the Contra Costa Clean Water Program, Provision C.3 of the Municipal Regional Permit for stormwater discharges." A detailed stormwater control plan and facility design will be completed during design of the Project.

Because the Project is using bioretention basins to prevent additional surface runoff from leaving the site, as described in Draft EIR Section 3.9 (Hydrology), a detailed study using the County's hydrology method is not applicable.

Response to Comment CCCFCWCD-9

Bioretention basins that would be constructed as part of the Project are described in the Draft EIR Project Description and shown in Figure 2.3 on page 2-4.

Response to Comment CCCFCWCD-10

The Project uses bioretention basins, not detention basins, for management of stormwater. Unlike detention basins, which only store runoff temporarily until it can be discharged when downstream capacity is available, the bioretention basins will hold water until it can percolate into the groundwater. Detailed design has not been completed, but the bioretention basins have been sized to capture runoff that would be generated by approximately 5.5 acres of additional impervious surface at the Walnut Creek WTP. Because the bioretention basins would hold water until it percolates or evaporates and would be sized appropriately to capture the runoff there are no outlet structures incorporated in the basins.

As noted in Section 3.9 of the Draft EIR on page 3.9-23, EBMUD would be responsible for maintenance of the bioretention basins: "Project facilities, structures, and landscapes would be regularly maintained and inspected, ensuring that facilities, structures, and landscapes would be in functional order to reduce the likelihood of polluted run-off on and off site."

Response to Comment CCCFCWCD-11

Because the Project uses bioretention basins all additional runoff would be managed on site and there would be no effect on downstream creeks and channels. Both the quantity and duration of stormwater discharges from the Walnut Creek WTP would be unchanged.

Response to Comment CCCFCWCD-12

Under Section 53091 of the California Government Code, building and zoning ordinances do not apply to the location or construction of projects involving facilities for the production, generation, storage, treatment, or transmission of water. There will be no building permit or subdivision map filed for the Project and the drainage fee ordinance does not apply. Furthermore, Division 1010. Drainage, Section 2.010. Fees, of Contra Costa County Ordinance Code states that no fee shall be required for municipalities or public districts.

Response to Comment CCCFCWCD-13

As noted above, the drainage fee ordinance does not apply to EBMUD water treatment and transmission facilities.

Response to Comment CCCFCWCD-14

The Project does not include development of any regional stormwater facilities and would not affect any regional or Flood Control District-owned facilities.

Response to Comment CCCFCWCD-15

This comment does not pertain to the evaluation of impacts presented in the Draft EIR. However, because the Project is not creating additional surface runoff, these calculations are not applicable.

8.2.2 East Bay Regional Park District

Response to Comment EBRPD-1

The comment quotes the section of the Draft EIR that discusses EBMUD's license agreement with the East Bay Regional Park District (Park District), but also states that the excerpt discusses impacts to the Briones to Mt. Diablo Regional Trail. The section of the Draft EIR that is quoted primarily discusses impacts to "social footpaths." The social footpaths within EBMUD property that would have to be closed during construction are completely separate from the Briones to Mt. Diablo Regional Trail. Text in italics below does not pertain to the Briones to Mt. Diablo Regional Trail, but only the informal social footpaths within the existing boundaries of the Walnut Creek WTP. Users of the Briones to Mt. Diablo Regional Trail would be able to use the trail throughout construction of facilities at the Walnut Creek WTP with only extremely brief interruptions.

> "In accordance with the August 10, 2005 25-year, renewable right-of-way license issued by EBMUD to the Park District to allow the Park District use of the Walnut Creek WTP property to operate and maintain the Park District trail within the boundaries of EBMUD's property, EBMUD would provide the Park District thirty days' previous notice in writing prior to the initiation of any construction activity that would affect the Briones to Mt. Diablo Regional Trail. *During construction, closed social footpaths on EBMUD property would be clearly marked with EBMUD signage indicating the duration of the temporary footpath closure.*
>
> *Because construction impacts related to closure of social footpaths during construction and redirecting portions of social footpaths at the Walnut Creek WTP are not expected to lead to substantial deterioration of existing recreational areas, would be temporary in nature, and would ultimately support public recreational uses consistent with local plans and policies, the impact is less than significant."*

Response to Comment EBRPD-2

As discussed in the Draft EIR, any periods when construction vehicles need to cross the Briones to Mt. Diablo Regional Trail would be extremely brief. Page 3.12-8 of the Draft EIR states that: "The closure would occur infrequently for no more than a couple of minutes for each occurrence, and trail users would briefly wait for the construction vehicles to cross or temporarily be directed on a short detour around a small portion of the trail if feasible." Flaggers would be present during the entire time when construction vehicles are crossing the trail. The Briones to Mt. Diablo Regional Trail would not be realigned. As noted on page 3.12-8 of the Draft EIR above, "EBMUD would provide the Park District thirty days' previous notice in writing prior to the initiation of any construction activity that would affect the Briones to Mt. Diablo Regional Trail."

Response to Comment EBRPD-3

EBMUD does not anticipate any subsurface impacts to the paved portions of the Briones to Mt. Diablo Regional Trail surface as a result of Project construction. As noted in Response to Comment EBRPD-2, and Section 3.12 (Recreation) in the Draft EIR, construction equipment would need to cross the trail infrequently and crossings would not occur throughout the construction period but only when work was being conducted at the combined reclaimed

metering vault. Construction of the combined reclaimed metering vault would occur over about one year of the construction period. Because of the infrequent nature of construction related trail crossings, ramps, platforms or other protective material is not deemed to be necessary. However, if there are any subsurface impacts to the trail as a result of Project construction, EBMUD shall restore the ground surface to pre-construction condition, including paving, as required by license agreement between EBMUD and the Park District (EBMUD License Agreement dated August 10, 2005, regarding R/W X-1012 between EBMUD and East Bay Regional Park District).

Response to Comment EBRPD-4

Please refer to the visual simulation presented on page 3.1-25 of the Draft EIR. Viewpoint 3 on the Sousa Trail is substantially above the Walnut Creek WTP site, with the Walnut Creek WTP partially visible in the midground and screened from view by distance, topography, and trees. The new facilities at the Walnut Creek WTP are barely visible from Viewpoint 3. Because Viewpoint 3 is substantially above the Walnut Creek WTP site, plantings proposed in the Project vicinity have little effect on the views from that location. EBMUD is not planning to install screening vegetation on trails in the adjacent open space area. Any such vegetation would obstruct existing views of the surrounding landscape and is not deemed necessary because of the negligible visual impact from Viewpoint 3.

8.3 Responses to Organization Comments

8.3.1 Quail Ridge Homeowners Association 1

Response to Comment QRHOA1-1

Please refer to Global Response 2 for a discussion of plantings to screen new facilities.

Response to Comment QRHOA1-2

The comment includes the letter that was submitted as part of public scoping and expresses concern that no response to the letter was provided. All comments received during public scoping are included in Appendix B of the Draft EIR. The commenter's letter is included in its entirety in Appendix B. As noted during the scoping period for the Project, the purpose of comments submitted during scoping is to provide input into the content of the Draft EIR. These comments were considered during the development of the Draft EIR, and the Draft EIR addresses all of the comments presented in the letter that was submitted during public scoping.

On September 29, 2023, EBMUD released the Draft EIR for the Project for public review and filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research to begin a 45-day public review period (Public Resources Code Section 21161). Concurrent with issuance of the NOC, the Notice of Availability (NOA) was released informing the public that the Draft EIR was available and notice was provided to responsible and trustee agencies, other affected agencies, and interested parties, as well as all parties requesting a copy of the Draft EIR in accordance with Public Resources Code Section 21092(b)(3). During the public review period, the Draft EIR was available for review at the following locations:

East Bay Municipal Utility District
375 Eleventh Street
Oakland, CA 94607

Walnut Creek Library
644 North Broadway
Walnut Creek, CA 94596

Lafayette Library
3491 Mt. Diablo Boulevard
Lafayette, CA 94549

In regard to posting of information about the Project along the Briones to Mt. Diablo Regional Trail, EBMUD did post the Notice of Availability of the Draft EIR at two existing City of Walnut Creek trailhead kiosks located at Camino Verde Circle and at Sousa Drive, which was deemed a more appropriate method of posting information than the creation of a new kiosk along the trail. Public notice of the NOA of the Draft EIR exceeded the requirements of CEQA Guidelines Section 15087, which requires notice on the EBMUD website and notice by direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the Project is located or publication in the Contra Costa Times newspaper, and posting at the Contra Costa County clerk office. EBMUD also provided notice on NextDoor.

Response to Comment QRHOA1-3

Please refer to Global Response 2 for a discussion of newly added trees that would be planted in advance of construction to screen the proposed facilities.

Response to Comment QRHOA1-4

The existing social footpath (unofficial trail) through EBMUD property was not constructed by and is not maintained by EBMUD. As noted in the Draft EIR Project Description, the "social footpath is an unofficial, user-created path that forms over time, established by the community through regular use." As part of the proposed Project "The social footpaths would be redirected outside the new fence line as needed but would be kept as close to their existing locations as possible. The redirected portions of the social footpaths outside the security fencing would be dirt, graded flat, approximately 1 to 2 feet in width similar to the existing social footpaths, and would continue their current status and would not be maintained by EBMUD" (see Draft EIR page 2-27). Although the comment proposes a "new safer alternative connecting trail", the Draft EIR did not identify any safety issues associated with the existing Briones to Mt Diablo Regional Trail, which would remain open during construction. The new alternate trail amenity through the Walnut Creek WTP property that is proposed in the comment will not be constructed because:

- The existing social footpath was not constructed by and is not maintained by EBMUD, so it is not EBMUD's responsibility to provide an alternative.
- An official trail maintained by the East Bay Regional Park District (EBRPD) and the City of Walnut Creek already exists and provides an approximately 0.7-mile route to the desired destination.
- The Draft EIR found no significant impacts to recreational resources.
- Construction of public amenities that are not required as part of the Project or are not required to mitigate potential Project impacts could be considered a gift of public funds on the part of EBMUD.

As requested, representatives from EBMUD met with members of the Quail Ridge Homeowners Association at the Walnut Creek WTP on November 27, 2023, March 28, 2024, and April 2, 2024 to discuss impacts on views from the Briones to Mt. Diablo Regional Trail and proposed planting of trees as mitigation for those impacts.

8.3.2 Quail Ridge Homeowners Association 2

Response to Comment QRHOA2-1

EBMUD welcomes the opportunity to conduct community outreach for neighbors of our facilities and staff is pleased that the outreach for the Project has met the needs of local residents.

Response to Comment QRHOA2-2

Please refer to Global Response 2 for a discussion of additional trees that are proposed for screening of new facilities.

Response to Comment QRHOA2-3

As requested, representatives from EBMUD met with members of the Quail Ridge Homeowners Association at the Walnut Creek WTP on November 27, 2023, March 28, 2024, and April 2, 2024. The comment author was invited to the meetings but was unable to attend.

Response to Comment QRHOA2-4

Noise impacts associated with both construction and operation are described in detail in Section 3.11 (Noise and Vibration) of the Draft EIR. The noise section includes a detailed description of the sources of noise, timing and results of detailed modeling of noise during both construction and operation showing existing noise levels. Table 3.11-11 on pages 3.11-29 through 3.11-31 of the Draft EIR shows that existing daytime (7:00 a.m. to 6:00 p.m.) noise levels average about 46 dBA at Quail View Circle. Daytime (7:00 a.m. to 6:00 p.m.) noise levels during construction vary over time throughout construction but could be as high as 70 dBA at Quail View Circle during construction of the gravity thickeners. Table 3.11-12 on page 3.11-33 of the Draft EIR shows that early morning (6:00 a.m. to 7:00 a.m.) noise levels during construction would be as high as 63 dBA at Quail View Circle during concrete pours for the gravity thickeners and thickened solids pumping, which would begin as early as 6:00 a.m. A 9-foot high sound barrier would be installed for the duration of construction for Phase 1 and Phase 2 as part of Mitigation Measure NOI-1 described on page 3.11-42 of the Draft EIR, and depicted in Figure 3.11-5 on page 3.11-35 of the Draft EIR to reduce noise levels by at least 3 dBA to ensure noise levels do not exceed the 60 dBA sleep disturbance threshold during the early morning concrete pours.

As described in Section 3.11 (Noise and Vibration) of the Draft EIR, new operational and maintenance noise generating equipment that would operate on site include the pre-ozone and intermediate ozone pumping plants, thickened solids pumping plant, solids transfer pumping plant, ballasted flocculation basins, and new electrical substation with transformer and switchgear as well as noise from increased haul trucks to off haul dewatered solids. Table 3.11-16 on page 3.11-41 of the Draft EIR shows existing average 24-hour period noise levels and post construction operation and maintenance 24-hour noise levels at Quail View Circle, which shows the existing noise level of 49 dBA would not be affected by the Project. Noise from operations and maintenance of new facilities would not generate substantial changes from existing ambient noise conditions with current EBMUD operations based on noise modeling.

8.4 Responses to Individual Comments

8.4.1 Julia Jackson 1

Response to Comment Jackson1-1

Please refer to Global Response 1 for an explanation of why use of the existing parking lot at the entrance to the Walnut Creek WTP for staging is necessary.

Response to Comment Jackson1-2

Please refer to Global Response 1, which explains that all available space within the existing Walnut Creek WTP would be used.

Response to Comment Jackson1-3

Please refer to Global Response 1, which discusses mitigation for noise.

Response to Comment Jackson1-4

Please refer to Global Response 1, which explains that the staging area is necessary.

8.4.2 Julia Jackson 2

Response to Comment Jackson2-1

The comment was received and has been included in the Final EIR. Please refer to Global Response 1, which addresses the aesthetics of sound barriers.

Response to Comment Jackson2-2

Please refer to Global Response 1, which provides information on measures that EBMUD would use to ensure protection of nesting birds. Global Response 1 also provides information about criteria for evaluating impacts on biological resources and explains the justification for calling impacts on biological resources less than significant.

Response to Comment Jackson2-3

Please refer to Global Response 1, which explains that there is no other space within the Walnut Creek WTP facility available for staging. Use of both Staging Area 3 and Staging Area 4 would be necessary.

Response to Comment Jackson2-4

Please refer to Global Response 1 regarding the aesthetics of sound barriers.

Response to Comment Jackson2-5

If an emergency arises during Project construction, the Walnut Creek WTP site is designated as the alternate Emergency Operations Team base of operations for EBMUD. If an emergency were to occur that requires activation of the Walnut Creek WTP as a base of operations during Project construction, then Project construction would be temporarily halted until the emergency situation is resolved. Construction workers would be directed to leave the Walnut Creek WTP site and remove their vehicles from Staging Area 4. If necessary, the construction contractor would be required to remove construction equipment and materials from all staging areas including

Staging Area 4. During an emergency, Emergency Operations Team staff would park in any available spots at the Walnut Creek WTP, including the newly constructed Staging Areas 1 through 3, and Staging Area 4 to coordinate emergency operations. If there is a delay in contractor removing equipment and materials from Staging Area 4 and the space is needed, emergency staff may also need to park on the street outside of the water treatment plant.

8.4.3 Dan Katzki

Response to Comment Katzki-1

Please refer to Global Response 2 regarding visual impacts of new facilities as seen from the Briones to Mt. Diablo Regional Trail, which explains that it is not feasible to bury the gravity thickeners, thickened solids pumping plant and dewatering building.

Response to Comment Katzki-2

Noise impacts are addressed in Section 3.11 (Noise and Vibration) in the Draft EIR. The Project would include mitigation for construction noise, which is described in Mitigation Measure NOI-1 on page 3.11-42 of the Draft EIR. The mitigation includes installation of sound barriers to reduce noise from construction. A 9-foot high sound barrier would be installed for the duration of construction for Phase 1 and Phase 2 as part of Mitigation Measure NOI-1 described on page 3.11-42 of the Draft EIR and depicted in Figure 3.11-5 on page 3.11-35 of the Draft EIR to reduce noise levels by at least 3 dBA to ensure noise levels do not exceed the 60 dBA sleep disturbance threshold during the early morning concrete pours. Operational noise was evaluated in the Draft EIR and there would be no measurable increase in operational noise levels. Refer to Table 3.11-16 on page 3.11-41 of the Draft EIR, which shows existing average 24-hour period noise levels and post construction operation and maintenance 24-hour noise levels at Ramsay Circle, which shows the existing noise level of 49 dBA would not be affected by the Project. Noise from operations and maintenance of new facilities would not generate substantial changes at Ramsay Circle from existing ambient noise conditions with current EBMUD operations based on noise modeling.

8.4.4 Arvind Mallya

Response to Comment Mallya-1

EBMUD strives to be good a neighbor and to consider concerns of residents who live in proximity to EBMUD facilities. The Walnut Creek WTP serves potable water to about 225,000 people in portions of Walnut Creek, Pleasant Hill, Lafayette and the communities of Alamo, Danville, Blackhawk and the San Ramon Valley. It is the nature of potable water treatment facilities that they are located in proximity to the residents that they serve. The Walnut Creek WTP was constructed in 1967 and has been improved over the years as needed to maintain a high-quality water supply for the communities that EBMUD serves. The addition of pretreatment facilities is driven by the need to adapt to changing source water quality and improve operational flexibility at the Walnut Creek WTP. EBMUD did conduct a rigorous planning process to evaluate alternatives, which is described in Section 4.3, Project Alternatives Development: Engineering Alternatives for Pretreatment in the Draft EIR. As part of the evaluation, EBMUD considered whether off-site alternatives for pretreatment were feasible and determined that the new processes need to be constructed at the Walnut Creek WTP. Please refer to the Draft EIR, Section 4.3.1, Off-Site Alternatives, for an explanation of why off-site facilities would not

improve operational flexibility and would not meet Project objectives. As a municipal utility district with a publicly elected board, EBMUD is not a for-profit entity. EBMUD is committed to maintaining a high standard of serving its customers.

Response to Comment Mallya-2

Please refer to Global Response 5 for a discussion of the chemical handling and storage safety measures at the water treatment plant. Traffic impacts associated with chemical deliveries with the Project are addressed in Section 3.13 (Transportation) in the Draft EIR. As explained on page 3.13-25 of the Draft EIR, "Weekly truck trips could increase from approximately 2 per week to approximately 4 per week for chemical deliveries." The increase in traffic was evaluated and was determined that, "ongoing Project-generated trips are not likely to worsen the intersection operating conditions along local roads." Traffic jams during busy hours are thus not expected to result from the Project.

Response to Comment Mallya-3

Please refer to Global Response 5 for a discussion of the chemical handling and storage safety measures at the water treatment plant and Global Response 7 for a discussion of the community evacuation process. As discussed in Global Response 5, the Walnut Creek WTP does not use chlorine gas; disinfection is accomplished using liquid sodium hypochlorite. The Bhopal incident was a release of the highly toxic gas, methyl isocyanate (a chemical used in the manufacture of pesticide) and was not associated with the chemical processes used to disinfect potable water.

Response to Comment Mallya-4

Please refer to Global Response 4 for a discussion of the need to use Larkey Lane as an access route.

Accessing the Walnut Creek WTP from Pleasant Hill Road is possible but is a far less direct route than the proposed access route from Interstate 680 along San Luis Road and Larkey Lane. To access the Walnut Creek WTP from Pleasant Hill Road, trucks would turn off State Route 24 onto northbound Pleasant Hill Road, traveling about 3.5 miles, past Acalanes High School and Spring Hill Elementary School to the intersection with Camino Verde. Trucks would travel south on Camino Verde, then east on Conejo Way, which turns into San Luis Road. From San Luis Road trucks could turn south toward the Walnut Creek WTP on either Alfred Avenue or Larkey Lane, at the same T-junction intersections that would be used if trucks access the site from Interstate 680 via San Luis Road. Accessing the Walnut Creek WTP via Pleasant Hill Road would require a trip of about 4.5 miles through local streets after exiting the freeway. Because accessing the Walnut Creek WTP from Pleasant Hill Road includes the same T-junction intersections as the designated access route, passes by two schools and is a longer route, this suggested access route is not a better alternative to the designated access route via San Luis Road, and would not be used.

Response to Comment Mallya-5

The photographs provided in the comment are stated to show evidence of a liquid leak, but lack specific identifiers such as location, date, and source. Without that information it is not possible to identify what might have spilled, whether it was hazardous and how it was handled. However, the stains visible in the photos in the center of the access road appear to correspond to records of an isolated chemical spill incident that occurred Monday, June 7, 2021, at approximately 12:00

PM, on EBMUD property along the access road to the Walnut Creek WTP. There have been no liquid leaks at the Walnut Creek WTP since the June 7, 2021 event.

During the June 7, 2021 liquid leak event, a delivery truck transporting fluorosilicic acid experienced a leak from a 1-inch air vent line that had not been properly closed by the delivery company. Fluorosilicic acid is the chemical added for fluoridation of the potable water supplied by the Walnut Creek WTP to EBMUD customers. As the delivery truck drove up the access road, approximately 5-10 gallons of fluorosilicic acid was released behind the truck, leaving a visible stain approximately 2-3 inches wide and extending approximately 600 feet along the access road to the security gate entrance. Per EBMUD procedures, the following immediate actions were taken:

- Notification: The delivery company notified the Walnut Creek WTP supervisor who immediately notified EBMUD's Regulatory Compliance Office upon discovering the spill.
- Containment: The road was immediately cordoned off with cones and barrier to prevent further spread of the fluid by trucks or foot traffic. The chemical truck delivery crew promptly deployed on-board spill containment equipment, using absorbent materials to capture the leaked fluorosilicic acid.
- Clean-up: A second crew was dispatched the following day to remove the visible stain left by the chemical reaction with the lime in the pavement. All washwater was collected and properly disposed of by the clean-up crew. However, the stain persists in the access road.

EBMUD's Regulatory Compliance Office investigated the leak and concluded that the spill was not required to be reported to regulatory agencies because the spill was cleaned up, the spill did not reach any storm drains or surface waters, there was no harm to nearby operators, and the spill did not pose a significant risk to the general public or the surrounding environment.

In the event of any hazardous material leak or spill, EBMUD would comply with applicable regulations, including any required notifications to relevant agencies, as described in Global Response 5 (Chemical Handling and Storage Safety). Required plans include an EBMUD Emergency Action Plan and Fire Prevention Plan to require specific maintenance and inspection activities and require safe storage and handling of materials for fire prevention. EBMUD also maintains and updates a Hazardous Materials Business Plan specific to the Walnut Creek WTP, which requires that all hazardous materials are handled and stored correctly to prevent leakage or mixing, proper coding of chemicals, procedures, notification requirements and training for staff in the event of a spill.

Community and worker safety is of utmost importance to EBMUD. The transportation, storage, and use of chemicals that are required for the water treatment process is heavily regulated at the federal, state, and local agency levels. More detail is provided in Global Response 5 – Chemical Handling and Storage Safety Measures.

Response to Comment Mallya-6

Operational noise was evaluated in the Draft EIR and there would be no measurable increase in operational noise levels. Table 3.11-16 on page 3.11-41 of the Draft EIR shows that there is no Project change in operational noise levels at receptors on Alfred Avenue. Interference with radio

frequencies is outside the scope of the EIR as there are no established criteria for radio frequencies established under CEQA.

Response to Comment Mallya-7

Section 3.2 (Air Quality) in the Draft EIR explains the extensive procedures that EBMUD employs to control dust during construction. Requirements for a Dust Control and Monitoring Plan, Air Quality Control, and Dust Monitoring During Demolition and Construction are explained in detail beginning on page 3.2-14 of the Draft EIR. Measures to control dust include watering, use of ground covers and soil stabilizers, and covering of stockpiles and haul trucks. Potential impacts on pavement are evaluated in Section 3.13 (Transportation), and Mitigation Measure TRA-1 on pages 3.13-25 and 3.13-26 of the Draft EIR includes evaluation of the pavement condition of access routes and restoration of pavement if there is visible deterioration of pavement condition.

Response to Comment Mallya-8

Please refer to Global Response 1 regarding the staging area.

Response to Comment Mallya-9

Please refer to Global Response 4 for a discussion of the need to use Larkey Lane as an access route and the mitigation measures to ensure the safety of pedestrians using Larkey Lane during construction.

Response to Comment Mallya-10

The comment requests information on EBMUD's overall water system emergency preparedness in the event of natural and manmade disasters. Although evaluation of water system emergency preparedness is outside the scope of the Draft EIR, this information is provided in the interest of fully addressing public questions about the EBMUD water system. EBMUD regularly prepares for emergencies in a variety of ways including investing in infrastructure, identifying risks, and developing and practicing response plans as discussed below.

EBMUD has and will continue to improve the reliability of its water supply system through the implementation of its Capital Improvement Program, with the goals of replacing aging infrastructure, improving system reliability, maintaining water quality, preparing for droughts, and meeting customer demands. EBMUD has invested in strengthening its infrastructure by installing large and small emergency interties with adjacent water agencies, structurally strengthening key facilities, replacing or rehabilitating aging facilities including tanks and pumping plants, replacing aging pipelines, and upgrading its water treatment plants. The proposed Project is one of many projects to improve the transmission, treatment, and distribution infrastructure for the water system.

These capital improvements ensure EBMUD's water system is resilient against hazards through sizing and design standards including sizing distribution reservoirs to include capacity for emergencies, ensuring pumping plants have connections and space for portable or permanent generators and portable pumps, building transmission, pumping, or storage redundancy where feasible, adding isolation valves to the pipeline network to limit the effect of pipeline outages, and installing connections on large transmission pipelines that allow portable pipelines to cross geohazards (i.e., faults, landsides, and liquefaction areas) in the event the pipeline breaks.

To prepare for disasters, EBMUD completed risk assessments with mitigation and response plans for the water system that are submitted to state and federal agencies. Every five years EBMUD updates its Local Hazard Mitigation Plan (LHMP), which is reviewed and approved by the California Office of Emergency Services and the Federal Emergency Management Agency. The LHMP identifies risks and vulnerabilities associated with natural disasters and assists with developing long-term strategies for protecting the public and property from future hazards. The LHMP describes completed and potential mitigation activities against natural hazards that could affect EBMUD including earthquake-related hazards and other hazards including wildfires, droughts, floods and landslides. Every five years, EBMUD also updates and submits its risk and resilience assessments, and emergency response plans to the Environmental Protection Agency in compliance with America's Water Infrastructure Act, which was approved by Congress in 2018. These assessments and plans address natural and manmade disasters.

EBMUD's Emergency Operations Team (EOT) is ready to respond quickly and appropriately to any emergency and establishes response priorities based on the nature of the emergency, focusing on actions to address life safety, incident stabilization, and restoration of normal operations. The EOT manages emergency responses and meets, trains, and conducts routine exercises. The EOT maintains an Emergency Operations Plan, which describes the internal organizational structure used in the response to all emergencies and develops mutual aid agreements between EBMUD with other local government agencies including water agencies to provide mutual aid/assistance after a disaster. In addition to maintaining its own emergency preparedness program, EBMUD coordinates with local, regional, state, and federal partners to ensure readiness in the event of an emergency.

The comment also requests information on water availability statistics after a disaster. Specific water availability metrics after a disaster do not exist as water availability depends on many factors including location, magnitude and type of disaster. Although EBMUD continuously works to protect public health and safety by strengthening facilities and practicing strategies for recovery, a major disaster can temporarily disrupt water service. In the event of any type of emergency that interrupts water service, EBMUD works to ensure return to service for all customers and facilities as quickly and safely as possible. Therefore, EBMUD recommends customers take steps to be prepared, including storing at least two gallons per person per day for seven days minimum. More information on how EBMUD customers can prepare can be found on http://www.ebmud.com/emergency-preparedness.

Response to Comment Mallya-11

The comment asks how EBMUD's water system will supply customers after a disaster. Please refer to Response to Mallya-10 for information on how EBMUD prepares for emergencies in a variety of ways including investing in infrastructure, identifying risks, and developing and practicing response plans.

Response to Comment Mallya-12

The comment appears to request information on the plan to avoid residential flooding in the event of damage to the water tanks located at the Walnut Creek WTP after a disaster such as an earthquake. As noted in Section 3.6 (Geology, Soils, and Seismicity) on page 3.6-20 of the Draft EIR, because "no mapped active faults are known to pass through the immediate Project region the risk of ground rupture is low". Additionally, "risk … involving strong seismic groundshaking is low and impacts are considered less than significant." The two existing mostly buried water

tanks on the Walnut Creek WTP site were constructed in 2005, are made of reinforced concrete, and were designed in accordance with applicable state and federal building seismic codes and therefore are not expected to suffer damage after a major earthquake.

In the unlikely event the concrete tanks experience damage that results in water leakage, the water would be collected by the underdrain system consisting of underground pipelines that would discharge to the existing waterways north of the Walnut Creek WTP site and into the existing stormwater system. The reservoir and underdrain flows are routinely inspected and can drain the tanks through an emergency drain to the stormwater system if the tank structure is deemed unsuitable for storing water. The underdrain system and the emergency drain would ensure that if the concrete tanks experience an unforeseen failure as a result of a disaster, water would be transmitted to the storm drain system and would not flood the residential neighborhood.

Response to Comment Mallya-13

EBMUD security coordinates with relevant local, state and federal emergency and security agencies, as needed and as required. As stated in Response to Comment Mallya-9, water supplies are lifelines, and the safety of EBMUD's operations, untreated and treated water systems is of critical importance to the region, to EBMUD customers, and to EBMUD. Details of EBMUD's security coordination activities with other agencies are considered sensitive information and are thus confidential.

Response to Comment Mallya-14

EBMUD expects to control dust within the site and is not expecting that neighbors would need to use additional water. As stated in Section 3.2 (Air Quality) of the Draft EIR on page 3.2-23, "EBMUD's Standard Construction Specifications and Procedures for controlling dust and air quality emissions require implementation of BAAQMD's basic measures. Therefore, the Project's dust emissions would not exceed BAAQMD's significance thresholds for dust." A detailed list of measures to control dust is included in the Draft EIR on page 3.2-24 and includes watering, sweeping roadways, covering haul trucks and paving exposed surfaces as soon as possible.

Response to Comment Mallya-15

Please refer to Global Response 3 for a discussion of the need for the Project and Project Sizing at the Walnut Creek WTP site.

8.4.5 Cliff Threlkeld

Response to Comment Threlkeld-1

In April 2023, EBMUD completed a hydraulic study called the Raw Water System Study (Study) assessing the impact of the proposed Project on the raw water system, also known as the untreated water system. The Study specifically evaluated the combined effect of relining the Lafayette No. 1 Aqueduct and raising the Lafayette Aqueduct Weirs by up to 10 feet. The Project would increase water pressure for treatment by installing higher Lafayette Aqueduct Weirs (weirs), adjustable up to 10 feet higher than the existing weir elevations. The Study found that the Project would minimally decrease gravity flow capacity by approximately 3 percent when the weirs are at their maximum elevation. Despite the maximum 10-foot increase in weir height, the

actual weir elevation will be typically set at lower elevations to optimize working conditions. These working conditions will include managing the operation of the raw water system, the Walnut Creek WTP production rate, and whether Project facilities are in service (the proposed pretreatment facilities can be bypassed during periods of low turbidity). Therefore, the overall effect on the gravity capacity of the raw water system is considered insignificant.

Response to Comment Threlkeld-2

As discussed under Threlkeld-1, the Study evaluated the effect of raising the Lafayette Aqueduct Weirs by up to 10 feet. The Study found that the maximum increase of pressure on the Lafayette No. 1 Aqueduct would be approximately 4 psi which is minimal.

The Lafayette No. 1 Aqueduct was installed in 1929 and includes 3 miles of buried cast-in-place pipeline. The Lafayette Aqueduct Repair Study completed in May 1996 recommended relining Lafayette No. 1 Aqueduct with a steel pipeline to prevent leakage. The Lafayette No. 1 Aqueduct Relining Project is currently being designed and will be constructed before the Project is completed. The Lafayette No. 1 Aqueduct Relining Project is being designed to ensure the additional pressure associated with the Walnut Creek WTP would not damage the Lafayette No. 1 Aqueduct.

Response to Comment Threlkeld-3

As discussed under Threlkeld-1, the Study evaluated the combined effect of relining the Lafayette No. 1 Aqueduct and raising the Lafayette Aqueduct Weirs by up to 10 feet. The Study included hydraulic modeling that accounted for the unique characteristics of the Walnut Creek Raw Water Pumping Plant and determined the maximum decrease in the Walnut Creek Raw Water Pumping Plant capacity would be approximately 0.6 percent which is insignificant. Similarly, the Moraga Pumping Plant would experience a minor increase in capacity. The changes in capacity would typically be even smaller when operating the pumping plants because the weir elevations would be optimized to meet the required raw water system and Walnut Creek WTP working operating scenarios as discussed under Threlkeld-1.

Response to Comment Threlkeld-4

As discussed under Threlkeld-3, the effect on pumping and, therefore, the effect on energy use by the raw water pumping plants, is insignificant.

Response to Comment Threlkeld-5

As discussed under Threlkeld-3, the effect on pumping capacity due to the Project is insignificant; therefore, there would be no effect on EBMUD's Mokelumne River Water Rights.

8.4.6 Stephen Clark

Response to Comment Clark-1

The comment provides a number of excerpts from the Draft EIR analysis of aesthetic impacts of the Project including copies of visual simulations that show views from the Briones to Mt. Diablo Regional Trail looking south at the Walnut Creek WTP site both before and after construction of new facilities. The excerpts appear to be an accurate representation of information that is included in the Draft EIR.

Response to Comment Clark-2

Please refer to Global Response 2, regarding views from the Briones to Mt. Diablo Regional Trail. Section 3.1 (Aesthetics) in the Draft EIR provides a discussion of visual impacts from Viewpoint 5, noting that, the gravity thickeners, thickened solids pumping plant, and solids dewatering building would be clearly visible after construction, though remain at a distance of about 500 feet from the viewpoint.

Response to Comment Clark-3

EBMUD has confirmed that photographs of Viewpoint 5 and of some of the other viewpoints shown in the Draft EIR were taken with a wide-angle lens. Use of a wide-angle lens was not intended to deceive readers of the Draft EIR and all of the analysis of visual impacts in the Draft EIR was completed in an effort to accurately illustrate the existing visual environment and to demonstrate the changes in visual character that would occur after construction of the Project.

Section 15151 of the CEQA Guidelines provides direction regarding standards of adequacy for an EIR and states:

> "*An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*"

EBMUD is committed to fully disclosing impacts that would result from the Project. To address the concerns expressed in the comment, EBMUD performed additional visual analysis and took updated photographs of the Project site, including the view from Viewpoint 5. New photographs were taken with a non-wide-angle lens and used in the updated visual simulations that are presented in Global Response 2 and included in Section 10.2 of Chapter 10, Draft EIR Revisions. As noted in Global Response 2, information presented in comments has not altered the conclusions that were presented in the Draft EIR. However, in acknowledgement of public concerns about views of new facilities, EBMUD is proposing to include additional trees in the planting plan, including trees planted in front of the consolidated maintenance building and electrical building in locations suggested by neighbors. Global Response 2 shows the revised planting plan with additional trees and renderings.

Response to Comment Clark-4

The CEQA significance criteria for visual impacts address impacts from public viewpoints, not from private homes. Criterion AES-2 from the Draft EIR addresses whether the Project would: "In non-urbanized areas, substantially degrade the existing visual character or quality of **public views** (emphasis added) of the site and its surroundings, or in an urbanized area, conflict with applicable zoning or other regulations governing scenic quality." The photographs presented in the Draft EIR reflect views of the Walnut Creek WTP site from public viewpoints. The Draft EIR does, however, recognize that there are homes immediately to the north of the Walnut Creek WTP. Those homes are specifically pointed out in Section 3.10 (Land Use) in the Draft EIR and

are shown in Figure 3.10-1 on page 3.10-2 of the Draft EIR, which shows land uses surrounding the Walnut Creek WTP, including the Quail Ridge neighborhood north of the Walnut Creek WTP. The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Response to Comment Clark-5

The purpose of the Draft EIR is to evaluate and disclose impacts associated with construction and operation of the Project to decision makers and interested members of the public. EBMUD is committed to maintaining a high standard of serving customers and to fully disclosing impacts that would result from the Project. EBMUD strives to be a good neighbor and to consider concerns of residents who live in proximity to EBMUD facilities. Concerns expressed during scoping have been addressed in the Draft EIR. As requested, representatives from EBMUD met with members of the Quail Ridge Homeowners Association at the Walnut Creek WTP on November 27, 2023, March 28, 2024, and April 2, 2024. The author of the comment was present at the meeting.

8.4.7 Ashley and Peter Greene

Response to Comment Greene-1

Please refer to Global Response 1, which explains why it is not feasible to use existing employee parking areas within the Walnut Creek WTP for staging.

8.4.8 Sabrina and Derek Taaning

Response to Comment Taaning-1

Please refer to Global Response 1 regarding use of the existing parking area near the entrance to the Walnut Creek WTP for staging.

Response to Comment Taaning-2

Please refer to Global Response 1, which explains measures to protect wildlife in the vicinity of Staging Area 4.

Response to Comment Taaning-3

Please refer to Global Response 1, which explains the visual and noise impacts associated with using Staging Area 4 and explains mitigation that is proposed to reduce those impacts.

Response to Comment Taaning-4

Please refer to Global Response 1, which addresses aesthetics of the sound barrier.

Response to Comment Taaning-5

Although construction would be temporary, EBMUD acknowledges that the construction period would be lengthy, and that construction is inconvenient. Every effort will be made to reduce the impacts of construction on nearby residents. Please refer to Global Response 1 regarding impacts associated with use of Staging Area 4.

8.5 Response to Public Meeting Comments

8.5.1 Public Meeting – October 19, 2023

Response to Comment PM-1

The primary source of water for the Walnut Creek WTP is the Mokelumne River and that will not change as a result of the Project. Sacramento River supply is only used during periods of drought when Mokelumne River supplies are not sufficient to meet demand.

Response to Comment PM-2

Section 3.6 (Geology, Soils and Seismicity) in the Draft EIR, addresses the potential for earthquake faults and seismic-related ground failure due to liquefaction or landslides at the Walnut Creek WTP. As noted on page 3.6-5 of the Draft EIR, "the Walnut Creek WTP site is transected by secondary fault traces associated with the Franklin Fault. The California Geological Survey (CGS) does not consider the Franklin Fault and secondary traces to be active and therefore the site is not zoned within Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act." Also as discussed on page 3.6-21 of the Draft EIR, the Walnut Creek WTP site is in an area characterized by very low susceptibility to liquefaction based on regional studies, and soil susceptible to liquefaction was not encountered during subsurface exploration or previous investigations. Several landslides exist on the slopes along the easterly, western, and northern portions of the Walnut Creek WTP, but the mapped landslides do not overlap with the proposed facilities except for the southern intermediate ozone contactor. However, the foundation for the southern intermediate ozone contactor would be 20 to 27 feet below the existing grade and on stable soil below the landslide. In addition, slope stability analysis was performed to evaluate the impact of the proposed construction on existing slopes at the Walnut Creek WTP indicated that slope stability, as modified by the proposed construction, is adequate under seismic conditions. Therefore, the potential impacts related to rupture of a known earthquake fault or seismic-related ground failure due to liquefaction or landslide were determined to be less than significant.

Response to Comment PM-3

The Lafayette WTP is a water treatment plant with a smaller capacity and lacks sufficient space for significant upgrades to capacity in addition to pretreatment and ozone upgrades. In addition, the Lafayette WTP has a different and smaller service area than Walnut Creek WTP and would thus not meet Project objectives to maintain water treatment plant capacity at the Walnut Creek WTP, which is necessary to provide a reliable water supply to those customers served by the Walnut Creek WTP.

Response to Comment PM-4

As noted in Response to Comment PM-2, the Draft EIR does identify a secondary fault trace that crosses the Walnut Creek WTP site. The fault is not considered to be active.

Response to Comment PM-5

Please refer to Response to Comment EBRPD-2, which explains that the Briones to Mt. Diablo Regional Trail would not be closed due to the Project, except for infrequent, brief periods to allow construction vehicles to cross, thus no detour routes or signage would be needed.

Response to Comment PM-6

As discussed on page 3.2-21 of the Draft EIR, no operational odors are expected after completion of the Project.

Response to Comment PM-7

Please refer to Global Response 1, which explains that all available space at the Walnut Creek WTP would be used for storing materials and staging during construction, and use of the Staging Area 4 is necessary.

Response to Comment PM-8

Please refer to Response to Comment EBRPD-2, which explains that page 3.12-8 of the Draft EIR states that: "The closure would occur infrequently for no more than a couple of minutes for each occurrence, and trail users would briefly wait for the construction vehicles to cross or temporarily be directed on a short detour around a small portion of the trail if feasible."

Response to Comment PM-9

Please refer to Global Response 1, which explains that while the parking lot near the Walnut Creek WTP entrance is to be used only for emergency parking under normal operations, Project construction is not part of normal operations, and that all available space at the Walnut Creek WTP will be used for construction staging and was analyzed in the Draft EIR.

Response to Comment PM-10

No staging would be permitted on Larkey Lane.

Response to Comment PM-11

As stated on page 3.13-26 of the Draft EIR, the traffic control plan will specify that for heavy construction vehicles, no queuing, parking or idling on local roadways is permitted outside of the water Walnut Creek WTP site outside of designated construction hours.

Response to Comment PM-12

Section 3.2 (Air Quality) in the Draft EIR includes extensive requirements to control dust. EBMUD will require that trucks and stockpiles be covered. Watering will be done to keep down dust and any disturbed areas will be hydroseeded upon completion of construction.

Response to Comment PM-13

EBMUD will enforce idling limits, and as noted in Table ES-2 in the Draft EIR on page ES-12 "The contractor shall post an EBMUD-furnished, publicly visible sign with EBMUD and Air District contact information." Please refer to Global Response 6 for a discussion of community communication during construction, which provides information on notifying EBMUD if the contractor is not abiding by idling limits or dust control measures.

Response to Comment PM-14

A recording of the meeting is available on the EBMUD website:

https://www.ebmud.com/about-us/construction-and-maintenance/construction-my-neighborhood/walnut-creek-water-treatment-plant-pretreatment-project

Response to Comment PM-15

Habitat for wildlife is discussed starting on page 3.3-7 of the Draft EIR in the section on "Vegetation Communities and Wildlife Habitats", which identifies habitats within the Walnut Creek WTP and Lafayette WTP that provide habitat for birds, deer and other wildlife. Mitigation for wildlife is included in Section 3.3 (Biological Resources) in the Draft EIR. EBMUD practices and procedures to protect biological resources are detailed beginning on page 3.3-33 of the Draft EIR, and include measures to protect trees, nesting birds, and roosting bats. Please also refer to Global Response 1, which discusses "Biological Concerns about Use of Staging Area 4 for Construction." As noted there, and as described in Section 3.3 (Biological Resources) of the Draft EIR on page 3.3-48, the Walnut Creek WTP study area is not considered a wildlife corridor and the Project would not interfere substantially with the movement of any native wildlife species or established wildlife corridors. However, EBMUD would comply with requirements of the Migratory Bird Treaty Act. While the Walnut Creek WTP provides habitat for common urban wildlife such as fox, deer and birds, the area is not habitat for any rare, threatened or endangered species. The Draft EIR concluded that construction of the Project would not have a significant impact on biological resources based on any of the CEQA significance criteria identified in the Draft EIR.

Response to Comment PM-16

Mitigation for construction noise impacts is included in Section 3.11 (Noise and Vibration) in the Draft EIR, which discusses both EBMUD practices and procedures to minimize noise, and mitigation such as the use of sound barriers to reduce noise from construction. Please refer to Global Response 6 for a discussion of community communication during construction, which provides information on how EBMUD will provide advance notice to residents about potentially disruptive construction activities and discusses mechanisms for the public to get concerns and questions addressed.

Response to Comment PM-17

Please refer to Response to Comment EBRPD-3 regarding measures to protect the Briones Mt. Diablo Regional Trail from damage.

Response to Comment PM-18

Please refer to Global Response 6 for a discussion of community communication during construction, which provides information on notifying EBMUD if there are any concerns about parking and idling on Larkey Lane.

Response to Comment PM-19

On page 3.11-42 of the Draft EIR, Mitigation Measure NOI-1 lists the heights of the proposed sound barriers. However, for Staging Area 4, Mitigation Measure NOI-1 has been revised to require a redwood fence only if noise monitoring finds noise thresholds are exceeded. If required, the redwood fence at Staging Area 4 would be 6 feet tall and located at the far eastern end of Staging Area 4 (as shown in Figure 3.11-5 on page 3.11-35 of the Draft EIR).

Response to Comment PM-20

As noted in Section 3.11 (Noise) of the Draft EIR, in Mitigation Measure NOI-1 on page 3.11-42, the sound barriers would be in place for the duration of construction of both Phase 1 and

Phase 2 of the Project. The redwood fence at Staging Area 4 would only be installed if required, per revised Mitigation Measure NOI-1 as discussed in Response to Comment PM-19.

Response to Comment PM-21

Please refer to Global Response 1 for a discussion of the aesthetics of the sound barriers. EBMUD will enforce idling limits, and as noted in Table ES-2 on page ES-12 of the Draft EIR, "The contractor shall post an EBMUD-furnished, publicly visible sign with EBMUD and Air District contact information." Please refer to Global Response 6 for a discussion of community communication during construction, which provides information on notifying EBMUD if the contractor is not abiding by idling limits or dust control measures.

8.6 Response to Neighbor Feedback Received after Close of Comment Period

8.6.1 Response to Neighbor Feedback on Cumulative Impacts Evaluation

Neighbors expressed concerns about the cumulative impacts of the Project and other projects in the area, particularly the Larkey Pumping Plant (PP) Rehabilitation Project (Larkey PP Rehab). As noted in Table 3.0-1, on page 3.0-4 in the DEIR, the Larkey PP Rehab is slated to occur from 2028 to 2030 and would require improvements to the existing pumping plant during the Project. However, peak construction periods for the Larkey PP Rehab would be staggered to not align with peak construction periods of the Project, and periods of maximum traffic trips and noise generation would be less than those of the Project and would not overlap with Project peak traffic trip and noise generation. Thus, the DEIR determined that potential traffic, air quality and noise impacts associated with construction (short-term, temporary) and operations (long-term, no change post-construction) due to the Larkey PP Rehab would not contribute to cumulatively considerable traffic, air quality and noise impacts in combination with the Project.

8.6.2 Response to Neighbor Feedback on Operational Truck Trips for Dewatered Solids

Neighbors expressed concerns about the long-term peak operational truck trip generation due to increased solids production and related hauling of dewatered solids, which is reported in the Draft EIR on page 3.13-21. Further discussion to clarify the projected trip generation numbers is provided below.

Under historical average demands and relatively low turbidities[1], the Walnut Creek WTP requires 2 trips per day on average to off haul the thickened solids (i.e., wet sludge). Under future projected demands and a projection on future water quality, with turbidities which are expected to be higher than that what has been experienced historically, the Project's new facilities would require approximately 3 trips per day on average to remove the solids, which would be dewatered and compacted (i.e. dry cake) due to the Project's improved dewatering process. Also, as noted in the No Project discussion in Chapter 4, without implementation of the

[1] Turbidity is the measure of relative clarity of a liquid and is a key test of water quality. It is an optical characteristic of water and is a measurement of the amount of light that is scattered by material in the water when a light is shined through the water sample. The higher the intensity of scattered light, the higher the turbidity (and the poorer the water quality). Turbidity measurements are most commonly presented in Nephelometric Turbidity Units (NTU).

Project and its improved dewatering process, approximately 9 trips per day on average would be required to remove thickened solids due to the increased demands and turbidities.

The future peak operating conditions were reported in the Draft EIR to provide a conservative maximum trips operating scenario. Notably, however, *this future peak scenario has never occurred at the Walnut Creek WTP and is a rare scenario resulting only from a catastrophic event such as a landslide with erosion or a large wildfire followed by a storm event in the Mokelumne Watershed*. Under a future peak operating scenario, with the Project enabling Walnut Creek WTP to produce water to meet projected future demands under peak (extremely high) turbidities, approximately 21 trips per day are anticipated to be needed to remove the dewatered, compacted solids (i.e., dry cake). Without implementation of the Project and its improved dewatering process, a similar number of truck trips would be required during future peak operating conditions, but the Walnut Creek WTP capacity would decrease, which would also require mandatory water rationing for Walnut Creek WTP's service area.

In summary, under typical future operating conditions, due to projected future demands and turbidity, off haul trips of dewatered solids after the Project would be 3 roundtrips per day on average which is an increase from the historical 2 roundtrips per day. The 21 roundtrips per day would occur only in circumstances involving rare future peak turbidity and future demand conditions which is an operating scenario that cannot be handled without the Project. Having the flexibility to reliably handle such rare peak turbidity events and meet demands is a Project objective.

8.6.3 Response to Neighbor Feedback on Property Values

Neighbors also expressed concerns that construction staging activities at the existing parking area near the Walnut Creek WTP entrance could impact property values in the nearby area.

Pursuant to CEQA, lead agencies must analyze potentially significant adverse physical impacts of a project on the environment. The term 'environment' means "the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance." (Pub. Res. Code 21060.5.) The "environment" includes both natural and man-made conditions" (CEQA Guidelines Section 15360). An economic or social change by itself is not considered a significant effect on the environment that must be analyzed in an EIR. In addition, the Project, as noted in Draft EIR, involves only temporary construction activities. Phase 1 is expected to last approximately 3 ¼ to 5 years, and once construction is complete the parking area that would be used as Staging Area 4 would revert to existing conditions.

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Chapter 9 Comment Letters

The comment letters and other submittals received regarding the Draft EIR are included in this chapter.

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CCCFCWCD

From:	Michael Burger
To:	Walnut Creek Water Treatment Plant Pretreatment Project
Subject:	RE: Notice of Availability of EIR for Walnut Creek Treatment Plant Pretreatment Project
Date:	Monday, November 6, 2023 1:24:35 PM
Attachments:	image002.png image004.png

Good Afternoon Ms. Wang,

The Contra Costa County Flood Control and Water Conservation District (FC District) has reviewed the Draft Environmental Impact Report (DEIR) for the Walnut Creek Water Treatment Plant Project located at 2201 Larkey Lane (APN 175-220-016) in the City of Walnut Creek and Lafayette Water Treatment Plant located at 3848 Mt. Diablo Boulevard (APN 252-060-005). We submit the following comments:

1. In the Hydrology Section, please identify and show all existing watercourses, tributaries, and man-made drainage facilities within the project sites, and that could be impacted by the projects. The discussion should include an analysis of the capacity of the existing watercourses. **1**

2. The Hydrology Section should quantify the amount of runoff that would be generated by the projects and discuss how the runoff entering and originating from the sites would be distributed between the natural watercourses, the detention basins (if proposed), and the man-made drainage facilities. **2**

3. We recommend that the DEIR address the design and construction of storm drain facilities to adequately collect and convey stormwater entering or originating within the developments to the nearest adequate man-made drainage facility or natural watercourse, without diversion of the watershed, per Title 9 of the County Ordinance Code. **3**

4. The DEIR should discuss the adverse impacts of the runoff from the project sites to the existing drainage facilities, and drainage problems in the downstream areas, including those areas outside of the Cities of Walnut Creek and Lafayette (Cities). **4**

5. The Walnut Creek project is located in Drainage Area 46 (DA 46). This drainage area comprises a portion of the watershed for Grayson Creek/Murderer's Creek, which ultimately drains to Walnut Creek. The existing and planned flood control facilities are designed to mitigate flooding on Grayson Creek and Murderer's Creek, and further downstream on Walnut Creek. **5**

6. The Lafayette project is located in Drainage Area 68 (DA 68). This drainage area defines the watershed for Lafayette Creek, which comprises a portion of the greater Las Trampas Creek watershed and ultimately drains to Walnut Creek. The existing and planned flood control facilities are designed to mitigate flooding on Lafayette and Las Trampas Creek, and further downstream on Walnut Creek. **6**

7. The Contra Costa County FC District facilities that would be impacted by these developments include channelized portions of Grayson Creek; channelized portions of Walnut Creek; and the Lower Walnut Creek and Pacheco Marsh. **7**

8. The Hydrology Section of the DEIR should include a study that uses Contra Costa County's hydrology method (HYDRO6). The existing and planned regional drainage facilities that are affected by development within the area have been designed using HYDRO6, which is the only method the FC District will accept. Other commonly accepted hydrology methods were developed using runoff patterns of other regions that do not accurately model the Pacific Coast storm patterns experienced in Contra Costa County. The runoff results of other methods have proven to be significantly less than field observations of local storms made by the FC District and the Army Corps of Engineers. **8**

9. The DEIR should discuss any proposed on-site and off-site drainage improvements, and include **9**

maps or drawings for the improvements.

10. If detention basin facilities are proposed, the DEIR should include a discussion of the basin design information, (i.e., capacity, sizes of inlet and outlet structures, routing, etc.) A discussion of how maintenance of these facilities would be performed and funded should also be included. **10**

11. The DEIR should address the impacts of this project's runoff due to the increase in duration (length of time) of flows and the effect on creeks and channels downstream of the project. Whereas detention basins are capable of mitigating peak flows to pre-project levels, they increase the duration (length of time) of flows in the downstream watercourses, which saturate the channel banks and increase the potential for stream and channel erosion. **11**

12. Future developments in DA 46 will be subject to a drainage fee in accordance with Flood Control Ordinance Numbers 2002-43. By ordinance, all building permits or subdivision maps filed in this area are subject to the provisions of the drainage fee ordinance. Effective January 1, 2023, the current fee in DA 46 is $0.97 per square foot of newly created impervious surface. DA 68 is an unformed drainage area, so no fees will be due on the Lafayette portion of the project. **12**

13. The FC District is not the approving local agency for this project as defined by the Subdivision Map Act. As a special district, the FC District has an independent authority to collect drainage fees that is not restricted by the Subdivision Map Act. The FC District regularly adjusts its drainage fees to reflect increasing construction costs. The drainage fee rate does not vest at the time of project approval. The drainage fees due and payable will be based on the fee in effect at the time of fee collection. **13**

14. The FC District should be included in the review of all drainage facilities that have a region-wide benefit, that impact region-wide facilities, or that impact District-owned facilities. **14**

15. Review of development plans and hydrology and hydraulic calculations for conformance with our drainage area plan falls under our Fee-for-Service program. **15**

We appreciate the opportunity to comment on the DEIR submittal and welcome continued coordination. We look forward to reviewing an updated DEIR, which should address our comments. If you should have any questions, please call me at 925-313-2308 or email me at michael.burger@pw.cccounty.us.

Regards,

Michael Burger | **Engineering Technician**
Contra Costa County Flood Control & Water Conservation District
255 Glacier Drive, Martinez, CA 94553
Phone: 925.313.2308 | Fax: 925.313.2333
michael.burger@pw.cccounty.us | cccpublicworks.org

East Bay Regional Park District

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EBRPD

November 6, 2023

Dear Chien Wang
Associate Civil Engineer
M/S #701
375 Eleventh Street
Oakland, CA
94607-4240

The East Bay Regional Park District (Park District) appreciates the opportunity to review the Draft Environmental Impact Report for the Walnut Creek Water Treatment Plant (WTP) Pretreatment Project managed by East Bay Municipal Water District (EBMUD). The Walnut Creek WTP Pretreatment Project is adjacent to and overlaps portions of the Briones to Mt. Diablo Regional Trail. The Park District has an ongoing relationship with EBMUD, which has granted the Park District a license agreement in the northern portion of the Walnut Creek WTP for the operation of the Briones to Mt. Diablo Regional Trail. The proposed project has the potential to impact trail access for short periods of time, create an impact to the aesthetic experience, and have the potential to negatively impact the long-term infrastructural stability of the trail surface.

Key stipulations of the license agreement are identified in the DEIR on page 3.12-8, along with an analysis of the impacts to the Briones to Mt. Diablo Trail as follows: 1

> *"In accordance with the August 10, 2005 25-year, renewable right-of-way license issued by EBMUD to the Park District to allow the Park District use of the Walnut Creek WTP property to operate and maintain the Park District trail within the boundaries of EBMUD's property, EBMUD would provide the Park District thirty days' previous notice in writing prior to the initiation of any construction activity that would affect the Briones to Mt. Diablo Regional Trail. During construction, closed social footpaths on EBMUD property would be clearly marked with EBMUD signage indicating the duration of the temporary footpath closure.*
>
> *Because construction impacts related to closure of social footpaths during construction and redirecting portions of social footpaths at the Walnut Creek WTP are not expected to lead to substantial deterioration of existing recreational areas, would be temporary in nature, and would ultimately support public recreational uses consistent with local plans and policies, the impact is less than significant."*

Regarding temporary **trail closures** for access to the vaults on the north side of the Briones to Mt. Diablo Trail (labelled #7 on the WCWTP Site Plan on page ES-2 of the DEIR), the Park District would like clarification regarding use of flaggers to support trail users in comfortably navigating the trail during construction. *What are the anticipated durations of these closures? Will flaggers be utilized throughout the entirety of the closures? Will there be a temporary realignment included in the planning process? Will the Park District be included in the process to determine this realignment? How much notice will be given to the Park District ahead of any planned closures?* 2

Regarding **construction impacts**, the project is anticipated to require heavy equipment driving over the Briones to Mt. Diablo Trail to access the vaults north of the trail. The Park District would like clarification regarding the subsurface impacts to the paved portions of the trail. The Park District has experienced cracking 3

and received an undue repair burden at other Park District trail locations up to five years after heavy construction equipment has driven over or along Park District trails due to adjacent construction projects. *What provisions will EBMUD put in place to ensure protection of the trail surface during construction activities? To ensure trail preservation, can EBMUD commit to provision of a physical barrier between the trail and the equipment, such as a wooden ramp, platforms or other protective material at the location where the equipment will cross the trail?* 3 cont'd

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Regarding **aesthetic resources**, as noted on page 4-14, the project would have an impact, as compared to the No Project alternative, on Viewpoint 3 during construction and operation of the project. The No Project alternative would reduce these impacts. The Park District would like EBMUD to clarify how EBMUD will mask the improvements with regards to the aesthetic experience of trail users and to the security of the new facility. *Is EDMUD planning to install screening vegetation for the sections of trail that will have direct views of the new facility?* 4

Thank for the opportunity to comment on the DEIR. The Park District looks forward to working collaboratively with EBMUD as this project continues to progress.

Rourke Healey
Planner **|** Planning, Trails, and GIS
East Bay Regional Park District
2950 Peralta Oaks Court, Oakland, CA 94605
T: 510-881-1833
rhealey@ebparks.org | www.ebparks.org

QRHOA 1

From:	Robert Simon
To:	Rehnstrom, David; Coleman, John; john@bayplanningcoalition.org
Cc:	Nichole Fink; Larry Koch; John Densem; Angela; Sharon Ferguson; Bill Park-Li; Stephen Clark; John Fondnazio
Subject:	Quail Ridge Residential Association Comments for EBMUD DRAFT EIR (DEIR)
Date:	Monday, November 6, 2023 11:25:06 AM
Attachments:	DEIR Exhibit1 - 3-16-22 letter K Horn .docx

David Rehnstorm, Manager of Water Distribution Planning EBMUD

John Coleman, CEO, Bay Planning Coalition / Board Member at EBMUD

November 4, 2023

My name is Bob Simon (retired civil engineer), and property owner at Quail Ridge. I am representing the Board of Directors of the Quail Ridge Homeowners Association and Nichole Fink of CID management. We are grateful for EBMUD's pro-active vision to insure our water supply into the future with your proposed improvements. We have 113 townhouse properties, some abut EBMUD property line on the northside of your facility along the aqueduct right of way. We have worked on many mutually concerning problems with EBMUD over the years and with your plant manager Mr. Briggs. I understand this DEIR phase must have input before November 13th, 2023 and I have attached various documents, photos and requests some of which were sent back in March 2022 to Kathryn Horn after your March 16, 2022 zoom meeting. **1**

From our comments of a year ago, our first and primary comment was a commitment to include the planting of sufficient trees to grow into a barrier and hide the buildings and tank structures from view from all of the various trails, open space land, and views of abutting homeowners.

In that regard, attached are the various questions that were submitted to you, of which I am sorry to say, I have received no contact and no response since March 2022. You will see my comments on your recorded video of the zoom meeting at approximately 46 minutes into the program.

I walk these trails often and I have meet many walkers on the trails, who live in Walnut Creek and other towns and come here to hike. Obviously they were not sent EBMUD notification postcards and have told me they have no knowledge of the tremendous amount of construction work and scenery changes that will take place at EBMUD. These "visitors" love the views and trails and are surprised when told of these changes and I feel that EBMUD may have met the minimum notification requirements, purposely so as to not "reach" the extended hiking community for their comments. **2**

I did have a conversation with Kathryn Horn about setting up a bulletin board with information on the trail itself at the bottom of the hill in the area where the little bridge crosses over the stream where the two EBMUD aqueducts are exposed above ground. This bulletin board would have provided information to many of the walkers/hikers, who would not otherwise be informed, because they are not immediate abutters. Sad to say, that this was never done and my experience has

been that 100% of the people that I have talked to over the last year have no knowledge whatsoever of what you're going to be doing to this area.

I have attached my previous document to Kathryn Horn (Exhibit -1-) with the referenced drawing from that document (Exhibit -2-) .

I am including with this email, a drawing (Exhibit -3-) that I have modified after walking the site with Stephen Clark (another QR homeowner), and taking pictures at various locations and offering these comments related to, and the photos of, our having walked the property a few days ago.

On the Exhibit 2 drawing, I have superimposed your buildings and tanks onto a Google Earth, image and attached the two areas of major EBMUD construction.

The biggest concerns that we have, (as previously mentioned a year ago) are as follows:

1. TREES TO BLOCK DIRECTIONAL VIEWS OF EBMUD NEW FACILITIES:
The addition of trees at the top of the slope of the ravine along where building 14 and 15 are being built and additional to those trees, more trees following the property line around the ravine, and continuing to where you have already located new trees to be planted to hide your retaining wall, and the four tanks. You had wood stakes months ago, in the ground marked "ret" along the steep slope side and curing around the tanks. The wood stakes marked "ret" were well down the steep slope and it is clear that they dictated the need for a retaining wall structure, this intern would force the elimination of the "red" trail in Exhibit 2 which some hikers call the EBMUD "loop". **3**

From the photos, Exhibit 4, 5, 6, 7, you can see that there are many gaps allowing views of EBMUD's proposed buildings and tanks to be built on the property from the many points on the trails and from Quail View Circle homeowners. These must be filled in with additional trees, NOTE! the trees that you see on the Google Earth image are down in the ravine, and the tops of those trees do not provide any visual blockage of the construction areas and the new facilities see Exhibit 8, 9. the view looking from the trail to your new construction area Exhibit(s) 10, 11, 12, 13, 14, show various views from opposing directions.

Further, it is requested, instead of waiting 10 years (which was discussed in the zoom meeting of 16 March 2022) for trees to grow and provide potential visual blocking of your facility, we would like trees to be planted immediately, in areas that will not be disturbed by construction and give them a chance to grow and accelerate the "visual barrier" prior to completion of all your work.

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2. NEW SAFER ALTERNATIVE CONNECTING TRAIL: Second item is a highly used, unofficial trail right against your black chain-link fence that connects the trails on the north side (near the concrete underground aqueduct vaults Sta 428, 432, 429) then along the fence to your paved road that goes up to your Larkey reservoir tank. I **4**

mentioned this to you a year ago on the zoom meeting in March 2022, your engineer stated *that "the trail could not be made because the trees were too thick and you cannot pass through them.*" I said to him that I have walked up the Hillside, approximately where the red line on the map shows a proposed trail connection and did not get hit by any trees.

4 cont'd

The trail survey and design based on elevation rise and curve around the ravine will require some engineering. The is a steep slope next to the fence that is unsafe to climb and gets slippery when wet, see Exhibit 18. This 900+ foot long trail would climb from elevation 360+/- up to elevation 430+/-. Exhibit(s) 15 panorama view, 16, 17, 18, ravine pano 19, 20

Steve Clark and I Myself are available to meet with you and any of your representatives at the trail entrance off of Quail View Circle by 1452 Quail View Circle and walk and look at the site. PLEASE accept and confirm that these comments have been received AND WILL BE INCLUDED in the DEIR. Prior to the DEIR comment deadline, hopefully we can reach agreement upon additional trees to block the view and the potential up slope trail to connect the reservoir paved road with the other trails to the north.

Sincerely
Quail Ridge Residential Homeowners Association Nichole Fink,
Bob Simon, Stephen Clark, as representing the Board of Directors
Board of Directors QRR-HOA

Exhibits attached to Bob Simon Email

Exhibit 1 3-16-22 letter K Horn

George / Kathryn
3-16-22

My name is Bob Simon (retired civil engineer) and please note that many HOA homes face your property. I am working with the BOD of the Quail Ridge Homeowners Association, we have 113 townhouse properties and some abut the EBMUD property line on the North side of your facility (along the aqueduct ROW) . We have worked on many mutual concerning problems with EBMUD over the years and with your plant manager Mr Briggs. I understand this is an E I R phase and many changes may happen prior to construction start in 2027.

Of paramount concern is the **COMMITMENT TO INCLUDE IN THE PROJECT planting of trees to grow and hide the structures from view** for all who use the various trails and open space land and the views of abutting homeowners. Please try to answer all questions below, or forward them to the appropriate person:

1. I will join the zoom meeting and I assume that all the residents on Quail View Circle AND Camino Verde Circle (our HOA) have received your POSTCARD notice of a zoom meeting on March 16th @ 6pm ? **PLEASE CONFIRM ?**

2. I have attached your aerial view with a **RED line** indicating a popular trail that is enjoyed by all which exists along the North side of your property, also a thick **BLUE line** that is the existing fence today.

a. Will the RED line become your new fence and that beautiful field used for the GRAVITY THICKENERS and SOLID AND RECLAIM PUMPS, **PLEASE CONFIRM?**

b. Regarding the gravity thickeners and solids and reclaim pumps, these are significant structures. What is the height above the present grade (or final grade and the difference in actual final grade from existing grade) which now slopes downward from the existing EBMUD fence, **PLEASE RESPOND ?**

3. During your last major construction expansion EBMUD placed and graded earth and trees along the sides of the water treatment tanks and did a series of plantings for fast growing drought resistant trees to "hide" these ebmud tanks. In addition to hiding the tanks, trees were planted on either side of the existing Briones Trail - Acalanes Ridge Open Space and are circled in WHITE on the attached aerial.

Will ebmud include sufficient tree plantings to hide the new structures including the 6 buildings to on the west side of your facility **PLEASE RESPOND?**

4. There is a GREEN LINE which represents your 100 foot wide aqueduct ROW (right of way) This gravel road is used maybe once a week, by one or two trucks, WILL THIS BE PAVED(?) FOR FLEETS OF VEHICLES TO GO UP AND DOWN AND USED AS A MAJOR ACCESS, **PLEASE RESPOND?**

5. In addition to my revised aerial jpeg, I have taken the liberty to include your pdf documents that are on your website as information to the BOD of Quail Ridge. There are 12 photos of (I guess) ebmud property, now fields that look like open space that will be used for this construction? **PLEASE CONFIRM ?**

6. EBMUD Property Lines not on your aerial view ? Do you have a drawing that shows ebmud property lines AND new proposed construction? I have also attached the 2017 documman t of some property lines in that area.

Thank you very much for your time and cooperation on this most important matter.

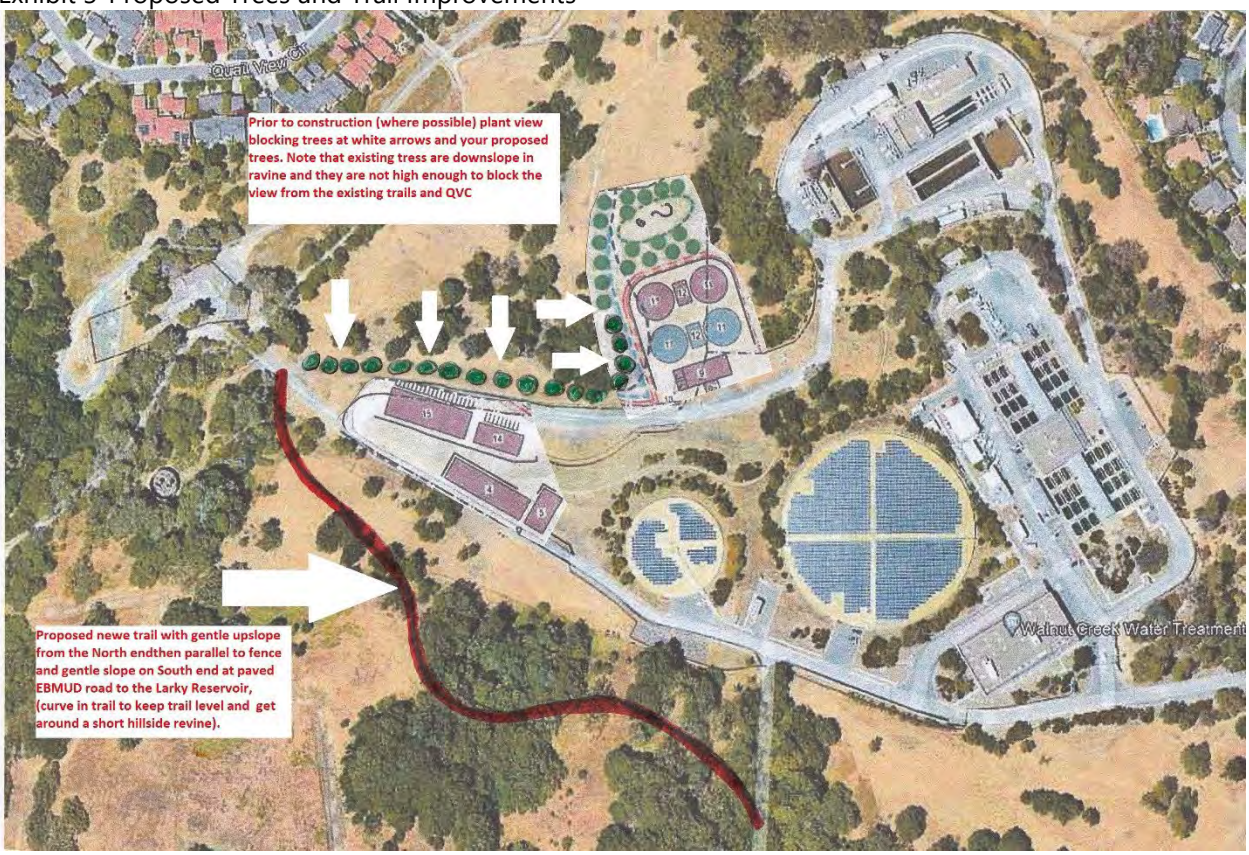
Sincerely

Bob Simon

Exhibits attached to Bob Simon Email

Exhibit 2-Aerial View Plan Trail

Exhibit 3-Proposed Trees and Trail Improvements



Exhibits attached to Bob Simon Email

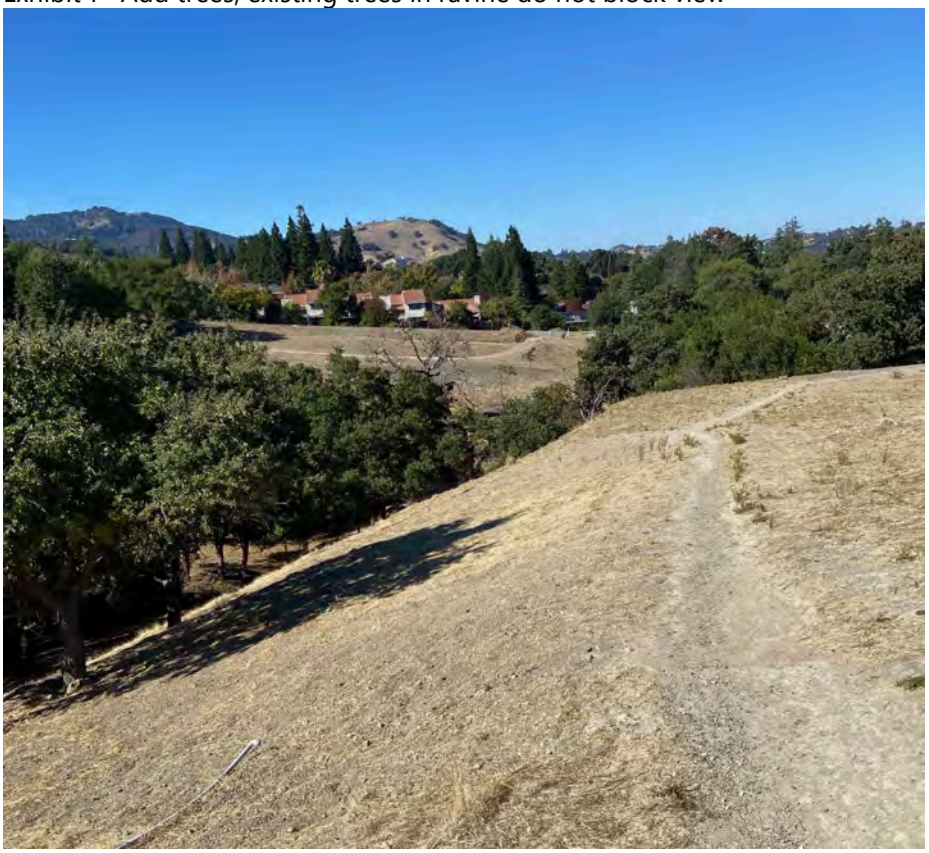
Exhibit 4-Add trees existing trees to far down slope

Exhibit 5-Add trees block buildings top of slope

Exhibits attached to Bob Simon Email

Exhibit 6-Add trees block view

Exhibit 7- Add trees, existing trees in ravine do not block view



Exhibits attached to Bob Simon Email

Exhibit 8- Add trees, existing trees too far down ravine

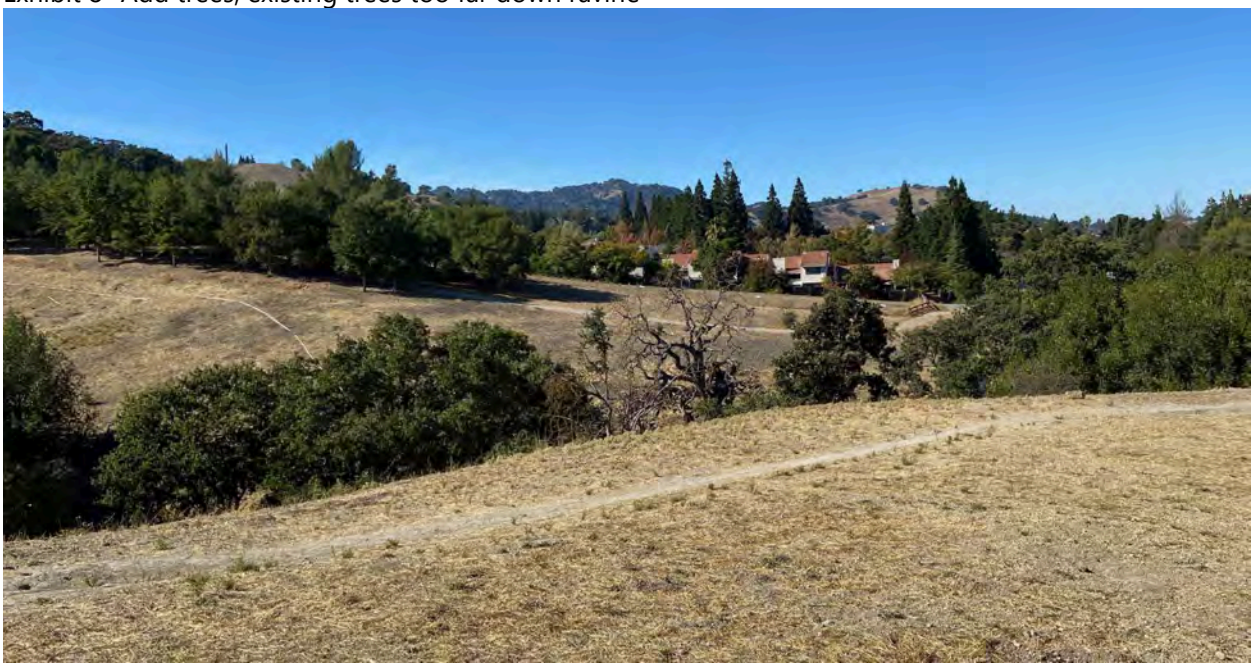


Exhibit 9-Add trees hide buildings

Exhibits attached to Bob Simon Email

Exhibit 10

Exhibit 11-View from trail

Exhibits attached to Bob Simon Email

Exhibit 12-Reverse view from EBMUD

Exhibit 13-View from trail

Exhibits attached to Bob Simon Email

Exhibit 14-View in reverse from EBMUD

Exhibit 15-New trail upslope from fence

Exhibits attached to Bob Simon Email

Exhibit 16-New trail upslope from fence

Exhibit 17-New trail upslope from fence

Exhibits attached to Bob Simon Email

Exhibit 18-Slope

Exhibit 19-Pano

Exhibits attached to Bob Simon Email

Exhibit 20

November 13, 2023

We would like to thank you for your community outreach especially the zoom meetings in March 2022 and most recently on October 19 and that you encouraged community participation. We appreciated the moderators Kathryn Horn and Tom Boardmen. Tom seemed genuinely interested in what members of the public had to say. We also appreciated your recording of the meetings so that those who couldn't attend would be able to watch them later.

EBMUD's new approach -- reaching out to communities effected by your proposed WCTCP project is a refreshing and a welcome departure from what EBMUD did with respect to the tanks. Many Quail Ridge homeowners remember the intense, protracted battle between us and your organization to get you to properly mitigate the tanks which would have been a visual assault on the landscape and negatively affected our enjoyment of our bucolic setting and our property values. We shouldn't have had to take on that fight and we wouldn't have if EBMUD done the right thing in the first place. **1**

As was mentioned in my October 26 email we are concerned with the visibility of the some of the buildings – specifically the Gravity Thickeners, the Thickened Solids Pumping Plant, and the Solids Dewatering Building, which are shown in the Draft EIR's Viewpoint 5.

The depiction of the buildings in Viewpoint 5 as they appear just after construction, after 5 years, and then 20 years must have resulted from an oversight. Clearly there is no visible mitigation unless you view your depictions with a magnifying glass. Doing this does reveal some "trees". The best description I can think of for these "trees" as mitigation is ***immaterial***. It obviously isn't what the California Environmental Quality ACT (CEQA) was contemplating in calling for the ***adoption of all feasible measures to mitigate those impacts*** – impacts that the CEQA required protocol of analysis was to disclose to the public. **2**

In response to my email of October 26, you offered to meet with us. Now that we have had the opportunity to attend your October 19 meeting either in person or view the recording of it and have had time to read and digest the relevant parts of your Draft EIR, we would like to take you up on your offer to meet with us. We have a small conference room in our office; a conference room at your office, on the Mt Diablo – Briones trail, or on Zoom on a day and at a time mutually agreeable. **3**

One last item, in the March 2022 Zoom meeting, the presenter warned us of noise - not just during construction but of permanent noise from the expanded facility. Can you be specific on what would cause the noise, when it would occur, and an estimate of how many decibels are you talking about? **4**

Sincerely,

Nichole Fink, CCAM
Quail Ridge HOA

From: Julia Jackson
To: Walnut Creek Water Treatment Plant Pretreatment Project
Subject: Staging area, Pretreatment Project
Date: Thursday, October 19, 2023 3:09:07 PM

To Chien Wang and other project members:

I live [redacted] adjacent to the entry roadway leading to your Walnut Creek Water Treatment Plant.

I expressed my concerns to Mr. Tom Boardman in a March 25, 2022 email about the potential use of the Emergency Response Parking Lot for the proposed new Pretreatment Project's staging area.

1

One of the proposed Staging Areas is directly behind my house and other Alfred Avenue residences. This lot was designated in the October 12, 2012 Addendum as the Walnut Creek Water Treatment Plant Emergency Response Parking Project. It would provide emergency parking facilities for EBMUD employees during unplanned emergencies, training for same, or special events , and not used on a daily basis. This designation was communicated to some Alfred Avenue residents on March 12, 2013.

Use of this lot for this projects' staging would certainly disrupt the open space character of this space and negatively impact the adjacent residences.

I would think that there is sufficient open space behind the current buildings, over the hill and out of sight of residences, that could be better used. Moving equipment around from a location closer to construction would cut a lot of "coming and going" out of this proposed Staging Area. It would relieve us of the unsightly equipment and associated noise.

2

Even though trees have been planted to mitigate some of the view, it is not 100% and does not cut the noise and associated disruption.

3

I am sending this email in case I am unable to express these concerns in tonight's Zoom Chat.

I greatly appreciate you evaluating other options for this proposed Staging Area in particular.

4

Sincerely,

Julia Jackson
[redacted]

From: Julia Jackson
To: Wang, Chien
Subject: FW: Emailing: View of Emergency Parking Lot, Open Space, Birds by Month Journal 8 pages, Nesting box 1, Nesting box 2, Nesting box 3, Owl nest box
Date: Friday, November 10, 2023 9:51:03 AM
Attachments: Birds by Month Journal 8 pages.docx

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Chien,
Please acknowledge receipt of my November 1 email below that "comments have been received and will be included in the DEIR...". As noted, I have many concerns, especially the K-railing which would be a disaster for our neighborhood.
On November 8, you acknowledged my previous email of October 19. **1**
I have been out of the country and may have missed your acknowledgement.
Thank you,
Julia

Julia Jackson and Dave Turner
[redacted]

-----Original Message-----
From: Julia Jackson [redacted]
Sent: Wednesday, November 1, 2023 3:58 PM
To: construction-east@ebmud.com; jvoelker@ebmud.com
Subject: Emailing: View of Emergency Parking Lot, Open Space, Birds by Month Journal 8 pages, Nesting box 1, Nesting box 2, Nesting box 3, Owl nest box

Mr. Voelker

Thank you for giving the neighborhood another opportunity to learn more about the Pretreatment Project Phase 1, 2027-2030, and to ask questions. This is an enormous project affecting Walnut Creek neighborhoods lasting for multiple years, Phase 1 lasting 3 years and Phase 2 length is unknown.

The Biological Resources Impact BIO-1, Section 3.2, Protection of Birds Protected Under the Migratory Bird Treaty Act and Roosting Bats showed that interruption to wildlife is Less than Sufficient (LTS). Page 33-35, ES-15 and ES-16. **2**
I disagree with LTS.

Impact BIO-4, Section 3.2, Protection of Birds, Page 37, ES-19 - refers to the above.

I have attached a Birds by Month Journal, November 2021 through October

2023. We have recorded 59 annual species viewed in and from the 1005 Alfred Avenue, Walnut Creek property as well as the adjacent EBMUD open space property. In addition to compiling monthly lists, I also send reports to the Cornell Lab of Ornithology in Ithaca NY on a regular basis via their eBird app. Cornell Lab gathers this kind of data worldwide. There are White-breasted Nuthatch, Western Blue Birds, and Oak Titmouse nesting on your open space property behind our 1005 Alfred Avenue lot. There are owls nesting on the other side of Larkey behind those Alfred Avenue houses. Several of these birds are listed in your EBMUD brochure - Birds of the East Bay Watershed May 2023.

2 cont'd

Birds react to distractions significantly as we have seen over the years, and as data suggests. The heavy vehicle and other traffic going up/down Larkey and in/out of the Staging Areas 3 and 4 which are next to the Walnut Creek Open Space on both sides of Larkey will have an enormous impact, and critically impact nesting season. Because of the abundance of birds, even the Mt. Diablo Audubon Society has field trip walks in our area.

In addition to birds, we have foxes, coyotes, wolves, deer, turkeys, racoons, skunks, opossums, and perhaps more.

Re-thinking the use of Stage Area 3 and 4 is critical. The traffic up/down Larkey can't be eliminated, but excess movement in/out of these areas would greatly reduce the impact noted above.

3

WALL: The K-rail wall/sound barrier proposed for the East Border of Staging Area 4 is not right for this residential neighborhood in both its industrial appearance and size. Six feet is tall for a human but short for a sound wall positioned at the base of a sloped hill where the Alfred Avenue back yards' view will look over the top of the wall. This seems useless for blocking views or reducing sound. It would also be there 24/7/365 - a long time to look at something unsightly. I would also be concerned about the cost of the proposed wall, cost to install and cost to take down at the end of the project. Please do not contract for the wall until other options/alternatives are considered such as natural green plantings/enhancements which may be less costly, last longer and be more environmentally and visibly friendly, and not blocking views of the larger open space. Or don't install any wall or barrier.

4

EMERGENCY PARKING: If Staging Area 4 is allowed for this Pretreatment Plant Project since it is not a "normal" project, where will a Water Treatment Plant Emergency Response Parking Lot be in the event of a natural disaster for EBMUD personnel to park and access damage at the plant? My understanding is that the emergency parking lot is for staff to manage the water system for the entire East Bay, not just to manage the Walnut Creek plant. Staging Area 4 is already an emergency parking lot, with significant thought and planning from previous years. With such a sizeable long-term project starting 2027, it would be critical for this emergency parking lot to remain for its intended purpose.

5

I would greatly appreciate your review of my concerns with the disturbance of wildlife, visual impact of Staging Areas 3 and 4 to the neighborhood, and the loss of Emergency Parking.

Julia Jackson

Julia Jackson and Dave Turner

Attachments to Julia Jackson email of 11/1/23

Nesting box 1

Nesting box 2

Attachments to Julia Jackson email of 11/1/23

Nesting box 3

Owl Nest box

Attachments to Julia Jackson email of 11/1/23

View of emergency parking lot, open space

Attachments to Julia Jackson email of 11/1/23

2021.11 Birds-1005 Alfred	2021.12 Birds-Alfred Ave	2022.01 Birds-1005 Alfred	2022.02 Birds-1005 Alfred
1. Acorn Woodpecker 2. American Crow 3. Anna's Hummingbird 4. Bewick's Wren 5. Bushtit 6. California Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Cooper's Hawk 10. Dark-eyed Junco (Oregon) - Slate-Colored 11. Downy Woodpecker 12. Golden-crowned Sparrow 13. Great Horned Owl – head only 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Flicker 18. Northern Mockingbird 19. Nuttall's Woodpecker 20. Oak Titmouse 21. Spotted Towhee 22. White-breasted Nuthatch 23. White-crowned Sparrow 24. Wild Turkey 25. Yellow-rumped Warbler	1. Acorn Woodpecker 2. American Crow 3. Anna's Hummingbird 4. Bewick's Wren 5. Black Phoebe 6. Bushtit 7. California Scrub Jay 8. California Towhee 9. Chestnut-backed Chickadee 10. Dark-eyed Junco 11. Downy Woodpecker 12. Golden-crowned Sparrow 13. House Finch 14. Lesser Goldfinch 15. Mourning Dove 16. Northern Flicker 17. Northern Mockingbird 18. Nuttall's Woodpecker 19. Oak Titmouse 20. Red-tailed Hawk 21. Spotted Towhee 22. White-breasted Nuthatch 23. White-crowned Sparrow 24. Wild Turkey 25. Yellow-rumped Warbler	1. Acorn Woodpecker 2. American Crow 3. American Robin 4. Anna's Hummingbird 5. Bewick's Wren 6. Black Phoebe 7. Bushtit 8. California Scrub Jay 9. California Towhee 10. Canada Goose 11. Chestnut-backed Chickadee 12. Cooper's Hawk 13. Dark-eyed Junco (Oregon) - Slate-Colored 14. Downy Woodpecker 15. Golden-crowned Sparrow 16. Great Horned Owl – heard only 17. Hermit Thrush 18. House Finch 19. Lesser Goldfinch 20. Mourning Dove 21. Northern Flicker 22. Northern Mockingbird 23. Nuttall's Woodpecker 24. Oak Titmouse 25. Red-tailed Hawk 26. Spotted Towhee 27. Turkey Vulture 28. White-breasted Nuthatch 29. White-crowned Sparrow 30. Wild Turkey 31. Yellow-rumped Warbler	1. Acorn Woodpecker 2. American Crow 3. American Robin 4. Anna's HB 5. Bewick's Wren 6. Bushtit 7. California Scrub Jay 8. California Towhee 9. Chestnut-backed Chickadee 10. Cooper's Hawk 11. Dark-eyed Junco (Oregon) - Slate-Colored 12. Downy Woodpecker 13. Golden-crowned Sparrow 14. Great Horned Owl – heard only 15. House Finch 16. Lesser Goldfinch 17. Mourning Dove 18. Northern Flicker 19. Northern Mockingbird 20. Nuttall's Woodpecker 21. Oak Titmouse 22. Red-breasted Sapsucker 23. Red-tailed Hawk 24. Spotted Towhee 25. Steller's Jay 26. Turkey Vulture 27. White-breasted Nuthatch 28. White-crowned Sparrow 29. Wild Turkey 30. Yellow-rumped Warbler

Attachments to Julia Jackson email of 11/1/23

2022.03 Birds-1005 Alfred 1. Acorn Woodpecker 2. Anna's HB 3. Bewick's Wren 4. Black Phoebe 5. Bushtit 6. California Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Cooper's Hawk 10. Dark-eyed Junco (Oregon) - Slate-Colored 11. Downy Woodpecker 12. Golden-crowned Sparrow 13. Great Horned Owl – hear only 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Flicker 18. Northern Mockingbird 19. Nuttall's Woodpecker 20. Oak Titmouse 21. Spotted Towhee 22. Steller's Jay 23. Turkey Vulture 24. White-breasted Nuthatch 25. White-crowned Sparrow 26. Wild Turkey 27. Yellow-rumped Warbler	2022.04 Birds-1005 Alfred 1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Bewick's Wren 5. Bushtit 6. California Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Cooper's Hawk 10. Dark-eyed Junco (Oregon) - Slate-Colored 11. Downy Woodpecker 12. Golden-crowned Sparrow 13. Great Horned Owl – heard only 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Mockingbird 18. Nuttall's Woodpecker 19. Oak Titmouse 20. Rufous Hummingbird 21. Spotted Towhee 22. Steller's Jay 23. Turkey Vulture 24. White-breasted Nuthatch 25. White-crowned Sparrow 26. Wild Turkey	See next page	See next page	

Attachments to Julia Jackson email of 11/1/23

2022.05 Birds-1005 Alfred	2022.06 Birds-1005 Alfred	2022.07 Birds-1005 Alfred	2022.08 Birds-1005 Alfred
1. Acorn Woodpecker 2. American Crow 3. Anna's Hummingbird 4. Bewick's Wren 5. Bushtit 6. California Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Cooper's Hawk 10. Dark-eyed Junco (Oregon) - Slate-Colored 11. Downy Woodpecker 12. Great Horned Owl – heard only 13. House Finch 14. Lesser Goldfinch 15. Mourning Dove 16. Northern Mockingbird 17. Nuttall's Woodpecker 18. Oak Titmouse 19. Rufous Hummingbird 20. Spotted Towhee 21. Steller's Jay 22. Turkey Vulture 23. White-breasted Nuthatch 24. Wild Turkey	1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Bewick's Wren 5. Black-headed Grosbeak 6. Bushtit 7. California Scrub Jay 8. California Towhee 9. Chestnut-backed Chickadee 10. Cooper's Hawk 11. Downy Woodpecker 12. House Finch 13. Lesser Goldfinch 14. Mourning Dove 15. Northern Flicker 16. Northern Mockingbird 17. Nuttall's Woodpecker 18. Oak Titmouse 19. Red-tailed Hawk 20. Spotted Towhee 21. White-breasted Nuthatch 22. Western Screech Owl – heard only 23. Wild Turkey	1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Band-tailed Pigeon 5. Bewick's Wren 6. Bushtit 7. California Scrub Jay 8. California Towhee 9. Chestnut-backed Chickadee 10. Cooper's Hawk 11. Dark-eyed Junco 12. Downy Woodpecker 13. Hooded Oriole 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Mockingbird 18. Nuttall's Woodpecker 19. Oak Titmouse 20. Spotted Towhee 21. Western Bluebird 22. White-breasted Nuthatch 23. White-crowned Sparrow 24. Wild Turkey	1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Band-tailed Pigeon 5. Bewick's Wren 6. Black-headed Grosbeak 7. Bushtit 8. California Scrub Jay 9. California Towhee 10. Chestnut-backed Chickadee 11. Cooper's Hawk 12. Dark-eyed Junco 13. Downy Woodpecker 14. Great-horned Owl – heard only 15. Hooded Oriole 16. House Finch 17. Lesser Goldfinch 18. Mourning Dove 19. Northern Mockingbird 20. Nuttall's Woodpecker 21. Oak Titmouse 22. Spotted Towhee 23. Western Bluebird 24. White-breasted Nuthatch 25. White-crowned Sparrow 26. Wild Turkey

Attachments to Julia Jackson email of 11/1/23

2022.09 Birds-1005 Alfred	2022.10 Birds-1005 Alfred	2022.11 Birds-1005 Alfred	2022.12 Birds-1005 Alfred
1. Acorn Woodpecker 1. American Crow 2. Anna's HB 3. Band-tailed Pigeon 4. Bewick's Wren 5. Bushtit 6. CA Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Dark-eyed Junco 10. Downy Woodpecker 11. Great-horned Owl – heard only 12. House Finch 13. Lesser Goldfinch 14. Mourning Dove 15. Northern Mockingbird 16. Nuttall's Woodpecker 17. Oak Titmouse 18. Red-tailed Hawk 19. White-breasted Nuthatch	1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Bewick's Wren 5. Bushtit 6. CA Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Cooper's Hawk 10. Dark-eyed Junco 11. Downy Woodpecker 12. Golden-crowned Sparrow 13. Hermit Thrush 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Flicker 18. Northern Mockingbird 19. Nuttall's Woodpecker 20. Oak Titmouse 21. Spotted Towhee 22. White-breasted Nuthatch 23. White-crowned Sparrow 24. Wild Turkey 25. Yellow-rumped Warbler	1. Acorn Woodpecker 2. American Robin 3. Anna's HB 4. Black Phoebe 5. Bushtit 6. CA Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Dark-eyed Junco 10. Downy Woodpecker 11. Golden-crowned Sparrow 12. Great Horned Owl heard only 13. Hermit Thrush 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Flicker 18. Northern Mockingbird 19. Nuttall's Woodpecker 20. Oak Titmouse 21. Spotted Towhee 22. Turkey Vulture 23. White-breasted Nuthatch 24. White-crowned Sparrow 25. Wild Turkey 26. Yellow-rumped Warbler	1. Acorn Woodpecker 2. American Crow 3. American Robin 4. Anna's HB 5. Bewick's Wren 6. Bushtit 7. CA Scrub Jay 8. California Towhee 9. Chestnut-backed Chickadee 10. Cooper's Hawk 11. Dark-eyed Junco 12. Downy Woodpecker 13. Golden-crowned Sparrow 14. Great Horned Owl heard only 15. House Finch 16. Lesser Goldfinch 17. Mourning Dove 18. Northern Flicker 19. Northern Mockingbird 20. Nuttall's Woodpecker 21. Oak Titmouse 22. White-breasted Nuthatch 23. White-crowned Sparrow 24. Wild Turkey 25. Yellow-rumped Warbler

Attachments to Julia Jackson email of 11/1/23

2023.01 Birds-1005 Alfred	2023.02 Bird-1005 Alfred	2023.03 Birds-1005 Alfred	2023.04 Birds-1005 Alfred
1. Acorn Woodpecker 2. American Crow 3. American Robin 4. Anna's HB 5. Bewick's Wren 6. Bushtit 7. CA Scrub Jay 8. California Towhee 9. Cedar Waxwing 10. Chestnut-backed Chickadee 11. Cooper's Hawk 12. Dark-eyed Junco 13. Downy Woodpecker 14. Golden-crowned Sparrow 15. Great Horned Owl heard only 16. House Finch 17. Lesser Goldfinch 18. Mourning Dove 19. Northern Flicker 20. Northern Mockingbird 21. Nuttall's Woodpecker 22. Oak Titmouse 23. Red-breasted Sapsucker 24. Ruby-crowned Kinglet 25. Turkey Vulture 26. Western Bluebird 27. White-breasted Nuthatch 28. White-crowned Sparrow 29. Wild Turkey 30. Yellow-rumped Warbler	1. Acorn Woodpecker 2. American Crow 3. American Robin 4. Anna's HB 5. Bewick's Wren 6. Bushtit 7. CA Scrub Jay 8. California Towhee 9. Chestnut-backed Chickadee 10. Cooper's Hawk 11. Dark-eyed Junco 12. Downy Woodpecker 13. Golden-crowned Sparrow 14. Hermit Thrush 15. House Finch 16. Lesser Goldfinch 17. Mourning Dove 18. Northern Flicker 19. Northern Mockingbird 20. Nuttall's Woodpecker 21. Oak Titmouse 22. Red-breasted Sapsucker 23. Western Bluebird White-breasted Nuthatch 24. White-crowned Sparrow 25. Wild Turkey 26. Yellow-rumped Warbler	1. Acorn Woodpecker 2. American Crow 3. American Robin 4. Anna's HB 5. Bewick's Wren 6. Bushtit 7. CA Scrub Jay 8. California Thrasher 9. California Towhee 10. Chestnut-backed Chickadee 11. Cooper's Hawk 12. Dark-eyed Junco 13. Downy Woodpecker 14. Golden-crowned Sparrow 15. Hermit Thrush 16. House Finch 17. Lesser Goldfinch 18. Mourning Dove 19. Northern Flicker 20. Northern Mockingbird 21. Nuttall's Woodpecker 22. Oak Titmouse 23. Turkey Vulture 24. White-breasted Nuthatch 25. White-crowned Sparrow 26. Wild Turkey 27. Yellow-rumped Warbler	1. Acorn Woodpecker 2. Anna's HB 3. Bewick's Wren 4. Bushtit 5. CA Scrub Jay 6. California Towhee 7. Chestnut-backed Chickadee 8. Cooper's Hawk 9. Dark-eyed Junco 10. Downy Woodpecker 11. Golden-crowned Sparrow 12. House Finch 13. Lesser Goldfinch 14. Mourning Dove 15. Northern Flicker 16. Northern Mockingbird 17. Nuttall's Woodpecker 18. Oak Titmouse 19. Rufous Hummingbird 20. Western Bluebird M&F 21. White-breasted Nuthatch in front birdhouse 4/23+ 22. White-crowned Sparrow 23. Wild Turkey 24. Yellow-rumped Warbler

Attachments to Julia Jackson email of 11/1/23

Attachments to Julia Jackson email of 11/1/23

2023.05 Birds-Alfred Ave	2023.06 Birds-Alfred Ave	2023.07 Birds-Alfred Ave	2023.08 Birds-Alfred Ave
1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Bewick's Wren 5. Black-headed Grosbeak 6. CA Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Cooper's Hawk 10. Dark-eyed Junco 11. Downy Woodpecker 12. European Starling 13. Hermit Thrush 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Flicker 18. Northern Mockingbird 19. Nuttall's Woodpecker 20. Oak Titmouse in front birdhouse 5/23+ 21. Western Bluebird 22. White-breasted Nuthatch 23. Wild Turkey	1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Bewick's Wren 5. CA Scrub Jay 6. California Towhee 7. Chestnut-backed Chickadee 8. Cooper's Hawk 9. Dark-eyed Junco 10. Downy Woodpecker 11. European Starling 12. House Finch 13. Lesser Goldfinch 14. Mourning Dove 15. Northern Mockingbird 16. Nuttall's Woodpecker 17. Oak Titmouse in front birdhouse 6/23 18. Western Bluebird M&F 7.22.22; 4.14.23; 5.8.23; 5.22.23, 6.2.23 feeding juvenile; 6.30.23 in birdhouse 19. White-breasted Nuthatch 20. Wild Turkey	1. Acorn Woodpecker 2. American Crow 3. Anna's Hummingbird 4. Bewick's Wren 5. Black-headed Grosbeak 6. Bushtit 7. CA Scrub Jay 8. California Towhee 9. Chestnut-backed Chickadee 10. Dark-eyed Junco 11. Downy Woodpecker 12. Great Blue Heron 7.27.23 on back fence 13. Hermit Thrush 14. House Finch 15. Lesser Goldfinch 16. Mourning Dove 17. Northern Mockingbird 18. Nuttall's Woodpecker 19. Oak Titmouse 20. Western Bluebird 21. White-breasted Nuthatch 22. Wild Turkey	1. Acorn Woodpecker 2. Anna's HB 3. Bewick's Wren 4. Bullock's Oriole 5. Black-headed Grosbeak 6. CA Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Dark-eyed Junco 10. Downy Woodpecker 11. House Finch 12. Lesser Goldfinch 13. Mourning Dove 14. Northern Mockingbird 15. Nuttall's Woodpecker 16. Oak Titmouse 17. Western Bluebird 18. White-breasted Nuthatch 19. Wild Turkey

Attachments to Julia Jackson email of 11/1/23

Attachments to Julia Jackson email of 11/1/23

2023.09 Birds-Alfred Ave	2023.10 Birds-Alfred Ave	Miscellaneous-Alfred Ave	59 Annual Species, Alfred Ave
1. Acorn Woodpecker 2. American Crow 3. Anna's HB 4. Bewick's Wren 5. Black-headed Grosbeak 6. CA Scrub Jay 7. California Towhee 8. Chestnut-backed Chickadee 9. Dark-eyed Junco 10. Downy Woodpecker 11. Great Horned Owl – heard only 12. House Finch 13. Lesser Goldfinch 14. Mourning Dove 15. Northern Mockingbird 16. Nuttall's Woodpecker 17. Oak Titmouse 18. Rock Pigeon – large flight group 19. Spotted Towhee 20. Steller's Jay 21. Western Bluebird 22. White-breasted Nuthatch 23. White-crowned Sparrow 9 24. Wild Turkey	1. Anna's HB 2. Bewick's Wren 3. CA Scrub Jay 4. California Towhee 5. Chestnut-backed Chickadee 6. Dark-eyed Junco 7. Downy Woodpecker 8. Golden Crowned Sparrow 9. Great Horned Owl – heard only 10. Hermit Thrush 11. House Finch 12. Lesser Goldfinch 13. Mourning Dove 14. Northern Flicker Northern Mockingbird 15. Nuttall's Woodpecker 16. Oak Titmouse 17. Rock Pigeon 18. Spotted Towhee 19. Turkey Vulture 20. Western Bluebird 21. White-breasted Nuthatch 22. White-crowned Sparrow 23. Wild Turkey 24. Yellow-rumped Warbler	California Quail, adults, 10 babies, 5/21 Red-breasted Sapsucker 10.3.21 Ruby-crowned Kinglet 1.02.21 Yellow Warbler 9/20	1. Acorn Woodpecker 2. Allen's Hummingbird (white neck) 3. American Crow 4. American Goldfinch 5. American Pipit 6. American Robin 7. Anna's HB 8. Band-tailed Pigeon 2.3.20/overhead 9. Bewick's Wren 10. Black Phoebe 11. Black-headed Grosbeak 12. Brown-headed Cowbird 13. Bullock's Oriole 14. Bushtit 15. California Quail 16. California Scrub Jay 17. California Thrasher 18. California Towhee 19. Canada Goose 20. Cedar Waxwing 21. Chestnut-backed Chickadee 22. Cooper's Hawk 23. Dark-eyed Junco 24. Downy Woodpecker 25. European Starling 26. Golden-crowned Sparrow 27. Great Blue Heron 28. Great Horned Owl 29. Hairy Woodpecker 30. Hermit Thrush 31. Hooded Oriole 32. House Finch 33. House Sparrow 34. Lesser Goldfinch 35. Mourning Dove 36. Northern Flicker 37. Northern Mockingbird 38. Nuttall's Woodpecker

Attachments to Julia Jackson email of 11/1/23

			39. Oak Titmouse 40. Pine Siskin 41. Purple Finch 42. Red-breasted Sapsucker 43. Red-tailed Hawk 44. Rock Pigeon 45. Ruby-crowned Kinglet 46. Rufous Hummingbird 47. Song Sparrow 48. Spotted Towhee 49. Steller's Jay 50. Townsend's Warbler 51. Turkey Vulture 52. Western Bluebird 53. Western Screech Owl 54. White-breasted Nuthatch 55. White-crowned Sparrow 56. Wild Turkey 57. Wrentit 58. Yellow Warbler 59. Yellow-rumped Warbler

KATZKI

From: Daniel Katzki[redacted]
Sent: Tuesday, November 7, 2023 5:54 PM
To:[redacted]Bill Park-Li [redacted]Stephen Clark[redacted]John Fondnazio <[redacted]Rehnstrom, David <david.rehnstrom@ebmud.com>; Coleman, John <john.coleman@ebmud.com>; john@bayplanningcoalition.org
Cc[redacted]ROBERT SIMON[redacted]
Subject: Re: Fwd: Quail Ridge Residential Association Comments for EBMUD DRAFT EIR (DEIR)

To all concerned -

My name is Dan Katzki. My family's residence is on Ramsay Circle and also faces your facility.

I also attended the March Zoom meeting and voiced my, and some of my neighbors, concerns. I am sending this email supporting all points made by Bob Simon, in the email below. There are two suggestions/concerns that I would like to add:

1. Many of the new proposed structures would directly be facing our neighborhood's properties and would be quite an eyesore. To mitigate this issue, it is our recommendation that, just like the "Rocky" and "Bullwinke" water tanks, earth be graded up the side of the structures to hide/camouflage them. This worked very well with the water tanks and should be incorporated into the mitigation plans for the new structures. **1**

2. In the March Zoom call, the presenter warned us of noise - not just during construction but of permanent noise from the expanded facility. This HAS to be mitigated. There are residences in the area that were there before this and previous expansions. They cannot be violated with more noise than we currently deal with. **2**

Thank you for taking these and other neighborhood issues into consideration. Please feel free to contact me at any time.

Dan Katzki

[redacted]

MALLYA

Arvind R. Mallya
[redacted]
November 8, 2023

Joseph Voelker
East Bay Municipal Utility District Water
Distribution Planning Division
375 11th Street Oakland, CA 94607

Subject: Walnut Creek Water Treatment Plant Pretreatment Project Draft Environmental Impact Report SCH # 2022020573 Volume I, II and III

Joe,

I'm a resident and a neighbor to your water treatment plant in Walnut Creek. Further I'm responding to your EIR Volume I, II and III.

We the residents are now back to seven long years of misery from your previous San Ramon Valley expansion plan. EBMUD continues to expand this sensitive facility with complete disregard for the residential community and its environment and has slowly turned this neighborhood into an industrial zone. There is no proper planning as I see it and no corporate environmental and good neighbor responsibility only corporate bottom-line! Unlike other utilities who have an oversight agency and recourse like the PUC and FCC, EBMUD has none, and your careless attitude is obvious. **1**

Please respond to my following concerns which I have listed below.

1. As we all know, with your continued expansion it would result in more chlorine and other toxic chemicals transported and stored at your facility. The transportation via San Luis and Larkey Lane is through a residential densely populated area, the turn-off from San Luis Road on to Larkey Lane is a T-junction and maneuvering those trucks and trailers is an accident waiting to happen. I brought this up a few years ago and no proper response was provided, it created a major traffic jam during busy hours. I hope this time around with all the heightened infrastructure terror susceptibility the Department of Homeland Security (DHS) takes note of this major infraction. **2**

    a. What is your mitigation strategy and evacuation plan with the local fire agency and other emergency response authorities if there is a gas leak and **3**

dispersal into the neighborhood. It reminded me of the careless poor planning and plant maintenance by Union Carbide which resulted in a huge Chlorine gas leak in Bhopal killing hundreds of people. **3 cont'd**

b. Why have you not considered bringing the trucks off Pleasant Hill Road and on to your facility through that direct route? There is also a direct route further on San Luis to your facility with no T-junction turns. **4**

c. I have attached a photo of a liquid leak on to the road leading to your plant. I personally witnessed the clean up at your facility was that ever reported into the local agencies. **5**

2. I see you continue to expand with solar panels and pumps, please provide us with details of base band noise and interference levels in the HF, VHF and Cellular band. There is no such data provided and I do see higher levels of noise as I'm an amateur radio operator. **6**

3. During the last construction phase your trucks plying up and down our streets brought in dust and dirt and pretty much damaged the roadway and not much was done by the city to fix that and took them years to do so, we the taxpayers footed the bill for the repairs. What are your planning steps to fix that and not turn our upscale neighborhood into an industrial facility? **7**

4. During the last construction phase the staging area on Larkey Lane past the gates on the right had your vehicle and generators constantly up and running creating pollution and noise the entire day into the evenings. It's like in a canyon and sound would travel everywhere. That whole staging area needs to move further up from residences. **8**

5. The neighborhood has also seen a transition to families with kids who go to school and walk down to the school using Larkey Lane. That creates a safety issue with your heavy trucks coming up and down on the steep road. **9**

6. Your continued expansion at one location for the entire San Ramon Valley from one location is of concern to many of us. Considering the recent terror threats to our infrastructure issued by the FBI, what has EBMUD done for a prolonged outage? Most to all utilities like Power and Telephone are required by legislation to provide reliability and availability statistics during a catastrophic outage like an earthquake and a man-made disaster on their web sites. Please tell us what is your overall water system availability during a major/catastrophic outage? **10**

7. What is your network layout and plan to meet the customer water demand, a critical commodity? Most of your networks like the pipes that bring the water, and the pumps are all above ground are exposed and are easily a target for disruption. **11**

8. In the event of an earthquake or a catastrophic mad-made disaster on the known fault lines what is the plan when one of the tanks collapses and for channeling the water away from the residences? **12**

9. Has EBMUD discussed these plans (EIR) with the Department of Homeland Security (DHS) to my point's number 1 and 6? **13**

In closing we put up with noise and dust on your last project to a point where I had to clean my pool and filter every so often and the house would get dusty, if you go ahead with your plans, we expect the same level of reimbursement for clean up and water usage. **14**

Lastly your water treatment plant belongs where there is growth like San Ramon **15**

and beyond and not the immediate area, it would be a good engineering and business practice to build one away from a residential are and where there is plenty of unused barren open space like in the San Ramon Hills. **15 cont'd**

Sincerely,

Arvind R. Mallya

Arvind Mallya attachments

THRELKELD

From: Cliff Threlkeld
To: Wang, Chien
Subject: Walnut Creek Treatment Plant Pretreatment Project
Date: Friday, November 10, 2023 4:40:28 PM

Dear Mr. Wang:

Thank you for sending me a copy of the Draft EIR for this project. I understand that the technical questions concerning this project that I expressed to Mr. Bordman in my March 10, 2023 letter would not be addressed in this document. Perhaps you could answer them in a brief note or a phone call. Being very familiar with the operations of the Aqueduct system could you please advise me of:

1. What hydraulic studies has the District or its consultants done on the impact of raising the downstream head in the system by 10 feet. Since there is very little elevation difference between the Walnut Creek Tunnel invert and the Lafayette Glory Hole Weir crest. It seems to me water now will be backed up all the way to Pardee Reservoir. This will decrease the gravity flow capacity in the system over the long term. **1**
2. What structural studies have been done to assure the District that the Lafayette #1 Aqueduct can safely operate under the increased hydraulic head produced by this project. **2**
3. What studies have been done to assure the Walnut Creek PP #1 and #2 will efficiently operate under the new hydraulic conditions. These pumps are very different from the normal distribution system pumps in that they designed to pump against a very small range if discharge heads. They are operate to lower the hydraulic grade line in the Aqueducts to increase flow. There may be impacts to the Moraga Pumps as well. **3**
4. What studies have been done concerning increased Aqueduct pumping energy resulting from the WCWTP pretreatment facilities. **4**
5. Has there been any work to determine the impacts this project may have on the District's Mokelumne River Water Rights since the maximum capacity of the Aqueduct System could be physically reduced from 325MGD. **5**

Thanks for your attention regarding my concerns. I look forward to hearing from you next week if possible.

Cliff Threlkeld
[redacted]

This supersedes the PDF file I sent yesterday, 11-9-23 @ 4:08 PM.

The first sentence of EBMUD's Draft EIR for the Walnut Creek WTP reads as follows:
"The California Environmental Quality Act (CEQA) requires that all state and government agencies consider the environmental consequences over which they have discretionary authority before taking an action that has the potential to affect the environment."

CEQA … requires state and local agencies within California to follow a protocol of analysis and public disclosure of environmental impacts of proposed projects and … adopt all feasible measures to mitigate those impacts. 1

Chapter 3 of the EBMUD's Draft EIR is entitled ***Environmental Setting, Impacts, and Mitigation Measures***

Section 3.1 Aesthetics is where we find what EBMUD has to say (or fails to say) about the impact on Quail Ridge. **1**

EBMUD has identified six Viewpoints where the construction and operation activities at the Walnut Creek WTP and Lafayette WTP sites would be most visible to the public.

Quail Ridge falls within **Viewpoint 5.**

If you walk out from Quail View Circle to the Briones to Mount Diablo Regional Trail, walk up it for about 300 ft, and look to your left 500 feet away you will see the area on EBMUD's property where it plans to construct three structures:
Chapter 2 ***Project Description*** includes a table of information about each of the 3 buildings that EBMUD plans to erect here.

EBMUD Facility #	Project Component	Qty	Approx. Dimensions (length & width in feet)	Depth in feet below existing grade	Maximum Height Above Existing Grade (in feet)	Comments
9	Solids Dewatering bldg	1	100 x 45	Above Grade	32	A 100 ft long 3 story bldg
11	Gravity Thickeners	4	80 (diameter)	4 to 27	4	
12	Thickened solids pumping plants	2	50 x30	22 - 29	19	A 2 story bldg

Solids Dewatering Building (9)
The solids dewatering building would be a two-story, concrete structure housing centrifuges that would mechanically dewater solids from the thickened solids blending tanks. The centrifuges would produce dewatered, compacted solids that would be loaded by screw conveyors into trucks at a truck loading station in front of the building.

Gravity Thickeners (11)
Thickened solids would collect at the bottom of the gravity thickeners and would be periodically pumped to the solids blending tanks prior to dewatering. Two gravity thickeners would be constructed in Phase 1 with two more constructed in Phase 2. The structures would be concrete, and would be almost entirely buried with the visible portion of the structures designed to be similar to existing structures at the Walnut Creek WTP.

1 cont'd

Thickened Solids Pumping Plants (12)
The buildings would be cast-in-place concrete with a flat steel framed roof like existing structures at the Walnut Creek WTP.

The examples of concrete and steel architecture that EBMUD will use on the WCTCP project are shown in the photo below that came from the Draft.

Figure 2-9: Existing Buildings at the Walnut Creek WTP

1 cont'd

In the Draft EIR on page 3.1-12 there is a table that addresses what EBMUD calls **Visual Sensitivity.** In the part of this table that focuses on Viewpoint 5, the following is presented.

Visual Quality **High**

Affected Viewers and Exposure Conditions **High**

Visual Sensitivity **High**

None of the other six Viewpoints shown rates anywhere nearly as **High.**

1 cont'd

Viewpoint	Visual Quality	Affected Viewers and Exposure Conditions	Visual Sensitivity
1	Moderate	Moderate to High	Moderate
2	Moderate	Low	Low
3	High	Moderate	Moderate
4	Moderate	High	Moderate
6	Moderate	Moderate	Moderate
Lafayette VP	Low	Low	Low

After seeing all this, a reader of this Draft EIR would be expecting Viewpoint 5 to receive careful attention and a mitigation that would be rated as **High.**

The two pages that follow come from the EBMUD Draft EIR. They are photographs of the site on EBMUD property that Viewpoint 5 is concerned with and how it is addressed.

Figure 3.1-14: Walnut Creek WTP Viewpoint 5 Visual Simulations – Before and After Construction

Before Construction – Existing View

After Construction - Gravity Thickeners, Thickened Solids Pumping Plant, and Solids Dewatering Building partially visible

1 cont'd

5 Years After Construction

20 Years After Construction

1 cont'd

The first thing I would like to point out is that if you carefully look at the photo ***after construction*** and then the one ***after 5 years*** and then the one ***after 20 years***. Specifically focus on the area above the red arrow. There is really no discernable between the photos. Yes, there are some dinky trees that accomplish essentially nothing to screen the structures. Other than those pathetic trees, I doubt you will find that even ***one branch of one tree*** has changed or been added since the day the project is to be completed. **2**

Why is that? I suspect it is due to EBMUD's inability to really put themselves in our place. They think they have, and that is clear from their presentations in their public meetings. But when you see things like this you realize they can't or they won't.

The next thing I want to point out which is far more concerning than the above has to do with what I consider a time honored, deceitful practice of EBMUD.

You, EBMUD, did this same thing, not only in your Draft but in the final EIR for the **tanks you wanted to build in 1999**. This practice was pointed out to your Board of Directors in a joint meeting of the Walnut Creek City Council and the EBMUD Board of Directors at a meeting that was held in the Del Valle auditorium one evening in June,1999 which lead to your decision to bury the tanks.

What I am talking about is your practice of using a wide angle lens or selecting a wide angle view on your camera used to take a photograph, in this case, at Viewpoint 5. When you do that, which I am sure you know, you push the subject matter of your photo back into the distance, back into relative insignificance. This use of a wide angle view in this situation does not, I would imagine, come close to meeting the definition of the ***analysis*** CEQA requires. The use of a wide angle view to push the problem into insignificance, I am quite sure does not meet the CEQA requirement to ***adopt all feasible measures to mitigate those impacts.*** **3**

I took the photo that follows yesterday looking at the EBMUD site for Project Components 9, 11, & 12. You can tell it is the same view as used in the EBMUD Draft EIR when you look at the two shrubs **on the left** circled in **red** and then go back up and look at your photographs.

This photograph of mine still has a wide angle effect to it. To correct for this effect, I walked 8 steps forward and took the second photo to show what the scene really looks like to the human eye. Notice that the **branch** (circled in **red**) in the foreground of the first picture is present in the second picture as well.

3
cont'd

3 cont'd

Again, this is what the human eye sees when looking at EBMUD's site, not something off in the distance and therefore almost forgettable. This site is very noticeable and something that truly needs to be mitigated and not the sort of mitigation EBMUD has a penchant for, which in this case, judging by the photos in the Draft EIR, is essentially nothing.

One last thing, near the top of page 3.1-15, in discussing **Viewpoint 5,** under the heading **Visual Quality**, EBMUD writes "Viewpoint 5 has high visual quality…"

Below that under the heading **Affected Viewers and Exposure Conditions,** the Draft EIR says "Viewpoint 5 would be experienced by the public when walking or hiking along the trail, which would provide for an extended exposure to the view of the site." This is true, but you inadvertently or maybe intentionally ignored another group of people who have not an extended view of the site but a **permanent** one. Those are the homeowners whose outlook is Viewpoint 5. See the next photo.

4

4
cont'd

This is not the entire group of homeowners; it extends up the hill to the left and down the hill on the right. All the EBMUD photographer had to do after taking the wide angle shot was to simply turn around, which I am sure the photographer did but then made the decision to ignore these inconveniently (for EBMUD) located houses and not take the photo.

When people have written EBMUD recently about this project the response they received was something like "thank you for your concerns, they will be addressed in the Final EIR.

Given EBMUD's sloppiness, their practice of intentionally diminishing the importance of things they really should be genuinely concerned about, an answer like that to the concerns raised here would be woefully inadequate, if not insulting. And it does nothing to indicate EBMUD is interested in dealing in good faith.

Because of that we (those of us most effected and concerned by this) insist that we have a meeting with you. You probably weren't working at EBMUD in 1999. At that time, in our efforts to get EBMUD to eventually take us seriously and ultimately decide to bury the tanks, we gave many oral presentations (with some compelling photographs) in Walnut Creek, contacted a local newspaper, enlisted the help of local political leaders, and appeared on 'ABC's 6:00 news.

5

I am sure that John Coleman (who was a Director then as well) remembers 1999. If you don't agree to soon meet with us, I am sure John Coleman would suggest that you do. You probably don't want to waste anytime in meeting with us.

5 cont'd

Looking forward to meeting with you .

Steve Clark
[redacted]

Bob Simon
[redacted]

1. "CEQA History". State of California Department of Justice, Office of Attorney General. Archived from the original on 2011-03-13. Retrieved 2011-03-28.

2. Page 3.1-2 of the Draft EIR

From:	Ashley Greene
To:	Walnut Creek Water Treatment Plant Pretreatment Project; construction-east; Voelker, Joseph Jr.
Cc:	mayor@walnut-creek.org
Subject:	Staging Area 4 - Pretreatment Project - Alternate Idea
Date:	Sunday, November 12, 2023 9:28:41 AM

Ms. Wang and Mr. Voelker,

I am emailing regarding the pretreatment project at the Walnut Creek EBMUD site. I live at [redacted] Our yard backs up to the emergency vehicle parking lot. I have concerns around turning the emergency lot into a staging area, due to the proximity of it to our homes.

I understand that this project needs to take place, so I'd like to propose an alternate idea for the emergency lot. Would EBMUD consider using the emergency lot as employee parking and using the current employee parking lot as a staging area? That way, staging would be closer to the building site. We would not have to worry about the noise from materials being moved to the construction site. And our views would be preserved during the nights and weekends. This would also eliminate the need for the sound barrier placement in the emergency lot, which would be a terrible eyesore for us for the years of the project. 1

Thank you for considering this idea, it could be a great compromise, keeping neighbors happy with limited impact to the project.

Kind regards,
Ashley and Peter Greene
[redacted]

TAANING

Voelker, Joseph Jr.

From: Sabrina Taaning [redacted]
Sent: Monday, November 13, 2023 3:42 PM
To: Voelker, Joseph Jr.; construction-east
Subject: Walnut Creek water treatment plant upgrades- Emergency parking area

Walnut Creek Water Treatment plant upgrades-
Re :construction use of the Emergency parking area off Larkey Lane.

Eastbay mud has always been good stewards of the land . I'm writing to ask you to reconsider using the emergency parking area for the Walnut Creek water treatment plant during the upcoming 5 year construction project. **1**

My neighbor has written a letter, documenting the numerous birds and wildlife that she has recorded in the open space behind our yards . My yard backs to a seasonal creek, and there is an owl box with owls every year. I hear them late at night, calling to one another and hunting. **2**

It would be a shame to lose all that if the emergency parking lot behind our homes is used as a staging area for materials, supplies equipment . It seems that would also mean bright lights at night to secure that equipment, a security fence, and perhaps even a sound wall, as was given on the presentation. **3**
If you absolutely must park extra vehicles in that overflow lot, people will take them home at the end of each day, reducing the need for lighting and security fencing.

The look of the sound wall totally does not fit the neighborhood. It's awful. Please do not put that up. **4**
Maybe just some bird friendly native plants.

5 years is a long time to disrupt our quiet bird sanctuary and the peace it brings to all of us. **5**

Thank you for your consideration
Sabrina and Derek Taaning
[redacted]

Sent from my iPhone

2175 North California Boulevard
Suite 315
Walnut Creek, California 94596
www.woodardcurran.com

T 800.426.4262
T 925.627.4100

MEETING NOTES

PROJECT NAME: Walnut Creek Water Treatment Plant Pretreatment Project

PROJECT NUMBER: 0011797.00

DATE October 19, 2023

SUBJECT Draft EIR Public Meeting

SUBMITTED BY: Robin Cort

Attendees

Name	Organization
Dave Rehnstrom	EBMUD
Chien Want	EBMUD
Bill Maggiore	EBMUD
Joe Voelker	EBMUD
Robin Cort	Woodard & Curran

Questions

1. Can you assure us that that the Sierra water source will continue, with the Sacramento River only used for emergencies?
2. The treatment plant is on an earthquake fault.
3. Why not expand the Lafayette plant, rather than closing it?
4. I was surprised to hear that you are unaware of the earthquake fault. Doesn't that invalidate the EIR?
5. Please discuss the impact to the Briones to Mt. Diablo trail - Will the project require the full closure of the Briones to mt Diablo trail? If so, for how long? Will there be a detour route and signage implemented as part of the mitigation?
6. After the upgrades are completed, will there be any odors coming from this plant during its normal day to day operation?
7. We are concerned about the staging area 4 both storage and sound barrier. Is it possible to have these supplies stored on other sites at the treatment plant?
8. The EIR discusses brief closures of the Briones to Mt. Diablo Trail during access to the vaults north of the trail. Could you confirm this?
9. Staging Area 4 was designated in 2012 as an Emergency Response Parking Area and was supposed to only be used for emergency purposes. Putting equipment and materials there is not an emergency. There should be area available closer to the construction area.
10. Will you restrict staging on Larkey Lane?
11. In the past workers parked in front of houses restricting safe ingress and egress from homes.
12. What are people with allergies to do? You did say something about minimizing dust, but it will be there to some extent.

13. Construction workers do not pay attention to the idle limits.
14. Will a recording of the meeting be available?
15. Where in EIR would you find mitigation for wildlife? How have birds, fox, deer and other wildlife been considered in the EIR?
16. Concerned about noise in the morning due to 6:30 a.m. start time. How can noise concerns such as impacts from loud personal vehicles such as motorcycles be mitigated? Who can be contacted to file complaints if employee vehicles are loud?
17. Machinery crossing East Bay Regional Park District trails can cause subsurface degradation of the trail. Please provide detail on how much construction traffic might affect Briones to Mt. Diablo Trail and the extent to which mitigation will be provided for the trail.
18. Who can be contacted if workers park and idle on Larkey Lane in front of homes?
19. How tall will the sound barriers be, and will they be placed as close to the gravel lot as possible in Staging Area 4?
20. How long will sound barriers be up?
21. Sound barriers look industrial. Can the look of the barriers be improved? Vehicles have idled on the streets in the past and the diesel engines are very loud.

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Chapter 10 Draft EIR Revisions

10.1 Introduction

This chapter presents revisions that have been made to the Draft EIR text. These revisions provide corrections, additions, or clarifications as requested by specific comments. The text revisions are organized by chapter. Underlined text represents language that has been added to the Draft EIR; text shown with ~~strikethrough~~ has been deleted from the Draft EIR.

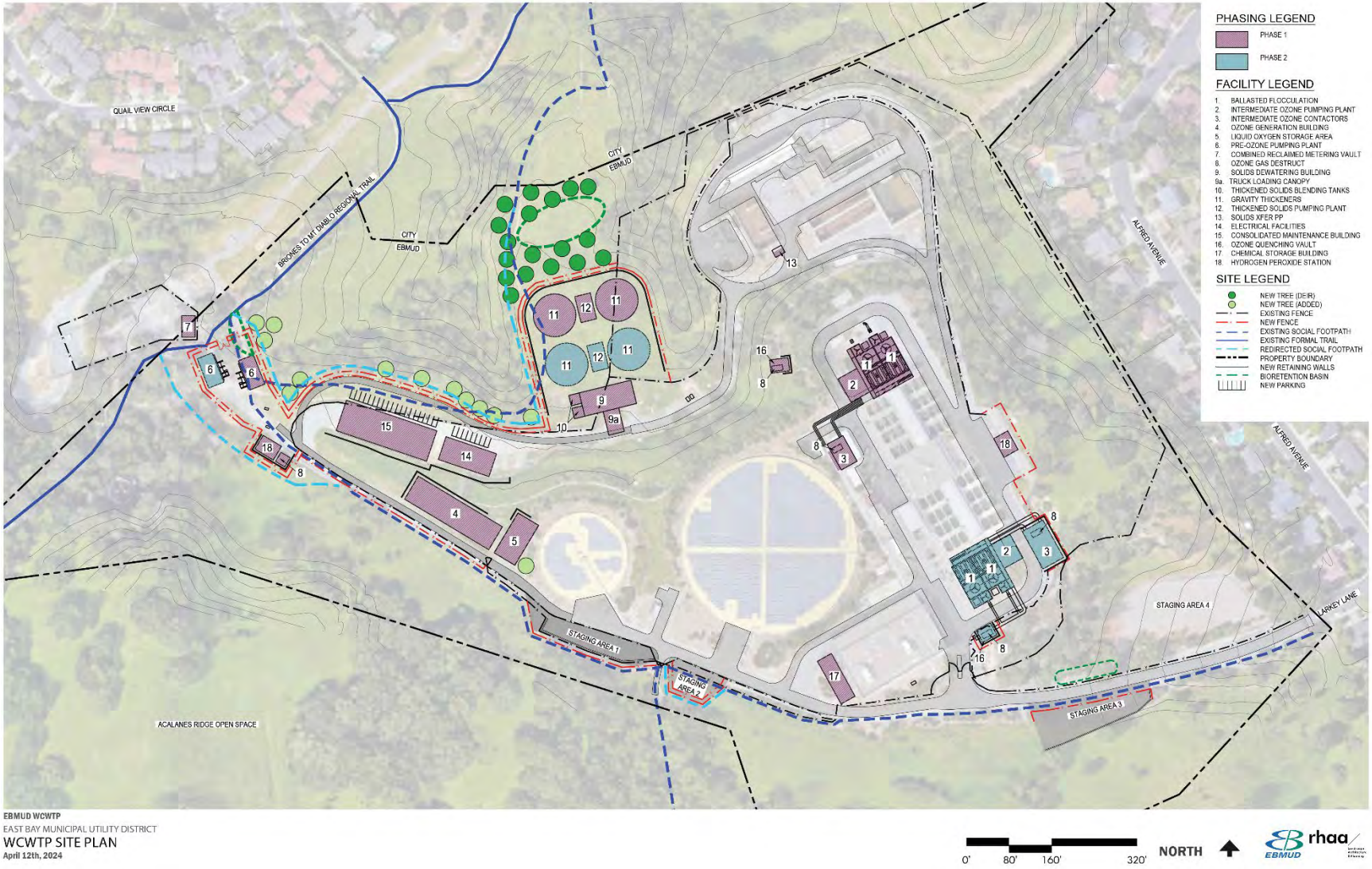
10.2 Draft EIR Text and Figure Revisions

The site plan, visual simulations, tree and shrub types and quantities in this chapter replace the corresponding site plan, visual simulations, tree and shrub types and quantities found in Draft EIR Appendix C, Aesthetics Conceptual Design Report.

10.2.1 Executive Summary Revisions

Page ES-2, Figure ES-1 has been revised as shown below to depict the updated site plan with additional trees to be planted at the northern end of the Walnut Creek WTP site and southeast of the liquid oxygen storage facility.

Figure ES-1: Walnut Creek WTP Site Plan and Phasing



Page ES-34, first entry in Table ES-2 under Noise and Vibration, a correction has been made for consistency with typical EBMUD practices as follows:

EBMUD Standard Construction Specification 01 14 00, Work Restrictions

Section 1.7, Construction Noise

A. Noise-generating activities greater than 90 dBA (impact construction such as concrete breaking, concrete crushing, tree grinding, etc) shall be limited to the hours of 8 a.m. to 4 p.m. ~~7 a.m. and 7 p.m.~~, Monday through Friday.

Page ES-43, Table ES-3, the entry for Noise has been revised as follows to refine the approach for mitigating potential noise impacts associated with the use of Staging Area 4:

Noise			
Impact NOI-1: Result in the 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.	PS	**Mitigation Measure NOI-1: Additional Noise Control and Monitoring Plan Measures at the Walnut Creek WTP** The Noise Control and Monitoring Plan required in the Project specifications would include specific measures to reduce noise to ensure that noise at residential receptors does not exceed 60 dBA L_{eq} before 7:00 a.m. in Walnut Creek. The following measures, or their equivalent, would be used in combination to meet the noise limits: • Coordinate worksite activities to minimize or eliminate non-essential noise-generating activities between 6:00 a.m. and 7:00 a.m. • Install temporary sound barriers achieving a minimum sound transmission class (STC) 25 to block the line of sight from concrete activities to nearby residences (**Figure 3.11-5**) for the duration of the applicable construction phase(s). o To reduce noise by at least 8 dBA from concrete trucks at the Hydrogen Peroxide Station during Phase 1, sound barriers would need to be at minimum 8 feet high and located on the northeast side of the Hydrogen Peroxide Station. o To reduce noise by at least 5 dBA from concrete trucks at the Combined Reclaimed Metering Vault during Phase 1, sound barriers would need to be at minimum 9 feet high, and located on the north, northeast, and northwest sides of the vault. o To reduce noise by at least 3 dBA from concrete trucks at the Thickened Solids Pumping Plants and Gravity Thickeners during Phases 1 and 2, sound barriers would need to be at minimum 9 feet high and located on the northeast side of the work area. o ~~To reduce noise from early morning worker arrivals and parking at Staging Area 4 during Phases 1 and 2, sound barriers would need to be at minimum 6 feet high and located on the east side of the staging area~~. o The Noise Control and Monitoring Plan will include daily noise monitoring at the EBMUD property line east of Staging Area 4 during construction of Phases 1 and 2. If noise thresholds are exceeded and expected to continue to be exceeded, a 6-foot-high redwood fence would be installed at that time at Staging Area 4. In anticipation of the possibility that a fence would be needed, 16 5-gallon shrubs will be planted in the area east of Staging Area 4 prior to construction to provide visual screening for the fence. **Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP** (Details as listed under Impact TRA-1)	SU

Page ES-43, Table ES-3 entry for Traffic Impact TRA-1 has been revised as follows to add radar speed feedback signs on San Luis Road:

Transportation			
Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system,	PS	**Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP** • Use of soil and demolition off-haul and large equipment delivery trucks to and from the Walnut Creek WTP will be restricted to between the hours of 9:00 a.m. to 3:30 p.m.	LTS

including transit, roadway, bicycle, and pedestrian facilities.		• The required Traffic Control Plan shall include the following measures: o EBMUD's Contractor shall distribute written traffic safety requirements to all Contractor heavy construction vehicle drivers. All drivers shall provide signed acknowledgement of having read and understood all traffic safety requirements and consequences of non-compliance. o Written traffic safety requirements shall include: ▪ Construction work hours specifying when construction traffic would be allowed to access the Walnut Creek WTP and staging areas. ▪ Construction haul routes and associated speed limits. ▪ Designated parking and queuing locations. o Contractor shall provide Project sticker or equivalent to drivers who have provided written acknowledgement of traffic safety requirements. ▪ Project sticker shall be made available upon request by EBMUD during the construction contract period. o Contractor heavy construction vehicle drivers shall conform to designated construction hours, including no driving, queuing, idling or parking on local roadways outside of designated construction hours as outlined in written traffic safety requirements. o Contractor heavy construction vehicle drivers shall use only designated construction traffic haul routes. o Contractor shall provide Radar Speed Feedback Signs along Larkey Lane and San Luis Road for the entire Project duration (four ~~two~~, one in each direction of traffic on Larkey Lane and San Luis Road) to deter speeding by heavy construction vehicles on construction traffic routes. o Contractor heavy construction vehicle drivers shall comply with roadway traffic safety rules as outlined in written traffic safety requirements, including, but not limited to: ▪ Stoplight signals and stop signs. ▪ Roadway speed limits (reduced speeds in construction zones and near schools). • Prior to Project construction, EBMUD shall require the contractor(s) to video document pavement conditions on San Luis Road between Casa Way and Larkey Lane and on Larkey Lane between San Luis Road and Alfred Avenue that will be used by Project-related vehicles. Pavement conditions shall also be documented after Project construction is complete. If there is visible deterioration in the pavement condition, any pavement damaged by Project construction-related traffic shall be repaired to a structural condition equal to that which existed prior to Project construction activity.	

Page ES-44, Table ES-3 entry for Traffic Impact TRA-3 has been revised as follows to add reference to Mitigation Measure TRA-1 and additions to Mitigation Measure TRA-2 to ensure the safety of pedestrians crossing the intersection of Larkey Lane and San Luis Road:

Transportation			
Impact TRA-3: Substantially increase hazards due to a design feature or incompatible uses.	PS	**Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP** (Details as listed under Impact TRA-1) **Mitigation Measure TRA-2: Additional Flagger Requirements at Larkey Lane for Walnut Creek WTP** Contractors shall implement the following measures as part of the Traffic Control Plan in Walnut Creek: • On extended workdays with large concrete pours and days with soil off-hauling at the Walnut Creek WTP, provide a traffic control flagger at the intersection of Larkey Lane and Alvarado Avenue and the intersection of Larkey Lane and San Luis Road during school start and dismissal times with a buffer before school starts and after school ends. • The construction contractor shall confirm with the Contra Costa Christian Schools (2721 Larkey Lane, Walnut Creek) and Buena Vista Elementary School (2355 San Juan Avenue, Walnut Creek) the typical start and dismissal times, school events, and irregular start and dismissal times prior to the beginning of each school year.	SU

10.2.2 Project Description Revisions

Page 2-4, Figure 2-3 has been revised as shown below to depict the updated site plan with additional trees to be planted at the northern end of the Walnut Creek WTP site and southeast of the liquid oxygen storage facility, and to reflect an adjustment to the location of consolidated maintenance building and a portion of the paved north access road to accommodate the additional trees at the northern end of the Walnut Creek WTP site.

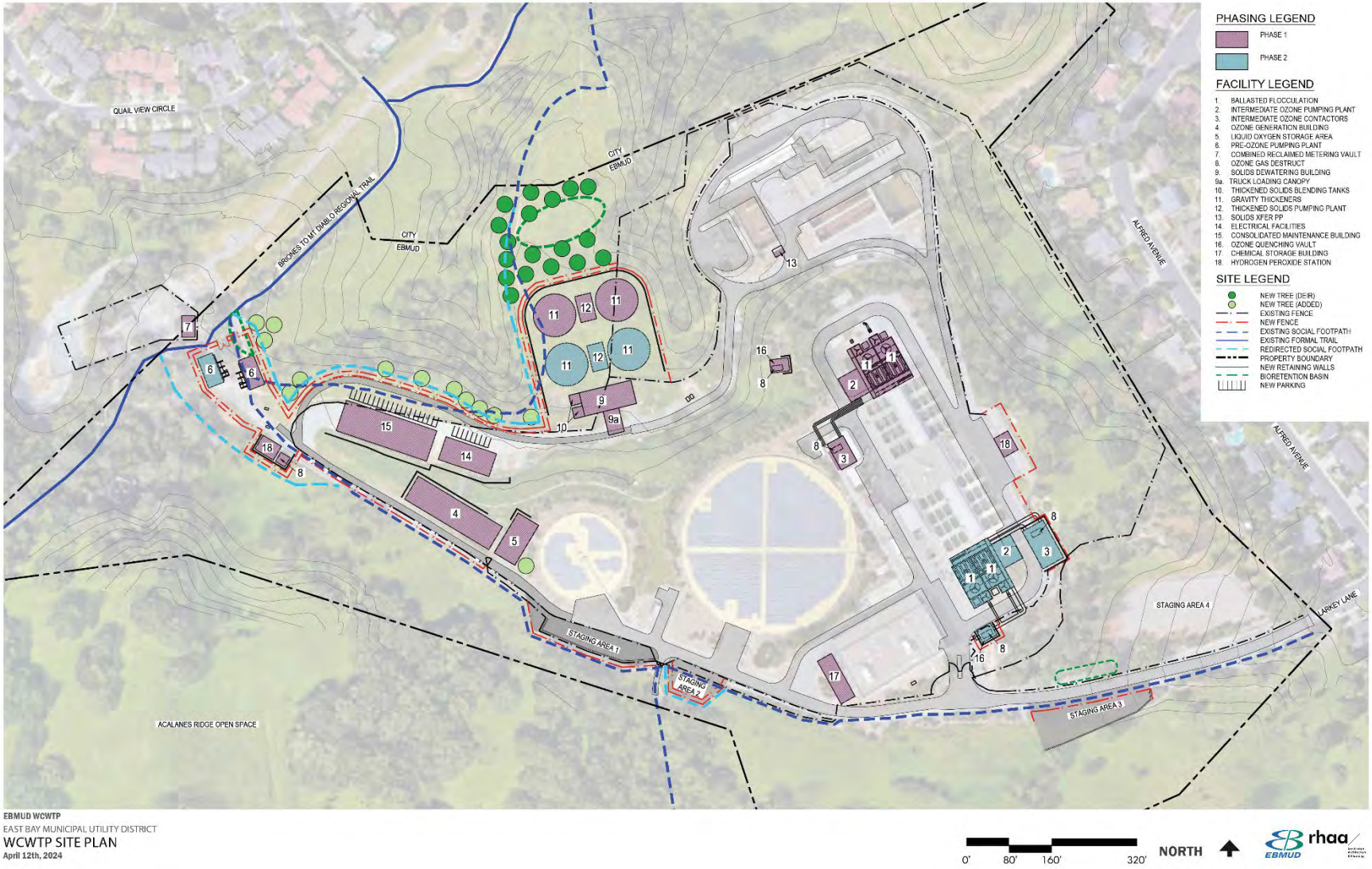
To clarify the retaining wall architectural treatment, page 2-22, Section 2.5.12, "Gravity Thickeners (11)," has been revised with the language below added as a new paragraph to the end of the section as follows:

> The retaining wall proposed around the gravity thickeners and the thickened solids pumping plants will have an aesthetic treatment (i.e., decorative concrete architectural finish) to be determined during design that would blend in with the surrounding open space environment.

Page 2-27, Section 2.5.30, "Screening and Landscaping", has been revised as follows to include planting of additional trees as requested by neighbors:

> Most of the facilities at the Walnut Creek WTP would be screened by topography and existing vegetation and structures, so extensive plantings to screen structures would not be required. As shown in **Figure 2-3**, approximately eighteen 24-inch box trees would be planted north and northwest of the proposed gravity thickeners and approximately twelve 24-inch box trees would be planted east of the pre-ozone pumping plants and north of the consolidated maintenance building and electrical building to screen new facilities ~~them~~ from view from the Briones to Mt. Diablo Regional Trail and the neighborhood to the north of the site. One tree would be planted southeast of the liquid oxygen storage facility to screen the storage area from view from the social footpath south of the Walnut Creek WTP southern boundary. During detailed design, the orientation, layout and sizing of the gravity thickeners, thickened solids pumping plants, and solids dewatering building and surrounding retaining will be optimized for efficient use of space, and additional trees would be sited and planted to the extent feasible on the west side the retaining wall to further enhance screening of the new facilities. New trees would be ~~a combination of~~ coast live oak (*Quercus agrifolia*) ~~and valley oak (*Quercus lobata*), both of~~ which are currently present at the site. ~~Both~~ Coast live oak ~~species~~ are drought tolerant California natives. Additionally, coast live oak is evergreen and would provide year-round screening. EBMUD's standard hydroseed mix of native grasses is proposed under the new tree plantings. The proposed landscaping would require minimal irrigation and maintenance, although temporary irrigation (up to about five years) would be required to establish trees. Tree locations shown in **Figure 2-3** are planning level, and tree locations may be adjusted to provide the most optimal screening of new facilities, accounting also for topography and to ensure tree survivorship. All trees planted for landscaping will be irrigated, monitored, maintained, and replaced, as required, by EBMUD post-construction to guarantee the future health and survivorship of all landscaping trees.

Figure 2-3: Walnut Creek WTP Site Plan and Phasing



Page 2-30, Section 2.6.1, the end of the first paragraph under the heading Staging and Stockpile Areas has been revised as follows to clarify storage activities that would take place in Staging Area 4:

> Staging Area 4 would be used for material and equipment storage on the western half and for worker parking on the eastern half – no aggregate material stockpiling (soil, gravel etc.) or construction trailers would be allowed. Material and equipment, such as electrical panels, pumps, and skids (support platforms), may be stored in secure storage containers. Vehicles including front loaders, forklifts, excavators, and standard telehandlers (also known as reach forklifts) would be used to offload and handle equipment and materials from delivery trucks. Staging Area 4 would also have a one-way access route for ingress and egress.

Page 2-32, Section 2.6.5, "Site Restoration," has been revised as follows to clarify which landscaping would occur at the end of the construction phase:

> At the end of each construction phase, all construction equipment, fencing, materials, and temporary construction trailers would be removed from the Walnut Creek and Lafayette WTPs. Staging Areas 1 through 3 at the Walnut Creek WTP would be retained for future use. Final landscaping would be completed at the Walnut Creek WTP (i.e., hydroseeding and planting of trees located near the liquid oxygen storage area, east of the pre-ozone pumping plants and north of the consolidated maintenance building and electrical building, and within the areas around the gravity thickeners and bioretention basin, which would be subject to grading during construction) and Lafayette WTP.~~,~~ ~~I~~ Lighting~~,~~ and paving would be completed as needed at each WTP.

Page 2-33, a footnote has been added to Table 2-5, to clarify when Phase 2 may occur:

Table 2-1: Maximum and Average Daily Worker Vehicle Trips and Truck Trips

Year	Maximum Daily Worker Vehicle Trips	Average Daily Worker Vehicle Trips	Maximum Daily Truck Trips	Average Daily Truck Trips
Phase 1				
2027	20	15	12	12
2028	25	18	68	15
2029	29	21	52	15
2030	30	16	47	7
Phase 2				
2031	25	18	75	15
2032	24	16	73	12

Notes:
One trip equals drive in plus drive out.
Construction in 2027 would start in August for a total of five months.
Construction in 2030 would end in November, for a total of 11 months.
Phase 2 construction will take place at a later date depending on future untreated water quality and water demand. For truck trips, the Phase 2 construction was conservatively assumed to start 6 months after Phase 1 as a placeholder only to determine manpower and traffic planning because the start of Phase 2 has not yet been determined.
Construction in 2031 would start in April, for a total of nine months.
Construction in 2032 would end in November, for a total of 11 months.

Page 2-38, Section 2.6.10, "EBMUD Practices and Procedures," has been revised as follows to include all EBMUD practices and procedures that are referenced in the PPMRP:

- **Procedure 600**

  This procedure ensures residents are provided advance notice of potentially disruptive construction activities and provides mechanisms for customers and the public to get concerns and questions addressed.

- **Procedure 711, Hazardous Waste Removal**

  This procedure defines hazardous waste and establishes removal responsibilities for hazardous wastes generated at EBMUD facilities.

- **Engineering Standard Practice 550.1, Seismic Design Requirements**

  This standard practice sets forth minimum criteria for the seismic design of new and existing EBMUD facilities which include (but are not limited to) offices, operating centers, water and wastewater treatment plants, water and other liquids storage structures, pumping plants, retaining walls, underground vaults, pipelines, and miscellaneous structures not covered above.

- **Engineering Standard Practice 512.1, Water Main and Services Design Criteria**

  This standard practice establishes basic criteria for the design of water pipelines and establishes minimum requirements for pipeline construction materials.

- **Engineering Standard Practice 514, Identifying Buried Conflicts**

  This standard practice provides pipeline project guidelines for the investigation needed to identify existing underground utilities, and to establish a uniform approach for site reconnaissance of existing buried conflicts, such as active and abandoned utilities. Minimum steps required to identify existing utilities are also provided. Efforts made during the planning, design, and pre-construction phases to identify existing buried conflicts should lessen the potential for subsequent impacts during construction.

10.2.3 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Section 3.1, Aesthetics, Revisions

Multiple figures in the Aesthetics section have been revised to present updated views of the existing setting using photographs taken with a standard (non-wide-angle) lens or without zoom. An updated Figure 3.1-1 showing viewpoint locations with revised viewsheds is provided below.

Viewpoint Figures

The following figures have been revised as shown below to include photographs taken with a standard (non-wide-angle) lens (Viewpoints 1, 3 and 5) or without zoom (Viewpoint 6):

Page 3.1-3, Figure 3.1-1, Walnut Creek WTP Viewpoint Locations

Page 3.1-5, Figure 3.1-3, Walnut Creek WTP Viewpoint 1 – Existing View

Page 3.1-7, Figure 3.1-5, Walnut Creek WTP Viewpoint 3 – Existing View

Page 3.1-9, Figure 3.1-7, Walnut Creek WTP Viewpoint 5 – Existing View

Page 3.1-10, Figure 3.1-8, Walnut Creek WTP Viewpoint 6 – Existing View

Figure 3.1-1: Walnut Creek WTP Viewpoint Locations

Figure 3.1-3: Walnut Creek WTP Viewpoint 1 – Existing View

Figure 3.1-5: Walnut Creek WTP Viewpoint 3 – Existing View

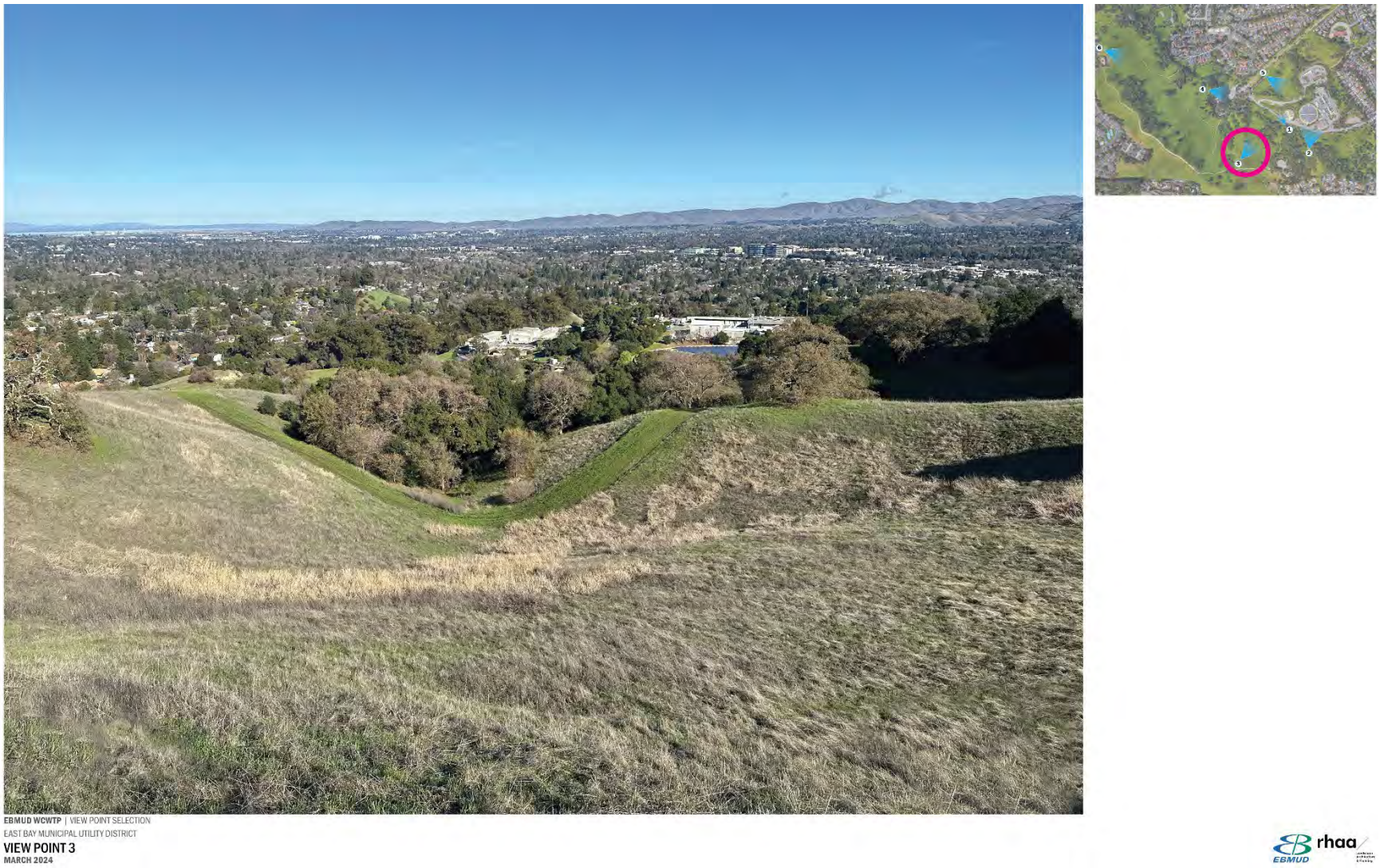


Figure 3.1-7: Walnut Creek WTP Viewpoint 5 – Existing View

Figure 3.1-8: Walnut Creek WTP Viewpoint 6 – Existing View

Visual Simulation Figures

To reflect the additional plantings that are proposed to address comments requesting greater screening of the new facilities, visual simulation figures have been revised to show the trees that EBMUD proposes to plant east of the pre-ozone pumping plants and north of the consolidated maintenance building and electrical building, as well as southeast of the liquid oxygen storage facility. Additional trees are shown in Figure 2-3, above. Visual simulations have also been revised to use photographs taken with a standard (non-wide-angle) lens (Viewpoints 1, 3, and 5) or without zoom (Viewpoint 6).

The following figures are revised as shown below:

Page 3.1-23, Figure 3.1-10, Walnut Creek WTP Viewpoint 1 Visual Simulations – Before and After Construction

Page 3.1-25, Figure 3.1-12, Walnut Creek WTP Viewpoint 3 Visual Simulations – Before and After Construction

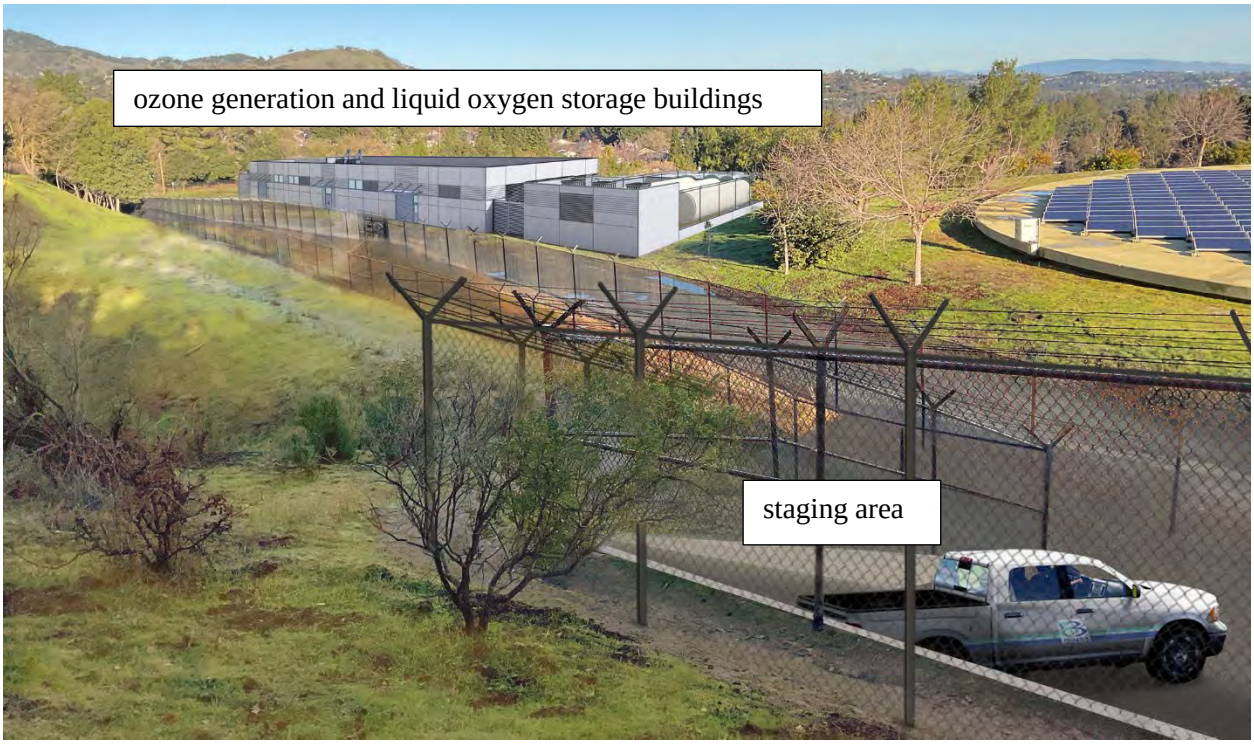
Pages 3.1-26 and 3.1-27, Figure 3.1-13, Walnut Creek WTP Viewpoint 4 Visual Simulations – Before and After Construction

Pages 3.1-28 and 3.1-29, Figure 3.1-14, Walnut Creek WTP Viewpoint 5 Visual Simulations – Before and After Construction

Pages 3.1-30 and 3.1-31, Figure 3.1-15, Walnut Creek WTP Viewpoint 6 Visual Simulations – Before and After Construction

Figure 3.1-10: Walnut Creek WTP Viewpoint 1 Visual Simulations – Before and After Construction

Before Construction - Existing View

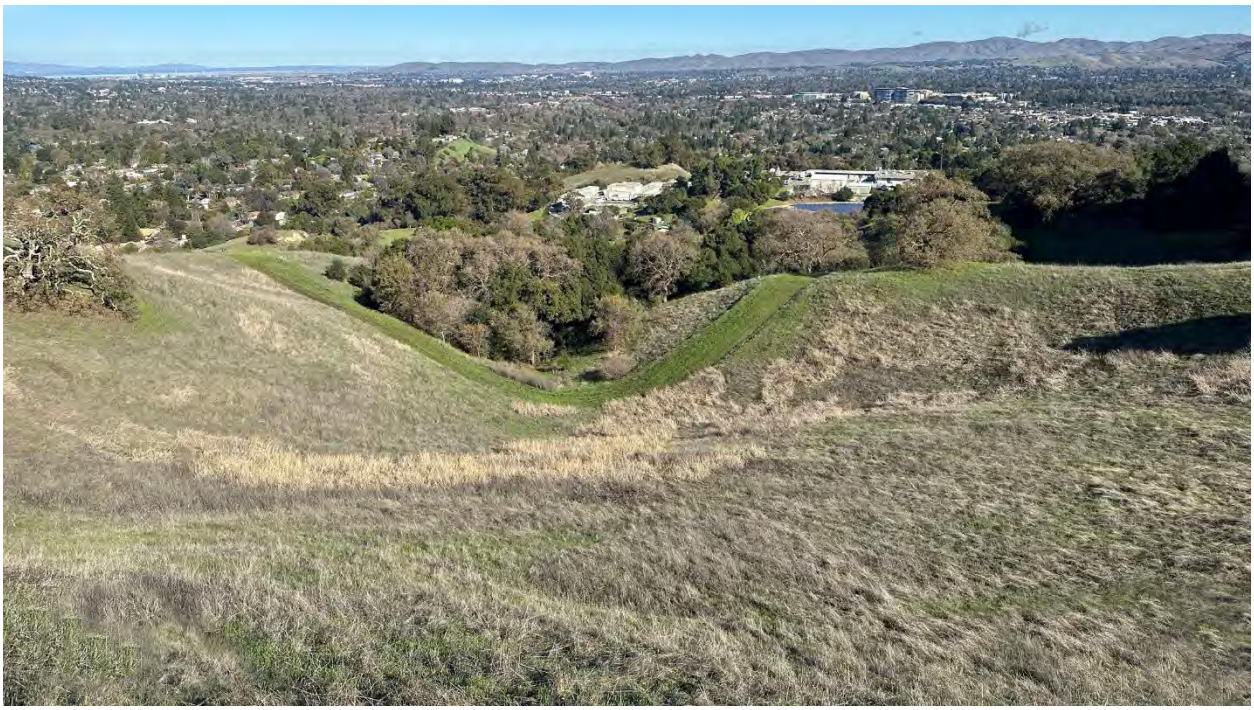


After Construction - Ozone generation building and liquid oxygen storage buildings and staging area in view

5 Years After Construction

20 Years After Construction

Figure 3.1-12: Walnut Creek WTP Viewpoint 3 Visual Simulations – Before and After Construction

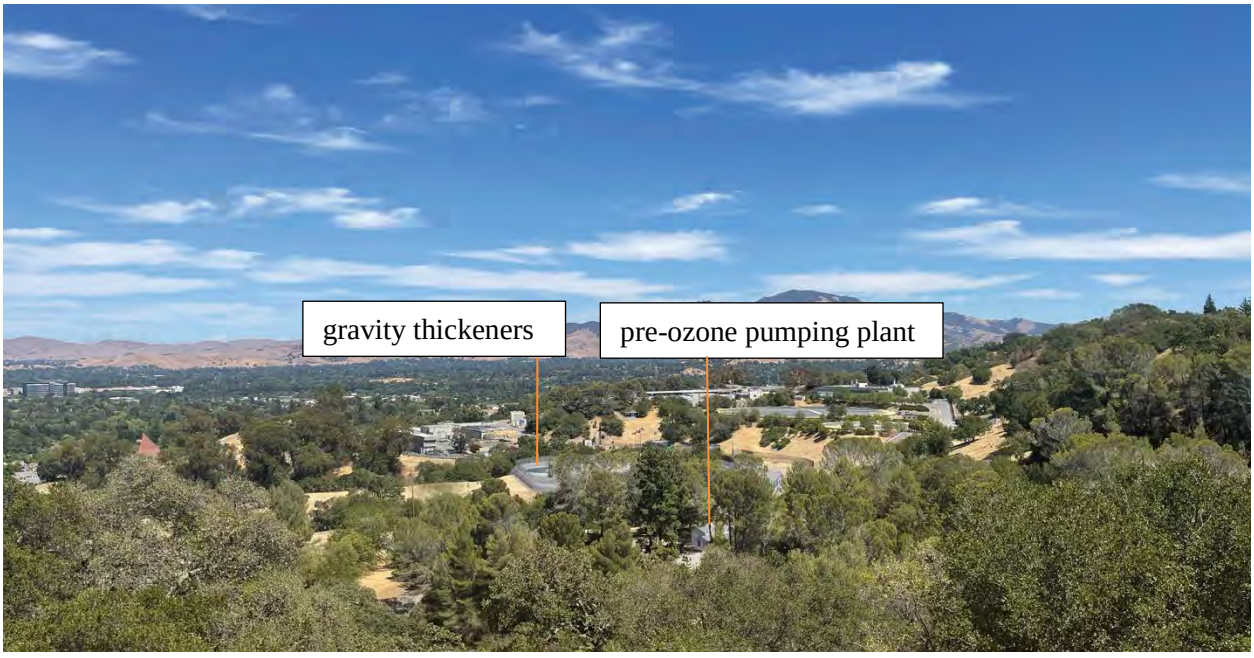


Before Construction – Existing Views

After Construction – Ballasted flocculation structures and dewatering building partially visible

Figure 3.1-13: Walnut Creek WTP Viewpoint 4 Visual Simulations – Before and After Construction

Before Construction – Existing View



After Construction - Consolidated maintenance building, pre-ozone pumping plant, thickened solids pumping plant, and gravity thickeners partially visible

5 Years After Construction

20 Years After Construction

Figure 3.1-14: Walnut Creek WTP Viewpoint 5 Visual Simulations – Before and After Construction

Before Construction – Existing View

After Construction - Gravity thickeners, thickened solids pumping plant, and solids dewatering building partially visible

5 Years After Construction

20 Years After Construction

Figure 3.1-15: Walnut Creek WTP Viewpoint 6 Visual Simulations – Before and After Construction

Before Construction – Existing View

After Construction - Consolidated maintenance building, pre-ozone pumping plant, thickened solids pumping plant, and gravity thickeners, and ballasted flocculation structure partially visible

5 Years After Construction

20 Years After Construction

10.2.4 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Section 3.3, Biological Resources, Revisions

Page 3.3-41, under Impact BIO-1, text describing regarding nesting bird species and proposed planting has been revised as follows to reflect additional tree plantings and proposed tree species:

> While some trees would be removed within the Project footprints (86 trees removed at Walnut Creek WTP and 28 trees removed at Lafayette WTP), approximately ~~18~~ 31 new trees would be planted at the Walnut Creek WTP and 7 new trees would be planted at the Lafayette WTP (as described in *Section 2.4.30, Screening and Landscaping*). New trees would be ~~a combination of~~ native coast live oak ~~and valley oak~~ and would provide future nesting bird habitat.

Page 3.3-43, under Impact BIO-1, regarding roosting bats and proposed tree planting has been revised as follows to reflect additional tree plantings and proposed tree species:

> While some trees would be removed within the Project footprints (86 trees removed at Walnut Creek WTP and 28 trees removed at Lafayette WTP), approximately ~~18~~ 31 new trees would be planted at the Walnut Creek WTP and 7 new trees would be planted at the Lafayette WTP (as described in *Section 2.4.30, Screening and Landscaping*). New trees would be ~~a combination of~~ native coast live oak ~~and valley oak~~ and could provide future bat roosting and foraging habitat.

Pages 3.3-49 and 3.3-50, under Impact BIO-5, text regarding tree planting has been revised as follows to reflect additional tree plantings:

> While the Walnut Creek Municipal Code does not have a tree replacement requirement, approximately ~~18~~ 31 new native oak trees (24-inch box) would be planted to the north and northwest of the gravity thickeners, near the liquid oxygen storage area, east of the pre-ozone pumping plants and north of the consolidated maintenance building and electrical building for visual screening, resulting in a total of ~~121~~ 134 trees within the Walnut Creek study area after construction is complete.

10.2.5 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Section 3.7, Greenhouse Gas Emissions, Revisions

Page 3.7-18, correction has been made to fix a typographical error in the fourth sentence of the fourth full paragraph and to reflect additional tree plantings:

> As described in Chapter 2, Project Description, operation and maintenance of the Walnut Creek WTP would increase electricity usage by 2,000 to 5,000 MWh/year depending on untreated water quality. In addition, operation and maintenance of the Walnut Creek WTP would involve one net additional daily trip to remove dewatered solids during periods of low turbidity, and up to 21 truck trips per day during peak turbidity. However peak turbidity events are expected to be infrequent (on the order of once every decade). High purity compressed liquid oxygen (LOX) would be trucked on-site approximately once per ~~day~~ week. In addition, the new Walnut Creek WTP pretreatment facilities may require approximately two additional operators and approximately two additional maintenance staff. There would be no staffing changes or truck trips at the Lafayette WTP. Operation and maintenance activities would involve the use of trucks to haul

dewatered solids from the site, truck trips to deliver LOX to the site, and worker trips. There would be no staffing changes or truck trips at the Lafayette WTP. To estimate average daily air pollutant emissions, this Air Quality analysis assumed Project operation and maintenance would result in an average of approximately six new trips per day (i.e., 1 trip for dewatered solids removal, 1 for chemical delivery, and 4 for operations and maintenance staff). It was assumed one diesel generator would be added at the Walnut Creek WTP for backup emergency energy supply purposes[1]. The kitchenette and bathroom in the consolidated maintenance building at the Walnut Creek WTP would require water supplies. These activities would produce direct GHG emissions as a result of the combustion of fuel from on-road and off-road vehicles, and indirect GHG emissions from production of electricity by Pacific Gas & Electric[2]. Approximately 86 trees would be removed and ~~18~~ 31 planted at the Walnut Creek WTP and approximately 28 trees would be removed and 7 planted at the Lafayette WTP. On balance, this would result in the loss of a carbon sink over the Project lifetime. As described above, CalEEMod was used to estimate GHG emissions, as presented in **Table 3.7-5** (see CalEEMod outputs in **Appendix K**). Emissions in **Table 3.7-5** are presented in terms of annual emissions in order to compare them to the operational threshold established in the 2017 BAAQMD CEQA Guidelines (BAAQMD, 2017a), which is in terms of MTCO2e per year.

10.2.6 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Section 3.8, Hazards and Hazardous Materials, Revisions

Page 3.8-5, edits have been made before the last section to identify California state requirements for the transportation of hazardous materials:

Transportation of Hazardous Materials

Regulatory requirements for the transport of hazardous materials in California are specified in Title 13, California Code of Regulations, Sections 1160-1167, and Section 353 of the California Vehicle Code. These regulations include requirements for hazard classification and identification, packaging and handling, transportation practices, training and certification, emergency response and reporting, and enforcement.

Transportation of Hazardous Wastes

Regulatory requirements for the transport of hazardous wastes in California are specified in CCR Title 22 Division 4.5 Chapters 13 and 29. Hazardous waste transporters must comply with the California Vehicle Code, California Highway Patrol regulations (CCR, Title 13), and California

Page 3.8-21, edits have been made to provide further clarification regarding where new chemicals would be stored and how chemicals would be distributed and what hazardous waste is generated in the second sentence of the second full paragraph:

The Project would thus require new deliveries of alum, polymer, microsand, hydrogen peroxide, and liquid oxygen as necessary to treat the range of water quality entering the Walnut Creek WTP. New water treatment plant chemicals at the Walnut Creek WTP would be stored inside of chemical storage buildings or outdoors under a canopy and distributed to water treatment plant facilities via chemical feed lines, with the exception

of liquid oxygen, which would be stored in storage tanks adjacent to the ozone generation building and distributed to the ozone generation building via a feed line. The Walnut Creek WTP would also generate hazardous waste (i.e. paint waste, lubricating oil waste) for off-site disposal or recycling. The waste would be stored in on-site lockers from the time of generation through legal off-site disposal. In addition to water treatment plant chemicals, the Project would include the storage of fuel at the Walnut Creek WTP electrical facilities building. Diesel for the emergency backup generators would be stored in tanks with secondary containment.

10.2.7 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Section 3.9, Hydrology and Water Quality, Revisions

Page 3.9-13, correction has been made to fix a typographical error at the beginning of the first full paragraph:

In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation (Criterion 4 ~~3d~~).

10.2.8 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Section 3.11, Noise and Vibration, Revisions

Table 3.11-11 on pages 3.11-30 and 3.11-31, three noise level entries have been updated to include refined information that adds daytime construction activities at Staging Area 4 for the receptor at Larkey Lane and Alfred Avenue. Revised entries are as follows:

Table 3.11-11: Walnut Creek WTP Project Construction On-Site Hourly L_{eq} Noise Levels[1] – Applicable to Hours 7:00 a.m. to 6:00 p.m.

Scenario	Receptor	Existing Conditions Noise Levels (dBA L_{eq})	Existing + Maximum Project Noise Levels[2] (dBA 1-hr L_{eq})	Speech Interference Indicator (dBA 1-hr L_{eq})	Exceeds Speech Interference Indicator? (Y/N)	
					Without Mitigation Measures	With Mitigation Measures[4]
1.C: Scenario 1.B + add Ballasted Flocculation + add Hydrogen Peroxide (Backhoes, bobcats, compactors, compressors, concrete saws, concrete pumps, concrete trucks, dozers, dump trucks, excavators, forklifts, form building, loaders, rooftop work, welding)						
	Larkey Ln & Alfred Ave	47	59 ~~52-53~~	70	N	N/A
1.D: Scenario 1.C + add Solids Transfer PP (Backhoes, bobcats, compactors, compressors, concrete saws, concrete pumps, concrete trucks, dozers, dump trucks, excavators, forklifts, form building, loaders, rooftop work, welding)						
	Larkey Ln & Alfred Ave	47	59 ~~52-53~~	70	N	N/A
2. A: Gravity Thickeners (S) + Ballasted Flocculation + Pre-Ozone pumping plant (with Phase 1 operations and Backhoes, bobcats, compactors, compressors, concrete saws, concrete pumps, concrete trucks, dozers, dump trucks, excavators, forklifts, form building, loaders)						
	Larkey Ln & Alfred Ave	47	62-63 ~~60-62~~	70	N	N/A

Table 3.11-12 on page 3.11-33, one noise level entry has been updated to include refined information that adds early morning worker arrivals at Staging Area 4 for the receptor at Larkey Lane and Alfred Avenue.

Table 3.11-12: Walnut Creek WTP Project Construction On-Site Hourly L_{eq} Noise Levels – Early Morning Concrete Work[1,2] (6:00 a.m. to 7:00 a.m.)

Receptor	Scenario and Building[3]: with Highest Noise from Concrete Work	Existing Conditions Noise Levels (dBA L_{eq})	Existing + Project Noise Levels[2] (dBA 1-hr L_{eq})	Sleep Disturbance Criterion 6:00 a.m. to 7:00 a.m. (dBA 1-hr L_{eq})	Exceeds Non-Daytime Criterion? (Y/N)	
					Without Mitigation Measures	With Mitigation Measures[4]
Larkey Ln & Alfred Ave	2.A Intermediate Ozone Contactors (3)	48	50-59 ~~48-59~~	60	N	N/A

Page 3.11-34, in the middle of the second paragraph, a correction has been made for consistency with typical EBMUD practices as follows:

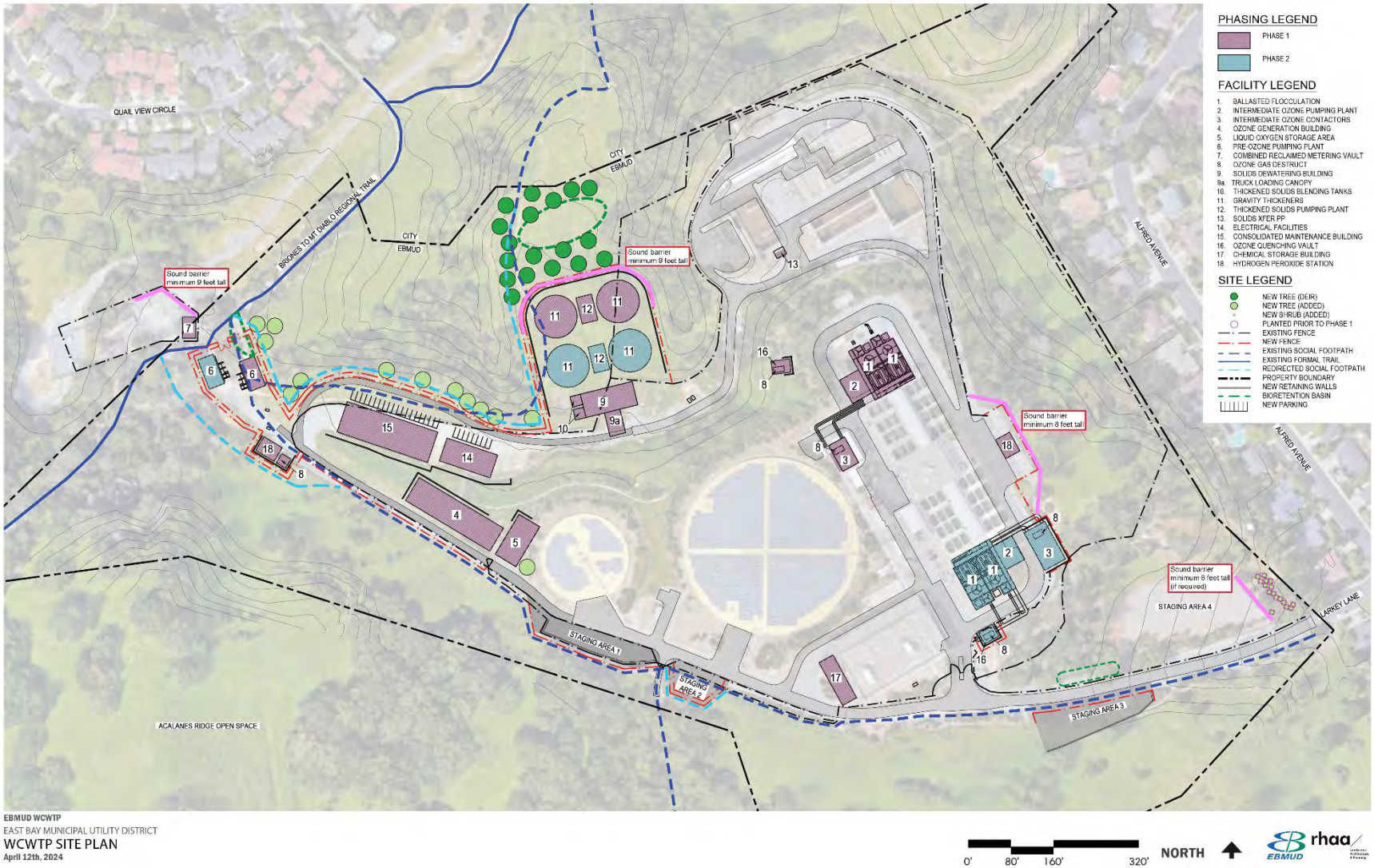
> EBMUD Standard Construction Specification 01 14 00, Section 1.7(A), requires that noise-generating activities greater than 90 dBA (impact construction such as concrete breaking, concrete crushing, tree grinding, etc.) shall be limited to the hours of 8:00 a.m. to 4:00 p.m.~~7:00 a.m. to 6:00 p.m.~~, Monday through Friday.

Page 3.11-34, last two paragraphs are revised as follows to reflect refinements in noise mitigation:

> Implementing **Mitigation Measure NOI-1**, which include additional specific noise control measures beyond the typical best management practices required by Standard Construction Specification 01 35 44, Section 3.8 would reduce the noise below the residential noise threshold of 60 dBA Leq, and the impact of early morning concrete pours ~~and early morning worker arrivals and parking~~ would be reduced to less than significant.
>
> **Mitigation Measure NOI-1** requires that the Noise Control and Monitoring Plan (to be prepared under Standard Construction Specification 01 35 44, Section 1.4(G)) include specific noise control measures such as coordination of worksite activities and the installation of temporary sound barriers to reduce noise levels before 7:00 a.m. (Calculations are provided in Appendix I). Sound barriers would be required for the duration of Phase 1 at the Hydrogen Peroxide Station, the Combined Reclaimed Metering Vault, the north Thickened Solids Pumping Plant, and the two north Gravity Thickeners, and for the duration of Phase 2 at the south Thickened Solids Pumping Plant and two south Gravity Thickeners, to block noise from concrete trucks during construction of the new facilities. A ~~sound barrier~~ 6-foot-high redwood fence will also be installed ~~required~~ at Staging Area 4 for Phases 1 and 2 if noise thresholds are exceeded ~~to reduce noise from early morning worker arrivals and parking~~ (see **Figure 3.11-5**).

Page 3.11-35, Figure 3.11-5, Sound Barrier Locations has been revised to indicate that the sound barrier would only be installed at Staging Area 4 if required based on noise monitoring during construction, and to show the 16 5-gallon shrubs that will be planted in the area east of Staging Area 4 prior to construction to provide visual screening in the anticipation that a redwood fence would be needed.

Figure 3.11-5: Sound Barrier Locations



Page 3.11-42, Mitigation Measure NOI-1 has been revised as follows to refine the approach for mitigating potential noise impacts associated with the use of Staging Area 4:

Mitigation Measure NOI-1: Additional Noise Control and Monitoring Plan Measures at the Walnut Creek WTP

The Noise Control and Monitoring Plan required in the Project specifications would include specific measures to reduce noise to ensure that noise at residential receptors does not exceed 60 dBA L_{eq} before 7:00 a.m. in Walnut Creek. The following measures, or their equivalent, would be used in combination to meet the noise limits:

- Coordinate worksite activities to minimize or eliminate non-essential noise-generating activities between 6:00 a.m. and 7:00 a.m.
- Install temporary sound barriers achieving a minimum sound transmission class (STC) 25 to block the line of sight from concrete activities to nearby residences (**Figure 3.11-5**) for the duration of the applicable construction phase(s).
  - To reduce noise by at least 8 dBA from concrete trucks at the Hydrogen Peroxide Station during Phase 1, sound barriers would need to be at minimum 8 feet high and located on the northeast side of the Hydrogen Peroxide Station.
  - To reduce noise by at least 5 dBA from concrete trucks at the Combined Reclaimed Metering Vault during Phase 1, sound barriers would need to be at minimum 9 feet high, and located on the north, northeast, and northwest sides of the vault.
  - To reduce noise by at least 3 dBA from concrete trucks at the Thickened Solids Pumping Plants and Gravity Thickeners during Phases 1 and 2, sound barriers would need to be at minimum 9 feet high and located on the northeast side of the work area.
  - ~~To reduce noise by at least 5 dBA from early morning worker arrivals and parking at Staging Area 4 during Phases 1 and 2, sound barriers would need to be at minimum 6 feet high and located on the east side of the staging area.~~
  - The Noise Control and Monitoring Plan will include daily noise monitoring at the EBMUD property line east of Staging Area 4 during construction of Phases 1 and 2. If noise thresholds are exceeded and expected to continue to be exceeded, a 6-foot-high redwood fence would be installed at that time at Staging Area 4. In anticipation of the possibility that a fence would be needed, 16 5-gallon shrubs will be planted in the area east of Staging Area 4 prior to construction to provide visual screening for the fence.

Page 3.11-40, correction has been made to fix a typographical error in the second sentence of the third full paragraph:

The Project would include new sources of operation and maintenance noise at the Walnut Creek WTP site. Increased vehicle noise would be created from increased truck trips associated with off hauling dewatered solids, increased truck trips associated with importing alum, polymer, microsand, hydrogen peroxide, and liquid oxygen (approximately ~~one~~ two additional trucks per week for chemical deliveries), and

increased vehicle trips associated with approximately four new operational staff reporting to the site. New noise generating equipment would be operating on site including the pre-ozone and intermediate ozone pumping plants, thickened solids pumping plant, solids transfer pumping plant, ballasted flocculation basins, and new electrical substation with transformer and switchgear.

10.2.9 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Section 3.13, Transportation, Revisions

Page 3.13-19, edits have been made before the last section to account for Mitigation Measure TRA-1, which requires the contractor to limit soil and demolition off-haul and large equipment delivery trucks to between 9:00 a.m. to 3:30 p.m.

- Truck Trips – Approximately 75 truck trips (comprised of concrete, haul, and delivery trucks) would be required on the highest traffic day for a large concrete pour during Phase 2. During the days of large concrete pours, concrete trucks would arrive between 6:00 a.m. and 5:00 p.m. and are assumed to be evenly spread throughout the day with approximately 4 trucks per hour (4 inbound and 4 outbound). Delivery and haul trucks would start arriving after ~~7:00 a.m.~~ 9:00 a.m. and on the peak construction day total truck trips (concrete trucks plus haul and delivery trucks) would be about 8 trucks per hour (8 inbound and 8 outbound)

Page 3.13-25, edits have been made in the second full sentence of the first paragraph in the description of Mitigation Measure TRA-1 as follows:

> **Mitigation Measure TRA-1** implements additional TCP measures for heavy construction vehicle traffic safety monitoring, including requiring the contractor to: distribute written traffic safety requirements to all heavy construction vehicle drivers, obtain drivers' written acknowledgement of the traffic safety requirements, and provide radar speed feedback signs on Larkey Lane and San Luis Road to reduce vehicle speeds.

Page 3.13-25, Mitigation Measure TRA-1 has been revised as follows to add radar speed feedback signs along San Luis Road:

> **Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP**
>
> - Use of soil and demolition off-haul and large equipment delivery trucks to and from the Walnut Creek WTP will be restricted to between the hours of 9:00 a.m. to 3:30 p.m.
> - The required Traffic Control Plan shall include the following measures:
>   - EBMUD's Contractor shall distribute written traffic safety requirements to all Contractor heavy construction vehicle drivers. All drivers shall provide signed acknowledgement of having read and understood all traffic safety requirements and consequences of non-compliance.
>   - Written traffic safety requirements shall include:
>   - Construction work hours specifying when construction traffic would be allowed to access the Walnut Creek WTP and staging areas.

        - Construction haul routes and associated speed limits.
        - Designated parking and queuing locations.
    - Contractor shall provide Project sticker or equivalent to drivers who have provided written acknowledgement of traffic safety requirements.
        - Project sticker shall be made available upon request by EBMUD during the construction contract period.
    - Contractor heavy construction vehicle drivers shall conform to designated construction hours, including no driving, queuing, idling or parking on local roadways outside of designated construction hours as outlined in written traffic safety requirements.
    - Contractor heavy construction vehicle drivers shall use only designated construction traffic haul routes.
    - Contractor shall provide Radar Speed Feedback Signs along Larkey Lane and San Luis Road for the entire Project duration (four ~~two~~, one in each direction of traffic on Larkey Lane and San Luis Road) to deter speeding by heavy construction vehicles on construction traffic routes.
    - Contractor heavy construction vehicle drivers shall comply with roadway traffic safety rules as outlined in written traffic safety requirements, including, but not limited to:
        - Stoplight signals and stop signs.
        - Roadway speed limits (reduced speeds in construction zones and near schools).

- Prior to Project construction, EBMUD shall require the contractor(s) to video document pavement conditions on San Luis Road between Casa Way and Larkey Lane and on Larkey Lane between San Luis Road and Alfred Avenue that will be used by Project-related vehicles. Pavement conditions shall also be documented after Project construction is complete. If there is visible deterioration in the pavement condition, any pavement damaged by Project construction-related traffic shall be repaired to a structural condition equal to that which existed prior to Project construction activity.

Page 3.13-28, edits have been made in the second full sentence of the last paragraph in the description of Mitigation Measure TRA-1 as follows:

> However, **Mitigation Measure TRA-1** implements additional TCP measures for heavy construction vehicle traffic safety monitoring, including requiring the contractor to: distribute written traffic safety requirements to all heavy construction vehicle drivers, obtain drivers' written acknowledgement of the traffic safety requirements, and provide radar speed feedback signs on Larkey Lane and San Luis Road to reduce vehicle speeds.

Page 3.13-29, Mitigation Measure TRA-2 has been revised as follows to add an additional flagger at the intersection of Larkey Lane and San Luis Road to ensure the safety of pedestrians crossing the intersection of Larkey Lane and San Luis Road:

> **Mitigation Measure TRA-2: Additional Flagger Requirements at Larkey Lane for Walnut Creek WTP**
> Contractors shall implement the following measures as part of the Traffic Control Plan in Walnut Creek:
>
> - On extended workdays with large concrete pours and days with soil off-hauling at the Walnut Creek WTP, provide a traffic control flagger at the intersection of Larkey Lane and Alvarado Avenue and the intersection of Larkey Lane and San Luis Road during school start and dismissal times with a buffer before school starts and after school ends.
> - The construction contractor shall confirm with the Contra Costa Christian Schools (2721 Larkey Lane, Walnut Creek) and Buena Vista Elementary School (2355 San Juan Avenue, Walnut Creek) the typical start and dismissal times, school events, and irregular start and dismissal times prior to the beginning of each school year.

10.2.10 Chapter 4, Alternatives, Section 4.3, Project Alternatives Development: Engineering Alternatives for Pretreatment, Revisions

Pages 4-3 through 4-4, edits have been made to further clarify why the upcountry alternatives do not meet project objectives.

Upcountry Pretreatment at Bixler

Because a pretreatment facility for Freeport water at Camanche Reservoir would not provide pretreatment of water from the Pardee Reservoir, EBMUD considered another offsite alternative for pretreatment before the Mokelumne River water reaches the service area. An alternative for pretreating water at the Bixler Chlorination Facility in Brentwood was evaluated (Carollo, 2018). This alternative would require the construction of a new pretreatment facility and 30,000 horsepower pumping plant to pump the pretreated water to Walnut Creek WTP. Operation of the new pumping plant creates new operational constraints on the Mokelumne Aqueducts, involves high energy usage, and high pressures on the Mokelumne Aqueducts. Under this alternative, water stored in Briones Reservoir or untreated water from the CCWD intertie could not be pretreated because these supplies would enter EBMUD's water system downstream of the pretreatment at the Bixler Chlorination Facility. In addition, the travel time of the water from Bixler to the Walnut Creek WTP is approximately 10 to 17 hours, which poses a significant process challenge because operators need to make regular and prompt adjustments in chemical dosing to optimize filter performance and treated water quality in response to changing water quality entering the Walnut Creek WTP, but the delay between chemical dosing at Bixler and when the water arrives at the Walnut Creek WTP would add significant delay to adjustments. This alternative would also be at risk of potential flooding given its low elevation and proximity to the California Delta, which is vulnerable to flooding in the event of a levee failure. The Bixler Chlorination Facility has a high cost for construction, estimated to be $770 million in 2018 dollars (Carollo, 2018). Construction of a pretreatment facility at the Bixler Chlorination Facility would have environmental impacts similar to the construction of a facility near the Camanche

Reservoir. While this alternative would provide pretreatment for water from the Pardee Reservoir, pretreatment at the Bixler Chlorination Facility would not be able to pretreat water stored in Briones Reservoir or the CCWD Intertie and would not improve operational flexibility at the Walnut Creek WTP and would thus not be able to consistently meet the Project objectives for increasing the water treatment capacity to meet planned future demands, and meeting drinking water regulations and EBMUD's internal long-term water quality goals.

10.2.11 Chapter 5, Other CEQA Considerations, Section 5.1.1, Significance Determination before Mitigation, Revisions

Page 5-2, the description of Mitigation Measure NOI-1 has been revised as follows to refine the approach for mitigating potential noise impacts associated with the use of Staging Area 4:

Mitigation Measure NOI-1: Additional Noise Control and Monitoring Plan Measures at the Walnut Creek WTP

The Noise Control and Monitoring Plan required in the Project specifications would include specific measures to reduce noise to ensure that noise at residential receptors does not exceed 60 dBA L_{eq} before 7:00 a.m. in Walnut Creek. The following measures, or their equivalent, would be used in combination to meet the noise limits:

- Coordinate worksite activities to minimize or eliminate non-essential noise-generating activities between 6:00 a.m. and 7:00 a.m.
- Install temporary sound barriers achieving a minimum sound transmission class (STC) 25 to block the line of sight from concrete activities to nearby residences (**Figure 3.11-5**) for the duration of the applicable construction phase(s).
  - To reduce noise by at least 8 dBA from concrete trucks at the Hydrogen Peroxide Station during Phase 1, sound barriers would need to be at minimum 8 feet high and located on the northeast side of the Hydrogen Peroxide Station.
  - To reduce noise by at least 5 dBA from concrete trucks at the Combined Reclaimed Metering Vault during Phase 1, sound barriers would need to be at minimum 9 feet high, and located on the north, northeast, and northwest sides of the vault.
  - To reduce noise by at least 3 dBA from concrete trucks at the Thickened Solids Pumping Plants and Gravity Thickeners during Phases 1 and 2, sound barriers would need to be at minimum 9 feet high and located on the northeast side of the work area.
  - ~~To reduce noise by at least 5 dBA from early morning worker arrivals and parking at Staging Area 4 during Phases 1 and 2, sound barriers would need to be at minimum 6 feet high and located on the east side of the staging area.~~
  - The Noise Control and Monitoring Plan will include daily noise monitoring at the EBMUD property line east of Staging Area 4 during construction of Phases 1 and 2. If noise thresholds are exceeded and expected to continue to be exceeded, a 6-foot-high redwood fence would be installed at that time at Staging Area 4. In anticipation of the possibility that a fence would be needed,

16 5-gallon shrubs will be planted in the area east of Staging Area 4 prior to construction to provide visual screening for the fence.

Chapter 11 Final Practices and Procedures Monitoring and Reporting Plan and Mitigation Monitoring and Reporting Program

11.1 CEQA Requirements

CEQA requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with project development. Section 20181.6 of the California Public Resources Code requires a CEQA lead or responsible agency that approves or carries out a project where an EIR has identified measures to mitigate significant environmental effects to "adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

CEQA Guidelines Section 15097 (a) states that "In order to assure the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revision which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects."

Draft EIR Appendix E included the Draft EBMUD Practices and Procedures Monitoring and Reporting Plan (PPMRP), as well as the Draft Mitigation Monitoring and Reporting Program (MMRP) for the Project. The PPMRP and MMRP have been finalized and reflect changes made as a result of comments on the Draft EIR.

11.2 PPMRP and MMRP Matrix

The Final PPMRP and MMRP are presented in **Table 11-1** and **Table 11-2**, which list all impacts identified in the EIR as significant or potentially significant along with the proposed mitigation measures (**Table 11-2**) and EBMUD's Practices and Procedures (**Table 11-1**) that are required to reduce impacts to less than significant levels. The impacts are briefly summarized in the table.

For each mitigation measure or EBMUD Practice and Procedure, the following information is provided:

- **Impact Area.** This column indicates impact areas that could be considered significant.
- **Mitigation Measure.** This column contains the full text of the mitigation measures, excerpt from the relevant standard specification, or identifies the applicable EBMUD design standard.
- **EBMUD Practices and Procedures/Standard Specifications.** This column contains excerpts from the relevant standard specification or identifies the applicable EBMUD design standard.
- **Responsibility for Implementation.** This column provides additional information on how the mitigation measures will be implemented to help clarify how compliance can be monitored.
- **Responsibility for Monitoring and/or Enforcement.** This column contains an assignment of responsibility for the monitoring and reporting tasks.

- **Timing of Implementation.** This column indicates when the mitigation measure would be applied.

Table 11-1: EBMUD Practices and Procedures Monitoring and Reporting Plan

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Aesthetics				
Impact AES-1 Have a substantial adverse effect on a scenic vista.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.1, Summary* B. Site Activities 1. Protect storm drains and surface waters from impacts of project activity. 2. Store materials and wastes such as demolition material, soil, sand, asphalt, rubbish, paint, cement, concrete or washings thereof, oil or petroleum products, or earthen materials in a manner to prevent it from being washed by rainfall or runoff outside the construction limits. 3. Reuse or dispose of excess material consistent with all applicable legal requirements and disposal facility permits. 4. Clean up all spills and immediately notify the Engineer in the event of a spill. 5. Equip stationary equipment such as motors, pumps, and generators with drip pans. 6. Divert or otherwise control surface water and waters flowing from existing projects, structures, or surrounding areas from coming onto the work and staging areas. The method of diversions or control shall be adequate to ensure the safety of stored materials and of personnel using these areas. 7. Following completion of Work, remove ditches, dikes, or other ground alterations made by the Contractor. The ground surfaces shall be returned to their former condition, or as near as practicable, in the Engineer's opinion. 8. Prevent visible dust emissions from leaving the work areas. 9. Maintain construction equipment in good operating condition to reduce emissions. 10. Handle, store, apply, and dispose of any chemical or hazardous material used in the performance of the Work in a manner consistent with all applicable federal, state, and local laws and regulations. **EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.1, Protection of Native and Non-Native Protected Trees* A. Tree Protection 1. Locations of trees to be removed and protected are shown in the construction drawings. Pruning and trimming shall be completed by the Contractor and approved by the Engineer. Pruning shall adhere to the Tree Pruning Guidelines of the International Society of Arboriculture. 2. Erect exclusion fencing five feet outside of the drip lines of trees to be protected prior to ground disturbing activities. Erect and maintain a temporary minimum 3-foot high orange plastic mesh exclusion fence at the locations as shown in the drawings prior to ground disturbing activities. The fence posts shall be six-foot minimum length steel shapes, installed at 10-feet minimum on center, and be driven into the ground. The Contractor shall be prohibited from entering or disturbing the protected area within the fence except as directed by the Engineer. Exclusion fencing shall remain in place until construction is completed and the Engineer approves its removal.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact AES-1 (cont.)	3. No grading, construction, demolition, trenching for irrigation, planting or other work, except as specified herein, shall occur within the tree protection zone established by the exclusion fencing installed shown in the drawings. In addition, no excess soil, chemicals, debris, equipment or other materials shall be dumped or stored within the tree protection zone. 4. In areas that are within the tree drip line and outside the tree protection zone that are to be traveled over by vehicles and equipment, the areas shall be covered with a protective mat composed of a 12-inch thickness of wood chips or gravel and covered by a minimum ¾-inch-thick steel traffic plate. The protective mat shall remain in place until construction is completed and the Engineer approves its removal. 5. Tree roots exposed during trench excavation shall be pruned cleanly at the edge of the excavation and treated to the satisfaction of a certified arborist provided by EBMUD. 6. Any tree injured during construction shall be evaluated as soon as possible by a certified arborist provided by EBMUD, and replaced as deemed necessary by the certified arborist. **EBMUD Standard Construction Specification 01 74 05, Cleaning** *Section 1.1, Description* A. Section includes: Perform the work necessary for cleaning during construction and final cleaning on completion of the work. B. Cleaning for specific products or work is specified in the individual specification sections. *Section 3.1, General* A. At all times maintain areas covered by the Contract and public properties free from accumulations of waste, debris, and rubbish caused by construction operations. B. Conduct cleaning and disposal operations to comply with local ordinances and anti pollution laws. Do not burn or bury rubbish and waste materials on project site. Do not dispose of volatile wastes such as mineral spirits, oil, or paint thinner in storm or sanitary drains. Do not dispose of wastes into streams or waterways. C. Use only cleaning materials recommended by manufacturer of surface to be cleaned. D. Use cleaning materials only on surfaces recommended by cleaning material manufacturers. *Section 3.2, Cleaning During Construction* A. During execution of work, clean site and public properties and legally dispose of waste materials, debris, and rubbish to assure that buildings, grounds, and public properties are maintained free from accumulations of waste materials and rubbish. All soil and any other material tracked onto the streets by the Contractor shall be cleaned immediately. The Contractor shall comply with all rules and regulations as applicable for its cleaning method. B. Dispose of all refuse off EBMUD property as often as necessary so that at no time shall there be any unsightly or unsafe accumulation of rubbish. 1. Pine needles, leaves, sticks, and other vegetative debris on the ground shall be removed if they are in the way of construction, present a safety hazard, or present a fire hazard. Otherwise they shall be left in place during construction and final cleaning C. Wet down dry materials and rubbish to lay dust and prevent blowing dust. D. Provide approved containers for collection and disposal of waste materials, debris, and rubbish. E. Remove grease, dust, dirt, stains, labels, fingerprints, and other foreign materials from exposed and semi exposed surfaces. F. Repair, patch, and touch up marred surfaces to specified finish to match adjacent surfaces.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact AES-1 (cont.)	G. Vacuum clean all interior spaces, including inside cabinets. Broom clean paved surfaces; rake clean other surfaces of grounds. H. Handle materials in a controlled manner with as few handlings as possible; do not drop or throw materials from heights. I. Schedule cleaning operations so that dust and other contaminants resulting from cleaning process will not fall on wet, newly painted surfaces. J. Vacuum clean interior of shop building areas when ready to receive finish painting and continue vacuum cleaning on an as needed basis until successful completion of the Startup Test as defined in Section 01 75 17 – Field Startup and Testing. *Section 3.3, Final Cleaning* . At the completion of work on all portions of the contract and immediately prior to final inspection, cleaning of the entire project will be accomplished according to the following provisions: 1. Thoroughly clean, sweep, wash, and polish all work and equipment, including finishes. The cleaning shall leave the structures and site in a complete and finished condition to the satisfaction of the Engineer. 2. Should the Contractor not remove rubbish or debris or not clean buildings and site as specified above, EBMUD reserves the right to have the cleaning done at the expense of the Contractor. B. Employ professional cleaners for final cleaning. C. In preparation for contract completion, conduct final inspection of sight exposed interior and exterior surfaces, and of concealed spaces. D. Remove grease, dust, dirt, stains, labels, fingerprints, and other foreign materials from sight exposed interior and exterior finished surfaces; polish surfaces so designated to shine finish. E. Repair, patch, and touch up marred surfaces to specified finish, to match adjacent surfaces. F. Broom clean paved surfaces; rake clean other surfaces of grounds. G. Replace air handling filters if units were operated during construction. H. Clean ducts, blowers, and coils, if air handling units were operated without filters during construction. I. Clean luminaires in accordance with manufacturer's recommendations and relamp. Clean all light fixtures. J. Clean debris from roofs, gutters, and downspouts. K. Remove from EBMUD property all temporary structures and all material, equipment, and appurtenances not required as a part of, or appurtenant to, the completed work. L. Leave watercourses, storm drains, inlets, and ditches open and clear.			
Impact AES-3 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 3.9, Lighting Used During Nighttime Work* A. Ensure that temporary stationary lighting used during nighttime construction is only used when needed. All lighting used for nighttime construction shall be designed, installed, and operated to minimize glare that affects traffic near the work zone or that causes annoyance or discomfort for residences near the work zone. Lighting fixtures shall be located and aimed to provide the required level of illumination and uniformity in the work zone without the creation of unnecessary glare.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Air Quality				
Impact AIR-1: Conflict with or obstruct implementation of the applicable air quality plan.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.4(F), Dust Control and Monitoring Plan* 1. Submit a plan detailing the means and methods for controlling and monitoring dust generated by demolition and other work on the site for the Engineer's acceptance prior to any work at the jobsite. a. Identify methods to comply with all applicable regulations including but not limited to the Bay Area Air Quality Management District (BAAQMD) visible emissions regulation and Public Nuisance Rule. b. Outline practices for preventing dust emissions and procedures to be used during operations and maintenance activities. c. Include measures for the control of paint overspray and abrasive blasting emissions, including, but not limited to containment, ventilation systems and monitoring for damage and leaks. d. Describe equipment and methods used to monitor compliance with the plan. *Section 3.5, Air Quality Control* A. Implement all necessary air pollutant construction measures per the Bay Area Air Quality Management District "Basic Construction Mitigation Measures" (BAAQMD CEQA Guidelines May 2017), including, but not limited to the following: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. 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. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 8. The contractor shall post an EBMUD-furnished, publicly visible sign with EBMUD and Air District contact information regarding dust complaints. B. Implement all necessary air pollutant construction measures per the Bay Area Air Quality Management District "Additional Construction Mitigation Measures" (BAAQMD CEQA Guidelines May 2017) including but not limited to the following: 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact AIR-1 (cont.)	2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. 6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel. 8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9. Minimizing the idling time of diesel-powered construction equipment to two minutes. 10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOx reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available. 11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. 13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines. C. Implement all necessary EBMUD air pollutant construction measures, including but not limited to the following: 1. Gravel or apply non-toxic soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites. Submit specifications for any dust palliatives applied to unpaved roads to the Engineer. 2. Water and/or cover soil stockpiles daily. 3. All transitions from soil to a paved road shall have best management practices applied to prevent drag out of soil. 4. Water used for dust control shall not run off the job site and cause erosion or other issues. 5. Use of recycled water for dust control is encouraged. 6. Use line power instead of diesel generators at all construction sites where line power is available.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact AIR-1 (cont.)	7. Temporary sources of air emissions (such as portable pumps, compressors, generators, etc.) shall be electrically powered unless the use of such equipment is not practical, feasible, or available. 8. All portable engines and equipment units used as part of construction shall be properly registered with the California Air Resources Board or otherwise permitted by the appropriate local air district, as required 9. Minimize the use of diesel generators where possible. 10. Follow applicable regulations for fuel, fuel additives, and emission standards for stationary, diesel-fueled engines. 11. Locate generators at least 100 feet away from adjacent homes, schools, and parks. 12. Perform regular low-emission tune-ups on all construction equipment, particularly haul trucks and earthwork equipment. 13. On road and off-road vehicle tire pressures shall be maintained to manufacturer specifications. Tires shall be checked and re-inflated at regular intervals. 14. Demolition debris shall be recycled for reuse to the extent feasible. See the Construction and Demolition Waste Disposal Plan paragraphs above for requirements for wood treated with preservatives (TWW). D. Dust Control during Abrasive Blasting: 1. Provide a containment system for the structure prior to beginning abrasive blasting operations. The system shall remain in place during the abrasive blasting operations and the painting of exterior surfaces. *Section 3.6, Dust Monitoring during Demolition and Construction* A. Provide air monitoring along the perimeter of the job site. A minimum of 4 stations, one on each side of the District property, shall be established, capable of continuous measurement of total particulate concentration when any dust generating activity is occurring. B. Conduct real-time air monitoring at appropriate locations onsite based on wind direction, type of construction activity, and sensitive receptors to ensure dust control measures are effective. C. All environmental and personal air sampling equipment shall be in conformance with the Association of Industrial Hygiene and National Institute of Safety and Health (NIOSH) standards. 1. All analysis shall be completed by an ELAP certified laboratory for the specific parameters of interest. 2. The Contractor shall provide to the Engineer, within 72 hours of sampling, all test results. D. The dust control system shall comply with the requirements of this section and any applicable laws and regulations. Specific limitations that shall be met include the following: 1. Ringelmann No. 1 Limitation: Contractor shall not emit from any source for a period or periods aggregating more than three minutes in any hour, a visible emission which is as dark or darker than No. 1 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree. 2. Opacity Limitation: Contractor shall not emit from any source for a period or periods aggregating more than three minutes in an hour an emission equal to or greater than 20% opacity as perceived by an opacity sensing device, where such device is required by Air Quality Management District regulations.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
	EBMUD Standard Construction Specification 02 82 13, Asbestos Control Activities *Section 1.1, Compliance and Intent* A. Furnish all labor, materials, facilities, equipment, services, employee training and testing, permits, and agreements necessary to perform the lead removal in accordance with these specification and with the latest regulations from the U.S. Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the Air Quality Management District with authority over the project, the Cal/EPA Department of Toxic Substance Control, the California Occupational Safety and Health Administration (Cal/OSHA), and other federal, state, county, and local agencies. Whenever there is a conflict or overlap of the above references, the most stringent provision is applicable. B. The Electrical and Instrumentation Building has the potential to contain asbestos materials. Notify the BAAQMD at (415) 749-4762 regarding the demolition of any facility containing asbestos at least ten (10) work days prior to beginning demolition activities. *Section 1.5, Submittals (Pre-Job)* A. Project Safety and Health Plan: The Contractor shall provide a Project Safety and Health Plan prior to project initiation as specified in Section 01 35 24. B. Plan of Action 1. Asbestos Abatement: a. Submit a detailed plan of the procedures proposed for use in complying with the regulations included in this specification. The plan shall include the location and layout of decontamination areas, the sequencing of asbestos work, the interface of trades involved in the performance of work, disposal plan including location of approved disposal site, and a detailed description of the methods to be employed to control pollution. Expand upon the use of portable HEPA ventilation system, method of removal to prohibit visible emissions in work area, and packaging of removed asbestos debris. Include asbestos abatement in the Construction and Demolition Waste Disposal Plan, in accordance with Section 01 35 44. **EBMUD Procedure 600** Purpose: To promote effective proactive communication and interaction with the public to maintain and enhance relationships between EBMUD and its customers. This procedure ensures residents are provided advance notice of potentially disruptive construction activities and provides mechanisms for customers and the public to get concerns and questions addressed.			
Impact AIR-2: Expose sensitive receptors to substantial pollutant concentrations.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 3.5(A), Air Quality Control* (Details as listed under Impact AIR-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Impact AIR-3: 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.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 3.5(A), Air Quality Control* (Details as listed under Impact AIR-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Biological Resources				
Impact BIO-1: 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 CDFW or USFWS.	**EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.1, Protection of Native and Non-Native Protected Trees* (Details as listed under Impact AES-1) *Section 3.2, Protection of Birds Protected Under the Migratory Bird Treaty Act and Roosting Bats* A. Provide 30 days' written notice to the Engineer prior to ground disturbing activities, pruning, and trimming. 1. EBMUD will conduct biological reconnaissance in advance of construction and will conduct biologic monitoring during construction as necessary. B. Protected Species 1. If protected species or suitable habitat for protected species is found during biological reconnaissance surveys: a. Before beginning construction, all Contractor construction personnel are required to attend an environmental training program provided by EBMUD of up to one-day for site supervisors, foreman and project managers, and up to 30-minutes for non-supervisory contractor personnel. The training program will be completed in person or by watching a video at an EBMUD-designated location, conducted by a designated biologist. The program will discuss all sensitive habitats and sensitive species that may occur within the project work limits, including the responsibilities of Contractor's construction personnel, applicable mitigation measures, and notification requirements. The Contractor is responsible for ensuring that all workers requiring training are identified to EBMUD. Prior to accessing or performing construction work, all Contractor personnel shall: 1) Sign a wallet card provided by the Engineer verifying that all Contractor construction personnel have attended the appropriate level of training relative to their position; have read and understood the contents of the environmental training; and shall comply with all project environmental requirements. 2) Display an environmental training hard hat decal (provided by EBMUD after completion of the training) at all times. b. Birds Protected under the Migratory Bird Treaty Act (MBTA): 1) It is unlawful to pursue, hunt, take, capture, or kill any migratory bird without a permit issued by the U.S. Department of the Interior. 2) If construction commences between February 1 and August 31, during the nesting season, EBMUD will conduct a preconstruction survey for nesting birds within 7 days prior to construction to ensure that no nest will be disturbed during construction. 3) If active nests of migratory bird species (listed in the MBTA) are found within the project site, or in areas subject to disturbance from construction activities, an avoidance buffer to avoid nest disturbance shall be constructed. The buffer size shall be determined by the Designated Biologist in consultation with California Department of Fish and Wildlife (CDFW) and is based on the nest location, topography, cover and species' tolerance to disturbance.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact BIO-1 (cont.)	4) If an avoidance buffer is not achievable, the Designated Biologist shall monitor the nest(s) to document that no take of the nest (nest failure) has occurred. Active nests shall not be taken or destroyed under the MBTA and, for raptors, under the CDFW Code. If it is determined that construction activity is resulting in nest disturbance, work should cease immediately, and the Contractor shall notify the Engineer who will consult with the Designated Biologist and appropriate regulatory agencies. 5) If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further action is required. Trees and shrubs within the construction footprint that have been determined to be unoccupied by special-status birds or that are located outside the avoidance buffer for active nests may be removed. Nests initiated during construction (while significant disturbance from construction activities persist) may be presumed to be unaffected, and only a minimal buffer, determined by the Designated Biologist, would be necessary. c. Roosting Bats: 1) If construction commences between March 1 and July 31, during the bat maternity period, EBMUD will conduct a preconstruction survey for roosting bats within two weeks prior to construction to ensure that no roosting bats will be disturbed during construction. 2) If roosting surveys indicate potential occupation by a special-status bat species, and/or identify a large day roosting population or maternity roost by any bat species within 200 feet of a construction work area, the Designated Biologist shall conduct focused day- and/or night-emergence surveys, as appropriate. 3) If active maternity roosts or day roosts are found within the project site, or in areas subject to disturbance from construction activities, avoidance buffers shall be constructed. The buffer size will be determined by the Designated Biologist in consultation with CDFW. 4) If a non-breeding bat roost is found in a structure scheduled for modification or removal, the bats shall be safely evicted, under the direction of the Designated Biologist, in consultation with CDFW to ensure that the bats are not injured. 5) If preconstruction surveys indicate that no roosting is present, or potential roosting habitat is unoccupied during the construction period, no further action is required. Trees and shrubs within the construction footprint that have been determined to be unoccupied by roosting bats, or that are located outside the avoidance buffer for active roosting sites may be removed. Roosting initiated during construction is presumed to be unaffected, and no buffer would be necessary.			
Impact BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.1(B), Site Activities* (Details as listed under Impact AES-1) *Section 1.4(A), Storm Water Management* 1. Construction General Permit a. Submit the Notice of Intent, Storm Water Pollution Prevention Plan (SWPPP), and all other documents prepared for compliance with the General Construction Storm Water Permit (NPDES No. CAS000002) to the Engineer and upload them in the SWRCB's Storm Water Multi-Application & Report Tracking System (SMARTS).	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact BIO-2 (cont.)	1) The Engineer will electronically acknowledge appropriate submittals in SMARTS after review. 2) Contractor shall pay for all registration and annual fees under this permit/program. 2. Storm Water Management Plan a. Submit a Storm Water Management Plan that describes measures that shall be implemented to prevent the discharge of contaminated storm water runoff from the jobsite. Contaminants to be addressed include, but are not limited to soil, sediment, concrete residue, pH less than 6.5 or greater than 8.5, and any other contaminants known to exist at the jobsite location as described in Document 00 31 24 – Materials Assessment Information. 3. Local Storm Water Permits a. Obtain any local storm water permits (e.g. city, county, etc.), submit copies, and comply with their requirements. b. For jobs in unincorporated Contra Costa County that are greater than one acre, Contractor shall obtain and comply with Contra Costa County's Watershed Program to enable the inspection of C.6 construction stormwater BMPs. *Section 1.4(B), Water Control and Disposal Plan* 1. Submit a detailed Water Control and Disposal Plan that complies with all requirements of the Specification and includes provisions for the types of discharges and permits in a through c below, if applicable to the project. a. Drinking Water System Discharges 1) Plan shall comply with Drinking Water Systems Discharges Statewide Permit, General Order CAG140001. a) Include the approximate discharge start date, location, receiving water, estimated flow rate, and volume of all proposed discharges to surface waters, including discharges to storm drains. b) Identify the tracking system to record all actual discharges to a surface water body or a storm drain system that drains to a surface water body, regardless of volume. c) Describe monitoring program for drinking water system discharges greater than 325,850 gallons. The Planned Discharge Tracking Form, attached to the end of this section, may be used to fulfill this requirement. d) Notify the Engineer at least one week prior to the start of a planned discharge equal to or greater than 325,850 gallons. e) Describe dechlorination and erosion/sediment controls to be used for discharges. Note: These controls shall meet or exceed EBMUD minimum standards (see Supplement 1 attached to the end of this section). f) Outline potential beneficial reuse of water from drinking water systems. Potential reuse strategies may include landscape irrigation, agricultural irrigation, dust control, and discharge to stormwater capture basins or other groundwater recharge systems. 2) Submit all records of actual discharges, monitoring, water quality data, and beneficial reuse described above to the Engineer.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
	3) Follow city/county/local requirements for discharging water from drinking water systems into storm drains. b. Non-Stormwater Discharges 1) Plan shall describe measures for containment, handling, treatment (as necessary), and disposal of discharges such as groundwater (if encountered), runoff of water used for dust control, stockpile leachate, tank heel water, wash water, sawcut slurry, test water and construction water. c. Sanitary Sewer Discharges 1) Plan shall describe required applications and/or permits from the sanitary sewer system owner or agency having jurisdiction regarding the planned discharge. a) Outline monitoring and reporting expected to support sanitary sewer discharge, including a sampling and analysis plan required in Paragraph 1.4.J. All monitoring results shall be submitted to the Engineer prior to the end of the Work. **EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.1, Protection of Native and Non-Native Protected Trees* (Details as listed under Impact AES-1)			
Impact BIO-3: 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.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.1(B), Site Activities* (Details as listed under Impact AES-1) *Section 1.4(A), Storm Water Management* (Details as listed under Impact BIO-2) *Section 1.4(B), Water Control and Disposal Plan* (Details as listed under Impact BIO-2)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	**EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.2, Protection of Birds Protected Under the Migratory Bird Treaty Act and Roosting Bats* (Details as listed under Impact BIO-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	**EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.1, Protection of Native and Non-Native Protected Trees* (Details as listed under Impact AES-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Cultural Resources				
Impact CUL-2: Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5.	**EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.3, Protection of Cultural and Paleontological Resources* A. Confidentiality of Information on Cultural and Paleontological Resources 1. In conjunction with Contractor's performance under this contract, the Contractor may obtain information as to the location and/or nature of certain cultural or paleontological resources, including Native American artifacts and remains. This information may be provided to the Contractor by EBMUD or a third party, or may be discovered directly by the Contractor through its performance under the contract. All such information shall be considered "Confidential Information" for the purposes of this Article. 2. Pursuant to California Government Code Section 6254.10, cultural resource information is protected from public disclosure. The Contractor agrees that the Contractor, its subcontractors, and their respective agents and employees shall not publish or disclose any Confidential Information to any person, unless specifically authorized in advance, in writing by the Engineer. B. Conform to the requirements of statutes as they relate to the protection and preservation of cultural and paleontological resources. Unauthorized collection of prehistoric or historic artifacts or fossils along the Work Area, or at Work facilities, is strictly prohibited. C. Before beginning construction, Contractor construction personnel involved in ground disturbing activities shall attend a cultural and paleontological resources training course provided by EBMUD of up to two hours for site supervisors, foreman, project managers, and non-supervisory contractor personnel. The training program will be completed in person or by watching a video, at an EBMUD designated location, conducted by a qualified archaeologist and/or paleontologist provided by EBMUD, or by EBMUD staff. The program will discuss cultural and paleontological resources awareness within the project work limits, including the responsibilities of Contractor's construction personnel, applicable mitigation measures, confidentiality, and notification requirements. The Contractor is responsible for ensuring that all workers requiring training are identified to EBMUD. Prior to accessing the construction site, or performing site work, all Contractor personnel shall: 1. Sign an attendance sheet provided by the Engineer verifying that all Contractor construction personnel involved in ground disturbing activities have attended the appropriate level of training; have read and understood the contents of the training; have read and understood the contents of the "Confidentiality of Information on Cultural and Paleontological Resources" document, and shall comply with all project environmental requirements. D. In the event that potential cultural or paleontological resources are discovered at the site of construction, the following procedures shall be instituted:	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact CUL-2 (cont.)	1. Discovery of prehistoric or historic-era archaeological resources requires that all construction activities shall immediately cease at the location of discovery and within 100 feet of the discovery. a. The Contractor shall immediately allow EBMUD to evaluate the find. The Contractor is responsible for stopping work and notifying the Engineer and shall not recommence work until authorized to do so by the Engineer. b. EBMUD will retain a qualified archaeologist to inspect the findings within 24 hours of discovery. If it is determined that the Project could damage a historical resource as defined by CEQA (or a historic property as defined by the National Historic Preservation Act of 1966, as amended), construction shall cease in an area determined by the archaeologist until a management plan has been prepared, approved by the Engineer, and implemented to the satisfaction of the archaeologist (and Native American representative if the resource is prehistoric, who shall be identified by the Native American Heritage Commission [NAHC]). In consultation with the Engineer, the archaeologist (and Native American representative) will determine when construction can resume. 2. Discovery of human remains requires that all construction activities immediately cease at, and within 100 feet of the location of discovery. a. The Contractor shall immediately notify the Engineer who will engage a qualified archaeologist provided by EBMUD to evaluate the find. The Contractor is responsible for stopping work and notifying the Engineer and shall not recommence work until authorized to do so by the Engineer. b. EBMUD will contact the County Coroner, who will determine whether or not the remains are Native American. If the remains are determined to be Native American, the Coroner will contact the Native American Heritage Commission (NAHC). The NAHC will then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to EBMUD for the appropriate means of treating the human remains and any associated funerary objects. 3. Discovery of paleontological resources requires that all construction activities immediately cease at, and within 100 feet of the location of discovery. a. The Contractor shall immediately notify the Engineer who will engage a qualified paleontologist provided by EBMUD to evaluate the find. The Contractor is responsible for stopping work and notifying the Engineer and shall not recommence work until authorized to do so by the Engineer. b. EBMUD will retain a qualified paleontologist to inspect the findings within 24 hours of discovery. The qualified paleontologist, in accordance with Society of Vertebrate Paleontology guidelines (Society of Vertebrate Paleontology 2010), will assess the nature and importance of the find and recommend appropriate salvage, treatment, and future monitoring and management. If it is determined that construction activities could damage a paleontological resource as defined by the Society of Vertebrate Paleontology guidelines (Society of Vertebrate Paleontology 2010), construction shall cease in an area determined by the paleontologist until a salvage, treatment, and future monitoring and management plan has been prepared, approved by the Engineer, and implemented to the satisfaction of the paleontologist. The Engineer, in consultation with the paleontologist, will determine when construction can resume.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact CUL-2 (cont.)	E. If EBMUD determines that the find requires further evaluation, at the direction of Engineer, the Contractor shall suspend all construction activities at the location of the find and within a larger radius, as required.			
Impact CUL-3: Disturb any human remains, including those interred outside of dedicated cemeteries.	**EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.3, Protection of Cultural and Paleontological Resources* (Details as listed under CUL-2)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Energy				
Impact EN-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 3.5, Air Quality Control* (Details as listed under Impact AIR-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Geology, Soils, and Seismicity				
Impact GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault; strong seismic groundshaking; seismic-related ground failure (liquefaction, lateral spreading); or landslides.	**EBMUD Standard Construction Specification 01 81 02, Seismic Design Criteria** *Section 1.1 References:* A. ASCE 7 , American Society of Civil Engineers, Minimum Design Loads for Buildings and Other Structures. *Section 1.2 Related Sections* A. Section 01 42 19 – Reference Standards B. Section 01 43 11 – Seismic Qualification and Certification C. Section 05 05 19 – Mechanical Anchoring to Concrete and Masonry D. Section 26 05 00 – Common Work Results for Electrical E. Section 26 23 00 – Low Voltage Switchgear F. Section 26 24 19 – Motor Control Centers *Section 1.2 System Description* A. Design Requirements: 1. Architectural elements, mechanical and electrical components, equipment housings and their attachments, supporting structures, and anchorages shall comply with the requirements of ASCE 7, using the following values: a. Design spectral acceleration at short periods, SDS = ___ b. Design spectral acceleration at long periods, SD1 =___ c. Seismic Design Category, [C] [D] [E] [F] d. Component importance Factor, Ip = 1.50			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact GEO-1 (cont.)	e. Component amplification factor, ap: In accordance with ASCE 7, Tables 13.5-1 and 13.6-1. f. Component response modification factor, Rp: In accordance with ASCE 7, Tables 13.5-1 and 13.6-1. g. Overstrength Factor, Ω: In accordance with ASCE 7, Tables 13.5-1 and 13.6-1 for anchorage in concrete. 2. Do not use friction to resist sliding due to seismic forces. 3. Do not use more than 60 percent of the weight of the mechanical and electrical equipment for designing anchors for resisting overturning due to seismic forces. 4. Do not use more than 60 percent of the weight of the tanks for resisting overturning due to seismic forces. 5. Resist seismic forces through direct bearing on anchors and fasteners. Do not design or provide connections that use friction to resist seismic loads. 6. Anchoring and fastening to concrete and masonry. a. Use cast-in anchors (anchor bolts or welded studs) whenever possible for anchors at connections that resist seismic forces. b. Do not use concrete anchors, flush shells, sleeve anchors, screw anchors, powder actuated fasteners, or other types of post-installed anchors unless indicated on the Drawings or accepted in writing by the Engineer. *Section 1.3 Seismic Qualification and Certification* A. The equipment and all components listed in this specification shall not undergo loss of their intended function after application of the Code prescribed seismic forces as specified in Section 01 43 11. *Section 1.4 Submittals* A. Shop drawings and calculations: Complete shop drawings and seismic calculations. B. Seismic Qualification and Certification shall be verified by an approved calculation that demonstrates the adequacy of the system for seismic forces. This calculation may be based on principles of structural analysis and engineering mechanics, or based on similarity to approved shake table tests as specified in Section 01 43 11. C. Contractor shall submit for review and approval test data or calculations signed and sealed by a Civil or Structural Engineer registered in the State of California to show compliance with the above requirements. **EBMUD Engineering Standard Practice 512.1** Engineering Standard Practice 512.1, Water Main and Services Design Criteria, establishes basic criteria for the design of water pipelines and establishes minimum requirements for pipeline construction materials. **EBMUD Engineering Standard Practice 550.1, Seismic Design Requirements** Engineering Standard Practice 550.1, Seismic Design Requirements, sets forth minimum criteria for the seismic design of new and existing EBMUD facilities which include (but are not limited to) offices, operating centers, water and wastewater treatment plants, water and other liquids storage structures, pumping plants, retaining walls, underground vaults, pipelines, and miscellaneous structures not covered above.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact GEO-2: Result in substantial soil erosion or the loss of topsoil.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.1(B), Site Activities* (Details as listed under Impact AES-1) *Section 1.4(A), Storm Water Management* (Details as listed under Impact BIO-2)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Impact GEO-3: 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.	**EBMUD Standard Construction Specification 01 35 24, Project Safety Requirements** *Section 1.3(L), Excavation Safety Plan* 1. Section 6705 of the Labor Code requires that the excavation of any trench 5 feet or more in depth shall not begin until the Contractor has received from the Engineer notification of the Engineer's acceptance of the Contractor's detailed plan for worker protection from the hazards of caving ground during the excavation of such trench. a. The plan shall show the details of the design of shoring, bracing, sloping or other provisions to be made for worker protection during such excavation. b. The plan shall meet the requirements of the Construction Safety Orders, Title 8, California Code of Regulations. 2. Contractor shall obtain an excavation permit per Cal/OSHA Title 8, CCR § 341(a)(1). 3. California Government Code § 4216 describes the requirements and procedures for excavation notifications and utility excavation.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Impact GEO-5: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.3, Protection of Cultural and Paleontological Resources* (Details as listed under Impact CUL-2)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Greenhouse Gas Emissions				
Impact GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 3.5, Air Quality Control* (Details as listed under Impact AIR-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Impact GHG-2: Conflict with a plan, policy, or regulation adopted for the purpose of reducing GHG emissions.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 3.5, Air Quality Control* (Details as listed under Impact AIR-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Hazards and Hazardous Materials				
Impacts HAZ-1 and HAZ-2: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.	**EBMUD Standard Construction Specification 01 35 24, Project Safety Requirements** *Section 1.3(B), Project Health and Safety Plan* 1. Submit a Project Health & Safety Plan for the Work to be performed prior to start of the Notice to commence field work (NTCFW) and/or prior to any limited notice to commence field work (LNTCFW). 2. The Project Health & Safety Plan shall implement applicable Title 8, California Code of Regulations for the work performed. *Section 1.3(K), Electrical Safety Plan* 1. Submit a detailed electrical safety plan that is in accordance with NFPA 70E Article 110. The plan shall include at a minimum: a. Electrical hazard potential b. Electrical safety program principles per Annex E.1 of NFPA 70E c. Electrical safety program controls per Annex E.2 of NFPA 70E d. Electrical safety program procedures per Annex E.3 of NFPA 70E e. Risk assessment and risk control procedures per Annex F of NFPA 70E f. Job briefing and planning checklists per Annex I of NFPA 70E g. Auditing effectiveness of project electrical safety program *Section 1.3 (L) Excavation Safety Plan* (Details as listed under GEO-3) **EBMUD Standard Construction Specification 01 35 44, Environmental Requirements,** *Section 1.1(B), Site Activities* (Details as listed under AES-1) *Section 1.4(A), Storm Water Management* (Details as listed under BIO-2) *Section 1.4(B), Water Control and Disposal Plan* (Details as listed under BIO-2) *Section 1.4(C), Waste Management* 1. Prepare a Waste Management Plan and submit a copy of the plan for the Engineer's acceptance prior to start of work (except for water wastes which shall be addressed in the Water Control and Disposal Plan). The Waste Management Plan shall address all Construction and Demolition Waste, universal wastes, Hazardous Wastes, Excavation Soils, and any other solid debris intended to be removed from the project site(s). a. Identify each type of material that will be generated during the project for disposal, recycling, salvage, or other management and estimate the volume/weight of each. b. Identify how the Contractor will handle, transport, dispose of, or otherwise divert each type of material required to be removed under this contract in a safe, appropriate, and lawful manner in compliance with all applicable regulations of local, state, and federal agencies having jurisdiction over the removed materials. c. Specify rules, regulations, and ordinances in the plan required by local agencies having jurisdiction over the handling, transportation, and disposal of waste. At a minimum, the following local rules, regulations or ordinances shall be followed: d. Identify diversion goals for all Construction and Demolition Wastes generated during the project. The specified diversion goals shall meet the minimum requirements of the local ordinances in the City/County/jurisdiction where each project site is located.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impacts HAZ-1 and HAZ-2 (cont.)	e. Identify any onsite or offsite soil reuse or recycling but note the limitations on this practice below. 1) Excavation Soils shall not be reused or recycled without explicit approval from the Engineer. Do not assume approval for any reuse of soils. Any proposed reuse shall be initially discussed with the Engineer for evaluation. If soil reuse is planned onsite or offsite, include a Soil Reuse Plan within the Waste Management submittal outlining sites and specific locations where soil will be reused and the estimated volumes of soil to be used at each site. Necessary sampling and analytical work shall be included in the Sampling and Analytical Plan submittal in Paragraph 1.4.J1.4.I. 2) Soil reuse is not allowed in excavations for EBMUD drinking water pipelines. 3) Soil reuse is not allowed at sites with land use covenants or other site restrictions. 4) Notwithstanding items 2 and 3 above, soil reuse may be allowed in other circumstances as outlined below: a) Soil may be placed in the same trench or excavation it came from on EBMUD property if no evidence of contamination (e.g. oil, sheen, chemical odors, discoloration, etc.) is found in the excavated soil. b) Soil may be sent to offsite reuse facilities with published contaminant acceptance criteria when: i) Offsite facility is on EBMUD-Approved Disposal Facility list ii) Offsite facility has regulatory approval to accept soil iii) Contractor tests soil for acceptability at facility iv) Contractor submits test results and approval of facility receiving soil for reuse f. Include a list of recycling facilities and processing facilities that will be receiving recyclable or recoverable materials, including, but not limited to concrete, asphalt, and metals. g. Identify materials that are not recyclable or not recovered which will be disposed of in a landfill (or other means acceptable by the State of California and local ordinance and regulations). List the permitted landfill, or other permitted disposal facilities, which will be accepting the disposed waste materials. All landfills, hazardous waste, and universal waste disposal sites shall be approved for use by the Engineer. Engineer will provide a list of approved facilities. h. Identify how the Contractor will comply with DTSC Alternative Management Strategies (AMS) when handling and disposing of TWW in compliance with Health and Safety Code Section 25230. i. Plan should state that TWW records demonstrating proper management of TWW shall be submitted to the Engineer within 5 work days of off-haul. j. Describe planned sampling and analysis for characterizing wastes or the Sampling and Analysis Plan below in Paragraph 1.4.J. 2. The following additional waste management provisions shall be included in the Waste Management Plan to demonstrate compliance with requirements of local agencies having jurisdiction over the handling, transportation, and disposal of waste. a. Include a good faith quantity estimate of each type of Construction and Demolition Waste that would be generated if no diversion methods were implemented. Submit			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impacts HAZ-1 and HAZ-2 (cont.)	estimate with calculations based on weight of each material. The following materials are subject to the estimate requirement: 1) Asphalt 2) Concrete 3) Aggregates 4) Brick, masonry, clay products, and ceramic tile 5) Excavation Soils 6) Wood products, including clean dimensional wood, palette wood, plywood, OSB, and particleboard 7) Metals, including banding, ductwork, flashing, piping, rebar, steel, iron, galvanized sheet steel, stainless steel, aluminum, copper, zinc, lead, brass and bronze 8) Plant and tree trimmings (may be included in wood products if accepted by recycling service) 9) Cardboard, paper products, and packaging 10) Treated Wood Waste 11) Drywall 12) Mixed waste, including, but not necessarily limited to the following: a) Beverage containers b) Insulation c) Roofing d) Glass, excluding that used for containers e) Gypsum board f) Acoustical ceiling materials g) Plastics, including ABS, PVC, and piping h) Latex paint i) Other materials b. Specify the haulers that will be used to transport or haul waste to landfills and disposal/reuse/recycling sites. c. Include an example of a waste log or other tracking mechanism that will clearly show each load and its destination. The record shall clearly distinguish between anything sent to landfill or recycling/reuse or salvage. 1) Include in log the type of load, load weight, name of hauling service, recycling service or landfill, and date accepted by recycling service or by landfill (or other service). d. Submit copies of any submittals to local agencies required by their local ordinance. This includes permit applications, Waste Reduction and Recycling Plans, Construction and Demolition Summary Reports, or other similar documents. The permit application and Waste Reduction and Recycling Plan shall be submitted as an Appendix to the Waste Management Plan when possible. 3. For any proposed facility that is not on EBMUD-approved disposal list, submit permission to reuse, recycle, reclaim, or dispose of material from the site owner along with any other			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impacts HAZ-1 and HAZ-2 (cont.)	information needed by EBMUD to evaluate the acceptability of the proposed reuse, recycling, or disposal site and obtain acceptance of the Engineer prior to removing any material from the project site. 4. All information pertinent to the characterization of the material or waste shall be disclosed to EBMUD and the reuse, recycling, reclamation, or disposal facility. Submit copies of any profile forms and/or correspondence between the Contractor and the reuse, recycling, reclamation, or disposal facility. *Section 1.4(E), Spill Prevention and Response Plan* 1. Submit plan detailing the means and methods for preventing and controlling the spilling of known hazardous substances used on the jobsite or staging areas. a. Include a list of the hazardous substances proposed for use or generated by the Contractor on site, including petroleum products. b. Define measures that will be taken to prevent spills, monitor hazardous substances, and provide immediate response to spills. c. Include provisions for notification of the Engineer or alternate contact and appropriate agencies including phone numbers; spill-related worker, public health, and safety issues; spill control, and spill cleanup. d. Map showing hazardous materials project-related storage locations, names of the hazardous materials, and volumes/quantities. e. Submit a Safety Data Sheet (SDS) for each hazardous substance proposed to be used prior to delivery of the material to the jobsite. *Section 1.4(I), Waste Disposal Records* 1. Copies of waste management and disposal records including bills of lading, manifests, weight tickets, and receipts from waste management facilities shall be submitted to the Engineer. This provision applies to Hazardous Wastes, universal wastes, treated wood wastes, solid wastes disposed at landfills, and radioactive wastes. 2. Hazardous Waste Manifests a. Use the "Uniform Hazardous Waste Manifest", EPA form 8700-22. Contractor shall prepare and Engineer will review all hazardous waste manifests for acceptability prior to use. b. Submit the "Generator's Initial Copy" and a legible photocopy of the first page of hazardous waste manifests, land disposal restriction forms, or other documentation required by applicable regulations governing transport and disposal of Hazardous Wastes for disposal of hazardous substances within 5 days of off haul. 3. TWW Records a. Submit all disposal records to the Engineer within 5 work days of off-haul. b. Records shall include: 1) Name and address of the TWW facility to which the TWW was sent 2) Estimated weight of TWW, or the weight of the TWW as measured by the receiving TWW facility 3) EPA ID (for quantities greater than 10,000 pounds) 4) Date of the shipment of TWW.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impacts HAZ-1 and HAZ-2 (cont.)	**EBMUD Standard Construction Specification 02 82 13, Asbestos Control Activities** *Section 1.1, Compliance and Intent* (Details as listed under Impact AIR-1) *Section 1.5, Submittals (Pre-Job)* (Details as listed under Impact AIR-1) **EBMUD Standard Construction Specification 02 83 13, Lead Hazard Control Activities** A. Furnish all labor, materials, facilities, equipment, services, employee training and testing, permits, and agreements necessary to perform the lead removal in accordance with these specifications and with the latest regulations from the U.S. Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the Air Quality Management District with authority over the project, the Cal/EPA Department of Toxic Substance Control, the California Occupational Safety and Health Administration (Cal/OSHA), and other federal, state, county, and local agencies. Whenever there is a conflict or overlap of the above references, the most stringent provision is applicable. B. During demolition procedures, the Contractor shall protect against contamination of soils, water, adjacent buildings and properties, and the airborne release of hazardous materials and dusts. The costs associated with the implementation of controls will be incurred by the Contractor. C. Any information developed from exploratory work done by EBMUD and any investigation done by the Contractor to acquaint himself with available information will not relieve the Contractor from the responsibility of properly estimating the difficulty or cost of successfully performing the work. EBMUD is not responsible for any conclusions or interpretations made by the Contractor based on the information made available by EBMUD or EBMUD's representative. D. Hazardous materials uncovered during the demolition activities shall be disposed of in an approved manner complying with all applicable federal, state, and local regulations. Appropriate waste manifests shall be furnished to the Engineer as per Section 01 35 44 – Environmental Requirements. Materials are conveyed to the Contractor "as is," without any warranty, expressed or implied, including but not limited to, any warranty to marketability or fitness for a particular purpose, or any purpose. *Section 1.4, Submittals (Pre-Job)* A. Site safety plan: The Contractor shall provide a site safety plan prior to project initiation as specified in Section 01 35 24 – Project Safety Requirements. B. Lead Demolition Plan: Lead-containing coating handling, engineering control, removal, and disposal procedures C. Cal/OSHA Lead Work Pre-Job Notification, if required D. Submittal of worker documentation for employees used on the job 1. Lead-Containing Coating Demolition Work: All Contractor's supervisors and workers performing lead-containing coating work shall meet the requirements of the California Department of Health Services (DHS) lead-related construction interim certification (17 CCR 350001). E. Licenses: Submit copies of state and local licenses and evidence of Cal-OSHA certification and permits necessary to perform the work of this contract. F. Submit name and Environmental Laboratory Accreditation Program Certificate number of laboratory that will test samples collected during air monitoring. See Article 3.2 below.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impacts HAZ-1 and HAZ-2 (cont.)	**EBMUD Engineering Standard Practice 514, Identifying Buried Conflicts** Purpose: to provide pipeline project guidelines for the investigation needed to identify existing underground utilities, and to establish a uniform approach for site reconnaissance of existing buried conflicts, such as active and abandoned utilities. Minimum steps required to identify existing utilities are also provided. Efforts made during the planning, design, and pre-construction phases to identify existing buried conflicts should lessen the potential for subsequent impacts during construction. **EBMUD Procedure 711, Hazardous Waste Removal** Purpose: To define hazardous waste and establish removal responsibilities for hazardous wastes generated at EBMUD facilities. Definitions: • Waste: Any solid, liquid, or contained gaseous material that is (1) disposed of, recycled, or incinerated, or (2) accumulated, stored, or treated before or in lieu of being disposed of, recycled, or incinerated. • Hazardous Waste: Any waste that meets the criteria for identification of a hazardous waste as set forth in California Code of Regulations, Title 22, Section 66261.3. A waste may be hazardous if it exhibits one or more of the characteristics of toxicity, reactivity, corrosivity, or ignitability, or if it is included on a specific list of wastes the U.S. Environmental Protection Agency (EPA) and/or California Department of Toxic Substances Control (DTSC) has determined are hazardous because the waste poses substantial present or potential hazards to human health or the environment. • Hazardous Waste Manifest: EPA's hazardous waste manifest is a document (paper or electronic) designed to track hazardous waste from the moment it leaves the facility where it was generated, until it reaches the off -site waste management facility that will store, treat and/or dispose of the hazardous waste. The manifest is what ties the generator to the waste from "cradle to grave". • These definitions are instructive but not comprehensive. State and federal legal definitions of hazardous waste are complex and subject to exceptions. Waste sample collection, analyses, and data comparison with Title 22 action levels may be necessary to determine if a waste is a hazardous waste. Responsibilities: • The Work Unit Supervisor or Project Manager (or his/her designee) o Identifies hazardous wastes and/or wastes requiring a determination for hazardous or non-hazardous classification and informs the Environmental Compliance Section (ECS). o Contacts ECS staff to coordinate waste disposal, reuse, or recycling. o Provides all known information about the waste to the ECS. o Labels, stores, inspects, and maintains the waste inventory records as directed by the ECS. o Ensures that the waste is available for transportation as scheduled through the ECS. o Helps the ECS coordinate interim storage of non-routine hazardous waste while an appropriate disposal method is being determined. o Reviews, with assistance from the ECS, Hazardous Waste Manifests (Manifest) prepared by haulers, to confirm the accuracy of information.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impacts HAZ-1 and HAZ-2 (cont.)	o Signs the Manifest, if authorized and trained by the ECS. o For paper manifests, sends the signed Generator copy of the Manifest to the ECS within seven (7) days of the off-haul date, unless the ECS has an agreement that the transporter sends the Generator copy directly to the ECS. o Provides the ECS with a budget unit number and a job number. • Environmental Compliance Section o Coordinates the appropriate steps to determine if the waste is hazardous. o Determines, with the help of the relevant department, what analyses are required to classify the waste. o Works with the EBMUD Laboratory and/or retained hazardous and nonhazardous waste management services contractor to analyze the waste or to assist in identifying other laboratories certified to perform the analyses. o Reviews analytical data to characterize the waste. o Obtains and provides EPA generator identification number. o Identifies and/or manages companies providing hazardous waste management services (sampling, hauling, and disposal) depending on EBMUD departmental needs. o Identifies and approves the waste disposal, reuse, or recycling method; additionally identifies disposal, reuse, or recycling facility. o Obtains hazardous waste acceptance documents (e.g., waste profile) from the disposal facility and provides to generating department to be included with hazardous waste shipment, as needed. o Provides training and guidance to unit or project staff on hazardous waste handling, disposal and Manifest completion requirements. o Reviews completed and signed Manifests prior to submittal to DTSC. o Tracks Manifest in dedicated database, and generates reports and summaries as needed. o Completes hazardous waste reporting requirements including, but not limited to:,Biennial Reports, Waste Minimization Plans, and hazardous waste fee and tax forms. o Provides additional information as needed.			
Impact HAZ-3: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	**EBMUD Standard Construction Specification 01 35 24, Project Safety Requirements** *Section 1.3(B), Project Safety and Health Plan* (Details as listed under Impact HAZ-1 and HAZ-2) *Section 1.3(E), Emergency Action Plan* E. Submit an Emergency Action Plan that prepares responses to employee accident/injury events, or any serious unplanned event (e.g.: utility break, fire, structure collapse, etc.) that requires notifying any first aid provider or responsive response agencies (e.g.: fire departments, utility agencies, rescue teams, etc.) 1. Plan shall include a map to medical facilities that are capable of caring for worker accidents & injury. 2. Plan shall include emergency contact numbers. *Section 3.2(G), Fire Prevention and Protection*	EBMUD and EDMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact HAZ-3 (cont.)	G. Fire Prevention and Protection 1. Perform all Work in a fire safe manner and supply and maintain on the site adequate fire fighting equipment capable of extinguishing incipient fires. Comply with applicable federal, local, and state fire prevention regulations. Where these regulations do not apply, applicable parts of the National Fire Prevention Standards for Safeguarding Building Construction Operations (NFPA No. 241) shall be followed. 2. A long-handled, round-point shovel, or a fire extinguisher shall be kept at an accessible (unlocked) location on the construction site at all times. 3. Earthmoving and portable equipment with internal combustion engines shall be equipped with a spark arrestor to reduce the potential for igniting a wildfire. Such equipment shall be maintained to ensure proper functioning of spark arrestor. 4. For all work occurring between April 1 and December 1, or any other periods during which a high fire danger has been identified: a. Equipment that could produce a spark, fire, or flame shall not be used within 10 feet of any flammable materials. b. Portable tools powered by gasoline-fueled internal combustion engines shall not be used within 25 feet of any flammable materials. 5. Vegetation management for fire prevention and protection a. Prior to and during construction: 1) Create and maintain a defensible space (100 feet or to EBMUD property boundary, whichever is shorter) around construction site, construction ingress and egress sites through landscaping, mowing, disking, and/or spraying dry brush or native grasses to a height of 4-inches or less. 2) Remove dead trees within 100-feet of construction site. 3) Limb up trees within 100 feet of construction site so that no leafy foliage, twigs or branches are within 5-feet of the ground. To maintain tree health, tree limbing shall not remove more than 25 percent of a tree canopy within one growing season. 4) Ensure and maintain 5-feet of vertical clearance between roof surfaces and portions of trees overhanging all structures within construction site, and keep roofs free of leaves, needles, twigs, and other combustible matter. To maintain tree health, tree limbing shall not remove more than 25 percent of a tree canopy within one growing season. 5) Keep all overhanging trees, shrubs, and other vegetation, or portions thereof, free of dead limbs, branches, and other combustible matter. b. Neatly stack all combustible materials away from structures within construction site and have all combustible growth cleared 15-feet around the stack. 6. During construction, maintain an unobstructed horizontal clearance at access drives of not less than the required width of the access drives, and an unobstructed vertical clearance of not less than 13 feet 6 inches above all roadways.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Hydrology and Water Quality				
Impact HYD-1: Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade water quality	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.1(B), Site Activities* (Details as listed under Impact AES-1) *Section 1.4(A), Storm Water Management* (Details as listed under Impact BIO-2) *Section 1.4(B), Water Control and Disposal Plan* (Details as listed under Impact BIO-2) *Section 1.4(E), Spill Prevention and Response Plan* (Details as listed under Impact HAZ-1 and HAZ-2) **EBMUD Standard Construction Specification 01 74 05, Cleaning** (Details as listed under Impact AES-1) **EBMUD Procedure 711, Hazardous Waste Removal** (Details as listed under Impact HAZ-1 and HAZ-2	EBMUD and EDMUD's Contractors	EBMUD	Prior to and During Construction
Impact HYD-3: 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 result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or 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.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.1(B), Site Activities* (Details as listed under Impact AES-1) *Section 1.4(A), Storm Water Management* (Details as listed under Impact BIO-2) *Section 1.4(B), Water Control and Disposal Plan* (Details as listed under Impact BIO-2)	EBMUD and EDMUD's Contractors	EBMUD	Prior to and During Construction
Impact HYD-4: Conflict with or obstruct implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.4(A), Storm Water Management* (Details as listed under Impact BIO-2)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Noise and Vibration				
Impact NOI-1: Result in the 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.	**EBMUD Standard Construction Specification 01 14 00, Work Restrictions** *Section 1.7, Construction Noise* A. Noise-generating activities greater than 90 dBA (impact construction such as concrete breaking, concrete crushing, tree grinding, etc) shall be limited to the hours of 8 a.m. to 4 p.m., Monday through Friday. **EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.4(G), Noise Control and Monitoring Plan* 1. Submit a plan detailing the means and methods for controlling and monitoring noise generated by construction activities, including demolition, alteration, repair or remodeling of or to existing structures and construction of new structures, as well as by items of machinery, equipment or devices used during construction activities on the site. The plan shall detail the equipment and methods used to monitor compliance with the plan. *Section 3.8, Noise Control* A. Comply with sound control and noise level rules, regulations, and local ordinances and in the CEQA documents which apply to any work performed pursuant to the contract. Noise-generating activities shall be limited to the hours specified in Section 01 14 00. B. Take appropriate measures, including muffling of equipment, selecting quieter equipment, erecting noise barriers, modifying work operations, and other measures as needed to bring construction noise into compliance. C. Each internal combustion engine, used for any purpose on the job or related to the job, shall be equipped with a muffler of a type recommended by the manufacturer. D. Use the best available noise control techniques (including mufflers, intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds) for all equipment and trucks, as necessary. E. Truck operations (haul trucks and concrete delivery trucks) shall be limited to the daytime hours specified in Section 01 14 00. F. Stationary noise sources (e.g., chippers, grinders, compressors) shall be located as far from sensitive receptors as possible. Enclosure opening or venting shall face away from sensitive receptors. Enclosures shall be designed by a registered engineer regularly involved in noise control analysis and design. G. If impact equipment (e.g., jack hammers, pavement breakers, rock drills etc.) is used during project construction, Contractor is responsible for taking appropriate measures, including but not limited to the following: 1. Hydraulically or electric-powered equipment shall be used wherever feasible to avoid the noise associated with compressed-air exhaust from pneumatically powered tools. However, where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed-air exhaust shall be used. External jackets on the tools themselves shall be used, where feasible. Quieter procedures, such as drilling rather than impact equipment, shall be used whenever feasible. It is the Contractor's responsibility to implement any measures necessary to meet applicable noise requirements. 2. Impact construction including jackhammers, hydraulic backhoe, concrete crushing/recycling activities, vibratory pile drivers etc. shall be limited to the daytime hours specified in Section 01 14 00.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact NOI-1 (cont.)	3. Erect temporary noise barriers or noise control blankets around the construction site, particularly along areas adjacent to residential buildings. 4. Limit the noisiest phases of construction to 10 work days at a time, where feasible. 5. Notify neighbors/occupants within 300 feet of project construction at least thirty days in advance of extreme noise generating activities about the estimated duration of the activity. 6. Noise Monitoring shall be conducted periodically during noise generating activities. Monitoring shall be conducted using a precision sound-level meter that is in conformance with the American National Standards Institute (ANSI) Standard S1.4, Specification for Sound Level Meters. Monitoring results shall be submitted weekly to the Engineer. **EBMUD Procedure 600** (Details as listed under Impact AIR-1)			
Impact NOI-2: Result in the generation of excessive groundborne vibration or groundborne noise levels.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.4(H), Vibration Control and Monitoring Plan* 1. Submit a plan detailing the means and methods for controlling and monitoring surface vibration generated by demolition and other work on the site. The plan shall detail the equipment and methods used to monitor compliance with the plan. *Section 3.7, Vibration Control* A. Limit continuous surface vibration to no more than 0.5 in/sec Peak Particle Velocity (PPV), measured at the nearest residence or other sensitive structure. See Section 01 14 00.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Transportation				
Impact TRA-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	**EBMUD Standard Construction Specification 01 32 36, Video Monitoring and Documentation** *PART 1 - General* *1.1 Summary* A. Section includes: 1. Audio-video documentation utilizing digital recording of surface features, supplemented by photography, that may be taken along the entire length of the project and may include work and storage areas, adjacent properties, and/or intersecting roadways. a. Prior to audio-video recording of the project, all areas to be inventoried shall be investigated visually with notations made of items not readily visible by audio-video recording or photographic methods. B. Related sections: 1. Section 01 11 00 – Summary of Work 2. Section 01 31 23.10 – Web-based Construction Document Management 3. Section 01 33 00 – Submittal Procedures *1.2 Site Survey Audio-Video Recording Requirements* A. The Contractor shall employ a qualified videographer, experienced in taking properly documented and annotated video to perform the Pre-Construction Site Survey, which shall be completed within 20 days after the issuance of the Notice to Proceed. The Pre-Construction Site Survey shall be completed and accepted prior to EBMUD issuance of the Notice to Commence Field Work (NTCFW). B. Pre-Construction Site Survey: The Contractor shall perform a Pre-Construction Site Survey of:	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact TRA-1 (cont.)	1. The project alignment 2. Proposed equipment and material staging areas 3. Access and haul routes to be utilized during construction (San Luis Road between Casa Way and Larkey Lane and on Larkey Lane between San Luis Road and Alfred Avenue), C. Prior to commencement of the Pre-Construction Site Survey recording, the Contractor shall notify the Engineer in writing within 48 hours of the recording. EBMUD will provide a designated representative to accompany and observe audio-video recording operations. Audio-video recording completed without an EBMUD Representative present will be unacceptable unless specifically authorized in writing and in advance by EBMUD. D. Provide a copy of the Pre-Construction Site Survey to EBMUD for review and comment. The Survey shall include all audio-video recordings, photography, annotations and all documentation. If the Engineer determines that critical areas are missing from the survey, the Contractor shall provide additional recording and documentation of the requested area and locations. E. Post-Construction Site Survey: The Contractor shall perform a Post-Construction Site Survey of the same areas recorded in the Pre-Construction Site Survey. The Engineer will review post-construction survey findings with the Contractor and develop a complete listing of project site restoration requirements to be accomplished by the Contractor. Prior to commencement of Post-Construction Site Survey recording, the Contractor shall notify the Engineer in writing within 48-hours of the recording. EBMUD will provide a designated representative to accompany and observe audio-video recording operations. Audio-video recording completed without an EBMUD Representative present will be unacceptable unless specifically authorized in writing and in advance by EBMUD. F. The Contractor shall be responsible for repairing any damage or defects not documented as existing prior to construction. *Part 2 - Products* *2.1 Audio-Video Recording* A. The resolution of the video shall be 1080p or higher. B. The format of the site survey shall be a digital audio-video file in mp4, avi, or mpg with narrative. C. Each recording shall contain the following information and arrangement at the beginning as a title screen: 1. “EBMUD” 2. PROJECT NAME 3. PROJECT NUMBER 4. CONTRACTOR: (Name of Contractor) 5. DATE: (When video was recorded) 6. VIDEO BY: (Firm Name of Videographer) 7. LOCATION: (Description of Location(s), View(s), Direction of Travel) D. Information appearing on the video recording must be continuous and run simultaneously by computer generated transparent digital information. No editing or overlaying of information at a later date will be acceptable. E. Time must be accurate and continuously displayed on the recording.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact TRA-1 (cont.)	F. Written documentation must coincide with the information on the recordings so as to make easy retrieval of locations at a later date. G. The video recording system shall have the capability to transfer individual frames of video electronically into hard copy prints or photographic negatives. H. The finalized audio-video recordings shall be saved on appropriate physical media (e.g. USB flash drive, DVD) viewable on computer with standard media player software and shall contain a Table of Contents outlining the file folder hierarchy and description of files included. I. The physical media shall be labeled with the following information: 1. "EBMUD" 2. Project Name and Number 3. Date of Recording 4. Contractor Name 5. Videographer Name J. Ownership of Recordings: All audio-video recordings will become the property of EBMUD. K. Any portion of the recorded coverage deemed unacceptable by EBMUD shall be re-taped by the Contractor at no additional cost to EBMUD. *Part 3 - Execution* *3.1 Views and Narrative Required* A. Prior to conducting the survey, the Contractor shall discuss with the Engineer to establish specific areas that must be recorded. If surveying of these areas requires private property access, the Contractor shall obtain written permission from the property owner(s), which shall be submitted to the Engineer. B. [Coverage shall include all surface features within 100-feet of the limits of Work to be used by the Contractor and shall be supported by appropriate audio description made simultaneously with video coverage.] C. Such coverage shall include, but not be limited to, existing driveways, sidewalks, pavement, curbs, gutters, ditches, berms, roadways, landscaping, trees, culverts, headwalls, and retaining walls, fencing, gates, handrails, signage, manholes, vaults, utility boxes, lighting, traffic signals and controls, loop detectors, landscaping, irrigation controllers, street furniture, equipment, appurtenances, structures, and other existing features etc. located within the work zone. Video coverage shall extend to the maximum height of all structures within the work zone. D. [When the Work includes construction of water, wastewater, recycled, or other lines in the vicinity of any street or road, the Contractor shall take digital audio-video recordings of existing conditions along both sides of the street or road.] E. All video recording shall be done during times of good visibility. No outside recording shall be done during periods of visible precipitation, mist, fog, or when the ground area is covered with snow, standing water, leaves or debris, unless otherwise authorized by the Engineer. F. Sufficient sunlight shall be present to properly illuminate the subjects of recording and to produce bright, sharp video recordings of those subjects. Shadowing and glare shall be avoided. In order to produce the proper detail and perspective, adequate auxiliary lighting shall be provided to fill in shadow areas caused by trees, utility poles, road signs and other such objects, as well as other conditions requiring artificial illumination.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact TRA-1 (cont.)	G. The camera shall be firmly stabilized such that transport of the camera during the recording process will not cause an unsteady picture. H. The average rate of speed in the general direction of travel of the conveyance used during taping shall not exceed 60-feet per minute. Panning rates and zoom-out rates shall be controlled sufficiently so that playback will produce adequate clarity of the object and features of interest being viewed. I. When conventional wheeled vehicles are used as conveyances for the recording, the distance from the camera lens to the ground shall be such as to ensure proper perspective. In instances where tape coverage will be required in areas not accessible to conventional wheeled vehicles, such coverage shall be obtained by walking or by special conveyance approved by the Engineer but with the same requirements for tape quality and content as specified herein, except as may be specifically exempted by the Engineer. J. When detail of areas in question are unable to be captured on video, high-resolution digital photography of adequate resolution shall be used to supplement video, with written annotations and descriptions. K. The video recorder shall take special efforts to point out and provide audio commentary on cracking, breakage, damage, settlement and other defects in existing features. Restrict commentary to factual descriptions of all features without commentary on causation. **EBMUD Standard Construction Specification 01 55 26, Traffic Regulation** *Section 1.1, Summary* A. Section includes: Comply with the traffic regulation requirements as specified herein. B. Where specific requirements are not detailed herein or in permits, comply with the requirements of the most current version of the California Manual on Uniform Traffic Control Devices (MUTCD). C. All proposed street closures shall be clearly identified in the Traffic Control Plan (TCP) and shall conform to the section “Traffic Control Devices” below. Construction area signs for street closure and detours shall be posted a minimum of forty-eight (48) hours prior to the commencement of street closure. Contractor shall maintain safe access around the project limit at all times. Street closures shall be limited to those locations indicated on the construction documents. D. Related requirements specified elsewhere: 1. Section 01 14 00 – Work Restrictions *Section 1.2, Submittals* A. Submit at least 15 calendar days prior to work a detailed traffic control plan, that is approved by all agencies having jurisdiction and that conforms to all requirements of these specifications and the most recently adopted edition of the MUTCD. Traffic Control Plan shall include: 1. Circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible. 2. A description of emergency response vehicle access. If the road or area is completely blocked, preventing access by an emergency responder, a contingency plan must be included. 3. Procedures, to the extent feasible, to schedule construction of project elements to minimize overlapping construction phases that require truck hauling. 4. Designated Contractor staging areas for storage of all equipment and materials, in such a manner to minimize obstruction to traffic.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Impact TRA-1 (cont.)	5. Locations for parking by construction workers. *Section 2.1, Traffic Control Devices* A. Traffic signs, flashing lights, barricades and other traffic safety devices used to control traffic shall conform to the requirements of the most recently adopted edition of the MUTCD and the agency having jurisdiction. 1. Portable signals shall not be used unless permission is given in writing by the agency having jurisdiction. 2. Warning signs used for nighttime conditions shall be reflectorized or illuminated. "Reflectorized signs" shall have a reflectorized background and shall conform to the current State of California Department of Transportation specification for reflective sheeting on highway signs. *Section 3.1, General* A. Except where public roads have been approved for closure, traffic shall be permitted to pass through designated traffic lanes with as little inconvenience and delay as possible. B. Install temporary traffic markings where required to direct the flow of traffic. Maintain the traffic markings for the duration of need and remove by abrasive blasting when no longer required. C. Convenient access to driveways and buildings in the vicinity of work shall be maintained as much as possible. Temporary approaches to, and crossing of, intersecting traffic lanes shall be provided and kept in good condition. D. When leaving a work area and entering a roadway carrying public traffic, the Contractor's equipment, whether empty or loaded, shall in all cases yield to public traffic. E. Provide temporary signs as required by the traffic control plan and remove signs when no longer required. F. Haul routes for each construction phase shall be provided to all trucks serving the site during the construction period. G. For complete road closures, immediate emergency access to be provided if needed to emergency response vehicles. H. A minimum of twelve (12) foot travel lanes must be maintained unless otherwise approved. *Section 3.2, Alternating One-Way Traffic* A. Where alternating one-way traffic has been authorized, the following shall be posted at each end of the one-way traffic section at least one week prior to start of work: 1. The approximate beginning and ending dates that traffic delays will be encountered. 2. The maximum time that traffic will be delayed. B. The maximum delay time shall be approved by the agency having jurisdiction. *Section 3.3, Flagging* A. Provide flaggers to control traffic where required by the approved traffic control plan. 1. Flaggers shall perform their duties and shall be provided with the necessary equipment in accordance with the current "Instructions to Flaggers" of the California Department of Transportation. 2. Flaggers shall be employed full time on traffic control and shall have no other duties.			

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
	Section 3.4, Temporary Traffic Control A. All traffic control devices shall conform to the latest edition of the MUTCD, and as amended by the latest edition of the MUTCD California supplement. Electronic signage board with changeable message shall be placed on a street in both directions 2 weeks in advance. B. The Contractor shall replace within 72 hours, all traffic signal loop detectors damaged during construction. Any work that disturbs normal traffic signal operations and ensure proper temporary traffic control (lane shifts, lane closures, detours etc.) shall be coordinated with the agency having jurisdiction, at least 72 hours prior to commencing construction. C. A minimum of twelve (12) foot travel lanes must be maintained unless otherwise approved. D. Access to driveways will be maintained at all times unless other arrangements are made. E. All traffic control devices shall be removed from view when not in use. F. Before leaving a work area, ensure the area is left orderly. Trenches must be backfilled or plated during non-working hours. G. Sidewalks for pedestrians will remain open if safe for pedestrians. Alternate routes and signing will be provided if pedestrian routes are to be closed.			
Impact TRA-3: Substantially increase hazards due to a design feature or incompatible uses.	**EBMUD Standard Construction Specification 01 55 26, Traffic Regulation** (Details as listed under Impact TRA-1)	**EBMUD and EBMUD's Contractors**	**EBMUD**	**Prior to and During Construction**
Impact TRA-4: Result in inadequate emergency access..	**EBMUD Standard Construction Specification 01 55 26, Traffic Regulation** (Details as listed under Impact TRA-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Tribal Cultural Resources				
Impact TC-1: 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	**EBMUD Standard Construction Specification 01 35 45, Biological, Cultural, and Paleontological Resource Requirements** *Section 3.3, Protection of Cultural and Paleontological Resources* (Details as listed under Impact CUL-2)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	EBMUD Practices and Procedures[1]	Responsibility for Implementation	Responsibility for Monitoring and/or Enforcement	Timing of Implementation
Wildfire				
Impact WF-1: 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.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.3(B), Project Health and Safety Plan* (Details as listed under Impact HAZ-1 and HAZ-2) *Section 1.3(E), Emergency Action Plan* (Details as listed under Impact HAZ-3) *Section 3.2(G), Fire Prevention and Protection* (Details as listed under Impact HAZ-3)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction
Impact WF-2: 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.	**EBMUD Standard Construction Specification 01 35 44, Environmental Requirements** *Section 1.1(B), Site Activities* (Details as listed under Impact AES-1) *Section 1.4(A), Storm Water Management* (Details as listed under Impact BIO-2)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Notes:

[1] In EBMUD Standard Specifications, "Engineer" = EBMUD Engineer; "Contractor" = EBMUD Contractor; "Work" = Scope of Work for the Project

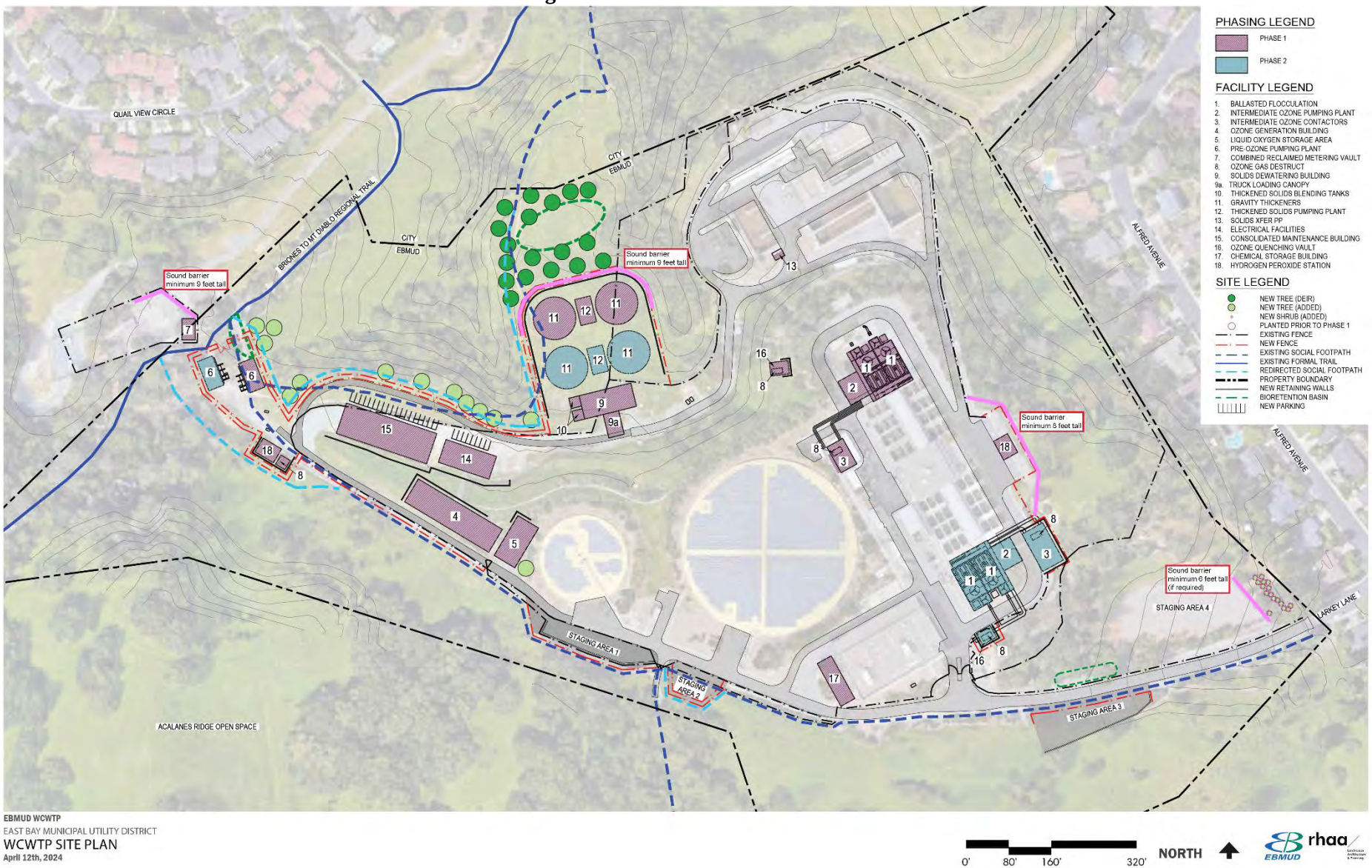
Table 11-2: Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Measure	Responsible for Implementation	Responsible for Monitoring and/or Enforcement	Timing of Implementation
Noise				
Impact NOI-1: Result in the 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.	**Mitigation Measure NOI-1: Noise Reduction Measures** The Noise Control and Monitoring Plan required in the Project specifications would include specific measures to reduce noise to ensure that noise at residential receptors does not exceed 60 dBA L_{eq} before 7:00 a.m. in Walnut Creek. The following measures, or their equivalent, would be used in combination to meet the noise limits: • Coordinate worksite activities to minimize or eliminate non-essential noise-generating activities between 6:00 a.m. and 7:00 a.m. • Install temporary sound barriers achieving a minimum sound transmission class (STC) 25 to block the line of sight from concrete activities to nearby residences (**Figure 3.11-5)** for the duration of the applicable construction phase(s). o To reduce noise by at least 8 dBA from concrete trucks at the Hydrogen Peroxide Station during Phase 1, sound barriers would need to be at minimum 8 feet high and located on the northeast side of the Hydrogen Peroxide Station. o To reduce noise by at least 5 dBA from concrete trucks at the Combined Reclaimed Metering Vault during Phase 1, sound barriers would need to be at minimum 9 feet high, and located on the north, northeast, and northwest sides of the vault. o To reduce noise by at least 3 dBA from concrete trucks at the Thickened Solids Pumping Plants and Gravity Thickeners during Phases 1 and 2, sound barriers would need to be at minimum 9 feet high and located on the northeast side of the work area. o <u>The Noise Control and Monitoring Plan will include daily noise monitoring at the EBMUD property line east of Staging Area 4 during construction of Phases 1 and 2. If noise thresholds are exceeded and expected to continue to be exceeded, a 6-foot-high redwood fence would be installed at that time at Staging Area 4. In anticipation of the possibility that a fence would be needed, 16 5-gallon shrubs will be planted in the area east of Staging Area 4 prior to construction to provide visual screening for the fence</u>. **Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP** o (Refer to Impact TRA-1 below for the full text of Mitigation Measure TRA-1)	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	Mitigation Measure	Responsible for Implementation	Responsible for Monitoring and/or Enforcement	Timing of Implementation
Transportation				
Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	**Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP** • Use of soil and demolition off-haul and large equipment delivery trucks to and from the Walnut Creek WTP will be restricted to between the hours of 9:00 a.m. to 3:30 p.m. • The required Traffic Control Plan shall include the following measures: o EBMUD's Contractor shall distribute written traffic safety requirements to all Contractor heavy construction vehicle drivers. All drivers shall provide signed acknowledgement of having read and understood all traffic safety requirements and consequences of non-compliance. o Written traffic safety requirements shall include: ▪ Construction work hours specifying when construction traffic would be allowed to access the Walnut Creek WTP and staging areas. ▪ Construction haul routes and associated speed limits. ▪ Designated parking and queuing locations. o Contractor shall provide Project sticker or equivalent to drivers who have provided written acknowledgement of traffic safety requirements. ▪ Project sticker shall be made available upon request by EBMUD during the construction contract period. o Contractor heavy construction vehicle drivers shall conform to designated construction hours, including no driving, queuing, idling or parking on local roadways outside of designated construction hours as outlined in written traffic safety requirements. o Contractor heavy construction vehicle drivers shall use only designated construction traffic haul routes. o Contractor shall provide Radar Speed Feedback Signs along Larkey Lane and San Luis Road for the entire Project duration (four, one in each direction of traffic on Larkey Lane and San Luis Road) to deter speeding by heavy construction vehicles on construction traffic routes. o Contractor heavy construction vehicle drivers shall comply with roadway traffic safety rules as outlined in written traffic safety requirements, including, but not limited to: ▪ Stoplight signals and stop signs. ▪ Roadway speed limits (reduced speeds in construction zones and near schools). • Prior to Project construction, EBMUD shall require the contractor(s) to video document pavement conditions on San Luis Road between Casa Way and Larkey Lane and on Larkey Lane between San Luis Road and Alfred Avenue that will be used by Project-related vehicles. Pavement conditions shall also be documented after Project construction is complete. If there is visible deterioration in the pavement condition, any pavement damaged by Project construction-related traffic shall be repaired to a structural condition equal to that which existed prior to Project construction activity.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Impact Area	Mitigation Measure	Responsible for Implementation	Responsible for Monitoring and/or Enforcement	Timing of Implementation
Impact TRA-3: Substantially increase hazards due to a design feature or incompatible uses.	**Mitigation Measure TRA-1: Minimize Impacts of Heavy Truck Traffic at the Walnut Creek WTP** (Refer to Impact TRA-1 above for the full text of Mitigation Measure TRA-1) **Mitigation Measure TRA-2: Additional Flagger Requirements at Larkey Lane for Walnut Creek WTP** Contractors shall implement the following measures as part of the Traffic Control Plan in Walnut Creek: • On extended workdays with large concrete pours and days with soil off-hauling at the Walnut Creek WTP, provide a traffic control flagger at the intersection of Larkey Lane and Alvarado Avenue and the intersection of Larkey Lane and San Luis Road during school start and dismissal times with a buffer before school starts and after school ends. • The construction contractor shall confirm with the Contra Costa Christian Schools (2721 Larkey Lane, Walnut Creek) and Buena Vista Elementary School (2355 San Juan Avenue, Walnut Creek) the typical start and dismissal times, school events, and irregular start and dismissal times prior to the beginning of each school year.	EBMUD and EBMUD's Contractors	EBMUD	Prior to and During Construction

Figure 3.11-5: Sound Barrier Locations



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