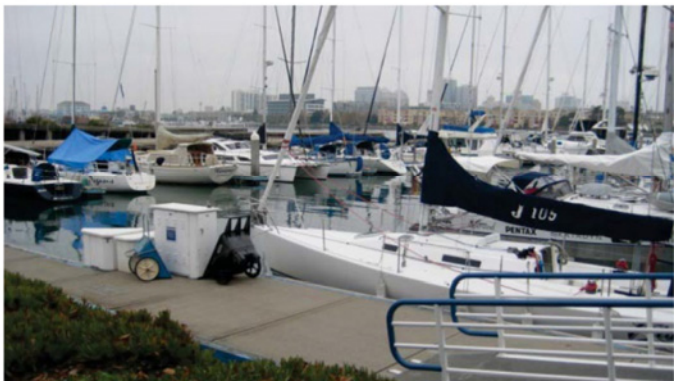

EAST BAY MUNICIPAL UTILITY DISTRICT

Alameda–North Bay Farm Island Pipeline Crossings Project

Final Environmental Impact Report

NOVEMBER 2016

PANORAMA ENVIRONMENTAL, INC.

One Embarcadero Center, Suite 740 San Francisco, CA 94111 650-373-1200 **www.panoramaenv.com**

EAST BAY MUNICIPAL UTILITY DISTRICT

Alameda–North Bay Farm Island Pipeline Crossings Project

Final Environmental Impact Report

NOVEMBER 2016

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

Prepared by:
Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111
650-373-1200
info@panoramaenv.com

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LIST OF ACRONYMS

A

AWWA	American Water Works Association

B

BART	Bay Area Rapid Transit
BPA	Bisphenol A

C

Caltrans	California Department of Transportation
CA MUTCD	California Manual on Uniform Traffic Control Devices
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CEQA Guidelines	Guidelines for Implementation of the California Environmental Quality Act
CHP	California Highway Patrol
CO	City of Oakland
CT	California Department of Transportation
CTMP	Construction Traffic Management Plan

E

EBMUD	East Bay Municipal Utility District
EIR	Environmental Impact Report
EPA	Environmental Protection Agency

H

HDD	horizontal directional drilling
HDPE	high-density polyethylene

LIST OF ACRONYMS

I

I-880	Interstate-880
I-980	Interstate-980

L

LOS	level-of-service

N

NSF/ANSI	National Sanitation Foundation/American National Standards Institute

P

PE	polyethylene
pH	measurement of acidity and/or alkalinity
PM1	Draft EIR Public Meeting #1
PM2	Draft EIR Public Meeting #2
proposed project	Alameda-North Bay Farm Island Pipeline Crossings Project

S

SR-61	State Route-61

U

USCG	United States Coast Guard
USFWS	United States Fish and Wildlife Service

1 INTRODUCTION

1.1 PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT

This Response to Comments document has been prepared to accompany the Draft Environmental Impact Report (Draft EIR) for the East Bay Municipal Utility District's (EBMUD) Alameda-North Bay Farm Island Pipeline Crossings Project (proposed project). The Draft EIR evaluated the potential impacts of the proposed project and recommended mitigation measures to reduce significant and potentially significant impacts. This document responds to comments on and makes revisions to the Draft EIR, as necessary. The California Environmental Quality Act (CEQA) and its implementing regulations (the "CEQA Guidelines") require a lead agency to prepare and certify a Final EIR before it may approve a project for which a Draft EIR has been prepared. Together with the Draft EIR, this Response to Comments document constitutes the Final EIR for the proposed project.

1.2 ENVIRONMENTAL REVIEW PROCESS

On July 1, 2016, EBMUD (lead agency) released the Draft EIR for public review (State Clearinghouse No. 2015082048). The public review and comment period extended from July 1, 2016 through August 15, 2016. A total of two public meetings were held in the cities of Alameda and Oakland. The public meeting in the city of Alameda was held at the Elks Lodge (2255 Santa Clara Avenue, Alameda, CA 94501) on July 26, 2016 at 6:00 p.m. The public meeting in the city of Oakland was held at the EBMUD office (375 Eleventh Street, Oakland, CA 94607) on July 28, 2016 at 6:00 p.m. This Response to Comments document has been prepared based on comments submitted during the public review period, including comments during public meetings and comment letters that were submitted.

1.3 REPORT ORGANIZATION

The Final EIR consists of the following elements consistent with CEQA Guidelines Section 15132:

1. Revisions to the Draft EIR;
2. Comments and recommendations received on the Draft EIR either verbatim or in summary;
3. A list of persons, organizations, and public agencies that commented on the Draft EIR; and
4. The responses of the Lead Agency to comments and recommendations received.

This Response to Comments document is organized as follows:

- **Chapter 1: Introduction.** This chapter discusses the use and organization of the Responses to Comments document. Names of agencies and individuals who commented on the Draft EIR are included in this chapter.
- **Chapter 2: Comments and Responses.** This chapter contains copies of comments received during the public review period and responses to those comments. Each comment letter is coded with the initials of the commenter or agency/organization acronym. Each comment is bracketed in the margin of the letter and assigned a secondary, comment-specific number. For example, the first comment in the letter from the U.S. Coast Guard is USCG-1. Each comment letter is followed by a response corresponding to the bracketed comment.
- **Chapter 3: Document Revisions.** This chapter presents changes to the Draft EIR that reflect text changes initiated by staff subsequent to publication of the Draft EIR and in response to comments to clarify, update, or correct the Draft EIR text. The text changes have not resulted in significant new information with respect to the proposed project, including any new potentially significant environmental impacts that cannot be mitigated to a less-than-significant level, or in any new mitigation measures. Corrections to the text and tables of the Draft EIR are contained in this chapter. Single underlined text represents language that has been added to the Draft EIR; ~~text with strikethrough~~ has been deleted from the Draft EIR.

1.4 LIST OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS COMMENTING

Table 1-1 lists all agencies, organizations, and individuals that submitted comments on the Draft EIR during the comment period.

Table 1-1 Agencies, Organizations, and Individuals that Provided Comments on the Draft EIR

Name, Title, and Affiliation	Comment Code	Date
Federal Government Agencies		
David H Sulouff, Commander U.S. Coast Guard	USCG	July 12, 2016
State Government Agencies		
Jesse B. Schofield, AICP California Department of Transportation (Caltrans) District 4	CT	August 2, 2016
Maria P. Montgomery, Sergeant California Highway Patrol, Oakland Area	CHP	August 18, 2016
Local Government Agencies		
Catherine Payne, Planner IV City of Oakland	CO	August 11, 2016

Name, Title, and Affiliation	Comment Code	Date
Individuals and Organizations		
Members of the public at the Draft EIR Public Meeting #1 in the city of Alameda	PM1	July 26, 2016
Members of the public at the Draft EIR Public Meeting #2 in the city of Oakland	PM2	July 28, 2016
Bob Ritter, P.E. P&F Distributors	BR	August 15, 2016
Janet Libby	JL	July 8, 2016
Joan Gale President, Oakland Museum Woman's Board	JG	August 4, 2016
Molly Miranda	MM	July 7, 2016

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2 COMMENTS AND RESPONSES

Chapter 2 presents the responses to comments received during the public review period. Similar issues were raised in various comments; therefore, two master responses addressing similar comments are included in Section 2.1 and 2.2. For each master response, the corresponding comment number is listed at the beginning of the response.

This chapter also includes the comments submitted at the Draft EIR public meetings and responses to those comments, in Sections 2.3 through 2.6. Furthermore, Sections 2.7 through 2.14 include a copy of and responses to each letter received during the public review period regarding the Draft EIR. Eight comment letters were received from public agencies, organizations, and individuals. Each comment letter is reproduced in its entirety, in the same order as listed in Table 1-1. Each letter is followed immediately by responses to its comments. The comment number and text of the individual comment are presented before each response for ease of reference.

2.1 MASTER RESPONSE 1 – PIPELINE MATERIALS

Master Response 1 is in response to comments BR-1 through BR-17 by Bob Ritter of P&F Distributors and to comments from Public Meeting #1. Comments are focused on the merits of using high-density polyethylene (HDPE) pipelines over welded steel pipelines.

As stated in Section 2.6 of the Draft EIR Project Description (page 2-10), the pipelines for the open trench portions of the proposed project would be made of steel or HDPE and the horizontal directional drilling (HDD) portions of the project would be made of HDPE. EBMUD's material choice for the open-trench portions would ultimately be determined based on the specific engineering needs of the proposed project as identified during design. The proposed project was evaluated in the Draft EIR using the material that would result in the worst case impact to ensure a conservative analysis.

One comment suggested that HPDE should be used instead of the steel casing on each side of the proposed Crossings. As described in Section 2.7.1.4 of the Draft EIR (page 2-17), a steel conductor casing approximately 200 feet long is needed on both sides of the drilling operation to support the pipeline in young bay mud soils. HDPE is not a suitable material for the 200-foot casing because HDPE is a flexible material that cannot be driven into the ground. Installing the conductor casing using traditional open-cut techniques would require a 200-foot long by 50-foot deep trench resulting in significantly more environmental impacts than envisioned by the proposed project.

Several comments discuss the seismic performance of the pipelines to be installed as part of the proposed project. As discussed in Section 3.7 of the Draft EIR (page 3.7-1), EBMUD uses two primary Engineering Standard Practices for the design of water pipelines in its distribution system to address geologic hazards, including earthquakes. 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 including both steel and HDPE. Engineering Standard Practice 550.1, Seismic Design Requirements addresses seismic design of the pipelines to withstand seismic hazards including fault rupture, ground shaking, liquefaction-related phenomena, landslides, seiches, and tsunamis and requires that EBMUD establish project specific seismic design criteria for pipelines, such as the pipelines that would be installed as part of the proposed project.

Several comments refer to the need to protect steel pipes from corrosive soils. As discussed in Section 3.7.2.3: Geologic Hazards (Draft EIR page 3.7-8), the shallow soils along the proposed pipeline alignments may be classified as corrosive to severely corrosive to metals. Section 3.7.4.3 of the Draft EIR (page 3.7-18) states that corrosive soils can weaken a metallic pipeline if the pipeline is not properly designed and that a cathodic protection system would be used to protect the proposed pipelines from corrosion. Section 2.6.2 of the Draft EIR (page 2-10) explains how a cathodic protection system would protect the pipelines from corrosive soils and describes major components of the cathodic protection system including test stations and anodes. Anodes would be provided along steel pipelines as part of the cathodic protection systems per EBMUD's Engineering Standard Practices as stated in Section 3.7.4.3 of the Draft EIR (page 3.7-18) and described in Section 2.6.2 of the Draft EIR (page 2-10). EBMUD's Engineering Standard Practice 572.1 specifies that anodes be placed every 150 to 600 feet, depending on the type of steel pipeline lining and coating, which will be determined during design. Section 2.6.2 further states that the anodes may require replacement about once every 25 years and that anode replacement would involve using a drill rig or backhoe to make a hole for the anode, placing the anode underground, connecting wires to the cathodic protection system, and backfilling the hole. The effects of corrosive soils would be further reduced by construction in accordance with EBMUD Engineering Standard Practices and industry standards. EBMUD's Engineering Standard Practice 512.1, described in Section 3.7.3.3 (Draft EIR page 3.7-15), would reduce the risk of corrosion through methods such as control of dissimilar metals, proper handling of materials, and use of insulating joints. Also, as stated on page 3.7-24 of the Draft EIR, EBMUD would follow the recommendations of the American Water Works Association (AWWA) M11 Manual for the design and installation of steel pipe, including design for corrosion control. Design features may include epoxy coating of reinforcing steel, use of Type 5 Portland cement in structural concrete, or soil treatment to neutralize pH in the soil or reduce excessive chloride and sulfate concentrations in the soil (see Appendix H: Geotechnical Assessment of Draft EIR).

Several of the comments compare the merits of HDPE to welded steel pipeline in terms of leakage, material construction, seismic design, carbon footprint, and cathodic protection. The comments purporting the benefits of HDPE pipeline are noted.

2.2 MASTER RESPONSE 2 – IMPACTS TO COMMERCIAL ACTIVITIES FROM ROAD CLOSURES

Master Response 2 is in response to comments PM-1 (from Public Meeting #1) and JG-1 by Joan Gale of Oakland Museum Women's Board, which raise the concern of potential disruptions to commercial activities from the full closure of Lincoln Avenue in the city of Alameda at Crossing #3 (comment PM-1) and the full closure of Derby Avenue in the city of Oakland at Crossing #3 (comment JG-1).

While Lincoln Avenue and Derby Avenue would be closed to through traffic during construction hours, pedestrian traffic and emergency vehicle access would be maintained at all times per Mitigation Measure Traffic-5 (Draft EIR page 3.13-42), which requires identification and signage for pedestrian access around construction zones, and Mitigation Measure Traffic-6, which requires notification of emergency responders of road closures and easily removable temporary barricades for emergency access (Draft EIR page 3.13-44). While access to individual businesses is not an impact typically considered under CEQA, EBMUD would coordinate with the business and property owner at the time of construction, per Mitigation Measure-1, bullet 16 (Draft EIR page 3.13-41). Resident and local business vehicular access would be allowed to the extent feasible, although delays may be encountered depending upon the stage of construction.

2.3 PUBLIC MEETING #1 COMMENTS

The following text reflects comments stated or questions that were raised at the Alameda-North Bay Farm Island Pipeline Crossings Draft EIR public meeting on July 26, 2016. These comments were not transcribed verbatim, but rather they provide a representation of those comments and questions received.

2.3.1 Comment PM1-1

What is the start date of construction for each Crossing? Does EBMUD have a projected time for the start of construction of Crossings #2 and #3?

2.3.2 Comment PM1-2

What is the projected end of the useful life of the existing pipelines?

2.3.3 Comment PM1-3

What is the lead time for notification of businesses and residents of construction of Crossing #2 and #3?

2.3.4 Comment PM1-4

Are the existing pipelines at each crossing the original pipelines that were installed?

2.3.5 Comment PM1-5
How will the steel pipelines be joined? Would a bell and spigot design or welded joints be used?

2.3.6 Comment PM1-6
How far apart would the anodes be placed along the trenched pipeline segment?

2.3.7 Comment PM1-7
What is the minimum depth of the HDD pipelines at the land/water edge for Crossing #2?

2.3.8 Comment PM1-8
Since construction of Crossing #3 may be far into the future, will another EIR be prepared to address the impacts of that crossing?

2.3.9 Comment PM1-9
What is the role of the city of Alameda on the proposed project?

2.3.10 Comment PM1-10
The proposed project includes an objective regarding the long-term reliability of the project. Does the EIR address the likelihood and the impacts of failure of the new pipeline, particularly at intersections where soil-types change (such as at the fringe of the young bay muds)? What is the basis for the design? Were soil hazards analyzed?

2.3.11 Comment PM1-11
The channel shoreline is all fill. A leak in the pipeline could cause flooding or other issues at the land surface.

2.3.12 Comment PM1-12
Does the EIR address the energy used to procure and install the materials and the energy use for the lifecycle of the pipelines? How do the pipelines meet green infrastructure standards or goals?

2.3.13 Comment PM1-13
Lincoln Avenue at Crossing #3 has heavy commercial use (oil pickup for oil changers, delivery trucks, restaurant supplies) and commercial delivery trucks are frequently parked on Lincoln Ave. There is concern over the potential impact to commercial uses from road closures during open trench construction.

2.3.14 Comment PM1-14
Clarify the location of the pits for existing crossing abandonment on Bridgeview Isle for Crossing #2 and clarify why the work cannot be performed from Towata Park. Would Bridgeview Isle be closed?

2.3.15 Comment PM1-15

A portion of the proposed project that would require jet grouting, south of Towata Park at Crossing #2 was identified as being on private property. The area from Bridgeview Isle to the rip rap at the estuary shoreline is private property. A private property encroachment agreement would likely be needed. Would the jet-grouting work require access on the private property to install the jet-grouted columns would it impact uses of the property in the future?

2.4 PUBLIC MEETING #1 RESPONSES

2.4.1 Response PM1-1

Page 2-31 of the Draft EIR identified that Crossing #1 is schedule for 2018/2019 and that the timing for construction of Crossing #2 and #3 would occur after 2020 and before the existing pipelines at Crossings #2 and #3 reached the end of their useful lives.

2.4.2 Response PM1-2

The projected end of the useful life of the existing pipelines is currently unknown.

2.4.3 Response PM1-3

Notifications would be sent to residents and businesses at a minimum of 7 days prior to construction. Mitigation Measure Traffic-6 in the Draft EIR (page 3.13-44), states that "…Businesses, commercial offices, and residents located within one block of construction shall [receive notices] at least 7 days in advance of activities requiring roadway closures [which] outline the proposed project schedule and the duration of construction activities. EBMUD would send notices to the individuals and businesses on the proposed project's mailing list to update them prior to any roadway closures."

2.4.4 Response PM1-4

Some of the original pipelines pre-date EBMUD and were constructed by the agency's predecessors. The Park Street Crossing is the oldest and was built in 1918. Other crossings such as the Blanding Street Crossing (near Crossing 3) and the BFI #2 Crossing (near Crossings #2) were built more recently, in the 1980s.

2.4.5 Response PM1-5

As described in the second paragraph on page 3.7-22 of the Draft EIR, "EBMUD has Engineering Standard Practices that would be implemented as part of the proposed project, including use of special joints (i.e., butt welds or double welded joints) …" However, the final determination of how the steel pipelines will be joined would be made during detailed final design. More information can be found in Master Response 1.

2.4.6 Response PM1-6

See Master Response 1.

2.4.7 Response PM1-7

Figures 2.7-4 to 2.7-6 in the Draft EIR (pages 2-20 to 2-22) show cross sections of the HDD construction methods for Crossings #1 to #3. The pipeline would be about 75 feet deep at the beginning of the water/edge of land along Crossing #2.

2.4.8 Response PM1-8

Crossing #3 is covered in this EIR. EIRs have indefinite "shelf-lives" as long as the baseline conditions and the proposed project evaluated do not change substantially. A new or subsequent EIR would not be needed unless there are major project changes or the baseline conditions change, with the potential for such changes to result in either a new significant environmental impact or increased severity of a previously identified significant environmental impact.

2.4.9 Response PM1-9

Encroachment permits are required for the proposed project and would be obtained from the City of Alameda (as well as the City of Oakland). Prior to issuance of the Notice of Preparation, EBMUD consulted with the City of Oakland and the City of Alameda regarding potential community concerns. EBMUD owns and operates the pipelines.

2.4.10 Response PM1-10

The Geology, Soils, and Seismicity section of the Draft EIR (page 3.7-1) provides a summary of the liquefaction hazards, the areas of fill, the general soils maps, and mitigation/discussion of impacts including the EBMUD Design Standards that apply to minimize potential for pipeline failure. Jet grouting and steel casings would stabilize the shallow HDD pipeline at the transition from young bay muds to older bay muds.

2.4.11 Response PM1-11

As stated in the Draft EIR, Section 2.7.1.4 (page 2-17), the pipeline would be installed within a conductor casing on each side of the underwater crossings. As further described in the Draft EIR, Section 3.7.4.3 (page 3.7-18), the casing would support the pipeline on the land portions of each of the crossings and the casings would be stabilized with jet grouted columns. The casing and grouting design features would minimize potential leaks from normal operation and from seismic shaking. Mitigation Measure Geology-1 in the Draft EIR (page 3.7-20) would further limit the risk of a pipe break by requiring EBMUD to incorporate the recommendations and results from a geotechnical investigation into design of the pipeline to withstand geologic and seismic hazards. Once installed, as stated in the Draft EIR, Section 2.8.3 (page 2-34), EBMUD would conduct routine leak detection on its pipelines. A leak that could cause flooding is not likely to occur given the engineering and monitoring provisions.

2.4.12 Response PM1-12

While CEQA generally does not require a detailed analysis of green infrastructure, Draft EIR Section 3.6: Energy Use (page 3.6-1), includes a high-level account of energy that is used for the Project. Energy impacts were found to be less than significant.

2.4.13 Response PM1-13

See Master Response 2.

2.4.14 Response PM1-14

HDD construction would occur within Towata Park, but the pipeline abandonment pits would be located within public right-of-way on Bridgeview Isle as shown on Figure 2.1-4 in the Draft EIR (page 2-5). The pits for abandonment must be in Bridgeview Isle due to the location of the pipelines that would be abandoned. Bridgeview Isle would be closed during open trench construction as shown on Figure 3.13-4 in the Draft EIR (page 3.13-30).

2.4.15 Response PM1-15

EBMUD verified the land ownership at the terminus of Bridgeview Isle. The southeastern-most parcel of land, where the proposed HDD pipeline would primarily cross under, is owned by the City of Alameda. The adjacent parcel to the northwest is privately owned but vacant.

A permanent easement and temporary encroachment agreement would be required from the City of Alameda for the southeastern-most parcels, as stated in Section 2.9 of the Draft EIR (page 2-35). EBMUD would coordinate with the City of Alameda on the terms and conditions of the easement and/or encroachment agreement.

The bullet at the top of page 2-35 in the Draft EIR (in Section 2.9 Permanent Rights-of-Way and Temporary Easements) is revised as follows to clarify the locations where permanent easements would be required:

- An approximate 200-foot-long pipeline easement would be required in Towata Park and across from Towata Park near 3342 Bridgeview Isle from the City of Alameda for Crossing #2.

The HDD pipeline segment would not likely cross under the privately-owned vacant parcel, although the exact alignment of the HDD pipeline (at this fine a scale) will not be known until final design. If the pipeline alignment or staging area for jet grouting were to cross through the northeast corner of the privately-owned parcel, a permanent easement and temporary encroachment agreement may be required, as stated in Section 2.9 of the Draft EIR (page 2-35). If a private easement is required, EBMUD would coordinate with the property owner on the terms and conditions of the easement and/or encroachment agreement.

2.5 PUBLIC MEETING #2 COMMENTS

The following text reflects comments stated or questions that were raised at the Alameda-North Bay Farm Island Pipeline Crossings Draft EIR public meeting on July 28, 2016. These comments were not transcribed verbatim, but rather they provide a representation of those comments and questions received.

2.5.1 Comment PM2-1

How long would construction last on a single block?

2.5.2 Comment PM2-2

Clarify what daytime hours mean in the context of noise activities.

2.5.3 Comment PM2-3

How long would staging for HDD be? How far in advance would the public be noticed for construction activities, including HDD operations at Crossing #3 on Derby Avenue, near Glascock Street and Ford Street?

2.5.4 Comment PM2-4

The White Elephant Sale Building near Crossing #3 is quite busy from the end of December to the middle of March. If EBMUD could avoid those months, they could avoid conflicts with the White Elephant Sale operations.

2.5.5 Comment PM2-5

For what distance will open trench construction be in the open state?

2.5.6 Comment PM2-6

Is the main reason for constructing the proposed project driven by the issue of earthquakes or development driven; that is, is the issue that more water needs to be brought to Alameda Island to service the new development?

2.5.7 Comment PM2-7

What are the sizes of the [new] pipelines?

2.5.8 Comment PM2-8

Flooding had occurred within the Posey Tube as a result of a main break. How many breaks have occurred?

2.5.9 Comment PM2-9

Has EBMUD reduced the level of redundancy at Crossing #3 due to the Derby Crossings currently out of service?

2.5.10 Comment PM2-10
Clarify what biological resources and cultural resources are?

2.5.11 Comment PM2-11
Would the new HDPE pipelines leach chemicals?

2.5.12 Comment PM2-12
What are the existing pipelines made of? Are the new pipelines reliable and safer? Will the HDPE pipelines have BPA (or some other chemical that is not recommended for pipes in homes)?

2.5.13 Comment PM2-13
What does EBMUD plan to do with all the soil that is excavated during construction?

2.6 PUBLIC MEETING #2 RESPONSES

2.6.1 Response PM2-1
Open trench construction would last approximately one week in front of any one residence and approximately two weeks along a standard single block. Figure 2.7-1 in the Draft EIR (page 2-13) provides a schematic representation of how open trench construction would progress along the pipeline alignments.

2.6.2 Response PM2-2
For the purpose of construction time limits, the City of Oakland and the City of Alameda define daytime hours as 7 a.m. to 7 p.m. (see Table 3.11-4 on Draft EIR page 3.11-11). However, per Mitigation Measure Noise-1 in the Draft EIR (page 3.11-41), noise-generating construction would not begin until after 8 a.m.

2.6.3 Response PM2-3
All HDD work, including staging of equipment and operations would last a total of about 6 to 8 months, as shown in Tables 2.7-5 and 2.7-6 in the Draft EIR (page 2-32). See Master Response 2 regarding advance notification.

2.6.4 Response PM2-4
See Master Response 2.

2.6.5 Response PM2-5
The area of the open trench on a given day would be as much as 80 to 200 linear feet; however, steel plates would be used to cover the open trench outside of the immediate work area. Road closures would occur on a block-by-block basis during open trench construction.

2.6.6 Response PM2-6

As identified in Section 2.5: Project Objectives in the Draft EIR (page 2-9), the fundamental purpose of the proposed project is to improve long-term reliability and redundancy of the water distribution system and maintain high in-service reliability after a seismic event for Alameda Island and North Bay Farm Island. The proposed project would support currently planned future growth as stated in the Draft EIR (page 5-44).

2.6.7 Response PM2-7

As identified in Section 2.6.1: Pipeline Design Features in the Draft EIR (page 2-10), the sections of pipeline installed underwater would be 24-inch-inner-diameter and 30-inch-outer-diameter fused HDPE. The pipelines installed in streets would be steel or HDPE with a maximum outer diameter of 30 inches.

2.6.8 Response PM2-8

Flooding at the Posey Tube was not a result of a break in the existing crossings. Instead, it was caused by main breaks along Webster Street between the Posey Tube and Atlantic Avenue. Two main breaks have caused flooding in the Posey Tube since 2006.

2.6.9 Response PM2-9

Two crossings, the Blanding Crossing and the Park Crossing, are still in-service near the proposed Crossing #3 location. As determined in the Alameda-North Bay Farm Island Crossings Master Plan (referenced in Section 4 of the Draft EIR, page 4-3), the loss of the Derby Crossing in the northeast corridor of the island does not cause a significant reduction in the levels of service.

2.6.10 Response PM2-10

Appendix G of the CEQA Guidelines provides a summary of what are considered biological and cultural resources. Biological resources include species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USWFS); riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS; federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.); migratory wildlife corridors and native wildlife nursery sites; and trees protected by local policies or ordinances.

Cultural resources include historical resource as defined in § 15064 of the CEQA Guidelines, archaeological resources pursuant to § 15064.5 of the CEQA Guidelines, unique paleontological resources or sites, unique geologic features, and human remains, including those interred outside of formal cemeteries.

2.6.11 Response PM2-11

As described in Section 2.7.3 of the Draft EIR (page 2-33), the pipelines would be designed according to EBMUD's Engineering Standard Practice 512.1, which states that HDPE pipe shall conform to AWWA C906, a standard that requires materials used to make the pipe and fittings shall contain no ingredient in an amount that has been demonstrated to migrate into water in quantities that are considered to be detrimental to water quality.

All pipeline materials used on the proposed project would be certified safe by nationally recognized standards. EBMUD's Engineering Standard Practice 512.1 also states that HDPE pipe shall be manufactured from polyethylene (PE) resin that is National Sanitation Foundation/American National Standards Institute (NSF/ANSI) Standard 61 approved for potable water applications. NSF International is a not-for-profit, non-governmental organization, and a world leader in standards development, product certification, education, and risk-management for public health and safety. The NSF/ANSI Standard 61 is the American National Standard for health effects of drinking water system components. It establishes the health effects requirements for the chemical contaminants and impurities that are indirectly imparted to drinking water from products, components and materials used in drinking water systems. To be NSF/ANSI 61 certified, HDPE pipe and fittings are tested by exposing the products to drinking water, and the exposure waters are then analyzed for contaminants. Any contaminants found must be below Environmental Protection Agency (EPA) levels for regulated contaminants. For non-regulated contaminants found, NSF/ANSI Standard 61 sets health based pass/fail levels based on review of available toxicity data.

2.6.12 Response PM2-12

The existing pipelines are made of cast iron, steel, or HDPE. HDPE is a type of plastic that does not contain Bisphenol A (BPA). See also response to Comment PM2-11 above regarding material safety. See Master Response 1 for a general discussion of the reliability of HDPE and steel pipelines to be used for the proposed project and the engineering standards, practices, and performance measures that will be used to ensure reliable installation and operation.

2.6.13 Response PM2-13

As described in Impact Geology Soils-2 in the Draft EIR (page 3.7-21), the spoils generated from construction would be temporarily stockpiled adjacent to the pipeline alignments for reuse in trenches or would be hauled off-site.

2.7 U.S. COAST GUARD

Hope, Aaron

From: Sulouff, David H CIV <David.H.Sulouff@uscg.mil>
Sent: Tuesday, July 12, 2016 3:25 PM
To: Alameda Crossings Project
Cc: Yee, Justin J SPN; D11-SMB-SectorSF-WaterwaySafety
Subject: PROPOSED EBMUD PIPELINE CROSSINGS
Attachments: 4571_001.pdf

Attn: Aaron Hope, Associate Civil Engineer,

There appears to be no pipeline bridge work under USCG jurisdiction for this project.
If in-water work and navigational impacts become necessary, please contact USCG Sector San Francisco, Waterways Safety in advance at:

USCG-1

D11-SMB-SectorSF-WaterwaySafety@uscg.mil

I am also providing to SF USACE, Mr. Justin Yee as fyi...

Thank you,
David

Commander, (dpw)
Eleventh Coast Guard District
Attn: Mr. David H. Sulouff, Bridge Administrator Bldg 50-2, Coast Guard Island Alameda, CA 94501

(510) 437-3516 Office
(510) 219-4366 Cel
(510) 437-5836 Fax
David.H.Sulouff@uscg.mil

7

2.7.1 Response USCG-1

Comment noted. EBMUD acknowledges that none of the pipeline work near bridges would fall under USCG jurisdiction. The Draft EIR, however, identifies that in-water work would occur for the geotechnical investigations. Section 2.7.1.3 of the Draft EIR (page 2-16): Geotechnical Investigation notes the following: "Exploratory borings would be made…along the underwater alignment…". The potential navigational impacts, including the hazards associated with changes in vessel traffic, are addressed in Impact Hazards-6 in the Draft EIR (page 3.9-23). EBMUD proposes to mitigate the potential navigational impacts by implementing Mitigation Measure Hazards-6 in the Draft EIR (page 3.9-23), which requires EBMUD to notify the USCG prior to any in-water work.

2.8 CALTRANS

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov

Serious Drought. Help save water!

August 2, 2016

SCH # 2015082048
GTS # 04-ALA-2016-00006
ALAVAR034
ALA-VAR-PM VAR

Mr. Aaron Hope
East Bay Municipal Utility District
375 11th Street
Oakland, CA 94607

Alameda-North Bay Farm Island Pipeline Crossings Project – Draft Environmental Impact Report

Dear Mr. Hope:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Alameda-North Bay Farm Island Pipeline Crossings Project. The following comments are based on the Draft Environmental Impact Report (DEIR).

Project Understanding
The proposed project involves the construction and operation of three transmission pipeline segments within Alameda County in the City of Oakland, the City of Alameda, and on North Bay Farm Island, also in the City of Alameda. The proposed pipelines would be located within city streets, one business park parking lot, Towata Park, and underneath the Oakland Inner Harbor, Tidal Canal, and San Leandro Bay Channel. The proposed crossing alignment locations and their route options may intersect or be within proximity to State Route 61, Interstate 880, and Interstate 980. CT-1

Mitigation Responsibility
As the Lead Agency, the East Bay Municipal Utility District (EBMUD) is responsible for all project mitigation, including any needed improvements to State highways. Page ES-84 of the DEIR states that EBMUD shall submit a Construction Traffic Management Plan to the cities of Alameda and Oakland for review and approval. Please also submit the plan to Caltrans. The remaining comments offer guidance on the Caltrans approval process. CT-2

Transportation Management Plan
A Transportation Management Plan (TMP) or construction TIS may be required of the developer for approval by Caltrans prior to construction where traffic restrictions and detours affect State highways. TMPs must be prepared in accordance with *California Manual on Uniform Traffic Control Devices* (CA MUTCD). For further TMP assistance, please contact the Office of Traffic Management Plans/Operations Strategies at 510-286-4579. You can access the CA MUTCD CT-3

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

from the following website: http://www.dot.ca.gov/trafficops/camutcd/camutcd2014rev1.html

CT-3 cont.

Transportation Permit

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a Transportation Permit that is issued by Caltrans. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to:

Caltrans Transportation Permits Office
1823 14th Street
Sacramento, CA 95811-7119.

See the following website for more information about Transportation Permits:
http://www.dot.ca.gov/trafficops/permits/index.html.

CT-4

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State right of way (ROW) requires an Encroachment Permit that is issued by Caltrans. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

David Salladay, District Office Chief
Office of Permits, MS 5E
California Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

See the following website for more information about Encroachment Permits:
http://www.dot.ca.gov/hq/traffops/developserv/permits

CT-5

Should you have any questions regarding this letter, please contact Jesse Schofield at 510-286-5562 or jesse.schofield@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

2.8.1 Response CT-1

Figure 2.1-2 in the Draft EIR (page 2-3) shows that open trench construction for Crossing #1 would be located within Madison Street, underneath the Interstate-880 (I-880) and Interstate-980 (I-980) overcrossing. Figure 2.1-4 in the Draft EIR (page 2-5) shows that Crossing #3 would be located within State Route-61 (SR-61) (Otis Drive). Jack and bore construction would be utilized to install the pipeline within SR-61, as described in the Draft EIR (page 2-14). While the existing Bay Farm pipeline, which would be abandoned, is located under SR-61, no abandonment-related construction would occur on SR-61.

2.8.2 Response CT-2

Mitigation Measure Traffic-1 in the Draft EIR (page 3.13-40) is revised as follows to clarify that the Construction Traffic Management Plan (CTMP) would also be submitted to Caltrans for review and approval:

> **Mitigation Measure Traffic-1.** Construction Traffic Management Plan. EBMUD shall develop and implement a project-specific Construction Traffic Management Plan (CTMP). EBMUD shall submit the plan to the Cities of Alameda and Oakland and Caltrans (as applicable) for review and approval at least 30 days prior to construction. The CTMP shall conform to the California Manual on Uniform Traffic Control Devices, and shall include provisions for the following…

2.8.3 Response CT-3

Comment noted. EBMUD would prepare a Transportation Management Plan for the proposed project in accordance with the California Manual on Uniform Traffic Control Devices (CA MUTCD) as required by Mitigation Measure Traffic-1 in the Draft EIR (page 3.13-40).

2.8.4 Response CT-4

Comment noted. Table 2.10-1 in Section 2: Project Description in the Draft EIR (page 2-36) identifies that EBMUD would be required to prepare a Transportation Permit for the proposed project.

2.8.5 Response CT-5

Comment noted. Table 2.10-1 in Section 2: Project Description in the Draft EIR (page 2-36) identifies that EBMUD would be required to prepare an Encroachment Permit for the proposed project.

2.9 CALIFORNIA HIGHWAY PATROL

Alameda Crossings Project

From: Montgomery, Maria@CHP <MMontgomery@chp.ca.gov>
Sent: Thursday, August 18, 2016 3:02 PM
To: Alameda Crossings Project
Cc: Whitten, BJ@CHP; CHP-30AAdesk; Breen, Rebecca@CHP; CHP-EIR
Subject: 063-R.B. Environmental Document Review - SCH# 2015082048
Attachments: image002.gif; image001.png

Good afternoon,

No impact to Oakland Area's local operations and/or public safety by SCH#2015082048 was identified. CHP-1

Very respectfully,

MARIA P. MONTGOMERY, #16770
Sergeant
California Highway Patrol
Oakland Area
3601 Telegraph Avenue
Oakland, CA 94609
Phone: (510) 450-3821
Fax: (510) 450-3829
mmontgomery@chp.ca.gov<mailto:mmontgomery@chp.ca.gov>

[cid:image001.png@01CEBF3F.BC0BFC30]

1

2.9.1 Response CHP-1

Comment noted.

2.10 CITY OF OAKLAND

CITY OF OAKLAND
Bureau of Planning
250 Frank H. Ogawa Plaza, Suite 3315, Oakland, California, 94612 - 2032

VIA EMAIL AND U.S. MAIL

August 12, 2016

East Bay Municipal Utility District
375 Eleventh Street, MS 701
Oakland, CA 94607
Attn. Aaron Hope, Project Manager

RE: City of Oakland Comments on Draft Environmental Impact Report for Alameda-North Bay Farm Island Pipeline Crossings Project (dated July 2016)

Dear Mr. Hope:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the Alameda-North Bay Farm Island Pipeline Crossings Project (Project), for which the East Bay Municipal Utility District (EBMUD) is both the Project proponent and lead agency, and for which the City of Oakland is a responsible agency and affected land owner. At this time, the City of Oakland respectfully submits comments regarding both the analysis in the Draft EIR and the merits of the proposed project.

Project Description

The City of Oakland understands that the purpose of the proposed Project is to ensure continued reliable water service to the City of Alameda. The Project would involve construction of pipelines within City of Oakland streets and property, including Estuary Park, as well as underwater pipeline crossing activities in the City of Oakland. Construction activities related to the Project would also involve project staging to potentially be located on City of Oakland property. It is understood that any new utility alignments on City property would be subject to easements that would be negotiated with the City of Oakland and could limit use of City of Oakland real property into the future.

The proposed Project would affect heavily used streets in Oakland, possibly including established truck routes. In addition, the Project would possibly affect a very popular and heavily used park along the Oakland waterfront, Estuary Park. Estuary Park is currently extensively used for pick-up field games (soccer and other team sports), picnicking, exercise and viewing the waterfront, an important regional destination. It should also be noted that Estuary Park was designed by Lawrence Halprin, a famous American Landscape Architect, whose body of work is both iconic and well respected throughout the world. The City of Oakland, of course, wishes to preserve this amazing legacy, and protect our ability to maintain the park's relevance into the future as both an important recreation and landscape design resource. CO-1

Environmental Analysis

The City of Oakland has the following comments regarding the environmental analysis provided in the Draft EIR:

- **Environmental analysis did not account for planned roadway reconfiguration in Jack London:** This fall, the Lake Merritt BART Bikeways Project will implement roadway reconfigurations in the Lake Merritt BART/Jack London Square area. These improvements will include reductions in the number of travel lanes on Madison and Oak, which will impact the effectiveness of the proposed mitigations at significant impact CO-2

intersections. The DEIR traffic impact analysis should be re-evaluated with the correct inputs. Attached are the striping plans that the traffic consultant can refer to. CO-2 cont.

- **Construction will trench recently resurfaced corridors**: The Lake Merritt BART Bikeways Project is being implemented through coordination with the City's resurfacing program. This means that within the next year, the City will resurface Madison, Oak, and 2nd Streets, directly where construction for Crossing #1 will occur. EBMUD's trenching on these corridors will trip the city's 5-year moratorium on cuts to streets resurfaced in the past 5 years, and will require EBMUD to restore the streets to City standards and requirements. CO-3
- **Construction detours will impact key bicycle routes:** The construction program for this project will close streets with signed bicycle routes in an area with limited to no alternate routes. The DEIR's proposed construction impact mitigation for bicyclists is to require EBMUD to use "share the road" signs, obtain a permit that allows bicyclists to use sidewalks, and provide detours (Mitigation Measure Traffic-5). This is an insufficient program to address bicyclist safety, particularly given the significant vehicle congestion anticipated as part of the construction project. EBMUD's temporary traffic control plans should incorporate striping plans to create a designated alternate Class II or better bikeway when any Oakland street that has a signed and striped bikeway is closed for project-related construction. Please see the Lake Merritt BART Bikeways project page for additional information: http://www2.oaklandnet.com/government/o/PWA/o/EC/s/BicycleandPedestrianProgram/OAK043752 CO-4
- **Page 3.12-2**: HDD construction would occur within, and not adjacent to, Estuary Park. CO-5

Merits of the Project

Although the City of Oakland is sympathetic to the need for reliable water service on both the part of the City of Alameda and EBMUD, we also believe that the proposed project could cause significant inconvenience to our community in Oakland. It must be acknowledged that:

- The proposed project would affect the use of Estuary Park during construction (and perhaps beyond) in a manner that would potentially alter the design and use of the park. Construction activities could limit use of Estuary Park in a manner that would place additional wear and tear on other City of Oakland parks and limit the ability to provide for established recreational activities such as organized team sports. In addition, implementation of the project could jeopardize the existing and future design of the park in a manner that alters the existing, culturally important Lawrence Halprin-designed features of the park or limits future design and use of the park site as the City might desire. CO-6
- The proposed project would result in inconvenience related to transportation in a neighborhood of Oakland that is a regional destination. The proposed project includes construction throughout the Jack London neighborhood over an extensive period of time. Movement of traffic, availability of street parking and path of travel would be affected during the construction period. Neighbors and visitors alike will be negatively affected during the long construction period. CO-7
- Even with mitigation measures incorporated, construction noise will be a nuisance for neighbors. The Jack London neighborhood includes a variety of land uses, including office, residential and live-work uses, in an area that hosts an active heavy rail line. Neighbors already experience an unusually loud and disruptive noise environment and an extended construction period will exacerbate this condition for our community. CO-8

Staff believes that EBMUD should consider taking this opportunity to provide benefits for the City of Oakland that could potentially mitigate the significant inconveniences related to the proposed project that will be experienced by our community. The City of Oakland believes that taking this opportunity to expand recycled water delivery service in the affected area (specifically, the Jack London neighborhood and east Oakland) would mitigate the project inconveniences to our community identified above. CO-9

Specifically, the City of Oakland identifies opportunities for EBMUD to expand recycled water distribution from west Oakland and downtown to the Jack London District (as well as from 5th Avenue to Brooklyn Basin) as part of the proposed project. Expanding the existing recycled water conveyance system from west Oakland to the Jack London district during construction of the proposed project would serve extensive public open space throughout

the Jack London District and at Estuary Park, as well as to up to 665 residential units that are part of the Jack London District project (approved in 2014). There may then be opportunities to convey recycled water via the Embarcadero Bridge to the Brooklyn Basin project, which includes close to 30 acres of parks and 3,165 residential units (approved in 2009). Expanding recycled water conveyance could even, if planned properly, provide future service to Coliseum City, with a projected demand of 46 million gallons of water per year for landscaping at build-out. City of Oakland staff believes that the Jack London neighborhood and east Oakland represent a huge demand for recycled water for EBMUD into the future. In accessing this large market for EBMUD's existing recycled water product, EBMUD would proactively support environmental justice in Oakland by serving our currently underserved population. In short, the City of Oakland believes that expansion of recycled water conveyance is not just mitigation for the inconvenience of implementing the proposed project, but also an opportunity for EBMUD to leverage the proposed project to achieve something greater for all affected communities.

CO-9 cont.

Again, thank you for the opportunity to comment. The City of Oakland looks forward to reviewing the Final EIR once it is available. If you have any questions, please contact **Catherine Payne** at **(510) 238-6168** or **cpayne@oaklandnet.com**.

Sincerely,

Darin Ranelletti, Deputy Director
Environmental Review Officer

Attachments
cc: File; Robert Merkamp; Catherine Payne; Ed Kawamoto; Daniel Hamilton; Sarah Fine; Lily Soo Hoo

2.10.1 Response CO-1

The comment is noted. The proposed project's temporary traffic impacts are addressed in Section 3.13 of the Draft EIR (page 3.13-1). Implementation of Mitigation Measures Traffic-1 through Traffic-3 in the Draft EIR (pages 3.13-40 through 3.13-42 and 3.13-44) would minimize traffic impacts on heavily used Oakland streets. Mitigation Measure Traffic-1 requires EBMUD to prepare and implement a CTMP that includes comprehensive traffic control and traffic safety measures. Mitigation Measure Traffic-2 requires EBMUD to maintain a minimum of one southbound lane of traffic on Madison Street, between 8th Street and 5th Street during construction, and Mitigation Measure Traffic-3 requires a flag person at specific unsignalized intersections at Crossing #1 and #3. While impacts to designated truck routes are not specifically called out in the Draft EIR, the CTMP required under Mitigation Measure Traffic-1 includes several measures that would facilitate truck travel on established routes. Such measures include implementation of appropriate barriers or cones between vehicles and construction areas, use of flaggers, timing construction-related deliveries to non-peak hours to avoid even more trucks on the road at the times of greatest congestion, repairing asphalt damage, amongst others.

Section 3.12 of the Draft EIR (page 3.12-1) addresses the potential temporary recreational impacts of the proposed project. The reduced accessibility to Estuary Park and potential for direct impacts to park features from construction activities was identified as a potentially significant impact to recreationalists in the Draft EIR (page 3.12-13); however, the entry pit for HDD and open trench construction would be located within a paved access roadway and parking lot in Estuary Park and not in the sports fields or viewing areas of the park. Mitigation Measure Recreation-1 and Recreation-2 in the Draft EIR (page 3.12-15) requires coordination with the City of Oakland and site restoration after construction. Active areas and shoreline within Estuary Park used for pickup games, picnicking, exercise, and water viewing would not be directly impacted by project construction because the fields and the shoreline would remain open during all construction activities. As stated in the Draft EIR (page 3.12-13), "the HDD pit and associated staging would occupy up to 2,500 square feet or 0.06 acre, which represents a very small portion of the 7.7-acre Estuary Park."

It is acknowledged that the park was designed by Lawrence Halprin and that the City of Oakland wants to protect their ability to maintain the park's relevance into the future as both a recreation and landscape design resource. Once construction of the proposed project is completed, the pipeline would be underground, within an alignment where EBMUD has historic property rights. The pipeline would not have permanent visual or recreational impacts to Estuary Park or its recreational or design legacy.

2.10.2 Response CO-2

EBMUD appreciates the additional information provided regarding the Lake Merritt Bay Area Rapid Transit (BART) Bikeways Project. The Bikeways Project is a component of the Phase I circulation improvement strategy in the Lake Merritt Station Area Plan, which was considered in the cumulative projects analysis in the Draft EIR (page 5-38). The cumulative impact analysis

in the Draft EIR (pages 5-39 through 5-43) found that the proposed project's contribution to cumulative transportation and traffic impacts would be less than significant for Crossing #1.

The traffic impact assessment presented in Section 3.13 of the Draft EIR (page 3.13-1) accounts for the planned roadway reconfiguration. The Lake Merritt BART Bikeway Project may include a reduction in travel lanes along Madison and Oak Streets in Oakland in order to stripe in bike lanes. The traffic analysis identified potentially significant intersection impacts on Jackson Street due to full road closures on Madison Street during construction. Mitigation Measure Traffic-2 in the Draft EIR (page 3.13-41) requires that one traffic lane be maintained open along Madison Street between 8th and 5th Streets, which was shown in the traffic modeling to reduce significant impacts to less-than-significant levels. Even with new Class II bikeway lanes and reduced lanes of traffic along Madison Street due to new bike lane striping, one lane of traffic could remain open. The new Class II bicycle lanes; however, would likely need to be temporarily closed to accommodate one lane of traffic and project construction. The analysis and effectiveness of the mitigation for traffic LOS, presented in the Draft EIR (pages 3.13-24 through 3.13-27), is accurate and adequate because one lane of traffic could still remain open along Madison Street from 5th Street to 8th Street even after implementation of the Bikeway Project.

The Lake Merritt BART Bikeway Project also includes new bike lanes on Oak Street, as previously mentioned. Oak Street was included in the traffic modeling as a vehicular traffic detour route due to closure of Madison Street from 5th Street to 2nd Street. The traffic modeling presented in the Draft EIR (pages 3.13-23 through 3.13-27) and Figure 3.13-2 (page 3.13-28), was performed assuming only one lane of vehicle travel in either direction from Embarcadero to 2nd and Oak Streets as well as along Oak Street from 2nd to 5th Streets, as interim bike lanes had already been installed at the time of the Draft EIR analysis. The reduced lanes of travel; therefore, were already accounted for in the modeling. The modeling presented in the Draft EIR is adequate and already considers reduced lanes of travel.

2.10.3 Response CO-3

As stated in the Draft EIR, Section 2.10 (page 2-35), EBMUD would be required to obtain permits for work that encroaches on city streets. As part of the encroachment permit process, EBMUD would coordinate repaving and street restoration requirements with the City of Oakland.

2.10.4 Response CO-4

Bike lanes would need to be temporarily closed, including any new bike lanes that may be installed along Madison Street between 2nd and 8th Streets as part of the Lake Merritt BART Bikeways Project discussed under Response CO-2. The establishment of bicycle detour routes called out in Mitigation Measure Traffic-5 in the Draft EIR (page 3.13-42) encompasses the City's concerns regarding bicycle safety; however, the need for greater specificity in the measure is acknowledged. Mitigation Measure Traffic-1 of the Draft EIR (page 3.13-41) requires that the

CTMP include …13. Detours for cyclists and pedestrians when bike lanes or sidewalks must be closed."

The following edits have been made to Mitigation Measure Traffic-1 of the Draft EIR to provide more specificity and details in the requirements for detour routes, per the City's suggestion:

> 13. Detours for cyclists and pedestrians when bike lanes or sidewalks must be closed. Bicycle detour routes, if designated on roads that currently do not have a signed or striped bikeway, shall incorporate safety measures consistent with the California Manual on Uniform Traffic Control Devices for temporary bike detours in coordination with the City of Oakland and City of Alameda.

Mitigation Measure Traffic-1 requires that EBMUD submit the CTMP to the City of Oakland for review and approval prior to construction.

2.10.5 Response CO-5

Table 3.12-1 in the Draft EIR (page 3.12-1) is revised as follows to clarify that HDD construction would be located within the paved access roadway and parking lot for Estuary Park.

Table 3.12-1 Recreational Facilities within 1,000 feet of the Proposed Project Area

Name of Recreational Facility	Location	Managing Agency	Facilities	Location in Relation to Proposed Project
Crossing #1				
Estuary Park	Oakland	City of Oakland Department of Parks and Recreation	• Large play field • Benches	~~Adjacent to the location where HDD construction would occur~~ The HDD pit is located within a paved access roadway and the Estuary Park parking lot.

2.10.6 Response CO-6

Project related impacts to Estuary Park would be temporary. As described in Impact Recreation-2 in the Draft EIR (page 3.12-12), the entry pit for HDD and open trench construction would be located within a paved access roadway and parking lot in Estuary Park. The HDD pit and associated staging would occupy up to 2,500 square feet or 0.06 acre, which represents less than 1 percent of the 7.7-acre Estuary Park. Figure 5.1-2 in the Draft EIR (page 5-37) illustrates the approximate location and size of the primary work area for Crossing #1 within Estuary Park. Active areas and shoreline within Estuary Park used for pickup games, picnicking, exercise, and water viewing would not be directly impacted by project construction because the fields and the shoreline would remain open during all construction activities. Use of the park would not be altered.

As described in Section 3.12: Recreation of the Draft EIR (page 3.12-12), sufficient capacity is available at other local and regional parks to temporarily accommodate park users

inconvenienced by the indirect impacts from the proposed project. The Draft EIR identifies that there are 122 local parks within the City of Oakland and 64 regional parks. Temporary construction of the proposed project would not cause a substantial increase the use of existing neighborhood and regional parks or other recreational facilities resulting in substantial deterioration of other recreational facilities because the degree of diverted recreation is anticipated to be minimal since the proposed project would not affect the ball fields or shoreline access. The impact was found to be less than significant.

The proposed project would not permanently alter the design, cultural significance, or use of Estuary Park, nor significantly limit the City in its future design options across the park, since once the project is constructed, it would be located entirely underground. Following construction, the paved roadway and parking lot would return to its pre-construction conditions. The proposed project's impacts on the future design of the park are presented in the Cumulative Analysis in Section 5 of the Draft EIR (page 5-35). Figure 5.1-2 in the Draft EIR (page 5-37) shows the project HDD pit in relation to the future design, were construction to occur after the park had been redesigned. The proposed project would not impact or limit the design features of the current or planned park design.

2.10.7 Response CO-7

The comment is noted. While the transportation-related inconvenience of constructing a linear pipeline cannot be avoided, the Draft EIR traffic impact analysis (pages 3.13-23 through 3.13-27) identifies the following mitigation measures that would be applicable to work in Oakland that would reduce impacts. Mitigation Measures Traffic-1 (Construction Traffic Management Plan), Traffic-2 (Traffic Control), Traffic-3 (flag-persons at un-signalized intersection), and Traffic-5 (minimize impacts to pedestrian, bicyclists, and people using public transit) would ensure that the level-of-service (LOS) and other impacts on traffic, including along the detour routes, would be reduced to less than significant levels, and that bicycle and pedestrian safety and emergency access are maintained. The proposed project has been designed to be completed as efficiently as possible and impacts to any single section of street would generally last approximately seven days. Construction timeframes can be found in the Draft EIR (pages 2-31 to 2-32).

2.10.8 Response CO-8

The comment is noted. EBMUD would implement Mitigation Measure Noise-1 in the Draft EIR (page 3.11-41) to reduce noise impacts to the degree feasible; however, significant and unavoidable temporary construction noise impacts would remain following application of the mitigation measure. The proposed project has been designed to be completed as efficiently as possible. Construction timeframes can be found in the Draft EIR (pages 2-31 to 2-32). Most construction-related, significant unavoidable noise in front of individual residences and businesses would be temporary and limited to approximately seven days at any given location (Draft EIR page 3.11-22). The exception would be significant and unavoidable noise resulting from HDD activities at Crossing #3, which would last the duration of HDD activities.

2.10.9 Response CO-9

The comment is noted. CEQA requires that a project proponent mitigate for potentially significant impacts to specific environmental factors, such as noise or traffic (see CEQA Guidelines Section 1526.4). Mitigation should be focused. To be effective, mitigation must specifically target the major impacting factors, area of influence, and resources affected that were identified during the impact assessment. Mitigation should also be proportionate to the significance of the impact: it should be scaled to the impact magnitude and impact significance [see CEQA Guidelines Section 1526.4 (4) (B)].

The suggested mitigation is not appropriate for the type, scale, and significance of impacts that the proposed project would generate. The proposed project would not generate any long term impacts to water supply that would merit mitigation that includes an expansion of the recycled water distribution system. Furthermore, such a proposal would be inappropriate as mitigation due to its scale and it would generate its own environmental impacts that would need to be assessed under CEQA. An expanded recycled water distribution system would be an independent project requiring its own proposal and CEQA review. It is not appropriate for it to be included as part of the proposed project.

Aside from the proposed project, EBMUD's Policy 9.05 requires that customers use non-potable water, including recycled water, for non-domestic purposes when it is of adequate quality and quantity, available at reasonable cost, not detrimental to public health and not injurious to plant, fish and wildlife to offset demand on EBMUD's limited potable water supply. EBMUD's goal is to recycle 20 millions of gallons of water per day by the year 2040. EBMUD has identified a portfolio of recycled water projects that could be implemented to meet that goal, depending on the availability of funding, customer demands, and other factors. EBMUD's plan is to identify and implement the most cost-effective recycled water projects to meet its recycled water goal. Some of these projects would require the construction of new treatment facilities, while others would involve expanding the distribution systems for existing projects to reach additional customers.

The City of Oakland's comment discusses opportunities for EBMUD to expand recycled water distribution from west Oakland and downtown to the Jack London District (as well as from 5th Avenue to Brooklyn Basin). Future phases of EBMUD's East Bayshore Recycled Water Project will involve expanding the distribution system to serve additional customers in Oakland, which could potentially include parts of downtown Oakland and the Jack London District and nearby areas. In the next year, EBMUD will commence work on a Recycled Water Master Plan aimed at identifying changed conditions and new recycled water users since the last plan was completed in 2000. Customer demands and locations have changed due to redevelopment. The Recycled Water Master Plan will also evaluate transmission and distribution capacities and alignments needed to provide services to the potential customers. The results of the Recycled Water Master Plan, which is expected to be complete in 2017, may affect how EBMUD implements future phases of the East Bayshore Recycled Water Project. EBMUD will reach out to stakeholders, including the City of Oakland, as part of the process.

The City of Oakland comment also discusses the potential for recycled water to be delivered to the planned Coliseum City Specific Plan area. The Coliseum City Specific Plan area is located within EBMUD's San Leandro Recycled Water Project area which currently serves golf courses and other sites. The size and nature of the proposed development will present several opportunities for the use of recycled water for landscape irrigation, commercial and industrial process uses, toilet and urinal flushing in sports arenas and other applications. As part of the preparation of the Recycled Water Master Plan, EBMUD will investigate expanding the existing recycled water infrastructure or constructing a localized satellite facility that treats onsite wastewater to provide recycled water to the Coliseum City Specific Plan area. The existing San Leandro Recycled Water Project could potentially expand in the future should the treatment level be upgraded to a tertiary level and if additional distribution pipelines are extended towards the Coliseum City Specific Plan area. EBMUD recommends that the City of Oakland and its developers maintain continued coordination and consultation with EBMUD as they plan and implement the various developments as identified within the Coliseum City Specific Plan area regarding the feasibility of providing recycled water for appropriate non-potable uses.

2.11 BOB RITTER

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Alameda & Bay Farm Island Environmental Impact Report (EIR) Comments
Robert J. Ritter, P.E. August 15, 2016

Pursuant to Sections 15128 and 15083 (a) of the CEQA Guidelines, this Draft EIR analyzes only the potentially significant effects identified in the Initial Study prepared for the proposed project. The resources include:

1. Aesthetics
2. Air Quality
3. Biological Resources
4. Cultural Resources
5. Energy Use
6. Geology, Soils, and Seismicity
7. Greenhouse Gas Emissions
8. Hazards and Hazardous Materials
9. Hydrology and Water Quality
10. Noise
11. Recreation
12. Transportation and Traffic

EBMUD Standard Practices

EBMUD uses two primary Engineering Standard Practices for the design of water pipelines in its distribution system to address geologic hazards. 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. Engineering Standard Practice 550.1 Seismic Design Requirements addresses seismic design of the pipelines to withstand seismic hazards including fault rupture, ground shaking, liquefaction-related phenomena, landslides, seiches, and tsunamis and requires that EBMUD establish project specific seismic design criteria for pipelines with a diameter of greater than 12-inches, such as the water mains that would be installed under the proposed project.

Comments regarding Pipeline Materials [Corresponding Resources Effected]:
Open-Trench Segment

- 10,000 feet of 24-inch steel pipe is planned for the 'open-trench' segment
- Steel pipe joints are to be welded
- Steel pipe is mortar-lined and plastic coated to **limit** corrosion & tuberculation
- Steel pipe also require anodes to **limit** corrosion

Potentially Significant Effects:

- Welding steel requires more energy to weld than to fuse High-density Polyethylene (HDPE) [5] — BR-1
- In-trench welding of steel every 40 or 50 feet requires a wider trench – HDPE is fused above ground then pulled into a narrower trench [2, 5, 10, 12] — BR-2
- The mortar lining and plastic coating do not extend to the end of the pipe segments to enable the welding together – therefore, once welded the mortar lining on the inside and plastic coating on the outside need to be reconstituted [5, 10, 12] — BR-3
- In-field reconstitution of the lining & coating are subject to diminished quality when compared to factory installation [9] — BR-4
- Additional corrosion protection of the steel pipe is still required via the use of sacrificial anodes – Per the EIR, anodes require replacement about once every 25 years, thus holes will need to be dug to allow workers access enabling anode replacement [5, 10, 12] — BR-5

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The EIR also states HDPE pipeline would **NOT** require cathodic protection. Nor does HDPE pipe require lining or coating. Why use 'old school' steel pipe where you **must attempt to limit corrosion**? BR-6

Underwater Crossings
Per the Crossings Master Plan – Ground shaking in the project area during future earthquakes in the region will be strong enough to cause liquefaction and related effects (e.g., lateral spreading) in relatively shallow depths (less than 50 feet), in loose saturated silts and sands including Young Bay Mud and some artificial fills.

HDPE pipe has been chosen for the underwater crossings. The design calls for a 200 foot steel pipe casing for the HDPE pipe where it transitions from near the surface down through Young Bay Mud into the deeper Older Bay Mud. Additionally, the HDPE pipe will be grouted inside the steel casing. The design also calls for eight foot diameter jet grouted columns every 20 feet to support the steel casing.

Potentially Significant Effects: BR-7

- All of the Potentially Significant Effects of the Open-Trench Segment of Steel Pipe also apply to this steel casing
- Additionally, accessing the underwater anodes for replacement is probably more difficult
- Even though the bottom of the columns extend into the Older Bay Mud, if the top ends of the columns located in the Young Bay Mud were to move during a seismic event the steel pipe could bend, and/or kink, and/or break collapsing the HDPE pipe [9]

Per the Crossings Master Plan – Mitigation Methods for Reducing Pipeline Vulnerabilities
Alice Street Channel Pipeline Crossing

Pipe Replacement. Heavy wall and corrosion protected welded steel pipe generally has better seismic performance versus cast iron pipe. However, under the relatively large Permanent Ground Deformations (PGDs) postulated for this site, the integrity of thin-walled steel pipe (as commonly used by the District) could not be assured if the pipe is simply placed in the same trench as the old cast iron pipe. Instead, a heavy wall (about 0.5 inch) butt welded steel pipe, with suitable corrosion protection, would likely be required, and the trench would require a combination of CDF (CLSM) and sand layers for anchorage purposes, to protect both the new and non-replaced original pipe. Due to the high levels of potential PGDs (over 5 feet), the use of "chained" ductile iron pipe (such as manufactured by Kubota of Japan) might be considered, as part of the final design process, but may be impractical due to cost. BR-8

Comments
The evaluation of pipe materials was made between welded steel versus cast iron pipe. While these pipe materials may have been the EBMUD Standard Practices materials of choice at project conception, HDPE pipe is rapidly becoming the pipeline material of choice at EBMUD in the last couple of years but was not considered for the application. If a casing is still desired, make it an HDPE pipe casing. BR-9

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HDPE pipe has proven to withstand large seismic events. How many of you have seen coils of yellow pipe on PG&E trucks?

- That pipe is joined by what is commonly known as hot plate welding
- Since the joints are fused & it all becomes one piece, there is no leakage
- 96% of all natural gas distribution lines in the US and worldwide are Polyethylene

Regarding HPDE's survivability through an extreme seismic event **there were NO Polyethylene pipeline failures** in the:

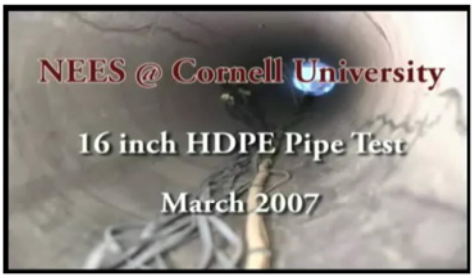
- 1989 Loma Prieta earthquake
- 1995 Kobe earthquake
- 2011 Christ Church earthquake
- 2014 Northridge earthquake
- 2015 Chile earthquake

BR-10

Because Polyethylene pipe can bend & does NOT leak is precisely why it is used for natural gas distribution.

HDPE pipe without any additional casing is better suited for the transitions from near the surface down through Young Bay Mud into the deeper Older Bay Mud because Polyethylene pipe can bend & does NOT leak.

See the Cornell University Seismic Test on 16" HDPE pipe below. (PowerPoint Video attached)



The test laterally shears the buried pipe four feet. The HDPE pipe's toughness and flexibility allow the pipe to bend without collapsing remaining fully functional.

Allowable Leakage

Allowable Leakage, PVC Gasketed Pipe – **Allowed** (Attached)
Allowable Leakage, HDPE Fused Pipe – **None** (Attached)
As is with the steel pipe, the use of "chained" ductile iron pipe is 'old school'. Ductile iron pipe joints are gasketed. Gasketed pipelines per the American Water Works Association (AWWA) have 'allowable' leakage rates, whereas HDPE doe NOT have 'allowable' leakage rates.

BR-11

While some agencies do not accept 'allowable' leakage during the leak testing of a new pipeline, the gaskets will leak over the lifetime of the pipeline. Not only is there loss of water and associated revenues, there is a potential for property damage.

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Green Infrastructure
HDPE Pipe has a significantly lower Carbon Footprint

Category	Steel	HDPE
• Manufacturing Temperatures	1,600°F	< 450°F
• Lining	Yes	N/A
• Coating	Yes	N/A
• Shipment	94 Lbs / Ft	66 Lbs/Ft
• Handling	Heavier/Stronger Equip	-
• Joining	Weld, Line & Coat	Fuse

BR-12

Conclusions
Crossings Feasibility Study examined:

- In terms of major risks
- The best trenchless construction methods to reduce those risks
- While maximizing survivability and minimizing repair-related water service outages following a major seismic event

Jet grouted columns are **intended** to strengthen the steel casing through the Young Bay Mud into the **less liquefiable** Older Bay Mud.

Horizontal Directional Drilling (HDD) with jet-grouted soil improvements is the selected construction method based on total cost and robustness against failure. The Info-Gap analysis also indicates that **three reliable crossings provide adequate redundancy** and are very robust against failure due to anticipated external events such as a major earthquake. The planned crossings at Fallon Street near Estuary Park (Alternative1D), Blanding (Alternative 3A) and Bay Farm #2 (Alternative 2) are geographically separate, **significantly reducing the likelihood of multiple failures** during a single earthquake

Risks:

- Steel pipe enhancements, Lining, Coating & sacrificial anodes, strive to **limit** corrosion & tuberculation
- Any Lining or Coating discontinuities enable a concentration of electrolysis & accelerated corrosion
- Steel pipe requires maintenance & repair
- Steel pipe casings at Crossing transitions require support columns that can be compromised by lateral spreading during a seismic event

BR-13

While redundancy is good, why install steel pipe that is too heavy, requires support, is prone to weaken due to corrosion, and could be the initiator of multiple failures?

BR-14

HDPE was chosen for the Crossings, the most challenging pipeline segments! HDPE is NOT specified for the Open-Trench Segments. Why not?

BR-15

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HDPE has been proven to withstand extreme seismic events. Why is extra protection of the HDPE pipe specified when, in fact, the extra protection could become the cause of the HDPE pipeline failure? BR-16

Total Life Cycle Costs
Life Cycle Analysis of Water Networks, Commonwealth Scientific and Industrial Research Organization (CSIRO) (Attached)

HDPE has the lowest total life cycle maintenance/repair costs of all water pipeline materials. HDPE piping characteristics include:

- Seismic Stability
- Corrosion Resistance
- Leak Free Joints
- No Infiltration (Contamination)
- Crack Resistance
- Greater Than 100 Year Service

Regarding the Evaluation of the Pipeline: BR-17

- Materials
- Maintenance
- Repairs
- Green Infrastructure
- Total Life Cycle Costs

Steel Pipe presents added risks at addition costs.

HDPE Pipe can readily transition to Alameda's and Oakland's existing pipeline materials. HDPE is the preferred pipeline material of choice!

Attachments:

- Cornell University Seismic Test on 16" HDPE pipe
- Allowable Leakage, PVC – **Allowed**
- Allowable Leakage, HDPE – **None**
- Life Cycle Analysis of Water Networks, Commonwealth Scientific and Industrial Research Organization (CSIRO)

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2.11.1 Responses BR-1 through BR-17

See Master Response 1.

2.12 JANET LIBBY

Hope, Aaron

From: Janet Libby [redacted]
Sent: Friday, July 08, 2016 8:44 AM
To: Alameda Crossings Project
Subject: Large water pipeline

I live on Broadway in Alameda and received flyer about pipeline. What does temporary pipeline lay down mean? The pipeline will not be above ground will it? Anxious for explanation. JL-1
Thanks

Sent from my iPhone

6

2.12.1 Response JL-1

An explanation of temporary pipeline laydown can be found in Section 2: Project Description of the Draft EIR (page 2-18). HDPE pipelines would be pulled underneath the Oakland Inner Harbor, Tidal Canal, and San Leandro Bay Channel using HDD. In order to install the pipeline, HDPE pipeline segments would need to be temporarily staged above ground, linked or fused together, and pressure tested. Temporary pipeline laydown refers to the placement of the HDPE pipeline above ground on city streets. For Crossing #3, the HDPE pipeline would be temporarily placed on Broadway in Alameda for the 2 weeks needed to assemble, fuse, and pressure test the pipeline, after which the pipeline would be pulled into its final underground location underneath the Tidal Canal. Once installed, no pipeline would be located above ground. The connection pipelines would also all be installed underground.

2.13 JOAN GALE

Hope, Aaron

From: Joan Gale [redacted]
Sent: Thursday, August 04, 2016 3:44 PM
To: Alameda Crossings Project
Cc: Luong, Laura
Subject: EBMUD Project- Alameda North Bay Farm Island Pipeline Crossings

EBMUD
375 Eleventh Street, Oakland, CA,94607-4240
Attn: Aaron Hope, Associate Civil Engineer

Dear Mr. Hope,
Thank you for your information at the July 28th EIR meeting for the Alameda- North Bay Farm Island Pipeline crossings Project.

As the current President of the Oakland Museum Women's Board that runs the White Elephant Sale at 333 Lancaster Street, I wish to express our concerns regarding the pipeline project's environmental impact.
We use the warehouse at 333 Lancaster Street, Oakland, that extends from Lancaster to Derby along Glascock Street and to the canal. There are 1100 volunteers and thousands of shoppers that come to the warehouse over the year, mostly from January 1 to March 31. We also work there during the rest of the year but usually the second week of the month, including Saturdays. The Derby Street door is a roll-up door that we use for our Moving van 6 days a week ALL year AND donors' cars to come in to drop off donations on the days we are working. We do have a roll-up door on the Lancaster side but our configuration inside would have to be changed in order to use it as our van/donor door.
It would be very disruptive to our organization to have a daytime closure of Derby Street, especially from January 1 to March 31. Our hours are usually from 9am to 3pm (sometimes 4pm). The Van drops off donations between 3-5pm daily. JG-1
Also, the volunteers and shoppers use the local streets to park while in the warehouse and our handicapped spots are on the Derby Street side of the building. A lot of the parking is in the neighborhood, on the Glascock Street, Ford Street and towards the Park Street Bridge. JG-2
Emergency access is imperative at least to the Lancaster end and Glascock side of the building as we have many older volunteers and shoppers. JG-3
Another question for you.. Is there any possible effect on our foundation with the drilling along Derby to the canal? JG-4
I hope this information is taken into account when you are making plans to work on Crossing No.3.

Sincerely,

Joan Gale
President, Oakland Museum Women's Board
[redacted]

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2.13.1 Response JG-1
See Master Response 2.

2.13.2 Response JG-2
See Master Response 2.

2.13.3 Response JG-3
See Master Response 2. Impact Traffic-3 in the Draft EIR (pages 3.13-43 and 3.13-44) addresses the potential impact of inadequate emergency access during construction of the proposed project. EBMUD would be required to implement Mitigation Measure Traffic-6 in the Draft EIR (page 3.13-44), which requires (1) notification of and coordination with emergency response services as well as notification of businesses, commercial offices, and residents located within 300 feet of construction areas prior to road closures; (2) the use of easily removed, temporary barricades; and (3) the removal of barricades and closure of open trenches at the end of the day. With implementation of mitigation measures, emergency access would remain sufficient.

2.13.4 Response JG-4
Impacts to foundations could occur from vibration. Vibration impacts to structures are analyzed in Section 3.11 Noise of the Draft EIR (page 3.11-1). All project-generated ground-borne vibration would be attenuated within 32 feet or less of the vibration source to levels that are below thresholds for cosmetic or structural damage, as discussed in the Draft EIR and demonstrated on Table 3.11-10 (pages 3.11-43 and 3.11-44). Because the source of vibrations would be more than 32 feet from the White Elephant Sale building, no impacts to the foundation of the building from vibration are anticipated. Where buildings could be located within 32 feet or less of construction areas, several measures are included in Mitigation Measure Noise-2 in the Draft EIR (page 3.11-45) that would reduce vibration impacts to less than significant levels, which include vibration monitoring, using less impacting equipment during pavement compaction, avoiding impact drivers where possible, amongst others.

2.14 MOLLY MIRANDA

Hope, Aaron

From: Hope, Aaron
Sent: Friday, July 08, 2016 8:16 AM
To: Alameda Crossings Project
Subject: FW: Timeline for Crossing #2

From: Luong, Laura
Sent: Thursday, July 07, 2016 5:40 PM
To: Hope, Aaron
Subject: FW: Timeline for Crossing #2

Hi Aaron,

Do you want me to respond to these emails and cc alamedacrossings@ebmud.com or you want me to forward these emails to alamedacrossings@ebmud.com?

Thank you!
Laura

From: Molly B. Miranda [redacted]
Sent: Thursday, July 07, 2016 9:54 AM
To: Luong, Laura
Cc: Jorge Miranda
Subject: Timeline for Crossing #2

Hi Laura,

I am an Alameda resident who recently received the mailing about the Alameda-North Bay Farm Island Pipeline Crossings Project. I'm curious, when is crossing #2 scheduled to begin and end? I'm particularly interested in the work on Peach Street, as I live on Peach Street in between Calhoun and Washington. MM-1

I look forward to hearing from you.

Thank you!
Molly Miranda

[redacted]

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2.14.1 Response MM-1

The timing for construction of Crossing #2 is not currently known; however, for the purposes of the Draft EIR analysis, construction of Crossing #2 was assumed to start after 2020 (page 2-31). Construction would be completed before the existing pipelines at Crossings #2 reached the end of their useful lives, which could be several years into the future. Open trench construction would occur on Peach Street and would last about one week in front of any one residence. Figure 2.7-1 in the Draft EIR (page 2-13) provides a schematic representation of how open trench construction would progress along the pipeline alignments.

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3 DOCUMENT REVISIONS

3.1 INTRODUCTION

This chapter presents revisions that have been made to the Draft EIR text. These revisions provide corrections, additions, or clarifications as requested by a specific comment. The text revisions are organized by resource topics, for which revisions were requested. EIR. Single underlined text represents language that has been added to the Draft EIR; ~~text with strikethrough~~ has been deleted from the Draft EIR.

3.2 DRAFT EIR REVISIONS

3.2.1 Project Description

The bullet at the top of page 2-35 in Section 2.9 Permanent Rights-of-Way and Temporary Easements) is revised as follows:

- An approximate 200-foot-long pipeline easement would be required in Towata Park and across from Towata Park near 3342 Bridgeview Isle from the City of Alameda for Crossing #2.

3.2.2 Recreation

Table 3.12-1 on page 3.12-1 is revised as follows:

Table 3.12-1 Recreational Facilities within 1,000 feet of the Proposed Project Area

Name of Recreational Facility	Location	Managing Agency	Facilities	Location in Relation to Proposed Project
Crossing #1				
Estuary Park	Oakland	City of Oakland Department of Parks and Recreation	• Large play field • Benches	~~Adjacent to the location where HDD construction would occur~~ The HDD pit is located within a paved access roadway and the Estuary Park parking lot.

3.2.3 Traffic and Transportation

Every instance that Mitigation Measure Traffic-1 shows up in the Draft EIR, including the Executive Summary (page ES-84), Section 3.13: Transportation and Traffic (page 3.13-40), and Section 7: Draft Mitigation Monitoring and Reporting Plan (page 7-19) is revised as follows:

> Mitigation Measure Traffic-1. Construction Traffic Management Plan. EBMUD shall develop and implement a project-specific Construction Traffic Management Plan (CTMP). EBMUD shall submit the plan to the Cities of Alameda and Oakland and Caltrans (as applicable) for review and approval at least 30 days prior to construction. The CTMP shall conform to the California Manual on Uniform Traffic Control Devices, and shall include provisions for the following…

Additionally, item 13 under Mitigation Measure Traffic-1 is also revised everywhere it appears, as follows:

> 13. Detours for cyclists and pedestrians when bike lanes or sidewalks must be closed. Bicycle detour routes, if designated on roads that currently do not have a signed or striped bikeway, shall incorporate safety measures consistent with the California Manual on Uniform Traffic Control Devices for temporary bike detours in coordination with the City of Oakland and City of Alameda.