

CITY OF ALAMEDA

Alameda General Plan 2040

FINAL ENVIRONMENTAL IMPACT REPORT
SCH # 2021030563

AUGUST 2021



1. INTRODUCTION

1.1 THE FINAL ENVIRONMENTAL IMPACT REPORT

This document is a Final Environmental Impact Report (Final EIR or FEIR) prepared pursuant to the California Environmental Quality Act (CEQA) by the City of Alameda as Lead Agency. Following preparation and publication of a Draft Environmental Impact Report (Draft EIR or DEIR), CEQA requires the Lead Agency to prepare a Final EIR that provides responses to all of the substantive comments on environmental concerns received from public agencies, organizations, and members of the public, along with any revisions to the Draft EIR. Together, the DEIR and FEIR constitute a complete document whose purpose is to inform decision makers about the environmental consequences of approving or denying a proposed development or planning project. An EIR is also intended to identify mitigation measures to eliminate or reduce the severity of all identified significant environmental impacts, and to describe and evaluate alternatives to the proposed project that would meet the basic objectives of the project while avoiding one or more significant impacts of the project. This EIR meets these requirements of CEQA, as set forth in the statute (Public Resources Code, Section 21000 *et seq.*) and in the *CEQA Guidelines* (California Code of Regulations, Section 15000 *et seq.*).

The Draft EIR for the *Alameda General Plan 2040* was published by the City on May 6, 2021 and was distributed to local, regional, and State agencies and interested residents and property owners in the project vicinity. A 50-day public review period during which agencies and members of the public could submit written comments on the adequacy of the DEIR was provided, extending from May 6, 2021 to June 25, 2021.

After considering the Draft and Final EIRs for the proposed project and prior to approving the project, the Lead Agency must certify that the EIR has been completed in compliance with the requirements of CEQA; that the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and that the Final EIR reflects the Lead Agency's independent judgment and analysis. In the case of the *Alameda General Plan 2040*, the City Council

of the City of Alameda will make the final decision on whether to certify the EIR and adopt the proposed General Plan.

Following certification of the EIR and prior to project approval, the Lead Agency must make written findings for each significant effect identified in the EIR, accompanied by a brief explanation for the rationale for each finding. The findings must indicate that (1) changes or alterations have been required in, or incorporated into, the project that would avoid or substantially lessen the significant environmental effect as identified in the Final EIR; (2) such changes to the project are within the jurisdiction of another public agency and the changes have been or can and should be adopted by that agency; or (3) specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR (*CEQA Guidelines*, Section 15091(a)).

The Lead Agency must not approve a project unless all significant environmental effects have been eliminated or substantially lessened, as set forth in the findings described above, and any remaining unavoidable significant effects are found acceptable due to overriding considerations. If the Lead Agency finds that the economic, legal, social, technological, or other benefits of the proposed project outweigh the unavoidable adverse environmental effects, it may find those effects to be acceptable, and make a Statement of Overriding Considerations documenting its specific reasons for the conclusion, as supported by substantial evidence in the record (*CEQA Guidelines*, Section 15093).

When making findings on the significant effects of a project, a Lead Agency is also required by CEQA to adopt a program to monitor and/or report on implementation of each mitigation measure adopted as a condition of approval (*CEQA Guidelines*, Section 15091(d)). The mitigation measures must be fully enforceable through permit conditions, agreements, or other measures. A Mitigation Monitoring and Reporting Program has been prepared for the proposed project and is presented in Appendix A of this document.

1.2 ORGANIZATION AND CONTENTS OF THE FINAL EIR

CEQA requires a Final EIR to contain the Draft EIR, which can be incorporated by reference; revisions to the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; all written and oral comments received on the Draft EIR, either verbatim or in summary; responses of the Lead Agency to all significant environmental points raised in the review and consultation

process; and any other information added by the Lead Agency (*CEQA Guidelines*, Sections 15132, 15150). Accordingly, the *Alameda General Plan 2040 Draft Environmental Impact Report* (SCH#2021030563, May 6, 2021) is hereby incorporated by reference. All other content requirements for a Final EIR are included in this document.

This Final EIR for the *Alameda General Plan 2040* is organized into the following chapters:

1. Introduction
2. Responses to Comments
3. Text Changes to the DEIR

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2. RESPONSES TO COMMENTS

This chapter contains all of the written comments received by the City of Alameda on the *Alameda General Plan 2040 Draft Environmental Impact Report* and presents the City's responses to each of the substantive comments submitted by public agencies and members of the public. Written comments were received during the 50-day public review period, which extended from May 6, 2021 to June 25, 2021.

According to the State Clearinghouse, the State public agencies that reviewed the Draft EIR included the following:

- California Natural Resources Agency
- California Department of Conservation (DOC)
- California Department of Fish and Wildlife, Region 3 (CDFW)
- California Fish and Game Commission
- California Department of Parks and Recreation
- California Department of Forestry and Fire Protection (CAL FIRE)
- California Department of Water Resources (DWR)
- California Highway Patrol (CHP)
- California Governor's Office of Emergency Services (EOS)
- California Department of Transportation (Caltrans), District 4
- California Department of Transportation (DOT), Division of Aeronautics
- California Department of Transportation (DOT), Division of Transportation Planning
- California Department of Education
- California Department of General Services
- California Public Utilities Commission (CPUC)
- San Francisco Bay Conservation and Development Commission (BCDC)
- California Air Resources Board, Transportation Projects (ARB)
- California Regional Water Quality Control Board, Region 2 (RWQCB)
- California State Water Resources Control Board (SWRCB), Division of Drinking Water
- California State Water Resources Control Board (SWRCB), Division of Water Quality

- California State Water Resources Control Board (SWRCB), Division of Financial Assistance
- California Department of Toxic Substances Control (DTSC)
- California Department of Resources Recycling and Recovery (CalRecycle)
- California Native American Heritage Commission (NAHC)
- Office of Historic Preservation (OHP)
- California State Lands Commission (SLC)

The City received comment letters from the California Department of Transportation (Caltrans) and the East Bay Municipal Utility District (EBMUD). One local organization submitted a comment letter: the Alameda Architectural Preservation Society. A number of emails were received from four private citizens. All of the comment letters/emails are reproduced in this chapter, followed by the City's responses to the submitted comments. Consistent with the requirements of the California Environmental Quality Act (CEQA), the responses to comments focus on questions raised related to the adequacy of the environmental analysis of the proposed project that was presented in the DEIR. Some comments address issues unrelated to the potential environmental impacts of the project or the adequacy of the DEIR. Although these comments are acknowledged, detailed responses to such comments have not been provided.

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

***.dot.ca.gov

*Making Conservation
a California Way of Life.*

June 25, 2021

SCH #: 2021030563
GTS #: 04-ALA-2021-00588
GTS ID: 22404
Co/Rt/Pm: AL/61/20.13Andrew Thomas, Senior Planner
City of Alameda
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501**Re: Alameda General Plan 2040 + Draft Environmental Impact Report (DEIR)**

Dear Andrew Thomas:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Alameda General Plan 2040 project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the May 2021 DEIR.

Project Understanding

Alameda General Plan 2040 is a statement of goals, objectives, policies and actions to guide and manage change to the physical, environmental, economic, and social conditions in Alameda, California. Alameda General Plan 2040 is an update to the Alameda General Plan, which was last comprehensively updated in 1991. The update does not include an update to the Housing Element, which will be updated in 2022. The General Plan and the associated policies and actions in each element provide a policy framework to guide future decisions to achieve four overarching themes: 1) to promote a healthy, equitable and inclusive city, 2) to protect the environment, respond to the climate crisis and meet regional responsibilities, 3) to enhance mobility and accessibility, and 4) to preserve and enhance Alameda's distinctive character.

Lead Agency

As the Lead Agency, the City of Alameda is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN), including State Route (SR)-61. The project's fair share contribution, financing,

scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access and Standards

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Please ensure that all lane widths, sidewalk widths, and other roadway design must be in accordance to Caltrans standards.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov.

Sincerely,



MARK LEONG
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Letter A

California Department of Transportation (Caltrans)

Thank you for your letter regarding General Plan 2040, the General Plan EIR, and the State of California transportation facilities. Your letter will be transmitted to the Alameda Planning Board and City Council for their consideration prior to their final decisions on the General Plan update and associated Environmental Impact Report.

The City of Alameda is committed to managing growth consistent with State of California General Plan and Housing Law, and the City is committed to ensuring that all future growth that may occur as the result of State housing mandates or economic development objectives are consistent with the Bay Area's State-mandated Sustainable Communities Strategy, *Plan Bay Area*, and the Regional Transportation Plan, and that those developments are appropriately evaluated and mitigated consistent with the California Environmental Quality Act and the Americans with Disabilities Act.

The City of Alameda appreciates its productive partnership with Caltrans over the last 20 years and looks forward to working in coordination with Caltrans for the next 20 years.

June 11, 2021

Andrew Thomas, Planning, Building, and Transportation Director
City of Alameda
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Re: Notice of Availability of Draft Environmental Impact Report – Alameda General
Plan 2040, Alameda

Dear Mr. Thomas:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Alameda General Plan 2040 located in the City of Alameda (City). EBMUD commented on the Notice of Preparation (NOP) of a Draft EIR for the project on August 27, 2020 and on April 19, 2021 following the second publication of the NOP. EBMUD's original comments (see enclosure) still apply regarding water service, water conservation, water recycling, and wastewater planning. EBMUD has the following additional comments.

WATER SERVICE

EBMUD cannot maintain water mains and services installed under pervious pavement; therefore, an alternative to pervious pavement would be required if installation of EBMUD water mains or services on site is required.

WASTEWATER SERVICE

EBMUD's Main Wastewater Treatment Plant (MWWTP) and interceptor system are anticipated to have adequate dry weather capacity through 2040 to accommodate increased wastewater flows from the City of Alameda. However, wet weather flows are a concern. The East Bay regional wastewater collection system experiences exceptionally high peak flows during storms due to excessive infiltration and inflow (I/I) that enters the system through cracks and misconnections in both public and private sewer lines. The Draft EIR describes that the City of Alameda joined the EBMUD Regional Private Sewer Lateral Program in 2011, and "takes responsibility for replacement of the lower portion of the lateral (within the public right-of-way) when the public sewer main to which it is connected is rehabilitated or replaced, or if the lower lateral fails, whichever occurs first."

EBMUD has the following comments on the Draft EIR relevant to wastewater infrastructure.

Under the “Wastewater Collection and Treatment” Section:

- Under the “Treatment” Section – The preferred acronym for the Main Wastewater Treatment Plant is MWWTP, not WWTP. The updated current population for the wastewater service area is 740,000, not 685,000. The storage basin provides operational flexibility to manage peak flows (do not need to specify 415 MGD). The average annual flow rate to the MWWTP varies each year and is approximately 60 MGD. EBMUD generates approximately 75,000 wet tons of biosolids each year. Consider removal of the mention of alternative daily cover (ADC) as a biosolids end use since the General Plan is for 2040, and ADC is being phased out in the near-term due to Senate Bill 1383.
- Under the “Collection” Section – On Alameda Island and Bay Farm Island, EBMUD owns 7 pump stations, 6.7 miles of gravity interceptors, and 4.7 miles of force mains. The Point Isabel Wet Weather Facility is located in Richmond, not El Cerrito. Figure US-5 cuts off wastewater infrastructure located on the western side of Alameda. In Figures US-5 and US-6, some force mains are mislabeled as interceptors.

Under the “Impact 7-1” Section – The Draft EIR makes simplified assumptions and calculations regarding EBMUD’s primary and secondary treatment capacity. Capacity is a complex function of multiple factors, including chemical composition and flow of influent wastewater, physical constraints, and operational factors. There are two types of capacity limitations: hydraulic and solids loading. The Draft EIR only mentions hydraulic capacity. Each step in the wastewater treatment process (not just primary and secondary treatment) has capacity limitations, which may vary throughout the year depending on internal and external factors.

EBMUD’s population estimates from 2020 through 2040 are different from those in the Draft EIR. EBMUD uses population data published in the Plan Bay Area Projections 2040, which is a statistical companion to Play Bay Area 2040, adopted by the Association of Bay Area Governments and the Metropolitan Transportation Commission in July 2017. For 2020, the population of Alameda is 67,853, which is 9% of the wastewater service area’s population. For 2040, the population of Alameda is 71,685 and the population of the wastewater service area is 942,415. The assumption made in the Draft EIR to include the entire City of Richmond in the 2040 population is overly conservative, as the portion of Richmond that lies within the wastewater service area – referred to as the Richmond Annex – makes up only 6% of Richmond’s total population. EBMUD recommends rounding all population data to reduce the number of significant figures.

Under the “Impact 7-3” Section – See comments above under the “Impact 7-1” Section. Consider removal of discussion about the FY20-24 budget, as the General Plan is for 2040.

Under the “Impact 7-4” Section – See comments above under the “Impact 7-1” Section.

WATER RECYCLING

EBMUD also requests that an estimate of expected water demand for feasible recycled water uses be provided for each specific project. When development plans are finalized, the project sponsor should contact EBMUD's New Business Office and request a water service estimate to determine applicant costs and conditions for providing recycled water service including the installations of recycled water main extensions needed to serve proposed developments within the General Plan. Engineering and installation of recycled water mains and services require substantial lead time, which should be accounted for in the project sponsor's development schedule.

If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Sincerely,



David J. Rehnstrom
Manager of Water Distribution Planning

DJR:JRK:djr
sb21_120 Alameda General Plan 2040 DEIR response letter

Enclosure



April 19, 2021

Andrew Thomas, Planning, Building, and Transportation Director
City of Alameda
Planning, Building, and Transportation Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Re: Notice of Preparation of an Environmental Impact Report – Alameda General Plan
2040, Alameda

Dear Mr. Thomas:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Notice of Preparation of an Environmental Impact Report (EIR) for the Alameda General Plan 2040 in the City of Alameda. EBMUD commented on an earlier Notice of Preparation of an EIR for the General Plan on August 27, 2020. EBMUD's original comments (see enclosure) still apply.

If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Sincerely,

A handwritten signature in blue ink that reads 'David J. Rehnstrom'.

David J. Rehnstrom
Manager of Water Distribution Planning

DJR:VDC:djr
sb21_079

Enclosure



August 27, 2020

Andrew Thomas, Planning, Building, and Transportation Director
City of Alameda, Planning, Building, and Transportation Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Re: Notice of Preparation of an Environmental Impact Report -- Alameda General Plan
2040, Alameda

Dear Mr. Thomas:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Alameda General Plan 2040 in the City of Alameda (City). EBMUD has the following comments.

GENERAL

Pursuant to Section 15155 of the California Environmental Quality Act (CEQA) Guidelines and Sections 10910-10915 of the California Water Code, if any individual project within the General Plan area meets the threshold requirement for a Water Supply Assessment (WSA), then a WSA will be required and a written request submitted to EBMUD to prepare a WSA. EBMUD requires the project sponsor to provide water demand data and estimates for the project site for the analysis of the WSA. Please be aware that the WSA can take up to 90 days to complete from the day on which the request is received.

WATER SERVICE

Effective January 1, 2018, water service for new multi-unit structures shall be individually metered or sub-metered in compliance with California State Senate Bill 7 (SB-7). SB-7 encourages conservation of water in multi-family residential, mixed-use multi-family and commercial buildings through metering infrastructure for each dwelling unit, including appropriate water billing safeguards for both tenants and landlords. EBMUD water services shall be conditioned for all development projects that are subject to SB-7 requirements and will be released only after the project sponsor has satisfied all requirements and provided evidence of conformance with SB-7.

EBMUD's Central Pressure Zone, with a service elevation range between 0 and 100 feet, serves the City. Main extensions that may be required to serve individual projects within the General Plan area to provide adequate domestic water supply, fire flows, and system redundancy will be installed at the project sponsor's expense. Pipeline and fire hydrant

relocations and replacements, due to modifications of existing streets, and off-site pipeline improvements, also at the project sponsor's expense, may be required depending on EBMUD metering requirements and fire flow requirements set by the local fire department. When development plans are finalized, individual project sponsors should contact EBMUD's New Business Office and request a water service estimate to determine costs and conditions of providing water service to their projects within the General Plan area. Engineering and installation of new and relocated pipelines and services require substantial lead time, which should be provided for in the project sponsor's development schedule.

A minimum 20-foot wide right-of-way is required for installation of new and replacement water mains. Additional utilities installed in the right-of-way with the water mains must be located such that the new water mains meet the minimum horizontal and vertical separation distances as set forth in the California (Waterworks Standards) Code of Regulations, Title 22, Section 64572 (Water Main Separation) and EBMUD requirements for placement of water mains within a right-of-way. The minimum horizontal separation distance requirements include, but are not limited to, 10 feet between the water main and sewer, 5 feet between the water main and storm drain, 7 feet from the face of the curb, and 5 feet from the edge of the right-of-way. In addition, water mains must be vertically located a minimum of one foot above sewers and storm drains.

EBMUD will not design piping or services until soil and groundwater quality data and remediation plans have been received and reviewed. In addition, underground work will not start until remediation has been carried out and documentation of its effectiveness has been received and reviewed. If no soil or groundwater quality data exists, or the information supplied by the project sponsor is insufficient, EBMUD may require the project sponsor to perform sampling and analysis to characterize the soil and groundwater that may be encountered during excavation, or EBMUD may perform such sampling and analysis at the project sponsor's expense. If evidence of contamination is discovered during EBMUD work on the project site, work may be suspended until such contamination is adequately characterized and remediated to EBMUD standards.

WASTEWATER SERVICE

EBMUD's Main Wastewater Treatment Plant (MWWTP) and interceptor system are anticipated to have adequate dry weather capacity to accommodate the proposed wastewater flows from this project and treat such flows provided that the wastewater generated by the project meets the requirements of the EBMUD Wastewater Control Ordinance. However, wet weather flows are a concern. The East Bay regional wastewater collection system experiences exceptionally high peak flows during storms due to excessive infiltration and inflow (I/I) that enters the system through cracks and misconnections in both public and private sewer lines. EBMUD has historically operated three Wet Weather Facilities (WWFs) to provide primary treatment and disinfection for peak wet weather flows that exceed the treatment capacity of the MWWTP. Due to reinterpretation of applicable law, EBMUD's National Pollutant Discharge Elimination

System (NPDES) permit now prohibits discharges from EBMUD's WWFs. Additionally, the seven wastewater collection system agencies that discharge to the EBMUD wastewater interceptor system ("Satellite Agencies") hold NPDES permits that prohibit them from causing or contributing to WWF discharges. These NPDES permits have removed the regulatory coverage the East Bay wastewater agencies once relied upon to manage peak wet weather flows.

A federal consent decree, negotiated among EBMUD, the Satellite Agencies, the Environmental Protection Agency (EPA), the State Water Resources Control Board (SWRCB), and the Regional Water Quality Control Board (RWQCB), requires EBMUD and the Satellite Agencies to eliminate WWF discharges by 2036. To meet this requirement, actions will need to be taken over time to reduce I/I in the system. The consent decree requires EBMUD to continue implementation of its Regional Private Sewer Lateral Ordinance (www.eastbaypsl.com), construct various improvements to its interceptor system, and identify key areas of inflow and rapid infiltration over a 22-year period. Over the same time period, the consent decree requires the Satellite Agencies to perform I/I reduction work including sewer main rehabilitation and elimination of inflow sources. EBMUD and the Satellite Agencies must jointly demonstrate at specified intervals that this work has resulted in a sufficient, pre-determined level of reduction in WWF discharges. If sufficient I/I reductions are not achieved, additional investment into the region's wastewater infrastructure will be required, which may result in significant financial implications for East Bay residents.

To ensure that the projects within the City contribute to these legally required I/I reductions, the lead agency should require projects to comply with EBMUD's Regional Private Sewer Lateral Ordinance. Additionally, it would be prudent for the lead agency to require the following mitigation measures for future proposed projects: (1) replace or rehabilitate any existing sanitary sewer collection systems, including sewer lateral lines, to ensure that such systems and lines are free from defects or, alternatively, disconnected from the sanitary sewer system, and (2) ensure any new wastewater collection systems, including sewer lateral lines, for the project are constructed to prevent I/I to the maximum extent feasible while meeting all requirements contained in the Regional Private Sewer Lateral Ordinance and applicable municipal codes or Satellite Agency ordinances.

WATER RECYCLING

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. Appropriate recycled water uses include landscape irrigation, commercial and industrial process uses, toilet and urinal flushing in non-residential buildings, and other applications.

EBMUD does not currently have any recycled water service in the City; however, the General Plan area is located within EBMUD's East Bayshore Recycled Water Project

Andrew Thomas, Planning, Building, and Transportation Director
August 27, 2020
Page 4

service boundaries. As part of EBMUD's long term water supply planning, future expansion plans will extend recycled water to the City and could potentially serve a significant portion of the General Plan area. EBMUD will assess and consider the feasibility of providing recycled water to projects within the General Plan area for appropriate uses including landscape irrigation, commercial and industrial process uses, toilet and urinal flushing.

As EBMUD continues to implement its recycled water supply expansion to the City, EBMUD requires the City and project sponsors to continue to coordinate closely with EBMUD during the planning phases of the various General Plan components to further explore the options and requirements relating to recycled water use.

WATER CONSERVATION

Individual projects within the General Plan may present an opportunity to incorporate water conservation measures. EBMUD requests that the City include in its conditions of approval a requirement that the project sponsor comply with Assembly Bill 325, "Model Water Efficient Landscape Ordinance," (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495). The project sponsor should be aware that Section 31 of EBMUD's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense.

If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Sincerely,



David J. Rehnstrom
Manager of Water Distribution Planning

DJR:VDC:sjh
sb20_182.doc

Letter B

East Bay Municipal Utility District (EBMUD)

Thank you for your letter regarding General Plan 2040, the General Plan EIR, and the East Bay Municipal Utility District facilities. Your letter will be transmitted to the Planning Board and City Council for their consideration prior to their final decisions on the General Plan update and associated Environmental Impact Report.

Under the Wastewater Collection and Treatment section, both the Treatment section and the Collection section will be revised per your suggestions. See Chapter 3 for the text of these revisions.

Regarding the errors noted on DEIR Figures US-5 and US-6, these figures were taken from the City's *Sewer Master Plan* prepared in 2015 by RMC Water and Environment, an environmental engineering firm focusing on water facilities. The comment is noted, but the minor issues identified in the comment do not alter the findings and conclusions presented in the DEIR.

Thank you for clarifying the capacity of EBMUD's Main Wastewater Treatment Plant (MWWTP). It is acknowledged that future development allowed under the proposed General Plan could contribute to the existing infiltration and inflow (I/I) that enters the EBMUD system during peak wet-weather flows. However, as discussed on pages 7-11 and 7-12 of the DEIR, future property transfers, building permits, and remodeling permits for projects costing over \$100,000 would be required to comply with EBMUD's Regional Private Sewer Lateral (PSL) Ordinance, which requires affected property owners to obtain a certificate from EBMUD certifying that all of their PSLs are leak-free. To obtain certification, a contractor must conduct a closed-circuit television (CCTV) inspection of the PSL that is witnessed by an EBMUD inspector and pass an EBMUD verification test. With this compliance, new development allowed under the proposed General Plan is not expected to cause a significant impact on EBMUD's wastewater treatment capacity.

Regarding the comment that the population estimates assumed in the wastewater capacity analysis summarized in DEIR Impact 7-1 do not agree with population data used by EBMUD for planning purposes, as acknowledged in the comment, the assumptions underlying the analysis result in conservative results, as stated on page 7-44 of the DEIR. Therefore, the discrepancy noted in the comment does not alter the conclusions of Impacts 7-1 or 7-3, and does not increase the severity of the impacts or result in a new significant impact.

The comment letter suggests that Impact 7-3 should be revised to remove discussion about EBMUD's FY2020-2024 Capital Improvement Program (CIP). However, the discussion reflects existing conditions at the time the DEIR was prepared, which is consistent with the requirements of CEQA. As stated in Section 15125(a) of the *CEQA Guidelines*, a lead agency should generally describe environmental conditions as they exist at the time the Notice of Preparation is published. A lead

agency may use projected future conditions *if and only if* the use of existing conditions would be either misleading or without informative value to decision-makers and the public. The cited CIP was the only one adopted at the time the DEIR was prepared, and its reference should not be considered irrelevant or misleading. As noted in the discussion, EBMUD has a history of making ongoing improvements to its wastewater infrastructure to ensure that the MWWTP operates within its permitted capacity.

To clarify, the *Alameda General Plan 2040* is specifically designed to comply with State of California General Plan and Housing Law, and the City is committed to ensuring that all future growth that may occur as the result of State housing mandates or economic development objectives are consistent with the Bay Area's State-mandated Sustainable Communities Strategy, Plan Bay Area.

The request that an estimate of expected water demand for feasible recycled water uses be provided for each future development project is noted. As noted in the comment, future development will be required to request water service from EBMUD during project planning, and this water demand can be calculated at that time. As discussed on page 7-12 of the DEIR, new development requiring a tentative map or parcel map, and that is located within a City-Designated Water Reuse Area, will be required by the City to provide a separate plumbing system to serve recycled water uses in the common landscape areas of the subdivision, pursuant to the Alameda Water Reuse Ordinance (Municipal Code Chapter XXX, Article IIIA, Section 30-57 *et seq.*).



June 25, 2021

(By electronic transmission)
Andrew Thomas, Planning, Building and Transportation Director
City of Alameda
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Subject: Draft Environmental Impact Report (DEIR) for the March, 2021 Draft Alameda General Plan - - Alameda Architectural Preservation Society (AAPS) comments

Dear Mr. Thomas:

The California Environmental Quality Act (CEQA) in Public Resources Code Section 21084.1 mandates that "A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 15064.5 (b) (1) and (2) of the CEQA Guidelines (Sections 15000– 15387 of the California Code of Regulations, Title 14, Chapter 3) defines "substantial adverse change" as follows:

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Section 15064(b)(3) and (4) goes on to state:

(3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

(4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

The Draft EIR variously states that the General Plan will have a less than significant impact on historical resources via project-specific mitigation or because a subsequent project-specific EIR would be required. More specifically, Volume 2, Page 18-21 of the DEIR states:

*While future development activity that would cause a substantial adverse change in the significance of a historical resource would be a significant, adverse impact on historical resources, including properties listed on or eligible for listing on the NRHP or CHRP and well as City-designated historic monuments and properties, compliance with the General Plan policies listed above and with existing regulations and procedures would **ensure** (emphasis added) that such impacts would be less than significant. As discussed in the Setting section, any future discretionary development proposed within the Naval Air Station Alameda Historic District, Alameda Marina Historic District, or Park Street Historic Commercial District would be required to be submitted for review by the Alameda Historical Advisory Board and obtain a Certificate of Approval from the HAB prior to implementing the project. Project applicants would be required to comply with any conditions intended to preserve and protect historic resources that are identified by the HAB as part of the Certificate of Approval. Similarly, any discretionary project proposing removal of or modification to a resource included on the City's Historical Building Study List, a designated Historical Monument, or a protected tree, as defined in Alameda Municipal Code Section 13-21.7(c), would be required to obtain a Certificate of Approval from the HAB prior to implementing the project.¹*

Impacts to historical resources are highly localized and site-specific, so specific impacts can only be determined once a particular project has been proposed. Modifications to historic properties can be made that avoid significant impacts to historic resources, such as by designing and carrying out renovations or reconstructions in a manner that is consistent with the Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. When reviewing applications for future development projects, the Alameda Planning Department will make a preliminary determination regarding the potential for the proposed project to adversely affect historical resources. If the Department identifies any potential for effects on historical resources, the Planning Director will require an evaluation of the project's potential impacts to historical resources by a qualified professional architectural historian meeting the Secretary of the Interior's Professional Qualification Standard. If the Historic Resources Evaluation identifies potentially significant impacts to historic resources, the project applicant will be required to either (a) implement all recommendations identified in the Historic Resources Evaluation report to reduce potential impacts to a less-than-significant level, if applicable, or (b) sponsor the preparation of an Environmental Impact Report (EIR) pursuant to CEQA to fully evaluate and disclose the project's potential impacts to historical resources.

¹ This sentence is incorrect. Only demolition and removal of Study List properties or protected trees require a Historical Advisory Board Certificate of Approval. Other modifications to Study List properties only require design review approval from the Planning Department.

*Given these existing rules, regulations, and procedures in place to protect historic resources, adoption of the proposed Alameda General Plan 2040 would have a **less-than-significant impact** on historic resources.*

However, since the proposed General Plan policies and the City's existing "rules, regulations and procedures" still allow the City to approve demolition or adverse alteration of historic resources based on economic hardship or other considerations, the DEIR's assertion that these policies, rules, regulations and procedures '**ensure**' that impacts on historical resources are less than significant is an overstatement.

The DEIR's conclusion that adoption of the General Plan would have a less-than-significant impact on historical resources is therefore blatantly incorrect. ² The characterization of impacts as significant or less-than-significant is critical to EIR analysis. PRC Section 21084.1 makes clear that demolition or other substantial adverse change in the significance of a historic resource IS a significant environmental impact. The only way the General Plan could have a less-than-significant impact on historic resources is if the Plan is altered to mandate that demolition or substantial alteration of historic resources is **not allowed**.

Otherwise, preparation of a subsequent project-specific EIR does *not* ensure that there will be no significant impact. Preparation of a project-specific EIR is not mitigation; it is a state-mandated requirement if a project may have a significant impact. If the Plan is not revised to add the "**is not allowed**" language proposed above, the Plan and EIR should be revised to identify Impact 18-1 ("New development allowed under the Alameda General Plan 2040 could damage or destroy historical resources") as a "significant" rather than a "less-than-significant" impact. Mitigation should be added to the effect that if a project under the Plan may result in demolition or other substantial adverse change in the significance of an historic resource, a project-specific EIR must be prepared and any feasible alternatives to demolition or other substantial adverse change in the significance of the resource must be adopted. If and only if there are no feasible alternatives, an appropriate level of compensatory mitigation for historic resource impacts should be imposed.

In addition, the following project alternative and mitigation measures for Impact 18-1 should be added to the DEIR:

1. Additional project alternative:

To minimize impacts on historical resources and existing built-up residential neighborhoods and minimize overall impacts on transportation facilities and other infrastructure, delete the proposed residential density increases above the current 2000 sq. ft. of lot area per residential unit and height limit, FAR and other intensity increases in the following areas: (i) the R-2 through R-6 Zones, the NP-R and NP-MU Zones (portions of the North Park Street area), and the C-1 Zone (which includes the "Stations"), all as shown on the 2020 City of Alameda Zoning Map; (ii) the historic portions of the Park and Webster Street Business Districts; and (iii) properties that are on the City of Alameda Historical Monument or Historic Building Study Lists.

Define the historic portion of the Park Street Business District as:

"The portion of the Park Street Business District located in: (i) the C-C Zone south of Lincoln Avenue; and (ii) the NP-G Zone on the west side of Park Street between Lincoln and Buena Vista Avenues all as shown on the 2020 City of Alameda Zoning Map."

² Further, the text beginning with: "When reviewing applications for future development projects..." in the above DEIR excerpt's second paragraph is not part of any existing written City procedure or document.

Define the historic portion of the Webster Street Business District as:

“The portion of the Webster Street Business District located in the C-C Zone south of Lincoln Avenue as shown on the 2020 City of Alameda Zoning Map”

2. Additional mitigation measures:

- a. Retain all existing Alameda Municipal Code demolition protections for pre-1942 buildings, properties on the Historic Building Study List and Historical Monuments. This mitigation measure would replace the proposed Action LU--25f text on Page 44 which only states “Maintain demolition controls for historic properties” without specifying which controls would be maintained or defining “historic properties”.
- b. Prior to adoption of the General Plan, conduct a historical and architectural survey, including historic context statements, for all buildings 50 years old or older within any areas identified in the new General Plan for increased residential density, height limits, FARs or other intensities to identify which of these buildings are potential historical or cultural resources. Identify any historic districts formed by these buildings. Expand existing Alameda Municipal Code demolition protections to these buildings.
- c. Prior to adoption of the new General Plan, the City of Alameda shall submit an application to the State Historical Resources Commission for listing on the California Register of Historical Resources all properties within any areas identified in the new General Plan for increased residential density, height limit, FAR or other intensities that are on the City of Alameda Historic Building Study List, are City of Alameda Historical Monuments and/or are identified as potential historical and cultural resources (including potential historic districts) in the historical and architectural survey described in Mitigation Measure (b) above and the Commission shall take action on such application.
- d. Maintain the existing General Plan’s 40 foot height limit for the historic portions (as defined in the Item 5’s Project Alternative above) of the Park Street and Webster Street Business Districts. Amend the Alameda Municipal Code to bring the height limits for the historic portions of the Park Street Business District that are now over 40 feet into conformity with the 40 foot height limit.
- e. Maintain the existing General Plan’s and Alameda Municipal Code’s 30 foot height limit for the C-1 Zone as shown on the 2020 City of Alameda Zoning Map.
- f. Require that the housing types listed in the Draft General Plan’s Action LU-2f on Page 29 of and located in the MDRA be contained within existing building envelopes.³

³ Action LU-2f states:

***Multi-family and Shared Housing.** Permit multi-family and shared housing opportunities, including co-housing, congregate housing, senior assisted living, single room occupancy housing, transitional housing, emergency warming shelters, and shelters for the homeless in all Medium-Density residential zoning districts and in all three of the Mixed-Use Land Use Classification zoning districts to provide for the housing needs of all Alamedans.*

Within the Medium-Density residential zoning districts (MDRZDs) this wider range of uses could promote new construction of contrasting building types that architecturally disrupt existing neighborhoods and existing and potential historic districts and replace existing historic buildings with new buildings. Some of these uses are already permitted or conditionally permitted in some of the MDRZDs, but others are not. **The impacts of this wider range of uses on the numerous historic buildings in the MDRZDs should be considered a “significant effect” in the EIR for CEQA purposes, and project alternatives and mitigation measures identified to avoid or reduce this significant effect.**

- g. Delete the Draft General Plan's Action LU-26b or limit its applicability to areas not containing Alameda Historical Monuments, Historic Building Study List properties or historic resources identified by the historical and architectural survey described in Mitigation Measure (b) above.⁴

Thank you for the opportunity to comment. Please contact me at (510) 523-0411 or cbuckleyAICP@att.net if you would like to discuss these comments.

Sincerely,

Christopher Buckley, Chair
Preservation Action Committee
Alameda Architectural Preservation Society

cc: Mayor and City Councilmembers (by electronic transmission)
Planning Board (by electronic transmission)
Historical Advisory Board (by electronic transmission)
AAPS Board and Preservation Action Committee (by electronic transmission)
Susan Brandt-Hawley, Esq. (by electronic transmission)

⁴ Action LU-26b states:

***b. Creativity.** Encourage and support creative and contemporary architectural design that complements, but does not mimic, existing architectural designs in the neighborhood or district.*

This action is inconsistent with the City's existing design review policies and documents that promote designs consistent with the surrounding neighborhood. It is also too open-ended in its use of undefined and overly subjective terms, such as "creative" and "contemporary". Adoption of this action could set the stage for architecturally intrusive new development in historic areas and potentially compromise the continued eligibility of existing and potential National Register and California Register districts for these Registers. **The EIR should consider the potential impacts of this Action as "significant effects" for CEQA purposes and identify project alternatives and mitigation measures to avoid or reduce these significant effects.**

Letter C

Alameda Architectural Preservation Society

Thank you for your letter regarding the General Plan and the General Plan EIR. Your letter will be transmitted to the Planning Board and City Council for their consideration prior to their final decisions on the General Plan update and associated Environmental Impact Report.

The comment letter contends that implementation of the General Plan will with certainty result in a significant impact on historic resources. The City of Alameda respectfully disagrees for the following reasons:

The General Plan is a 20-year plan to manage change and growth. The General Plan includes Land Use and City Design Policy LU-25 (Historic Preservation), which sets forth the City policy to promote Citywide historic preservation, protection and restoration efforts and recommended actions to protect historic resources. The General Plan maintains all existing City of Alameda Municipal Code Requirements and the Historic Preservation Ordinance provisions that ensure that all future development will be subject to existing State and City of Alameda regulations specifically designed to identify and mitigate potential impacts to historic resources.

The comment letter also speculates that there will be a future development project on a site that has not yet been identified, and that site will be a historic resource under CEQA, and that the future, yet-to-be designed project will result in the loss of integrity or the demolition of the yet-to-be identified historic resource. The comment letter speculates further that the City of Alameda's existing regulations and ordinances will not be able to adequately protect that resource from a significant impact.

The California Environmental Quality Act does not require that the lead agency speculate about future potential impacts that may or may not occur in the future over the 20-year planning horizon for the General Plan. The California Environmental Quality Act does require that every future discretionary action by the City of Alameda regarding a future development project consider the potential environmental impacts of that future project on the environment or on historic resources. Furthermore, under the existing Historic Preservation Ordinance, demolition of any building constructed before 1942 must be reviewed by the Historical Advisory Board. None of these existing regulatory requirements are changed by the new General Plan.

Therefore, if and when the theoretical events and circumstances should occur in the future, that future, yet-to-be identified project will be subject to review under the California Environmental Quality Act, and the City of Alameda Historical Advisory Board and/or the City of Alameda City Council will determine if the impacts are significant and unavoidable and if the benefits of the project outweigh the loss of the historic resource. In the event that the City Council and/or Historical Advisory

Board makes such a determination on a future project, it will be an impact resulting from that particular project, not the Alameda General Plan 2040.

We do agree, though, that just as you cannot speculate that there definitely will be a future impact to historic resources as the result of the General Plan, we cannot “ensure” that compliance with the General Plan guarantees that there will never be a situation in the future where the Historical Advisory Board or the City Council makes findings of overriding considerations for a particular project resulting in impacts to historic resources. Therefore we are amending the paragraph on page 18-27 in the Draft EIR to delete the following sentence (insertions double-underlined, deletions shown in ~~strikethrough~~) (these revisions are also set forth in Chapter 3):

~~“While future development activity that would cause a substantial adverse change in the significance of a historical resource would be a significant, adverse impact on historical resources, including properties listed on or eligible for listing on the NRHP or CHRP and well as City designated historic monuments and properties, compliance with the General Plan policies listed above and with existing regulations and procedures would ensure that such impacts would be less than significant. As discussed in the Setting section, any future discretionary development proposed within the Naval Air Station Alameda Historic District, Alameda Marina Historic District, or Park Street Historic Commercial District would be required to be submitted for review by the Alameda Historical Advisory Board and obtain a Certificate of Approval from the HAB prior to implementing the project. Project applicants would be required to comply with any conditions intended to preserve and protect historic resources that are identified by the HAB as part of the Certificate of Approval. Similarly, any discretionary project proposing removal of 30 percent or more of a structure ~~or modification to a resource~~ included on the City’s Historical Building Study List, or modification to a designated Historical Monument, or a protected tree, as defined in Alameda Municipal Code Section 13-21.7(c), would be required to obtain a Certificate of Approval from the HAB prior to implementing the project.”~~

The City provides the following responses regarding the additional suggestions, beginning on page 3 of your letter:

1. Land Use Classifications and Zoning Changes to Accommodate the Regional Housing Need. Staff is recommending that these provisions be amended in the final draft General Plan to remove specific recommended zoning changes to accommodate the regional housing need. Those zoning changes will occur as necessary when the Housing Element is adopted.
2. Existing Municipal Code protections. The General Plan is not proposing to remove or weaken any existing protections in the Alameda Municipal Code.

3. Historical and Architectural surveys and historic context statements. Your request that comprehensive historical, architectural, and historic context statements for any area that might be rezoned at a future date to accommodate State-mandated regional housing needs be completed prior to any action to update the General Plan cannot be accommodated for a number of reasons. At this time it is not known specifically which areas (and the boundaries of those areas) may be up-zoned over the next 20 years to accommodate the Regional Housing Needs Determination. Therefore, comprehensive historical, architectural, and historic context statements for such areas cannot be completed prior to adoption of the General Plan. In addition, since it is likely that the City will need to remove constraints imposed by City Charter Article 26 in large areas of the City to comply with State law, your request could require architectural, historical, and context statements for very large areas, if not all of the City of Alameda. The costs of such an undertaking are not feasible. Alternatively, when a proposed change in zoning is proposed for a specific area of the City to accommodate regional housing needs obligations or for some other reason, the City may consider the feasibility of conducting an historic inventory at that time.
4. Zoning Changes for Heights and Uses. Whenever a change to the zoning is proposed, that proposed change will be subject to review under the California Environmental Quality Act. At that time, it can be determined if the proposed change would result in a significant impact on the environment.
5. Policy LU-26. Staff is recommending an amendment to this policy.

Nancy McPeak

From: Edward Sing <singtam168@att.net>
Sent: Monday, June 28, 2021 1:44 PM
To: Andrew Thomas
Cc: Nancy McPeak; Marilyn Ezzy Ashcraft; Lara Weisiger
Subject: [EXTERNAL] Fw: Comments Alameda Draft EIR Alameda General Plan 2040

June 28, 2021

Andrew Thomas, Planning, Building, and Transportation Director Alameda

Draft EIR Lead Agency Contact

City of Alameda, 2263 Santa Clara Avenue, Room 190 Alameda, CA 94501

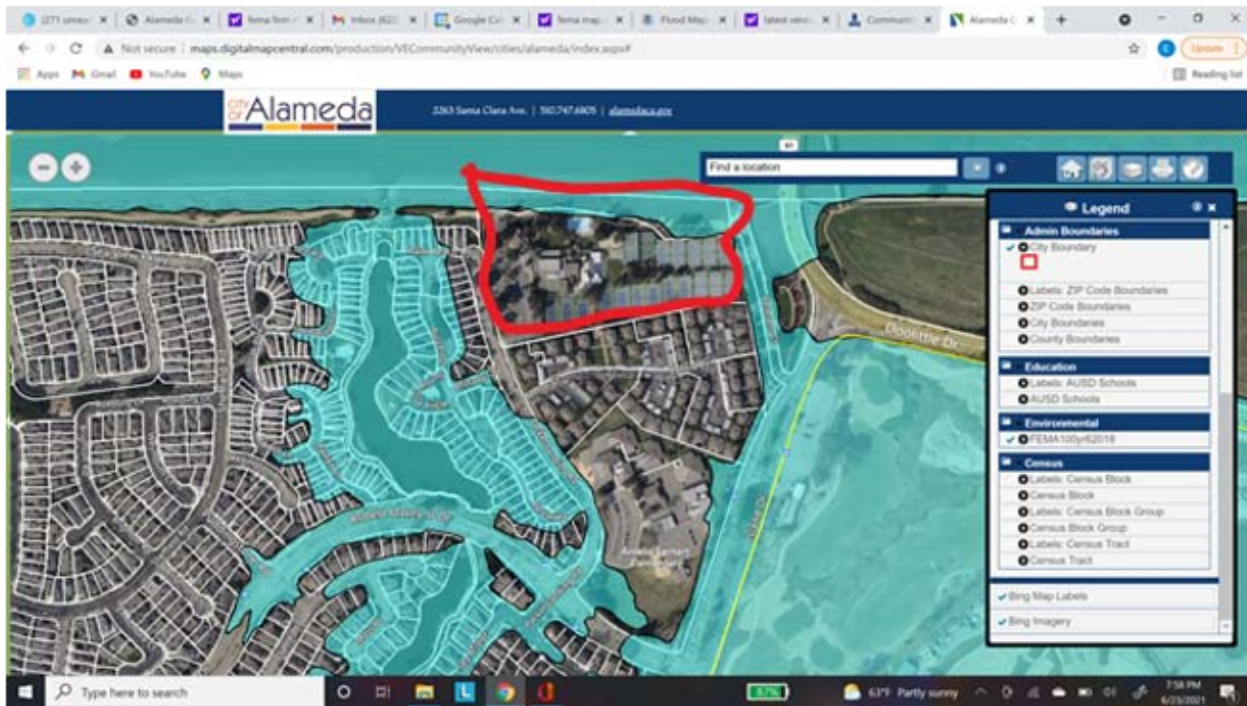
RE: Draft EIR Alameda General Plan 2040

Dear Andrew:

My apologies for submitting these comments, subject as above, after the 6/25/21 deadline. It is my understanding that you and your staff are still compiling comments on the Draft EIR. As such, I would appreciate your consideration of my comments on this document.

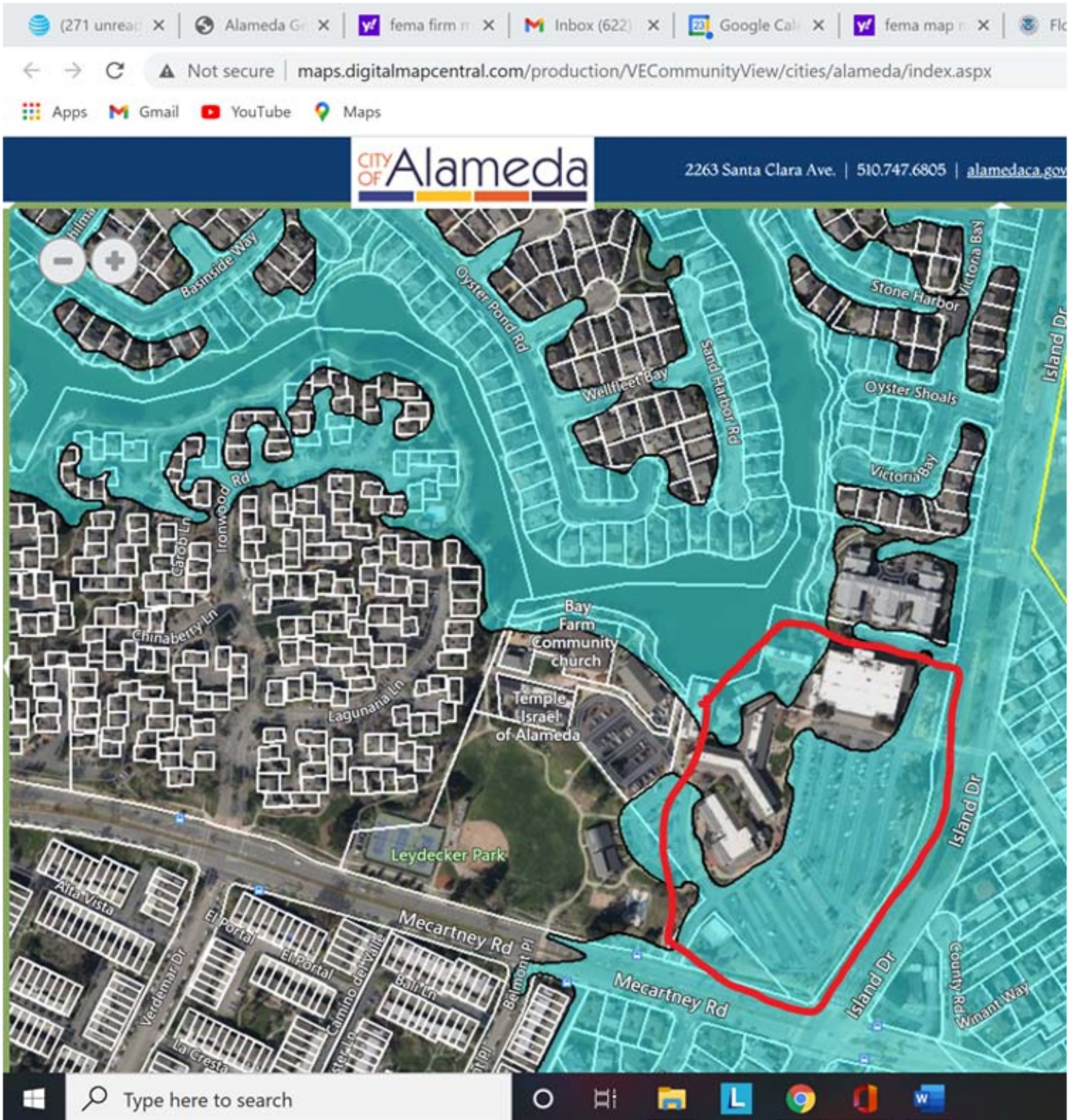
I want to second the comments, shown in the email below, submitted by Ms. Patricia Lamborn, and underscore the impacts that the current floodplains and future sea level rise will have on the Harbor Bay Health Club and Harbor Bay Landing Shopping Center, both identified as "opportunity sites" on Bay Farm Island in the Alameda General Plan 2040.

The 100 year floodplain for Harbor Bay Club (circled in red) - as identified in the 2018 FEMA FIRM (Flood Insurance Rate Map) and taken from the City of Alameda's website is shown below:



As noted by Ms. Lamborn, the Club is not within but is surrounded on 3 sides by the floodplain. In addition, the only emergency vehicle egress on Packet Landing Road (to the South) is predicted to be blocked by flooding, as is escape by Veterans Ct to the East, to the North (San Leandro Channel, and to the West (Brittany Bay Harbor). Under existing conditions, there will be an issue with flood evacuation of the homes in Centre Court and Brittany Bay Harbor as well as students from Amelia Earhart School. Building of high density housing at the Harbor Bay Club will only exacerbate evacuation efforts of this area.

The 100 year floodplains for Harbor Bay Landing (circled in red) – the other opportunity site for mixed use development on Bay Farm Island - is shown below:



Although some of the commercial buildings at the Landing are just outside of the floodplains, the large parking lots which would be used for mixed use development are within the floodplains. Evacuation of this site during flooding could only be accomplished by moving Westward along McCartney Road as flooding is expected to the North (the Lagoon), to the East (Island Drive) and to the South.

Both “opportunity sites” violate Policy CC-19 Sea Level Rise Protection: Land Planning. *Prioritize areas of little or no flood risk for new development (i.e. housing and commercial development) in new plans or zoning decisions.* Both of these sites have a high level of risk for flooding as certified by FEMA in 2018. The risk of flooding will only be exacerbated by the predicted sea level rise.

As noted by Ms. Lamborn, *“ART Bay Area projects a likely sea level rise of 48 inches above the Mean Higher High Water (MHHW) tide by 2030, in combination with a 100-year storm. It projects an increase of 52 inches by 2040 and 2050, with the same assumptions. These likely levels of increase have a 66 percent probability, based on modeling by the California Ocean Protection Council. Under an extreme risk scenario, the projected sea level rise during MHHW in combination with the 100- year storm increase to 52 inches by 2030, 66 inches by 2040, and 77 inches by 2050.”*

Sea level rise, in combination with flooding will increase not only the depth but also areal extent of flooding – resulting in an increase risk to not only existing residents but also those who might occupy the proposed mixed use housing at these “opportunity sites”. In addition, safe evacuation routes for these sites will further diminish.

Note that a common mitigation measure to raise building above flood levels is use of engineering fill above a given flood level. However, filling such areas would inevitably induce higher depths and larger areas of flooding in adjacent areas.

The DEIR and our Alameda General Plan 2040 ignores the fact that it is proposing opportunity building sites in floodplains nor the impacts of sea level rise at these sites. -- and then ignore them. I join Ms. Lamborn in urging our Planning Department to revise the Alameda General Plan in line with reality-- create defensible open space and wetland restoration. Create buffer zones adjacent to flood areas- don't allow housing construction in them. Re--imagine the Harbor Bay Club as described by Ms. Lamborn. Remove Harbor Bay Shopping Landing as an opportunity site due to its high flooding potential.

Thank you for your consideration of my comments and recommendations.

Ed Sing

Alameda Resident – 25 years

-----Original Message-----

From: Patricia Lamborn <patricia.lamborn@aol.com>

To: athomas@alamedaca.gov <athomas@alamedaca.gov>

Cc: nmcpeak@alamedaca.gov <nmcpeak@alamedaca.gov>

Sent: Fri, Jun 25, 2021 5:35 pm

Subject: Comments Alameda Draft EIR Alameda General Plan 2040

June 25, 2021

Andrew Thomas, Planning, Building, and Transportation Director Alameda
Draft EIR Lead Agency Contact
City of Alameda, 2263 Santa Clara Avenue, Room 190 Alameda, CA 94501

RE: Draft EIR Alameda General Plan 2040

Dear Mr. Thomas

I am writing to comment on the Alameda General Plan 2040 Draft EIR (DEIR). I am concerned about the inconsistency between the DEIR's statements on sea level rise and their Land Use Policy related to Mixed use Shopping Centers. I'm also concerned by the fact that neither the DEIR nor our Draft Alameda General Plan 2040 specifically identify buffer zones in line with the DEIR's proposal for Nature Based Flood Control Systems. The lack of funding for master planning of DePave Park during this 2022-2023 budget cycle was a big disappointment and showed that our City is not taking the CARP recommendations for wetland restoration seriously. The lack of firm and clear direction from both the DEIR and our General Plan paves the way for dense housing development on Alameda shorelines to satisfy developers incentive to build and sell luxury-waterfront condos, including towers. Three examples of dangerous developments which would be allowed are:

- Building towers right on the Shoreline at Southshore Shopping Center. This plan was proposed in community meetings in 2019 by Jamestown, the owner and developer of the shopping center.
- Developing housing at Harbor Bay Club - another disaster waiting to happen-- the bay is already within a few feet of the swimming pool there.
- Infill housing at the Harbor Bay Shopping Center. If it were limited, senior affordable housing could be ok-- but lets face it, the developer will say it doesn't "pencil out" for them unless it's dense and multistory.

The tragedy of the waterfront condo tower collapse in Florida on June 24th, 2021 is our wake up call. We will know more about why this tragedy happened, but it was documented to be slowly sinking for many years.

The DEIR must be amended to definitively change our General Plan and stop dense, multistory housing development on Alameda Landfill on the shoreline.

The DEIR was correct when it stated the following policies :

Policy CC-19 Sea Level Rise Protection. Reduce the potential for injury, property damage, and loss of natural habitat resulting from sea level rise. Actions:

- Land Planning. Prioritize areas of little or no flood risk for new development (i.e. housing and commercial development) in new plans or zoning decisions.
- Shoreline Habitat and Buffer Lands. Identify, preserve and restore existing undeveloped areas susceptible to sea level rise to increase flood water storage which can reduce flood risk, enhance biodiversity, and improve water quality. Maintain and restore existing natural features

Policy CC-20 Land Development. Require new development to reduce the potential for injury, property damage, and loss of natural habitat resulting from groundwater and sea level rise.

Policy CC-21 Sea Level Rise Plans. Develop neighborhood shoreline sea level rise protection and funding plans to address increasing sea and groundwater level rise and storm events.

Unfortunately it is completely contradictory when the DEIR states:

Policy LU-16 Climate-Friendly, Transit-Oriented Mixed-Use Development.

- Mixed-Use Shopping Centers. Amend the zoning code to facilitate the redevelopment and reinvestment in Alameda's single-use retail shopping centers and large open parking lots with higher density mixed use development with ground floor commercial, service, and office uses, and upper floor multi-family housing.

This could be fine in cities with inland shopping centers-- in Alameda we all know that this will be applied to Southshore Shopping Center, on Shoreline Drive which is predicted to overtop and flood by 2030. The parking lots on Shoreline Drive are our opportunity to develop sea level rise protection, not construct high rise condo towers.

The DEIR section on **Open Space, Recreation, and Parks Element** could give us hope-- **IF there were specific examples of implementation in our General Plan.**

The DEIR States: **GOAL 2** Expand and improve the parks and open space system to address the evolving needs of a growing community, serve all residents and neighborhoods equitably throughout the city, and adapt to the climate crisis.

Policy OS-11 Climate Adaptation. Adapt the existing park and open space network to rising sea levels, more severe storm events and wave energy and rising groundwater. Actions:

- Green Infrastructure. Utilize natural, green or 'soft infrastructure' such as sand dunes and wetlands over 'hard infrastructure' (concrete seawalls and/or levees) wherever possible.
- Hidden Benefits. **Recognize and promote the open space network as an expanding asset**

Harbor Bay Club provides exactly that opportunity. Rather than building housing, the club and grounds could be utilized for recreation, with a shoreline buffer zone. Now is not the time to bail out the club by enriching a housing developer. When we face flooding - the developer will be long gone. Again we need to take the lessons in front of us seriously. The residents of Foster City are paying \$ 90million in parcel taxes to reinforce their existing levee with an iron wall to protect the homes built on landfill. Our City could purchase Harbor Bay Club- operate it as a municipal recreation facility and continue to charge fees for use of tennis courts, club, etc. and eventually adapt the shoreline as defensible space. That is cheaper than building a sea wall. It's time to get creative--- and serious about the "Climate Emergency". Is it an emergency or not ?

The DEIR described a frightening reality :

Adapting to Rising Tides Bay Area (ART Bay Area) is a partnership between Caltrans District 4, the Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG), Bay Area Regional Collaborative (BARC), the San Francisco Bay Conservation and Development Commission (BCDC) and many public, private, and nonprofit partners. ART Bay Area is the first ever region-wide, cross-sector, asset-based vulnerability analysis of the Bay shoreline to sea level rise. The product of a multi-agency collaboration, the project illuminates shared vulnerability to sea level rise across the Bay Area. ART Bay Area projects a likely sea level rise of 48 inches above the Mean Higher High Water (MHHW) tide by 2030, in combination with a 100-year storm. It projects an increase of 52 inches by 2040 and 2050, with the same assumptions.²⁰ These likely levels of increase have a 66 percent probability, based on modeling by the California Ocean Protection Council. Under an extreme risk scenario, the projected sea level rise during MHHW in combination with the 100- year storm increase to 52 inches by 2030, 66 inches by 2040, and 77 inches by 2050. **The maximum modeled increase would be 108 inches by 2070. Although sea level rise will affect all shoreline areas in San Francisco Bay, the western end of Alameda Point is identified by ART Bay Area as one of several regional hotspots in the Bay.**

The DEIR went on to state: "With almost half of the land area in Alameda being within 6 feet of current sea level, and with groundwater being just a few feet below the ground surface, rising sea levels and rising groundwater levels threaten to overwhelm the City's waterfront open spaces and habitat areas, roadways, stormwater and sewer systems, and the seawalls, embankments, and shoreline barriers that made it possible to develop the City. "

The DEIR and our Alameda General Plan 2040 include these dire realities -- and then ignore them. I urge our Planning Department to revise the Alameda General Plan in line with reality-- create defensible open space and wetland restoration. Fund DePave Park. Create buffer zones on Shoreline Drive- don't allow housing construction in them. Re--imagine the Harbor Bay Club. Restrict housing at Harbor Bay Shopping Center to a limited number of senior affordable units, far from the waterfront.

If we were to see these types of changes we could take the E (Environmental) in DEIR seriously! Lets amend the Alameda General Plan 2040 that is in touch with our reality. We're a city built on landfill, on

former marshes that were IN the Bay. We can't change the past but we have to prepare for the future-- and it includes inevitable sea level rise and flooding.

Sincerely, Pat Lamborn
Alameda 30 years resident

Patricia Lamborn
patricia.lamborn@aol.com

Letter D

Edward Sing

Thank you for your email regarding the General Plan and the General Plan EIR. Your comments will be transmitted to the Planning Board and City Council for their consideration prior to their final decisions on the General Plan update and associated Environmental Impact Report.

Your comments focus on the proposed policies that identify potential sites for in-fill residential development to address regional housing needs, specifically two sites on Bay Farm Island in the Harbor Bay community. You note that they are both vulnerable to future flooding as is shown in the Sea Level rise maps in the General Plan Climate Action and Conservation Element. You state that the General Plan and the EIR “ignore the fact” that building opportunity sites are located in potential future flood zones due to sea level rise.

The General Plan includes a number of maps in the Climate Action and Conservation Element that specifically show the impacts of flooding and sea level rise in Alameda, and one of the four themes described in the General Plan introduction upon which all the policies in the General Plan are designed to address is the threat of sea level rise, flooding, and climate change. The draft General Plan includes a wide variety of policies to address sea level rise and rising groundwater to protect existing and future residents and businesses that are currently located on existing residential and commercial properties in Alameda. The sea level protections envisioned in the General Plan to protect existing neighborhoods and businesses are also designed to protect existing in-fill development sites identified in the General Plan to accommodate future State-mandated regional housing needs.

General Plan policies require future development of shoreline sites to provide protection against sea level and groundwater rise, consistent with the citywide efforts to protect all existing residents and businesses. Climate Action and Conservation Element Policy CC-20 specifically calls for new development to mitigate the impacts of sea level and groundwater rise. Policy CC-21 calls for neighborhood sea level rise plans to protect neighborhoods, such as at Bay Farm Island, from the impacts of sea level rise. These two policies ensure that redevelopment of existing in-fill sites with commercial or residential uses will be protected from the impacts of sea level rise. Finally, Mobility Element Policy ME-24 specifically calls out Veterans Court and other transportation facilities on Bay Farm Island as high priority transportation facilities in need of sea level protection to maintain access and emergency evacuation, when needed.

Nancy McPeak

From: Patricia Lamborn <patricia.lamborn@aol.com>
Sent: Friday, June 25, 2021 5:35 PM
To: Andrew Thomas
Cc: Nancy McPeak
Subject: [EXTERNAL] Comments Alameda Draft EIR Alameda General Plan 2040

Follow Up Flag: Follow up
Flag Status: Flagged

June 25, 2021

Andrew Thomas, Planning, Building, and Transportation Director Alameda
Draft EIR Lead Agency Contact
City of Alameda, 2263 Santa Clara Avenue, Room 190 Alameda, CA 94501

RE: Draft EIR Alameda General Plan 2040

Dear Mr. Thomas

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- Building towers right on the Shoreline at Southshore Shopping Center. This plan was proposed in community meetings in 2019 by Jamestown, the owner and developer of the shopping center.
- Developing housing at Harbor Bay Club - another disaster waiting to happen-- the bay is already within a few feet of the swimming pool there.
- Infill housing at the Harbor Bay Shopping Center. If it were limited, senior affordable housing could be ok-- but lets face it, the developer will say it doesn't "pencil out" for them unless it's dense and multistory.

The tragedy of the waterfront condo tower collapse in Florida on June 24th, 2021 is our wake up call. We will know more about why this tragedy happened, but it was documented to be slowly sinking for many years.

The DEIR must be amended to definitively change our General Plan and stop dense, multistory housing development on Alameda Landfill on the shoreline.

The DEIR was correct when it stated the following policies :

Policy CC-19 Sea Level Rise Protection. Reduce the potential for injury, property damage, and loss of natural habitat resulting from sea level rise. Actions:

- Land Planning. Prioritize areas of little or no flood risk for new development (i.e. housing and commercial development) in new plans or zoning decisions.
- Shoreline Habitat and Buffer Lands. Identify, preserve and restore existing undeveloped areas susceptible to sea level rise to increase flood water storage which can reduce flood risk, enhance biodiversity, and improve water quality. Maintain and restore existing natural features

Policy CC-20 Land Development. Require new development to reduce the potential for injury, property damage, and loss of natural habitat resulting from groundwater and sea level rise.

Policy CC-21 Sea Level Rise Plans. Develop neighborhood shoreline sea level rise protection and funding plans to address increasing sea and groundwater level rise and storm events.

Unfortunately it is completely contradictory when the DEIR states:

Policy LU-16 Climate-Friendly, Transit-Oriented Mixed-Use Development.

- Mixed-Use Shopping Centers. Amend the zoning code to facilitate the redevelopment and reinvestment in Alameda's single-use retail shopping centers and large open parking lots with higher density mixed use development with ground floor commercial, service, and office uses, and upper floor multi-family housing.

This could be fine in cities with inland shopping centers-- in Alameda we all know that this will be applied to Southshore Shopping Center, on Shoreline Drive which is predicted to overtop and flood by 2030. The parking lots on Shoreline Drive are our opportunity to develop sea level rise protection, not construct high rise condo towers.

The DEIR section on **Open Space, Recreation, and Parks Element could give us hope-- IF there were specific examples of implementation in our General Plan.**

The DEIR States: **GOAL 2** Expand and improve the parks and open space system to address the evolving needs of a growing community, serve all residents and neighborhoods equitably throughout the city, and adapt to the climate crisis.

Policy OS-11 Climate Adaptation. Adapt the existing park and open space network to rising sea levels, more severe storm events and wave energy and rising groundwater. Actions:

- Green Infrastructure. Utilize natural, green or 'soft infrastructure' such as sand dunes and wetlands over 'hard infrastructure' (concrete seawalls and/or levees) wherever possible.
- Hidden Benefits. **Recognize and promote the open space network as an expanding asset**

Harbor Bay Club provides exactly that opportunity. Rather than building housing, the club and grounds could be utilized for recreation, with a shoreline buffer zone. Now is not the time to bail out the club by enriching a housing developer. When we face flooding - the developer will be long gone. Again we need to take the lessons in front of us seriously. The residents of Foster City are paying \$ 90million in parcel taxes to reinforce their existing levee with an iron wall to protect the homes built on landfill. Our City could purchase Harbor Bay Club- operate it as a municipal recreation facility and continue to charge fees for use of tennis courts, club, etc. and eventually adapt the shoreline as defensible space. That is cheaper than building a sea wall. It's time to get creative--- and serious about the "Climate Emergency". Is it an emergency or not ?

The DEIR described a frightening reality :

Adapting to Rising Tides Bay Area (ART Bay Area) is a partnership between Caltrans District 4, the Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG), Bay Area Regional Collaborative (BARC), the San Francisco Bay Conservation and Development Commission (BCDC) and many public, private, and nonprofit partners. ART Bay Area is the first ever region-wide, cross-sector, asset-based vulnerability analysis of the Bay shoreline to sea level rise. The product of a multi-agency collaboration, the project illuminates shared vulnerability to sea level rise across the Bay Area. ART Bay Area projects a likely sea level rise of 48 inches above the Mean Higher High Water (MHHW) tide by 2030, in combination with a 100-year storm. It projects an increase of 52 inches by 2040 and 2050, with the same assumptions.²⁰ These likely levels of increase have a 66 percent probability, based on modeling by the California Ocean Protection Council. Under an extreme risk scenario, the projected sea level rise during MHHW in combination with the 100- year storm increase to 52 inches by 2030, 66 inches by 2040, and 77 inches by 2050. **The maximum modeled increase would be 108 inches by 2070. Although sea level rise will affect all shoreline areas in San Francisco Bay, the western end of Alameda Point is identified by ART Bay Area as one of several regional hotspots in the Bay.**

The DEIR went on to state: "With almost half of the land area in Alameda being within 6 feet of current sea level, and with groundwater being just a few feet below the ground surface, rising sea levels and rising groundwater levels threaten to overwhelm the City's waterfront open spaces and habitat areas, roadways, stormwater and sewer systems, and the seawalls, embankments, and shoreline barriers that made it possible to develop the City. "

The DEIR and our Alameda General Plan 2040 include these dire realities -- and then ignore them. I urge our Planning Department to revise the Alameda General Plan in line with reality-- create defensible open space and wetland

restoration. Fund DePave Park. Create buffer zones on Shoreline Drive- don't allow housing construction in them. Re--
imagine the Harbor Bay Club. Restrict housing at Harbor Bay Shopping Center to a limited number of senior affordable
units, far from the waterfront.

If we were to see these types of changes we could take the E (Environmental) in DEIR seriously! Lets amend the
Alameda General Plan 2040 that is in touch with our reality. We're a city built on landfill, on former marshes that were IN
the Bay. We can't change the past but we have to prepare for the future-- and it includes inevitable sea level rise and
flooding.

Sincerely, Pat Lamborn
Alameda 30 years resident

Patricia Lamborn
patricia.lamborn@aol.com

Letter E

Patricia Lamborn

Thank you for your email regarding the General Plan and the General Plan EIR. Your comments will be transmitted to the Planning Board and City Council for their consideration prior to their final decisions on the General Plan update and associated Environmental Impact Report.

Your comments focus on the proposed policies that identify potential sites for in-fill residential development to address regional housing needs. Please be aware that State Law requires that the General Plan identify lands appropriately planned and zoned to accommodate the regional housing needs.

The draft General Plan includes a wide variety of policies to address sea level rise and rising ground water to protect existing and future residents and businesses that are currently located on existing residential and commercial properties in Alameda. The sea level protections envisioned in the General Plan to protect existing neighborhoods and businesses are also designed to protect existing in-fill development sites identified in the General Plan to accommodate future State mandated regional housing needs. Those General Plan policies also require future development of shoreline sites to provide protection against sea level and ground water rise, consistent with the Citywide efforts to protect all existing residents and businesses.

Please also see the preceding Response to Letter D for additional discussion addressing your comments.

From: **Andrew Thomas** athomas@alamedaca.gov
Subject: Fwd: [EXTERNAL] Comments on draft EIR --2nd email
Date: June 25, 2021 at 5:58 PM
To: Doug Herring doug@douglasherring.us, Nancy McPeak nmcpeak@alamedaca.gov

AT

One more for GP EIR.

Andrew Thomas,
510-774-5361 (c)

Begin forwarded message:

From: Reyla Graber <reylagraber@aol.com>
Date: June 25, 2021 at 5:56:52 PM PDT
To: Andrew Thomas <athomas@alamedaca.gov>
Subject: [EXTERNAL] Comments on draft EIR --2nd email
Reply-To: Reyla Graber <reylagraber@aol.com>

Dear Andrew Thomas,

This is regarding the draft EIR for the GP 2040 and related subjects. Although I did not see A26 mentioned in the EIR this is a re-affirming that Article 26 (Measure A) is still part of the City Charter and was most recently reaffirmed by Alameda voters in 11/20 by a large margin.

Most importantly, Article 26 provides that at least one out of every 4 units built will be affordable units. Without the existence of A 26 there would be no guarantee that builders would build affordable units. However, with A26, Alamedans are assured that affordable homes will be built. Particularly now with State bills seeking passage which do not include affordable housing requirements, A 26 is seen as particularly important for pursuing social equity and yet maintaining Alameda's "town" character.

Thank you
Reyla Graber

From: **Andrew Thomas** ATHOMAS@alamedaca.gov
Subject: Fwd: Fwd: [EXTERNAL] ; 1st EIR draft letter to A. Thomas
Date: June 25, 2021 at 7:28 PM
To: Doug Herring doug@douglasherring.us, Nancy McPeak nmcpeak@alamedaca.gov

AT

One more for the folder. Gp comments.

Andrew Thomas,
510-774-5361 (c)

Begin forwarded message:

From: Reyla Graber <reylagraber@aol.com>
Date: June 25, 2021 at 6:34:02 PM PDT
To: Andrew Thomas <athomas@alamedaca.gov>
Subject: [EXTERNAL] Fwd: : 1st EIR draft letter to A. Thomas
Reply-To: Reyla Graber <reylagraber@aol.com>

Dear Andrew Thomas,

My comments pertain to the draft EIR report which is part of the draft General Plan: The EIR is based upon the Housing Requirements currently demanded by the State. As a result, possibly some 20,000 to 30,000 new Alameda residents may be added in the next 20 years together with some 10,000 new housing units.

A concern which the City might want to consider is that if a State initiative (or referendum) is passed by California voters in the next few years (there is growing talk around that) which would make the State Housing Bills null and void, and puts zoning back in the hands of cities, will the City of Alameda then prepare an amended General Plan for 2040.

Thank you,
Reyla Graber

From: **Andrew Thomas** ATHOMAS@alamedaca.gov
Subject: Fwd: [EXTERNAL] EIR-public comment on cumulative housing effect-- 5th emails
Date: June 26, 2021 at 7:21 AM
To: Doug Herring doug@douglasherring.us, Nancy McPeak nmcpeak@alamedaca.gov

AT

Please save. For gp EIR comments folder

Andrew Thomas,
510-774-5361 (c)

Begin forwarded message:

From: Reyla Graber <reylagraber@aol.com>
Date: June 25, 2021 at 10:56:22 PM PDT
To: Andrew Thomas <athomas@alamedaca.gov>
Subject: [EXTERNAL] EIR-public comment on cumulative housing effect-- 5th emails
Reply-To: Reyla Graber <reylagraber@aol.com>

Dear Andrew Thomas,

This is an initial statement of my concern around cumulative housing effect on the City and its residents. I may submit something more early next week if still agreeable.

I have concerns about the total possible number of small units (4 units or less) which may be built throughout Alameda with this projected upzoning for the next 20 years.

No, they don't need a CEQUA, but all Alamedans should be concerned about the possible cumulative effect of all these units if built out.

I think it is incumbent upon the City to research this, develop a report to show the cumulative effect to the public and to the City Council and include this report as part of the General Plan/EIR.

Thank you,
Reyla Graber

From: **Andrew Thomas** ATHOMAS@alamedaca.gov
Subject: Fwd: [EXTERNAL] Draft EIR--public comments-- 4th email
Date: June 26, 2021 at 7:22 AM
To: Doug Herring doug@douglasherring.us, Nancy McPeak nmcpeak@alamedaca.gov

AT

EIR comments.

Andrew Thomas,
510-774-5361 (c)

Begin forwarded message:

From: Reyla Graber <reylagraber@aol.com>
Date: June 25, 2021 at 10:49:56 PM PDT
To: Andrew Thomas <athomas@alamedaca.gov>
Subject: [EXTERNAL] Draft EIR--public comments-- 4th email
Reply-To: Reyla Graber <reylagraber@aol.com>

Dear Andrew Thomas,

I have issues with the EIR and what is contemplated for parking and streets.
The EIR indicates parking is being reduced to make people get out of their cars.

Does the City--does anyone ---have real proof that making it difficult for people to park their cars gets people taking the bus and biking? Maybe in NY. or SF where people can take cabs or Uber. Or do people get tired of the social engineering and move to the suburbs where they can afford more and drive an SUV! I think its the latter.

But people won't move out initially; instead they'll park their cars on the street if there's not enough residential parking and then then the quality of life diminishes drastically as these folks worry about their electric car and is someone going to break into it.

Its a very very bad idea not to put sufficient parking. And its a very bad idea. giving a large percentage parking space to electric vehicles when currently --what is the percentage in town? Only 5% electric vehicles? Probably not that much.

Better to do it gradually over time.

It is simply wrong and wrong headed all this social engineering such as the EIR saying the muni code will be amended to indicate

the maximum number of required spaces not the minimum.

And speaking of space, I believe the old compact code was 7 1/2 foot and you're increasing it to 8?

That is still not enough for a compact car. (only 6 inches more than before)

Again, you're creating stress for people when parking spaces are not sufficiently wide.

And with increasing Alameda's population by 20,000 in 20 years reducing stress for residents will be very very important.

Not increasing it.

Again, in the EIR it says amend all the streets to 10 feet wide(with a couple of exceptions) Guess what? Big trucks go down all of our streets(except maybe Buena Vista.) That is a very bad idea. I can see more deaths and injuries resulting from people trying to get out of a parked car and being hit by a passing motorist/truck driver in a 10 foot lane. That is only one foot wider than a parking space for a regular car: Only 6 inches wider on each side. Is that enough-- NO it is not.

Thank you,
Reyla Graber

From: doug@douglasherring.us
Subject: [FWD: [EXTERNAL] Draft EIR--Public Comment 3rd email]
Date: June 28, 2021 at 12:32 PM
To: Douglas Herring doug@douglasherring.us



----- Original Message -----

Subject: Fwd: [EXTERNAL] Draft EIR--Public Comment 3rd email
From: Andrew Thomas <athomas@alamedaca.gov>
Date: Sat, June 26, 2021 7:23 am
To: Doug Herring <doug@douglasherring.us>, Nancy McPeak <nmcpeak@alamedaca.gov>

For EIR comments.

Andrew Thomas,
510-774-5361 (c)

Begin forwarded message:

From: Reyla Graber <reylagraber@aol.com>
Date: June 25, 2021 at 10:00:48 PM PDT
To: Andrew Thomas <athomas@alamedaca.gov>
Subject: [EXTERNAL] Draft EIR--Public Comment 3rd email
Reply-To: Reyla Graber <reylagraber@aol.com>

Dear Andrew Thomas,

I have some concerns about the Parks Chapter and EIR assumptions.
(This is my first writing on this and I may add something very early in the week if that is still agreeable.)

First of all, there is a discrepancy in population growth figures and percentages between 2020 and 2040.

Please look **Under 8.1**: It says in the second sentence, first text paragraph that the DOF says the population will increase to (only) 92,000.

And then at the bottom of the page last sentence it says "... the projected 13.7 percent increase in the City's population".

That may all be correct if the City is to grow by only 12,000. (from 80,000 to 92,000)

However, these figures are contradicted by earlier predictions in the EIR that state the population will grow from 20,000 to 30,000. Which is more like a percentage increase of 24% to something over 30%. **(Can't locate that EIR statement right now)**

And additionally in a third place ---**3.6 Growth Forecasts** the EIR states that" the residential population (will increase) from 79,000 to approximately 104,000.

It would appear that the higher figure of population increase is more accurate (20,000 to 30,000)

Given that that really means we will need to build a great many more parks during those years.

I believe as presently written, the EIR does not really face this fact.

The Quimby Act requires that the developer either adds new parks and or recreational

facilities and or pays fees to rehabilitate 1.e perform capitol projects(not maintain) existing parks(this is my interpretation from online legal journals as well as the interpretation of the City and County of Los Angeles.

Why have we not adopted the Quimby Act in our muni code? Or are we required to follow the Quimby Act as part of Alameda County code?

Have our fees kept up with the times, and the recent costs of land?

Can the City show the public where this park money over the years has specifically gone? I assume its in a special account? Is the Park commission in charge of final expenditures or is the City Council?

I think there should be more detail in the Park Chapter about all of this.

Another point of concern: Realistically, I think the City is calling parcels" parks" when they are not parks. Or not yet parks-- and if so I seriously question that.

For instance do we really have now an Estuary Park? I don't know. Or is that in the future. **If so how can it be counted now.** There may be other such parcels in the list that are questionably called parks. I don't have enough info on that right this minute.

Another point of concern are the geographical spread of the parks.

What I notice is that the the vast acreage of real parks(not a golf course which has limited use for the general public) are heavily weighted in West Alameda.

On the other hand, Central Alameda going towards East East Alameda has relatively few parks and park acreage.

Bay Farm may be ok in acreage.

I urge the City to consider looking at the park acreage not as an aggregate, but looking at park coverage by district.

And put parks in those areas not currently covered sufficiently. Those lacking areas should be given a high priority.

If that is not in the current EIR I think that is a lack in the EIR.

And it might be very good for our City to put in smaller pocket parks throughout our City.

Pocket parks could be created and maintained relatively inexpensively. What would pocket parks provide? A great deal.

They would provide calming and contemplation and maybe some joy for seniors who dont want to walk 1/4 a mile and for disabled folks and for

mother's with strollers. And they could be a place for wild life to hang out which enriches everyone. No playgrounds in these pocket parks just trees and plants and perhaps a rock creek

and grasses and benches and a table to play chess! We have some pocket parks on Bay Farm Island?HBI and they are a blessing for the soul, young and old alike.

I urge the City to create neighborhood mini"natural" parks and I ask that the EIR reflects this specifically. I think the City could easily get a group of citizens together who would be willing to look into this and help.

Thank you Reyla Graber

Letter F

Reyla Graber

Thank you for your five (5) emails regarding General Plan 2040 and the General Plan EIR. Your comments will be transmitted to the Planning Board and City Council for their consideration prior to their final decisions on the General Plan update and associated Environmental Impact Report.

In response to your comments, we have provided the following information for your consideration:

One question you raise is whether the City can amend its General Plan in the future if the State of California amends State Law to remove the local obligation to address the Statewide housing need. The answer is yes. The City Council may amend each mandatory element of its General Plan up to four times per year (subject to limited exceptions) and could amend its General Plan to address any future changes to State law.

You state that City Charter Article 26 requires that 25 percent of all housing constructed in Alameda must be affordable to lower income households. This is not correct. City Charter Article 26 does not require that one out of every four housing units constructed in Alameda be affordable. Article 26 prohibits multifamily housing, which is a more affordable housing type than single-family housing, and Article 26 prohibits residential densities above 21.78 unit per acre, which are densities that are more affordable to lower income households.

Your comments also address the need for open space for a growing population. The Parks and Open Space Element of General Plan 2040 addresses these policy issues and identifies where new parks will be added over the course of the next 20 years in Alameda. In response to your question about the Quimby Act, the City of Alameda imposes a development impact fee on all new residential development in Alameda specifically to fund parks. At Alameda Point, the City has set aside a wide variety and significant acreage of waterfront land for future parks. As described in the Parks and Open Space Element of the General Plan, Alameda has done well to plan for and set aside land for parks and open space. The challenge for Alameda in the next 20 years will be to raise the money necessary to improve those lands for park use and to allocate the additional General Fund dollars necessary on an annual basis to maintain the new parks.

In response to your comments on the population statistics in the General Plan EIR and the apparent discrepancy in the City's future population as reported in the different sections of the Draft EIR cited in the comment, they are due to different ways of estimating the City's population growth. The growth projection listed in the second bullet point on Draft EIR page 3-10 (Section 3.6) is an example of the City's potential future growth based on the City's need to add 10,000 to 12,000 new housing units by 2040. Applying the City's average household size of 2.5 persons, the development of 10,000 new housing units could increase the City's population by 25,000 people, while creation of 12,000 new

units could increase the City's population by 30,000 people. If a 4-percent vacancy rate is assumed, then these population increases would be more on the order of 24,000 to 28,800 new residents, respectively.

It should be noted that the assumed household size reported in Section 3.6 was rounded to 2.5 persons for simplicity in estimating the City's future population in 20 years, which is not an exact science and cannot be predicted to an exact number. The 2040 population estimate reported in the second bullet item on Draft EIR page 3-10 is based on the California Department of Finance (DOF) estimate of the City's 2019 population—79,316 persons—with the addition of 25,000 new residents, i.e., 104,316 people, or approximately 104,000 people, as reported in this Draft EIR section. This is just one estimate example, and if growth of 30,000 people occurred, then the 2040 population would be on the order of 109,000 people, or lower if a 4-percent vacancy rate is factored in.

In the discussion of Impact 5-1 on page 5-16 of the Draft EIR, the more precise household size of 2.51 persons as determined by the DOF was applied, and no vacancy rate was assumed in order to produce a more conservative estimate. This resulted in projected growth by 2040 of 25,100 to 30,120 new residents. These growth estimates were added to the City's 2020 population, as reported by the DOF (81,312 residents), resulting in an estimated 2040 population of 106,412 to 111,432 people. If they were added to the City's 2019 population, these numbers would be 104,416 and 109,436, respectively.

As noted on pages 5-3 and 5-4 of the Draft EIR, the City's population estimates vary depending on provider. For example, the U.S. Census Bureau estimates the City's 2019 population to be 77,630 residents, while the DOF estimates its 2019 population to be 81,618 residents.

The 13.7-percent population growth between 2020 and 2040 referenced in the comment and reported on the bottom of page 8-14 of the Draft EIR is based on the DOF's 2020 (81,312 people) and 2040 (92,465 residents) population estimates, which represents an increase of 13.7 percent over the 20-year period. As noted in the comment, this growth rate appears to be substantially larger when different numbers are assumed. For example, if the 2040 population is assumed to be 111,432 people, which is the largest estimate considered, it would represent an approximately 37-percent increase over DOF's reported 2020 population.

One important point pertaining to these varying population estimates and projections is that the General Plan 2040 is designed to accommodate the City's future population growth while implementing policies that will minimize the potential environmental effects that could result from the growth. Regarding the concern about parkland expressed in the comment, as noted above, the City of Alameda imposes a development impact fee on all new residential development in Alameda specifically to fund parks. Thus, the developers of the new housing units the City must build to meet its regional housing allocation will be required to fund the development of new parks to meet the City's future need for parks and recreational facilities. Furthermore, as noted in the discussion of

Impact 5-1, the City's existing ratio of 6.26 acres of parkland per 1,000 population would still be 5.51 acres of parkland per 1,000 population in 2040 even without the creation of new parks, which exceeds the adopted parkland standards of the other cities in the region, including Emeryville, Oakland, Union City, Newark, Hayward, San Leandro, Berkeley, Albany, Pleasanton, Dublin, and Livermore. However, the City intends to increase parkland along with the growth in housing units, which will be facilitated by the fees imposed on the future development.

A second important point regarding the magnitude of the City's future population growth is that the potential impacts of such growth have been identified and evaluated in the Draft EIR, and where potentially significant impacts have been identified, mitigation measures have been included to minimize any potential significant environmental effects. Furthermore, the growth would be consistent with the growth planned for the City in *Plan Bay Area 2040*, the regional strategy adopted by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) for accommodating household and employment growth projected to occur in the Bay Area region through 2040. Finally, as concluded in Impact 5-1, the proposed General Plan would not induce substantial unplanned population growth, which is the applicable threshold of significance established in the *CEQA Guidelines*. Accordingly, the impact from the City's population growth would be less than significant.

Your comments also address parking policy. The General Plan recognizes the need to alter the transportation system in Alameda to address the City's climate change challenges and reduce the greenhouse gas emissions caused by transportation choices, to reduce the number of Alameda citizens that are killed or significantly injured each year Alameda's city streets, and to provide more choices for Alameda citizens. Specifically, in response to your comments, nationwide studies show that narrower lane widths reduce travel speeds, which increases safety for all users of the street. In regards to parking, the General Plan calls for changes to the parking requirements to ensure that the right number of spaces is provided, not a minimum number. This approach is supported by nationwide studies and has been implemented in a number of Bay Area cities and is being contemplated by the State Legislature as a statewide standard.

You also raise concerns about the construction of new housing in Alameda and in particular small residential projects with four or fewer units. You request that the City conduct a study and produce a report looking at the cumulative effects to the public and that the study be included in the Draft EIR.

Alameda General Plan 2040 does provide for additional housing as required by State Housing Law. The 10,000 to 12,000 units projected over the next 20 years is an estimate of how many units Alameda will be required to provide over that period to comply with State Law. These housing requirements are not optional. The City Council and Alameda community cannot simply decide that they do not want to build housing to comply with State law.

The Alameda General Plan EIR analyzes the cumulative environmental impacts associated with the development of 10,000 to 12,000 units over the next 20 years. The EIR analysis was completed in compliance with the requirements of the California Environmental Quality Act, including a consideration of potential cumulative impacts.

In your comments, you wish to know the impacts of the additional housing “on the public,” not the environment. As described in the introduction to the General Plan, the policies are designed to create a more equitable and inclusive community, create a more environmentally sensitive and resilient community, create a more mobile community with greater, safer transportation options, and maintain the special characteristics, both physical and social, that make Alameda special. From staff’s perspective, the General Plan will result in positive cumulative impacts “on the public.”

Mr. Andrew Thomas:

Attached find my comments on the Draft EIR [Environmental Impact Report] on the City of Alameda's General Plan.

The Draft EIR addresses nearly all of the historical environmental issues adequately, and in some cases superbly. My thanks to you and your team.

Still, the Draft EIR lacks the analytical innovations needed to address the environmental impacts of large numbers of unhoused people that the pandemic has illuminated. These impacts were hardly visible when the last General Plan was prepared around 1990.

It would be gross negligence on our part as Alameda citizens to omit the impacts on the environment of our rapidly growing population of the unhoused. We just have to look across the estuary toward Oakland to see what will be in store for us in the future if we don't adequately plan to manage this growing population. The General Plan 2040 is the best planning tool we have for long range and integrated planning for complex intersectional problems, especially that of properly supporting our unhoused populations to reduce their environmental impacts.

As an introduction to my comments below, I quote extensively from the City of Alameda's report on [Homelessness Initiatives and Efforts](#). This City report sets the stage for the many suggested mitigation measures listed in my attached markup of Table SUM-1, Summary of Environmental Effects, from the draft EIR.

The City concludes in that report that programs to support the homeless by providing temporary or permanent facilities to address homelessness in Alameda will require changes to the City's zoning and regulatory structure, which has not been updated to best address the needs of the homeless. Other than changing land use policies to allow rezoning for more housing on less land, I saw little evidence of such changes in the spring draft of the General Plan so related impacts could not have been addressed in the draft EIR.

William Smith
WJASmith@AOL.com

Background for Understanding the Environmental Effects of Unhoused Persons in Alameda

Excerpts from the City of Alameda's [Homelessness Initiatives and Efforts](#) Report

In January 2019, 231 individuals in the City of Alameda were identified during the [Countywide Point-In-Time Count](#)^(PDF, 2MB) of individuals experiencing homelessness. A consistent theme throughout ...is that most policy options listed are merely providing differing types of services and stopgap measures to individuals who remain homeless.

The City must commit resources to organizing its homelessness response as well as actual provision of services if it seeks to address the issue. Direction of these resources to assist homeless individuals is, of course, only a stopgap measure as housing units are the long-term solution to homelessness in Alameda.

The lack of physical facilities within the City of Alameda to provide services to those homeless individuals living on the streets is one of the most significant gaps ... Another gap in current resources for the homeless population is physical access to Countywide services within the City as no current County services are offered in Alameda,

*Zoning Amendments to Support Homeless Programs Providing temporary and/or permanent facilities to address homelessness in Alameda will require **changes to the City's zoning and regulatory structure**, which has not been updated to best address the needs of the homeless. For example, the zoning code only allows emergency homeless shelters on about nine properties citywide, the zoning code has no provisions to permit temporary "warming centers", and the zoning code does not have a definition or provisions for assisted living.*

Suggested Modifications to Draft EIR for Draft Alameda General Plan 2040

**Table SUM-1
Summary of Environmental Effects**

*Alameda General Plan 2040 Draft EIR 2–25
2. Summary*

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
LAND USE AND PLANNING			
<p><u>Impact 4-1</u> Implementation of the proposed <i>Alameda General Plan 2040</i> would not physically divide an established community.</p> <p>Indirectly, by inducing further growth in the population of the unhoused, implementation of the proposed <i>Alameda General Plan 2040</i> would conflict with several land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect.</p>	S	<p>Mitigation Measure 4-1 Required.</p> <p>None required:</p> <p>Adoption of measures, some outlined below, for mitigating the environmental effects of a growing unhoused population indirectly induced by implementation of the proposed <i>Alameda General Plan 2040</i>.</p>	LTS
<p><u>Impact 4-2</u> Implementation of the proposed <i>Alameda General Plan 2040</i> would not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.</p> <p>Indirectly, by indirectly inducing further growth in the population of the unhoused, implementation of the proposed <i>Alameda General Plan 2040</i> will conflict with land use plans, policies, or regulation that fail to address the resulting increase in the homeless population.</p>	S	<p>Mitigation Measure 4-2 Required.</p> <p>None required:</p> <p>Adoption of measures, some outlined below, for mitigating the environmental effects of the growth of the unhoused population indirectly induced by implementation of the proposed <i>Alameda General Plan 2040</i>.</p>	LTS
POPULATION AND HOUSING			

<p><u>Impact 5-1</u></p> <p>Implementation of the proposed <i>Alameda General Plan 2040</i> would not induce substantial unplanned direct or indirect population growth.</p> <p>According to the City’s Homelessness Initiatives and Efforts report in January 2019, there were 231 documented unhoused individuals in the City of Alameda, a number widely viewed as a severe undercount of the actual number. That number is expected to significantly increase for the foreseeable future. The report concludes that “most policy options listed are merely providing differing types of services and stopgap measures to individuals who remain homeless [unhoused].” Projections of the population of the unhoused in Alameda based on recent time trends indicate that the policy options identified in the housing element will not suffice to reduce the overall number of unhoused for many years.</p>	<p>S</p>	<p><u>Mitigation Measure 5-1 Required</u></p> <p>None required:</p> <p>Implementation of the proposed <i>Alameda General Plan 2040</i>, along with implementation of general plans of neighboring cities, would induce substantial unplanned direct or indirect growth of the number of unhoused Alameda residents. The City must address the many adverse environmental impacts that will accompany a growing population of the unhoused. These include provision of water and sanitary facilities for this population, solid, and sometimes toxic, waste from discarded make-shift shelters, untreated wastewater, urine and feces, and unpleasant odors from cooking and untreated sewage as well as toxic air emissions from burning shelters and vehicles.</p>	<p>LTS</p>
<p><u>Impact 5-2</u></p> <p>Future residential, commercial, and industrial development allowed under the <i>Alameda General Plan 2040</i> would not result in the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.</p>	<p>LTS</p>	<p><u>Mitigation Measure 5-2</u></p> <p>None required.</p>	<p>LTS</p>
<p><u>Impact 5-3</u></p> <p>Gentrification</p> <p>Future residential, commercial and industrial development allowed under the <i>Alameda 2040 General Plan 2040</i> will result in the long-term displacement of entire communities [gentrification] of low and middle income workers who cannot afford to buy or rent market rate housing. Alameda has been unable to build even 30% of the affordable housing needed to prevent such gentrification. The demographics show that the majority of Alameda’s population of African American population has been displaced from the City during the period of the current housing element. Their displacement is a proxy for illustrating what will happen under the current</p>	<p>SU</p>	<p><u>Mitigation Measure 5-3 Required.</u></p> <p>Measures to reduce gentrification, including rent control, vacancy control, just cause eviction and meeting RHNA (Regional Housing Needs Allocation) targets for all income levels and not building an excess of market rate housing.</p>	<p>SU</p>

General Plan 2040 without more significant and effective policies than included in this draft.			
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S = Significant, LTS = Less Than Significant, SU = Significant Unavoidable, NI = No Impact, B = Beneficial

Alameda General Plan 2040 Draft EIR 2-5
 2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
PUBLIC SERVICES			
<u>Impact 6-1</u> Future residential, commercial, and industrial development allowed under the <i>Alameda General Plan 2040</i> could result in increased calls for fire protection services, including emergency medical response, which could require the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.	LTS	<u>Mitigation Measure 6-1</u> None required.	LTS
<u>Impact 6-2</u> Future residential, commercial, and industrial development allowed under the <i>Alameda General Plan 2040</i> could result in increased calls for police protection services, which could require the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.	S	<u>Mitigation Measure 6-2 Required</u> See Impact 6-3 for background. A growing population of the unhoused resulting from future residential, commercial, and industrial development allowed under the <i>Alameda General Plan</i> will result in increased calls for police protection services, which could require the provision of new or physically altered facilities for the unhoused, especially those who temporarily camp in biologically or socially sensitive areas.	LTS

<p><u>Impact 6-3</u></p> <p>Future residential, commercial, and industrial development allowed under the <i>Alameda General Plan 2040</i> could result in increased demand for school services, which could require the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable</p>	S	<p><u>Mitigation Measure 6-3</u></p> <p>Required.</p> <p>None required:</p> <p>Measures to mitigate the environmental impacts of new school construction and generation of additional greenhouse gases by parents driving their children to school.</p>	LTS
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Alameda General Plan 2040 Draft EIR 2-6

2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
class sizes.			
<p><u>Impact 6-4</u></p> <p>The increased population generated by future residential development allowed under the <i>Alameda General Plan 2040</i> could result in increased demand for library services, which could require the provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts.</p>	LTS	<p><u>Mitigation Measure 6-4</u></p> <p>None required.</p>	LTS
UTILITIES AND SERVICE SYSTEMS			
<p><u>Impact 7-1</u></p> <p>Future residential, commercial, and industrial development allowed under the <i>Alameda General Plan 2040</i> would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural</p>	S	<p>Mitigation Measure 7-1 Required</p> <p>None required:</p> <p>A growing population of unhoused will require the provision of new or expanded facilities for the provisions of potable water and the collection and treatment of wastewater,</p>	LTS

<p>gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental impacts:</p>		<p>stormwater, and the provision of electric power or telecommunication facilities of which the failure to provide has, and would continue, to cause significant environmental impacts.</p>	
<p><u>Impact 7-2</u> There would be sufficient water supplies available to serve future residential, commercial, and industrial development allowed under the <i>Alameda General Plan 2040</i> during normal, dry and multiple dry years.</p>	<p>LTS</p>	<p><u>Mitigation Measure 7-2</u> None required.</p>	<p>LTS</p>

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Alameda General Plan 2040 Draft EIR 2-7
2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<p><u>Impact 7-3</u> Future residential, commercial, and industrial development allowed under the <i>Alameda General Plan 2040</i> would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments:</p>	<p>S</p>	<p>Mitigation Measure 7-3 Required. None required: Indirectly, growth in the unhoused population accompanying future residential, commercial and industrial development allowed under the <i>Alameda General Plan 2040</i> would result in a determination by the wastewater treatment provider, which serves or may serve the unhoused, that it does not have adequate collection capacity to catch and retain the projected demand of the unhoused as they temporarily locate in various parts of the City in addition to the provider's existing commitments.</p>	<p>LTS</p>

<p><u>Impact 7-4</u></p> <p>The increased population generated by future residential development allowed under the <i>Alameda General Plan 2040</i> would not result in generation of solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and would not conflict with federal, State, or local management and reduction statutes and regulations related to solid waste.</p>	S	<p><u>Mitigation Measure 7-4</u> <u>Required</u></p> <p>None required:</p> <p>Indirectly, growth in the population of the unhoused generated by future residential development allowed under the <i>Alameda General Plan 2021</i> would result in the generation of solid waste in scattered locations without the infrastructure required to collect and safely dispose of solid waste.</p>	LTS
PARKS AND RECREATION			
<p><u>Impact 8-1</u></p> <p>Population growth allowed under the <i>Alameda General Plan 2040</i> could result in increased use of existing neighborhood and regional parks or other recreational facilities as living spaces such that substantial physical deterioration of the facility could occur or be accelerated.</p>	S	<p><u>Mitigation Measure 8-1</u> <u>Required.</u></p> <p>None required:</p> <p>Indirect and induced growth of unhoused populations may result in substantial physical deterioration of park facilities, which often serve as latrines and safe overnight shelter for the unhoused. Park areas have often been used as shelters of last resort by the unhoused so mitigation measures for preparing parks to shelter the unhoused and to restore the park area afterwards are required.</p>	LTS

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Alameda General Plan 2040 Draft EIR 2-8
2. Summary

Table SUM-1
Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<p><u>Impact 8-2</u></p> <p>New development allowed under the <i>Alameda General Plan 2040</i> could include recreational facilities or require the construction or expansion of recreational</p>	LTS	<p><u>Mitigation Measure 8-2</u></p> <p>None required.</p>	LTS

facilities, which might have an adverse physical effect on the environment.			
BIOLOGICAL RESOURCES			
<p><u>Impact 9-1</u></p> <p>Construction of new development allowed under the <i>Alameda General Plan 2040</i> could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status species in local or regional plans, policies or regulations, or by the CDFW, USFWS, or NMFS.</p>	S	<p>Mitigation Measure 9-1 Required.</p> <p>None required:</p> <p>Unhoused individuals often shelter in isolated wildlife habitats, such as the Elsie Roemer Bird Sanctuary. As their population grows, better policies and regulations will be required to provide them with alternatives to sheltering in wildlife sanctuaries, both formal and informal.</p>	LTS
<p><u>Impact 9-2</u></p> <p>Future development consistent with the <i>Alameda General Plan 2040</i> could adversely affect sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), or the National Marine Fisheries Service (NMFS).</p>	S	<p>Mitigation Measure 9-2 Required.</p> <p>None required:</p> <p>Unhoused individuals often shelter in isolated wildlife habitats that also shelter endangered species, such as the Elsie Roemer Bird Sanctuary. As the unhoused population grows, better policies and regulations will be required to provide them with alternatives to sheltering in wildlife sanctuaries, both formal and informal.</p>	LTS
<p><u>Impact 9-3</u></p> <p>Future development consistent with the <i>Alameda General Plan 2040</i> could adversely affect federally protected wetlands as defined by Section 404 of the Clean Water Act and the California Porter-Cologne Water Quality Control Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological</p>	S	<p>Mitigation Measure 9-3 Required.</p> <p>None required:</p> <p>Unhoused individuals often shelter near, or even in federally protected wetlands that also shelter endangered species. They may dispose of their waste and debris in the wetlands proper. As the unhoused population grows, better policies and regulations will be required to provide them with alternatives to sheltering in near federally protected wetlands.</p>	LTS

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2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
interruption, or other means.			
<p><u>Impact 9-4</u></p> <p>Future development consistent with the <i>Alameda General Plan 2040</i> could interfere with the movement of 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.</p>	S	<p>Mitigation Measure 9-4 Required.</p> <p>None required:</p> <p>Unhoused individuals often shelter in isolated wildlife corridors, such as the Elsie Roemer Bird Sanctuary. As their population grows, better policies and regulations will be required to provide them with alternatives to sheltering in wildlife sanctuaries, both formal and informal.</p>	LTS
<p><u>Impact 9-5</u></p> <p>Future development facilitated by the <i>Alameda General Plan 2040</i> could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	LTS	<p><u>Mitigation Measure 9-5</u></p> <p>None required.</p>	LTS
<p><u>Impact 9-6</u></p> <p>Future development facilitated by the <i>Alameda General Plan 2040</i> could conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.</p>	S	<p>Mitigation Measure 9-6 Required.</p> <p>None required:</p> <p>Unhoused individuals often shelter in isolated wildlife habitats, such as the Elsie Roemer Bird Sanctuary. As their population grows, better policies and regulations will be required to provide them with alternatives to sheltering in habitat areas, both formal and informal.</p>	LTS
TRANSPORTATION			

<p><u>Impact 10-1</u> Implementation of the <i>Alameda General Plan 2040</i> would not conflict with a program, plan, ordinance, or policy</p>	S	<p><u>Mitigation Measure 10-1</u> Required. None required: Policies and regulations are needed to ensure that the unhoused are equitably and adequately served by public transit and given safe spaces to park their vehicles overnight.</p>	LTS
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Alameda General Plan 2040 Draft EIR 2-10
2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
addressing the circulation system, including transit, roadway, and bicycle and pedestrian facilities.			
<p><u>Impact 10-2</u> The <i>Alameda General Plan 2040</i> would result in average household VMT per capita or commute VMT per worker that exceeds 15 percent below the average baseline rate for the Bay Area region.</p>	SU	<p><u>Mitigation Measure 10-2</u> Required. None feasible: It would be feasible to prohibit construction of more than the minimum number of market rate homes allocated by RHNA. That could reduce the VMT of Alameda residents more when compared with the draft General Plan, and when accompanied by increased construction of affordable housing, could reduce the regional VMT as well when compared to the baseline case.</p>	SU
<p><u>Impact 10-3</u> Implementation of the <i>Alameda General Plan 2040</i> would not substantially increase hazards due to a geometric design feature or incompatible land uses.</p>	LTS	<p><u>Mitigation Measure 10-3</u> None required.</p>	LTS
<p><u>Impact 10-4</u> Implementation of the <i>Alameda General Plan</i></p>	LTS	<p><u>Mitigation Measure 10-4</u> None required.</p>	LTS

2040 would not result in inadequate emergency access.			
AIR QUALITY			
<u>Impact 11-1</u> Implementation of the <i>Alameda General Plan 2040</i> would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	<u>Mitigation Measure 11-1</u> None required.	LTS
<u>Impact 11-2</u> Construction of new development allowed under the <i>Alameda General Plan 2040</i> could result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	S	<u>Mitigation Measure 11-2</u> BAAQMD's Basic Construction Mitigation Measures Recommended for All Projects. Future discretionary projects within the City shall implement the following measures or equivalent, expanded, or modified measures based on project- and site-specific conditions: 1. All exposed surfaces (e.g., parking areas, staging	LTS

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Alameda General Plan 2040 Draft EIR 2-11

2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
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		<p>areas, soil piles, graded areas, and unpaved access roads) shall be watered at least two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</p> <p>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 shall be prohibited.</p> <p>4. All vehicle speeds on unpaved roads shall be limited to 15 mph.</p> <p>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.</p> <p>6. Idling times shall be minimized either by shutting equipment off when not in use or reducing 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.</p> <p>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.</p> <p>8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48</p>	
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Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.	
<p><u>Impact 11-3</u></p> <p>Operation of new development allowed under the <i>Alameda General Plan 2040</i> would not 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.</p>	LTS	<p><u>Mitigation Measure 11-3</u></p> <p>None required.</p>	LTS
<p><u>Impact 11-4</u></p> <p>New development allowed under the <i>Alameda General Plan 2040</i> could expose sensitive receptors to substantial pollutant concentrations.</p>	S	<p><u>Mitigation Measure 11-4(a)</u></p> <p>Also address toxic air contaminants from fires near encampments of the unhoused, which can be considerable from burning cars, upholstery and wood treated with formaldehyde.</p> <p>Future discretionary projects within the City that generate substantial toxic air contaminant (TAC) emissions (that are not regulated by the Bay Area Air Quality Management District (BAAQMD)) that would be located within 1,000 feet of sensitive receptors shall submit a Health Risk Assessment (HRA) to the City prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the BAAQMD. If the HRA shows that the incremental cancer risk, PM_{2.5} concentrations, or the appropriate non-cancer hazard index exceeds BAAQMD's project-level thresholds, then the applicant shall be required to identify and demonstrate that mitigation measures are capable of reducing potential PM_{2.5} concentrations, cancer risks, and non-cancer risks to below BAAQMD's project-level significance thresholds. Projects that</p>	LTS

		generate substantial TAC emissions that are not regulated by the BAAQMD include:	
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Alameda General Plan 2040 Draft EIR 2-13
2. Summary

Table SUM-1
Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		<p>1. Construction activities (on a case-by-case basis) lasting greater than two months, taking into consideration the specific construction-related characteristics of the project and proximity to off site receptors, as applicable.</p> <p>2. Facilities that include more than 100 truck trips per day, 40 trucks with transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week.</p> <p><u>Mitigation Measure 11-4(a)</u> Future discretionary projects within the City that site sensitive receptors within 1,000 feet of existing major sources of toxic air contaminants (TACs) (e.g., permitted stationary sources, highways, freeways and roadways with over 10,000 annual average daily traffic (AADT)) shall submit a Health Risk Assessment (HRA) to the City prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District (BAAQMD). If the HRA shows that the incremental cancer risk, PM2.5 concentrations, or the appropriate non cancer hazard index exceeds BAAQMD's cumulative-level thresholds, then the applicant shall be required to identify and</p>	

		demonstrate that mitigation measures (e.g., electrostatic filtering systems) are capable of reducing potential cancer and noncancer risks to below BAAQMD's significance thresholds.	
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Alameda General Plan 2040 Draft EIR 2-14
2. Summary

Table SUM-1
Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<u>Impact 11-5</u> New development allowed under the <i>Alameda General Plan 2040</i> would not result in other emissions (such as those leading to odors) that could adversely affect a substantial number of people.	S	<u>Mitigation Measure 11-5 Required.</u> None required. Also address odors from encampments of the unhoused, which can be considerable from human waste, rotting food and other sources.	LTS
GREENHOUSE GASES			
<u>Impact 12-1</u> Implementation of the <i>Alameda General Plan 2040</i> would not generate GHG emissions, either directly or indirectly, that could have a significant impact on the environment.	LTS	<u>Mitigation Measure 12-1</u> None required.	LTS
<u>Impact 12-2</u> Implementation of the <i>Alameda General Plan 2040</i> would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.	LTS	<u>Mitigation Measure 12-2</u> None required.	LTS
NOISE			

<p><u>Impact 13-1</u> Implementation of <i>Alameda General Plan 2040</i> could potentially generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</p>	S	<p><u>Mitigation Measure 13-1</u> Required. None required: The growing encampments of the unhoused could generate a substantial and intermittent increase in ambient noise levels in excess of standards.</p>	LTS
<p><u>Impact 13-2</u> Implementation of <i>Alameda General Plan 2040</i> could potentially result in the generation of excessive</p>	LTS	<p><u>Mitigation Measure 13-2</u> None required.</p>	LTS

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Alameda General Plan 2040 Draft EIR 2-15
2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
groundborne vibration or groundborne noise levels.			
<p><u>Impact 13-3</u> Implementation of <i>Alameda General Plan 2040</i> could potentially expose people to excessive aircraft noise levels.</p>	LTS	<p><u>Mitigation Measure 13-3</u> None required.</p>	LTS
GEOLOGY AND SOILS			
<p><u>Impact 14-1</u> Construction and operation of new buildings and facilities allowed under the <i>Alameda General Plan 2040</i> would not directly or indirectly cause potentially substantial adverse effects, including the risk of loss, injury, or death, from seismic ground failure, including liquefaction and fault rupture.</p>	LTS	<p><u>Mitigation Measure 14-1</u> None required.</p>	LTS

<p><u>Impact 14-2</u></p> <p>New land uses allowed under the <i>Alameda General Plan 2040</i> would not result in substantial soil erosion or the loss of topsoil.</p>	S	<p><u>Mitigation Measure 14-2</u> Required.</p> <p>None required:</p> <p>Indirect and induced growth in the population of unhoused could result in larger and unregulated encampments that result in substantial soil erosion.</p>	LTS
<p><u>Impact 14-3</u></p> <p>New development allowed under the <i>Alameda General Plan 2040</i> could 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.</p>	LTS	<p><u>Mitigation Measure 14-3</u> None required.</p>	LTS
<p><u>Impact 14-4</u></p> <p>New land uses allowed under the <i>Alameda General Plan 2040</i> could be located on expansive soil, creating substantial direct or indirect risks to life or property.</p>	LTS	<p><u>Mitigation Measure 14-4</u> None required.</p>	LTS

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Alameda General Plan 2040 Draft EIR 2-16
2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<p><u>Impact 14-5</u></p> <p>New development allowed under the <i>Alameda General Plan 2040</i> would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.</p>	S	<p><u>Mitigation Measure 14-5</u> Required.</p> <p>None required:</p> <p>Soils underlying homeless encampments may be inadequate to support the use of septic tanks or alternative waste water disposal systems.</p>	NI

<p><u>Impact 14-6</u></p> <p>Construction of new development allowed under the <i>Alameda General Plan 2040</i> could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	<p>S</p>	<p><u>Mitigation Measure 14-6</u></p> <p>Amend the General Plan to include the following new policy to be added to the Conservation and Climate Action Element:</p> <p>CC-__: Paleontological Resources. If any paleontological resources—such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions— are encountered during site grading or other construction activities, all ground disturbance within 100 feet of the find shall be halted until the services of a qualified paleontologist can be retained to identify and evaluate the scientific value of the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). Any further mitigation measures recommended by the paleontologist shall be implemented and construction shall not resume in the vicinity of the find until the paleontologist has authorized the resumption of work. Significant paleontological resources shall be salvaged and deposited in an accredited and permanent scientific institution, such as the University of California Museum of Paleontology (UCMP).</p>	<p>LTS</p>
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Alameda General Plan 2040 Draft EIR 2-17
 2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
HYDROLOGY AND WATER QUALITY			

<p><u>Impact 15-1</u></p> <p>Construction and operation of new buildings and facilities allowed under the <i>Alameda General Plan 2040</i> would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.</p>	S	<p><u>Mitigation Measure 15-1</u> Required.</p> <p>None required:</p> <p>Indirectly construction of housing and commercial spaces will induce an increase in the population of the unhoused and unsheltered. Untreated waste discharged by unhoused communities throughout Alameda could violate water quality standards or waste discharge requirements of otherwise substantially degrade the quality of surface water, as in the many isolated lagoons around the Island. Waste accumulated and abandoned at these encampments may also violate waste discharge requirements.</p>	LTS
<p><u>Impact 15-2</u></p> <p>New land uses allowed under the <i>Alameda General Plan 2040</i> would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.</p>	LTS	<p><u>Mitigation Measure 15-2</u></p> <p>None required.</p>	LTS
<p><u>Impact 15-3</u></p> <p>New land uses allowed under the <i>Alameda General Plan 2040</i> would not substantially alter the existing drainage pattern on 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 that would result in substantial erosion or siltation on-or off-site. Growth of unhoused populations may alter the existing drainage pattern on sites throughout the City.</p>	S	<p><u>Mitigation Measure 15-3</u> Required.</p> <p>None required:</p> <p>Encampments of the unhoused may result in substantial erosion in the area.</p>	LTS
<p><u>Impact 15-4</u></p> <p>New land uses allowed under the <i>Alameda General Plan 2040</i> would not substantially alter the existing drainage pattern on 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 that would substantially increase the rate or amount of surface runoff in a manner</p>	S	<p><u>Mitigation Measure 15-4</u> Required</p> <p>None required:</p> <p>Waste and debris accumulated at encampments of the unhoused could be a substantial source of additional polluted runoff, especially heavy rains or after inundation.</p>	LTS

S = Significant, LTS = Less Than Significant, SU = Significant Unavoidable, NI = No Impact, B = Beneficial

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<p>that 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. Runoff from encampments of the unhoused may be polluted.</p>			
<p><u>Impact 15-5</u> New land uses allowed under the <i>Alameda General Plan 2040</i> would not substantially alter the existing drainage pattern on 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 that would impede or redirect flood flows.</p>	LTS	<p><u>Mitigation Measure 15-5</u> None required.</p>	LTS
<p><u>Impact 15-6</u> Future development allowed under the <i>Alameda General Plan 2040</i> that is located within a flood hazard, tsunami, or seiche zone could risk the release of pollutants due to project inundation. Solid or toxic waste in homeless encampments in flood prone areas could release pollutants due to project inundation.</p>	S	<p><u>Mitigation Measure 15-6 Required.</u> None required: Solid and toxic waste in homeless encampments near the shoreline and in low lying areas throughout Alameda could risk the release of pollutants due to inundation.</p>	LTS
<p><u>Impact 15-7</u> Implementation of the <i>Alameda General Plan 2040</i> would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p>	LTS	<p><u>Mitigation Measure 15-7</u> None required.</p>	LTS
<p>HAZARDS AND HAZARDOUS MATERIALS</p>			

<p><u>Impact 16-1</u> Site preparation activities associated with construction of new buildings and facilities allowed under the <i>Alameda General Plan 2040</i> could potentially expose construction workers and future site workers or residents to hazardous</p>	LTS	<p><u>Mitigation Measure 16-1</u> None required.</p>	LTS
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2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<p>concentrations of contaminants in the soils and groundwater at the site.</p>			
<p><u>Impact 16-2</u> New land uses allowed under the <i>Alameda General Plan 2040</i> could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; or through emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p>	S	<p><u>Mitigation Measure 16-2 Required.</u> None required: Waste materials hauled from encampments of the unhoused may contain hazardous materials in unpredictable forms and create a significant hazard to the public or the environment. They may also need to be properly disposed of regularly increasing the risk for accidental spills or emissions. Infectious materials from these encampments would be of special concern.</p>	LTS
<p><u>Impact 16-3</u> New land uses allowed under the <i>Alameda General Plan 2040</i> could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment.</p>	LTS	<p><u>Mitigation Measure 16-3</u> None required.</p>	LTS

<p><u>Impact 16-4</u></p> <p>Implementation of the <i>Alameda General Plan 2040</i> could result in a safety hazard or excessive noise for people living and working within the planning area of Oakland International Airport.</p>	LTS	<p><u>Mitigation Measure 16-4</u></p> <p>None required.</p>	LTS
<p><u>Impact 16-5</u></p> <p>Future development allowed under the <i>Alameda General Plan 2040</i> could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.</p>	LTS	<p><u>Mitigation Measure 15-5</u></p> <p>None required.</p>	LTS

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Alameda General Plan 2040 Draft EIR 2–20
2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<p><u>Impact 16-6</u></p> <p>Future development allowed under the <i>Alameda General Plan 2040</i> would not expose people or structures, either directly or indirectly, to significant risk of loss, injury, or death involving wildland fires.</p>	LTS	<p><u>Mitigation Measure 15-5</u></p> <p>None required.</p>	LTS
VISUAL QUALITY			
<p><u>Impact 17-1</u></p> <p>Site preparation and construction of new buildings and facilities allowed under the <i>Alameda General Plan 2040</i> could disturb the existing landscape and would introduce heavy construction equipment into public and private views.</p>	LTS	<p><u>Mitigation Measure 17-1</u></p> <p>None required.</p>	LTS

<p><u>Impact 17-2</u></p> <p>Implementation of the <i>Alameda General Plan 2040</i> could adversely affect scenic vistas of San Francisco Bay and lands bordering the Bay, and could damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a State scenic highway.</p>	S	<p><u>Mitigation Measure 17-2</u> <u>Required.</u></p> <p>None required:</p> <p>Indirectly induced growth in unsupported encampments of the unhoused could significantly interfere with scenic vistas of the San Francisco Bay, especially the lands bordering the Bay, and could damage scenic resources.</p>	LTS
<p><u>Impact 17-3</u></p> <p>Implementation of the <i>Alameda General Plan 2040</i> would not conflict with applicable zoning or other regulations governing scenic quality.</p>	S	<p><u>Mitigation Measure 17-3</u> <u>Required.</u></p> <p>None required:</p> <p>Indirectly induced growth in unsupported encampments of the unhoused could significantly interfere with water front scenic and other view quality throughout the Island.</p>	LTS
<p><u>Impact 17-4</u></p> <p>Future development allowed under the <i>Alameda General Plan 2040</i> could create new sources of substantial new nighttime lighting that could adversely affect nighttime views in the area, including light pollution and skyglow.</p>	LTS	<p><u>Mitigation Measure 17-4</u></p> <p>None required.</p>	LTS

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2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
CULTURAL RESOURCES			
<p><u>Impact 18-1</u></p> <p>New development allowed under the <i>Alameda General Plan 2040</i> could damage or destroy historical resources.</p>	LTS	<p><u>Mitigation Measure 18-1</u></p> <p>None required.</p>	LTS

<p><u>Impact 18-2</u></p> <p>Construction of new development allowed under the <i>Alameda General Plan 2040</i> could involve subsurface disturbance that could potentially encounter and damage previously undiscovered buried historical or prehistoric archaeological resources, including tribal cultural resources.</p>	S	<p><u>Mitigation Measure 18-2</u></p> <p>a) During future development activities consistent with the Alameda General Plan 2040, in the event that prehistoric or historic cultural resources are encountered during excavation and/or grading of the project site, all activity within a 100-foot radius of the find shall be stopped, the Director of Planning shall be notified, and a qualified archaeologist shall examine the find. The archaeologist shall evaluate the significance of the encountered resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). (Construction personnel shall not collect any cultural resources.) Recommendations may include collection, recordation, and analysis of any significant cultural materials. The results of any additional archaeological effort required through the implementation of this measure and/or Mitigation Measure 10-3 shall be presented in a professional quality report, to be submitted to the Alameda Director of Planning and the Northwest Information Center at Sonoma State University in Rohnert Park.</p> <p>b) During construction of a future development project, in the event that any cultural resources encountered</p>	LTS
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Alameda General Plan 2040 Draft EIR 2-22
 2. Summary

Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
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		<p>during subsurface disturbance are determined to be historical resources as defined in Section 15064.5 of the CEQA Guidelines, the project sponsor shall implement the mitigation prescribed in Section 15126.4(b) of the CEQA Guidelines, which identifies preservation in place as the preferred manner of mitigating impacts to buried historic resources, while data recovery and documentation may be appropriate in some circumstances.</p> <p>c) If any Native American tribal representatives have requested consultation with the City of Alameda regarding general or specific development projects in Alameda, prior to issuance of a grading permit, the City shall notify the tribal representative(s) in writing about the proposed development, soliciting their input regarding the protection of tribal cultural resources (TCRs) during project construction. In accordance with California Public Resources Code Section 21080.3.2, the consultation may include discussion concerning the type of environmental review necessary, the significance of the TCRs, the significance of the project's impacts on the TCRs, and, if necessary, project alternatives or appropriate measures for preservation or mitigation that the California Native American tribe may recommended to the lead agency. Mitigation measures to reduce impacts to TCRs must be developed in coordination with the consulting tribal group. The preferred approach to mitigation is avoidance or preservation in place. If this is not feasible, the mitigation may take the form of interpretive treatment. Mitigation measures agreed to during tribal</p>
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Table SUM-1

Summary of Environmental Effects

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		<p>consultation must then be carried over into the CEQA document and the associated Mitigation Monitoring and Reporting Program (MMRP) that must be adopted by the lead agency as part of the CEQA process. The consultation required by Senate Bill (SB) 18 and Assembly Bill (AB) 52 is considered complete when either the parties agree to measures to mitigate or avoid any significant impact on TCRs, or if one of the parties, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.</p>	
<p><u>Impact 18-3</u> Construction of new development allowed under the <i>Alameda General Plan 2040</i> could involve subsurface disturbance that could potentially encounter and damage human remains, including those interred outside of formal cemeteries.</p>	<p>S</p>	<p><u>Mitigation Measure 18-3</u> a) In the event that any human remains are encountered during site disturbance at any future development site, all ground-disturbing work in the vicinity of the remains shall cease immediately until the coroner of Alameda County has been contacted, in accordance with Section 7050.5 of the California Health and Safety Code. Human remains may be an inhumation or cremation, and in any state of decomposition or skeletal completeness. If the coroner determines that the human remains are of Native American origin, the Native American Heritage Commission (NAHC) must be contacted within 24 hours, and the project sponsor shall comply with State laws relating to the disposition of Native American burials, regulated by the NAHC (Pub. Res. Code Sec. 5097). If any human remains are discovered or recognized in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:</p>	<p>LTS</p>

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Alameda General Plan 2040 Draft EIR 2-24

2. Summary

Letter G

William Smith

Thank you for your email regarding General Plan 2040, the General Plan EIR and the needs of the unhoused in Alameda. Your comments will be transmitted to the Planning Board and City Council for their consideration prior to their final decisions on the General Plan update and associated Environmental Impact Report.

In response to your comments, staff appreciates your efforts to highlight the growing need to address the needs of the un-housed in Alameda and in the region. As you correctly point out, the growing problem of homelessness in Alameda, Oakland, the region and the country, is not only a humanitarian crisis, but it also has the potential to result in significant environmental impacts on water quality and biological resources, if not addressed adequately.

We also appreciate your efforts to highlight the work of City staff on the City of Alameda report, Homelessness Initiatives and Efforts. This report identifies some of the important steps the City needs to take to address the issues of homelessness, and both the report and the research that informed the report also informed General Plan 2040. In particular, on the three changes needed to the City's zoning and regulatory structure that you raised in your letter—the need for emergency shelters, warming centers, and assisted living— *General Plan 2040* policies state that all neighborhoods in the City of Alameda should provide for multi-family and shared housing opportunities, including co-housing, congregate housing, senior assisted living, single room occupancy housing, transitional housing, emergency warming shelters, and shelters for the homeless. (See Land Use Policy LU-2)

These policy objectives set the stage for the next step in the General Plan update process, which is the updating of the Housing Element and the associated zoning amendments to accommodate the housing needs of all segments of the Alameda community. As documented in a series of staff reports to the Planning Board and City Council over the last six months, staff is working on a comprehensive set of zoning amendments in combination with the update to the Housing Element policies, which must be ready for City Council adoption within the next 12 to 16 months. These housing policy and zoning amendments will implement General Plan policy LU-2 and the necessary changes to accommodate the City Regional Housing Needs Allocation and comply with State Fair Housing Law.

Although we agree with you on the importance of these issues and taking action in Alameda to address the deficiencies in the Zoning Code which contribute to the costs and delays that are often caused by these deficiencies when trying to address the issues of homelessness, we respectfully disagree with your argument that General Plan 2040 will “indirectly induce growth in the population of the unhoused.” To the contrary, General Plan 2040 policies address the need to build more housing for the unhoused. General Plan 2040 sets a policy framework to accommodate 10,000 to 12,000 new

housing units in Alameda over the next 20 years. General Plan 2040 recommends zoning changes to allow for emergency shelters and assisted living in every Alameda neighborhood. Your argument appears to be that by building housing, the General Plan will indirectly create more people without housing. We respectfully disagree with this argument. The Draft EIR discloses and evaluates the potential environmental effects that could result from implementation of General Plan 2040, and since the General Plan would not induce unplanned population growth, including unhoused population growth, the proposed revisions to Draft EIR impacts and mitigation suggested in your comment will not be incorporated.

3. TEXT CHANGES TO THE DEIR

The following text changes to the DEIR are presented in sequential order:

- **Page 7-25** of the DEIR: The third and fourth paragraphs are hereby revised to read as follows: (insertions double-underlined, deletions shown in ~~strikethrough~~):

WASTEWATER COLLECTION AND TREATMENT

Treatment

Wastewater in Alameda is collected in a network of sewer pipes and conveyed to EBMUD's South Interceptor in Oakland via inverted siphon pipelines underneath the Oakland Estuary; from there the flow is conveyed north to EBMUD's Main Wastewater Treatment Plant (MWWTP) located near the eastern terminus of the San Francisco-Oakland Bay Bridge. The EBMUD plant treats wastewater from the cities of Alameda, Albany, Berkeley, El Cerrito, Emeryville, Kensington, Oakland, Piedmont, and part of Richmond, serving approximately 685,740,000 people in an 88-square-mile service area.

The MWWTP provides secondary treatment for a maximum flow of 168 million gallons per day (MGD). Primary treatment is provided for up to 320 MGD. Storage basins provide operational flexibility to manage peak flows ~~plant capacity for a short-term hydraulic peak of 415 MGD. Though inflow to the MWWTP varies each year, on~~ an average, about 63.60 million gallons of wastewater is treated every day.

- **Page 7-26** of the DEIR: The first paragraph is hereby revised to read as follows: (insertions double-underlined, deletions shown in ~~strikethrough~~):

The solids that are removed, or biosolids, undergo a separate treatment process, where they are heated to a high temperature for an extended period of time in "digesters," to reduce disease-causing organisms and break down the organic matter into a soil-like material. Approximately ~~60,000 to 70~~75,000 wet tons of biosolids are produced annually by EBMUD, which are beneficially reused as a soil amendment at nearby non-food crop farm sites and as alternative daily cover at local landfills, though this use at landfills is being phased out due to

the passage of Senate Bill 1383 (2016, Lara), which requires a 75-percent reduction in organic waste disposal by 2025. The biosolids are regularly monitored and tested to ensure that they meet or surpass the strict quality and safety standards established by the EPA, State of California, and local governments.

- **Page 7-26** of the DEIR: The second paragraph is hereby revised to read as follows: (insertions double-underlined, deletions shown in ~~strikethrough~~):

There are approximately 140 miles of City-owned sanitary sewers and 42 sewage pump stations in Alameda, including 14 miles of pipes and 9 pump stations located in Alameda Point, the former Alameda Naval Air Station site. In addition, there are over 10 miles of pipelines and 7 pump stations located in Alameda that are part of the EBMUD wastewater system, which serves as the “backbone” of Alameda’s sewer network. These EBMUD facilities include 6.7 miles of gravity interceptors and 4.7 miles of force mains. Wastewater collected in the system is conveyed to EBMUD’s WWTP via the South Interceptor, as described above. During periods of wet weather when the capacity of the interceptor is exceeded, flows in the South Interceptor may be diverted to EBMUD’s Oakport and San Antonio Creek Wet Weather Facilities (WWFs) in Oakland for storage and/or discharge. (EBMUD operates a third WWF at Point Isabel in Richmond~~El Cerrito~~, which serves its northern service area.)

- **Page 18-27** of the DEIR: The first full paragraph is hereby revised to read as follows: (insertions double-underlined, deletions shown in ~~strikethrough~~):

~~While future development activity that would cause a substantial adverse change in the significance of a historical resource would be a significant, adverse impact on historical resources, including properties listed on or eligible for listing on the NRHP or CHRP and well as City designated historic monuments and properties, compliance with the General Plan policies listed above and with existing regulations and procedures would ensure that such impacts would be less than significant.~~ As discussed in the Setting section, any future discretionary development proposed within the Naval Air Station Alameda Historic District, Alameda Marina Historic District, or Park Street Historic Commercial District would be required to be submitted for review by the Alameda Historical Advisory Board and obtain a Certificate of Approval from the HAB prior to implementing the project. Project applicants would be required to comply with any conditions intended to preserve and protect historic resources that are identified by the HAB as part of the Certificate of Approval. Similarly, any discretionary project proposing removal of 30 percent or more of a structure or modification to a resource included on the City’s Historical Building Study List, or modification to a

designated Historical Monument, or a protected tree, as defined in Alameda Municipal Code Section 13-21.7(c), would be required to obtain a Certificate of Approval from the HAB prior to implementing the project.

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