

# **Appendix G**

## **Comments on Draft Supplemental EA**

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## Comments on Draft Supplemental EA

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- Comment letter from BCDC
- Comment letter from EPA Region IX
- Comment letter from San Francisco Bay Regional Water Quality Control Board

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**From:** Olsson, Schuyler@BCDC <schuyler.olsson@bccdc.ca.gov>  
**Sent:** Monday, February 1, 2021 5:05 PM  
**To:** Elliott, Glenn (CFM)  
**Cc:** Modovsky, Christine M. (CFM); Bogan, Natalie  
**Subject:** [EXTERNAL] RE: Alameda Draft SEA

Dear Mr. Elliott,

Please see a response from the San Francisco Bay Conservation and Development Commission here:

[https://na2.documents.adobe.com/public/fs?aid=CBFCIBAA3AAABLblqZhCJn3SsK4S-LhCHbH11lhZlir5BWnDLYx2p3qGQ6Te7CqJeAo\\_g3Tm\\_vMCINCKBOKM%2A](https://na2.documents.adobe.com/public/fs?aid=CBFCIBAA3AAABLblqZhCJn3SsK4S-LhCHbH11lhZlir5BWnDLYx2p3qGQ6Te7CqJeAo_g3Tm_vMCINCKBOKM%2A)

Thank you,

**Schuyler Olsson**

Coastal Program Analyst  
San Francisco Bay Conservation and Development Commission  
+1 (415) 352 3668  
[schuyler.olsson@bccdc.ca.gov](mailto:schuyler.olsson@bccdc.ca.gov)

**From:** Bogan, Natalie <Natalie.Bogan@hdrinc.com>  
**Sent:** Tuesday, January 5, 2021 11:29 AM  
**Cc:** Modovsky, Christine M. (CFM) <Christine.Modovsky@va.gov>; Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>  
**Subject:** Alameda Draft SEA

Good morning,

Please see the attached Notice of Availability for the U.S. Department of Veteran Affairs Draft Supplemental Environmental Assessment for the Proposed VA Multi-Specialty Outpatient Clinic and Columbarium. Comments must be received by February 1, 2021.

Happy New Year!

Kind regards,

**Natalie Bogan**

*Environmental Planner*

**HDR**  
100 Pringle Ave., Suite 400  
Walnut Creek, CA 94596  
D 510-725-7833 M 925-286-5701  
[Natalie.Bogan@hdrinc.com](mailto:Natalie.Bogan@hdrinc.com)

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# San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510, San Francisco, California 94105 tel 415 352 3600 fax 888 348 5190

State of California | Gavin Newsom – Governor | [info@bcdc.ca.gov](mailto:info@bcdc.ca.gov) | [www.bcdc.ca.gov](http://www.bcdc.ca.gov)

February 1, 2021

U.S. Department of Veterans Affairs

Attn: Glenn Elliott (via email: [glenn.elliott@va.gov](mailto:glenn.elliott@va.gov))

**SUBJECT: Comments on Draft Supplemental Environmental Assessment, VA Alameda Point Multi-Specialty Outpatient Clinic and Columbarium**

Dear Mr. Elliott:

Thank you for sharing the draft supplemental environmental assessment for the VA Alameda Point Multi-Specialty Outpatient Clinic and Columbarium.

My name is Schuyler Olsson, and I am a permit analyst with the San Francisco Bay Conservation and Development Commission (BCDC). My comment is regarding page 161 of 178, which provides a list of required permits for the project, but does not list any required approvals from BCDC.

Please note that any federal agency activity or federal development project, whether it occurs inside or outside of the coastal zone of San Francisco Bay, that will affect any land or water use or natural resources of the coastal zone, is subject to the federal consistency provisions of the Coastal Zone Management Act (CZMA). As such, a BCDC Consistency Determination, or an amendment to the current BCDC Consistency Determination for the site (Number C2013.004.00), will be required for this project as described, pursuant to the requirements of the CZMA and related federal regulations. ." I have been in discussion with representatives from the U.S. Department of Veteran's Affairs and HDR Inc. regarding our agency's requirements.

Please note that while the requirement for a Consistency Determination was omitted from the table on 161, this requirement appears to be recognized separately on page 51 of 178, which states that: "the project received a Consistency Determination from BCDC in 2014, and the VA is currently coordinating with BCDC for an updated Consistency Determination that would include all project features, including the storm drains and wetland mitigation area

Thank you, and please do not hesitate to let me know if you have any questions. I can be reached via email at [schuyler.olsson@bcdc.ca.gov](mailto:schuyler.olsson@bcdc.ca.gov) or via phone at (415) 352-3668.

Sincerely,



SCHUYLER OLSSON

Coastal Program Analyst

San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510

San Francisco, California 94105







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

February 1, 2021

Glenn Elliott  
Environmental Program Office (003C2)  
Office of Construction & Facilities Management  
Department of Veterans Affairs  
810 Vermont Avenue, NW  
Washington, DC 20420

Subject: Draft Supplemental Environmental Assessment for the VA Alameda Point Multi-Specialty  
Outpatient Clinic and Columbarium, Alameda, California

Dear Glenn Elliott:

The U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Assessment for the subject project. The following comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Final Environmental Assessment for the proposed project was completed in November 2013 and resulted in a finding of no significant impact (FONSI). Since that time, the scope of the Veterans Administration's portion of the original project has been expanded to include implementing on-site wetland mitigation commitments and constructing stormwater management structures. The Draft SEA evaluates the environmental impacts of the proposed changes to the original scope and updates transportation and air quality-related impact assessments.

The EPA commented on the 2013 EA and highlighted the need for clear and full disclosure of regulatory roles and responsibilities regarding hazardous substances currently undergoing Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response actions on the transfer property. Based on our review of the Draft SEA for the new project components, we offer the following comments regarding on-site contamination and tribal input.

**Potential to Interfere with Groundwater Cleanup Remedy at Installation Restoration (IR) Site 14**

The project's proposed installation of 2 new 36-inch stormwater drainage pipes north of the VA parcel are located on either side of Installation Restoration (IR) Site 14, which is currently undergoing groundwater remediation under CERCLA. An active groundwater remedy on the southern portion of IR Site 14 located on the VA parcel is being conducted in an effort to achieve the remedial goals for unrestricted use. However, this southern portion of IR Site 14 will continue to have institutional controls (ICs) in place until the remedial goals for unrestricted use are achieved. The groundwater remedy for the northern portion of IR Site 14 includes monitored natural attenuation and ICs. **Should the excavation for the proposed drainage pipes, which would require dewatering, potentially interfere with the groundwater remedy at IR Site 14, a Site Management Plan on how the VA will prevent interference with the**

groundwater remedy will be required for the EPA and Regional Water Quality Control Board's review. We recommend this contingency, and a commitment to its implementation, be identified in the Final SEA. Please coordinate with Xuan-Mai Tran, EPA's Remedial Project Manager for the site, regarding this action. Xuan-Mai can be reached at (415) 972-3002 or [Tran.Xuan-Mai@epa.gov](mailto:Tran.Xuan-Mai@epa.gov).

### **Coordinating with the Navy Regarding Use of Soil Disposal Area**

The soil disposal area indicated in Figure 2-4 is currently being utilized by the Navy for storage of soil that will cover IR Site 32 to the north. The Navy is in the process of finalizing the Record of Decision for IR Site 32. Once the ROD is signed, the Remedial Design and Remedial Action Work Plan will be developed before the Remedial Action begins to remove the soil that is currently being stockpiled on the VA parcel. The construction schedule in the Draft SEA indicates that construction of offsite utilities is expected to occur in late 2022. We recommend consulting with the Navy to ascertain whether their Remedial Action schedule for IR Site 32 will accommodate the VA's project schedule and updating the construction schedule, as appropriate, in the Final SEA.

### **Construction-phase Water Quality Impacts**

The Draft SEA addresses construction phase impacts to surface waters in Section 3.3.3 and identifies the General National Pollutant Discharge Elimination System Permit that would be obtained and the Stormwater Pollution Prevention Plan that would be prepared to address erosion and sedimentation impacts. The Draft SEA does not address potential construction-phase impacts from the cleaning and jetting of two existing drainage pipes and outfalls that are part of the proposed action. It is unclear whether the sediments within this portion of the existing storm drain system contain contaminants from historic Navy use, nor how this material would be tested and disposed. We recommend the VA work with the Regional Water Quality Control Board to adequately characterize the contents of the storm drains and ensure contaminants are not discharged to surface waters during drainage pipe clearing. We recommend these potential impacts to surface waters, and mitigation measures to prevent them, be addressed in the Final SEA.

### **Tribal Input**

The Draft SEA identified input from the North Valley Yokuts Tribe, received via email, which included proposed mitigation measures including Tribal Cultural Resource awareness training, Tribal Cultural Resource avoidance procedures, inadvertent discovery protocol, Native American monitoring, and post-disturbance site visits. The Draft SEA indicates that the VA was unable to reach the commenter to continue consultation, but it does not indicate whether the mitigation measures submitted were incorporated into the project. We recommend the Final SEA address if/how the information received from the Tribe was incorporated into the project and any additional efforts to continue consultation.

EPA appreciates the opportunity to review this Draft SEA. When the Final SEA is completed, please send one electronic copy to Karen Vitulano, lead reviewer for this project, at [vitulano.karen@epa.gov](mailto:vitulano.karen@epa.gov). If you have any questions, please contact me at (415) 947-4167, or contact Karen at (415) 947-4178.

Sincerely,

Jean Prijatel  
Manager, Environmental Review Branch

cc: Brian Wines, SF Bay Regional Water Quality Control Board

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**From:** Wines, Brian@Waterboards <Brian.Wines@waterboards.ca.gov>  
**Sent:** Wednesday, January 20, 2021 10:59 AM  
**To:** Bogan, Natalie  
**Cc:** Modovsky, Christine M. (CFM); Elliott, Glenn (CFM); Edwards, Dawn; Hashimoto, Yemia@Waterboards; Vitulano, Karen  
**Subject:** [EXTERNAL] Re: Alameda Draft SEA - Please email me the complete document.

Hi Natalie

I have a couple of concerns with respect to the potential spread of contamination associated with installing and/or rehabilitating stormwater lines from the VA Clinic to the Oakland Inner Harbor.

The excavation footprint has been selected to avoid the footprint of areas of known contamination. But I have recently learned that the emerging contaminant, PFAS, may be present at IR Site 14. The extent of any PFAS contamination in soil or groundwater at this site is not yet known. Since the excavations will be placed near Site 14, they may encounter soil or groundwater contaminated with PFAS. Also, any dewatering of the excavations may draw contaminated groundwater into the excavation. Groundwater extracted for dewatering should be tested and then treated as necessary to attain acceptable contaminant levels for discharge.

Also, please clarify the extent to which sediments in the storm lines that are proposed for jetting have been characterized for contaminants. Storm drains are often conduits for improperly disposed materials to reach jurisdictional waters. Before jetting drain lines, we should know the extent to which sediments in those lines are contaminated. If groundwater infiltrates those lines, the extent to which groundwater may have introduced contaminants into the line should be assessed before the lines are jetted.

**BRIAN WINES**

Water Resource Control Engineer  
Watershed Management Division  
San Francisco Bay Regional Water Quality Control Board

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**From:** Bogan, Natalie <Natalie.Bogan@hdrinc.com>  
**Sent:** Tuesday, January 12, 2021 10:01 AM  
**To:** Wines, Brian@Waterboards <Brian.Wines@waterboards.ca.gov>  
**Cc:** Modovsky, Christine M. (CFM) <Christine.Modovsky@va.gov>; Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>  
**Subject:** RE: Alameda Draft SEA - Please email me the complete document.

**EXTERNAL:**

Hi Brian,

Please see the SEA main document, attached.

Thank you,

**Natalie Bogan**

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**From:** Wines, Brian@Waterboards <Brian.Wines@waterboards.ca.gov>  
**Sent:** Monday, January 11, 2021 11:59 AM  
**To:** Bogan, Natalie <Natalie.Bogan@hdrinc.com>  
**Cc:** Modovsky, Christine M. (CFM) <Christine.Modovsky@va.gov>; Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>  
**Subject:** Re: Alameda Draft SEA - Please email me the complete document.  
**Importance:** High

**CAUTION: [EXTERNAL]** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Natalie

I am not able to download files from other websites while working remotely.

Please email me the complete document.

If the document is too large to email, please break it down into smaller pieces and email them to me.

Brian Wines  
Water Resource Control Engineer  
Watershed Management Division  
San Francisco Bay Regional Water Quality Control Board

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**From:** Bogan, Natalie <Natalie.Bogan@hdrinc.com>  
**Sent:** Tuesday, January 5, 2021 10:02 AM  
**Cc:** Modovsky, Christine M. (CFM) <Christine.Modovsky@va.gov>; Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>  
**Subject:** Alameda Draft SEA

**EXTERNAL:**

Good morning,

Please see the attached Notice of Availability for the U.S. Department of Veteran Affairs Draft Supplemental Environmental Assessment for the Proposed VA Multi-Specialty Outpatient Clinic and Columbarium. Comments must be received by February 1, 2021.

Happy New Year!

Kind regards,

**Natalie Bogan**

*Environmental Planner*

**HDR**

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