CHAPTER 5 COMMENTS AND RESPONSES TO COMMENTS ON THE DEA/EIR FROM REGIONAL AGENCIES

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California Regional Water Quality Control Board

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San Francisco Bay Region

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Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

JUN 16 2006
Date:
File No.: 2188.05 (BT)

Gregory C. McConnell
Attention: Sheryl Dorado
California Department of Transportation
Mail Station 8B
P.O. Box 23660
Oakland, CA. 94623-0660

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL IMPACT REPORT FOR THE CALDECOTT IMPROVEMENT PROJECT ON STATE ROUTE 24

Dear Mr. McConnell:

Thank you for giving the Regional Water Quality Control Board (Water Board) staff the opportunity to review the *Draft Environmental Assessment/Environmental Impact Report (DEIR) for the Caldecott Improvement Project on State Route 24* (SCH No. 2002112068). The proposed Project involves construction of a fourth tunnel between Alameda and Contra Costa Counties on State Route 24. The DEIR discusses impacts associated with the two-lane tunnel, three-lane tunnel, and no-build alternatives. Water Board staff have reviewed the DEIR and have the following comments.

Non-Storm Water Discharges

The DEIR mentions that the California Department of Transportation (Department) has existing arrangements with the East Bay Municipal Utility District (EBMUD) to route tunnel wash waters to the sanitary sewer for treatment. The DEIR further mentions that the Department has intentions of making similar arrangements with EBMUD for future wash water discharges associated with either Alternative 2N or 3N. It can be inferred from the language in the DEIR that arrangements with EBMUD for treatment were tentative at the time the DEIR was written. Please note that the discharge of tunnel wash water to the storm drain is prohibited. If the Department is unable to discharge tunnel wash water to EBMUD's sanitary sewer, then it must identify other appropriate disposal options, such as hauling wash water to an approved sanitary sewer discharge point, or obtaining from the water board and individual NPDES permit allowing the discharge of appropriately treated wash water. 1

Impervious Area and Drainage

As noted in the DEIR on page 132, Section 2.2.2.3, implementation of either Alternative 2N or 3N would result in additional impervious area of approximately 2.8 acres, and 4.1 acres, respectively. 2

Mr. Gregory C. McConnell - 2 - Draft EIR for Caldecott Improvement Project

The DEIR subsequently notes that "the amount of additional runoff...is negligible for either the two-lane or three-lane new tunnel." The DEIR does not provide a basis for determining that this additional impervious surface would have negligible consequences on water quality. Please provide a more thorough discussion on the areas of added impervious surfaces; specifically:

- Does the area of added impervious surface refer to the tunnel approaches only, or does it refer to both the tunnel roadway and the approach surfaces?
- What is the area of impervious area proposed to be added to each end of the tunnel approaches?
- What area of impervious surface within the project site will drain to San Pablo Creek?
- If a portion of added impervious surface will drain to San Pablo Creek, why does the Department believe that the increase in flow volume and velocity will have an insignificant effect on the Creek and its' beneficial uses, as identified on page 131 of the DEIR (i.e., what analyses have been completed allowing such a determination)? (Also, note that the Water Board concurs with the DEIR assertion that the potential increase in discharge of stormwater volume and velocity into Temescal Creek will not have significant consequent effects on the creek, which flows through a culvert nearly all the way to the Bay.)

Additionally, the DEIR should state that the Department will ensure the appropriate treatment of stormwater runoff from the entirety of the area of new and any redeveloped impervious surface. Should it prove infeasible to treat runoff, the DEIR should require the Department to identify alternate treatment that will provide a water quality benefit equivalent to the foregone treatment.

Wetlands Impacts

The proposed tunnel alternatives will provide a subdrain to relieve groundwater hydrostatic pressure on the tunnel walls (2.2.2.2, *Groundwater*). The EIR should address the possibility of any wetland impacts resulting from the associated perpetual groundwater drawdown. 3

If you have any questions, comments, or concerns, please contact Brendan Thompson of my staff at (510) 622-2506, or via e-mail to BThompson@waterboards.ca.gov.

Sincerely,

Keith H. Lichten, P.E.
Senior Engineer

cc: State Clearinghouse

California Environmental Protection Agency

Recycled Paper

1-The Department has noted your comment and has revised the text in Volume I. It was incorrectly stated in the Draft Environmental Assessment/Environmental Impact Report (DEA/EIR) that the tunnel wash water from the existing tunnels flows into an East Bay Municipal Utility District (EBMUD) system and that there is an existing agreement with EBMUD to accept this water. The actual connection is to an existing City of Oakland (City) sanitary sewer pipe network. The City currently accepts these discharges from the existing tunnels into its sanitary sewer system. This wash water is eventually treated in the EBMUD wastewater treatment plant. Discussions will be held with the City concerning the new bore and our proposal to continue to discharge the tunnel wash water as previously approved. EBMUD will also be

invited in these discussions. The Department understands that if an agreement is not reached, and the Department is unable to discharge tunnel wash water to City's sanitary sewer, then it must identify other appropriate disposal options as noted.

2- The estimated total added impervious areas for the 2N (the Preferred Alternative) and 3N Alternatives of 1.1 hectares (2.8 acres) and 1.7 hectares (4.1 acres) have been revised, due to an adjustment of project scope, to 0.72 hectares (1.7 acres) and 1.06 hectares (2.6 acres), respectively. The stated additional impervious areas do not take into account the tunnel roadway surface. No rainfall roadway surface runoff is generated within the Tunnel. However, groundwater intercepted within the existing tunnels is conveyed by the roadway drainage system. The drainage trunkline within the median of State Route 24 from the East Tunnel Portals to the eastbound off-ramp to Orinda conveys the West Branch of San Pablo Creek to its confluence with San Pablo Creek at Moraga Avenue in Orinda. The West Branch of San Pablo Creek watershed area tributary to the median system is about 750 hectares (1853 Acres). The area of the existing highway and ramps total about 13 hectares (32 Acres), or 1.73% of the total watershed. The tributary paved area for Tunnel Road, Fish Ranch Road, and Gateway Blvd. is not included in the 13 hectares of paved highway surface. The additional paved highway area for the Preferred Alternative (Alternative 2N) is approximately 0.46 hectares (1.1 Acres). This represents 0.06% of the watershed for the West Branch of San Pablo Creek. Alternative 3N would increase the paved highway area by about 0.72 hectares (1.8 Acres), or 0.10% of the watershed. The additional runoff associated with the added paved surface area is minimal and would have no significant effect on flow volume and velocity within the median system. The total watershed area tributary to the San Pablo Creek arch culvert under State Route 24 is about 1700 hectares (4200 Acres). The additional paved area for the 2N and 3N alternatives represent 0.03% and 0.04% of the arch culvert watershed, respectively. The additional runoff for the 2N and 3N alternatives would have no significant effect on flow volume and velocity within the San Pablo Creek arch culvert and San Pablo Creek proper. In Alameda County, the State Route 24 drainage system, upstream of Lake Temescal, is independent of the storm drain system that conveys storm runoff from the hillside areas above the highway to the Lake. The existing area tributary to the highway drainage system from the State Route13/24 Interchange to the Tunnel Portals is about 13.4 hectares (33 Acres), with about 6 hectares (14.8 Acres) of paved highway and ramp surfaces. Alternative 2N would add about 0.26 hectares (0.6 acres) of new pavement. Alternative 3N would generate about 0.34 hectares (0.8 Acres) of new pavement. The additional pavement areas for the 2N and 3N alternatives represent about 1.9% and 2.5% of the highway drainage system's watershed, respectively. The State Route 24 drainage system connects to an Alameda County Flood Control and Water Conservation District (ACFC&WCD) storm drain system downstream of Lake Temescal near Chabot Road. No highway pavement runoff or tunnel wash water drains to the Lake. The Department will consider Treatment BMPs as noted in the DEA/EIR, in compliance with the Department NPDES Permit with the SWRCB. The selection of appropriate treatment controls must be based on effectiveness, practicability, feasibility, safety and maintainability. Future meetings will be scheduled with the RWQCB to discuss proposed treatment of stormwater runoff to address the Project's impacts.

3-The groundwater regime would not be adversely affected by the fourth bore. The amount of additional groundwater removed will be minimal because there are already three tunnels at this location. The immediate effects will be both directly above and to the north of the fourth bore. A wetland area near the East Portal will be impacted by the project. This wetland is not fed from groundwater, but from surface water runoff. Any permanent impacts to wetlands will be mitigated for as detailed in Section 2.3.2.4 of the FEA/EIR.

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