

MEMORANDUM

DATE: April 17, 2024

To: Niel Mock, City of Walnut Creek, Public Works Engineering Division

FROM: Edward Heming, AICP, Principal/Environmental Planner

SUBJECT: Las Trampas Bridge Project Initial Study/Mitigated Negative Declaration – Response to Comments

In accordance with Section 15074 of the State CEQA Guidelines, prior to approving a project, the decision-making body of the lead agency shall consider the proposed environmental document together with any comments received during the public review process. Although there is no legal requirement to formally respond to comments on a proposed Mitigated Negative Declaration (MND) as there is for an Environmental Impact Report (EIR), this memorandum provides a response to the written comments received on the Las Trampas Bridge Project Initial Study/Mitigated Negative Declaration (IS/MND) to aid the Walnut Creek decision-makers in their review of the project.

The Draft IS/MND was available for public review and comment from February 16, 2024, to March 18, 2024. One comment letter was received on the Draft IS/MND. In the following pages, the comments and responses are enumerated to allow for cross-referencing of CEQA-related comments. The enumerated comment letters are included in this memorandum, followed by the respective responses. Individual comments within the letter are numbered consecutively. For example, comment A-1 is the first numbered comment in Letter A.

The following comment letter was submitted:

- LETTER A: East Bay Municipal Utility District (EBMUD), Neil Mock, Project Engineer of Public Works Engineering Division, March 13, 2024

As noted above, CEQA does not require or provide guidance on responding to comments on MNDs; therefore, this memorandum follows State CEQA Guidelines Section 15088, applicable to responses to comments on EIRs, which requires that agencies respond only to significant environmental issues raised in connection with the project. Therefore, this document focuses primarily on responding to comments that relate to the adequacy of the information and environmental analysis provided in the IS/MND.

March 13, 2024

Neil Mock, Project Engineer
 City of Walnut Creek, Public Works Engineering Division
 1666 North Main Street
 Walnut Creek, CA 94596

Re: Notice of Intent to Adopt a Mitigated Negative Declaration – Las Trampas Creek Bridge at South Main Street Replacement Project, Walnut Creek

Dear Mr. Mock:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the Las Trampas Creek Bridge at South Main Street Replacement Project (Project) located on South Main Street, approximately 0.1 miles south of Olympic Boulevard, in the City of Walnut Creek (City). EBMUD has the following comments.

WATER DISTRIBUTION PIPELINES

EBMUD owns and operates 6-inch, 8-inch, and 12-inch water distribution pipelines in South Main Street, Botelho Drive and Broadway Plaza within the proposed Project limits. These pipelines provide continuous service to EBMUD’s customers in the area. Any proposed construction activity in South Main Street, Botelho Drive and Broadway Plaza would need to be coordinated with EBMUD so that the integrity of these water mains is maintained at all times. It is imperative to coordinate with EBMUD during the development of the Project to identify potential conflicts and avoid schedule impacts.

EBMUD recommends at least 18-months of advance notification for upcoming projects to allow for reasonable time to allocate resources and modify internal construction schedules. The following table provides a typical project schedule for EBMUD to design and relocate approximately 1,500-feet of 8-inch distribution pipeline. The required time may vary depending on the size, length, and complexity of the Project and if constructed by EBMUD crews or by a contractor.

A-1

<u>Required Time</u>	<u>Schedule Task</u>
1 month	Receive Street Improvement and Understand Impacts
1 month	Review Project and Planning Assessment

2 months	Collect Survey Data or Use Existing Survey from Requesting Agency
2 months	Draft Base Drawing for Water Main Relocation
3 months	Design Water Main Relocation
2 months	Develop Construction Bid Documents
3 months	Advertise and Award Water Main Relocation Project
4 months	Install New Water Main and Provide Temporary Paving
18 months	<i>Reasonable Notification Time (Typical Project: 1,500 feet of 8-inch pipe)</i>

A-1

EBMUD’s water distribution pipelines and valves must be accessible to EBMUD maintenance staff to maintain water operations, fire flow services, and to mitigate planned or unplanned pipeline outages. The City is responsible for protecting in-place pipeline valves and ensuring that pipeline valves are accessible (i.e., not paved over) during and after Project construction. EBMUD recommends that the City review EBMUD as-built drawings and identify potential utility conflicts between Project improvements and existing EBMUD infrastructure. Attached are EBMUD guidelines for requesting pipeline as-builts that include pipeline vertical data (see Attached – EBMUD Map & Utility Information Request Form and Guidelines).

The Project’s IS/MND indicate the potential for contaminated soils or groundwater to be present within the Project site boundaries. The City should be aware that EBMUD will not install piping or services in contaminated soil or groundwater (if groundwater is present at any time during the year at the depth piping is to be installed) that must be handled as a hazardous waste or that may be hazardous to the health and safety of construction and maintenance personnel wearing Level D personal protective equipment. Nor will EBMUD install piping or services in areas where groundwater contaminant concentrations exceed specified limits for discharge to the sanitary sewer system and sewage treatment plants. The City must submit copies to EBMUD of all known information regarding soil and groundwater quality within or adjacent to the project boundary and a legally sufficient, complete, and specific written remediation plan establishing the methodology, planning and design of all necessary systems for the removal, treatment, and disposal of contaminated soil and groundwater.

A-2

EBMUD will not design piping or services until soil and groundwater quality data and remediation plans have been received and reviewed and will not start underground work

A-3

until remediation has been carried out and documentation of the effectiveness of the remediation has been received and reviewed. If no soil or groundwater quality data exists, or the information supplied by the City is insufficient, EBMUD may require the City to perform sampling and analysis to characterize the soil and groundwater that may be encountered during excavation. Alternatively, 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.

A-3

EBMUD'S DESIGN STANDARDS AND SPECIFICATIONS

When evaluating the need and method for relocating and adjusting EBMUD infrastructure (e.g., pipelines, meters, valves, and fire hydrants), please review EBMUD's Design Standards and Specifications for Mains 20-inch and Smaller, which are located on the following webpage under "Apply for Standard Water Service":
<https://www.ebmud.com/customers/new-meter-installation>

A-4

PIPELINE VALVE COVER ADJUSTMENTS

The top of water valve box covers must fit flush with the finished grade of new/existing surface and must not be set in gutters or in curb ramps. For utility conflicts between the Project and existing EBMUD pipeline valve covers, the City must share with EBMUD utility conflict locations and the existing and final pavement grade elevations. EBMUD will support paving street improvement projects as follows:

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- Grade change less than 0.5-inches - EBMUD is not obligated to adjust pipeline valve covers to facilitate the construction of street improvements, pursuant to Streets & Highways Code Section 680, which states that EBMUD may not be required to relocate its facilities for a temporary purpose. However, EBMUD will provide valve cover rings, at no cost, to be used to make valve cover adjustments as needed. The City is responsible for protecting in-place EBMUD pipeline valve covers which will be inspected by EBMUD staff post Project completion.
- Grade change greater than 0.5-inches - EBMUD will support the Project by adjusting pipelines valve covers (one time) to the final street grade. However, EBMUD is not obligated to adjust valves during construction to facilitate means and methods for completing street improvements, pursuant to Streets & Highways Code Section 680, which states that EBMUD may not be required to relocate its facilities for a temporary purpose. The City is responsible for protecting in-place EBMUD pipeline valve covers which will be inspected by EBMUD staff post Project completion.
- Pipeline Valve Box Upgrades - If the City and EBMUD determines a need to upgrade existing pipeline valve boxes to the new Christy G-05 Valve Boxes, a Gate Valve Pot Agreement will be required. EBMUD will provide the valve boxes and covers to

A-6

A-7

A-8

upgrade the identified facilities. An EBMUD Union notification will be required to complete the work by the City's contractor.

WATER METER RELOCATIONS AND ADJUSTMENTS

If water meter relocations may be required as part of this Project, EBMUD will relocate water meters to their new location once the area is staked and is ready for final meter placement (e.g., forms for new sidewalk and other features are in place). The City is responsible for relocating the customer's private water service line to the new meter location. EBMUD is not financially liable for work beyond the water meter (i.e., private water line).

A-9

Water meters must not be set in traveled walkways or driveways, must be set flush with new/existing surface, and must be placed at 1-foot off the face of curb. For utility conflicts between the Project and existing EBMUD water meters, the City must share with EBMUD conflict locations, including meter number and a clear indication whether the meter requires relocation or adjustment.

A-10

HYDRANT RELOCATIONS OR ADJUSTMENTS (SET-BACKS/SET FORWARDS)

If hydrants relocations or adjustments may be required as part of this Project, the City must share with EBMUD the location of the hydrants in conflict. Hydrants must be located 5-feet from the edge of curb ramps and 20 to 24-inches from the face of street curb. Hydrant relocations are horizontal offsets that require the installation of new hydrant service laterals. Hydrant relocations require the City to submit a Hydrant Relocation Application with EBMUD's New Business Office (510-287-1010) or via EBMUD's online water service application at <https://wsa.ebmud.com>. The City is responsible for providing fire department approval and payment for hydrant relocations. The lead time for the hydrant relocation process may be 3-6 months. Hydrant adjustments are either forward/backward movement along the existing hydrant lateral or lowering or raising the hydrant in the existing horizontal location.

A-11

PRE-CONSTRUCTION MEETING

The City shall invite EBMUD's East Area Service Center Superintendent, Charles Whites (510-287-7181 or charles.whites@ebmud.com) and the Assistant Superintendent, Chiam Bismillah (510-287-7182 or chiam.bismillah@ebmud.com) to all pre-construction meetings.

Neil Mock, Project Engineer
March 13, 2024
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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:DVG:djr
wdpd24_030 Las Trampas Creek Bridge at South Main Street Replacement Project.doc

Attachment: Map & Utility Information Request Form



Map & Utility Information Request Form

(Fillable PDF form)

Date of Submission:	
Requestor:	Name
	Company/Agency
	Address
	Email
	Phone
Purpose of Request: Provide brief reason for the requested Mapping or Utility Information	

**Include a Vicinity Map with all requests and
a Highlighted Map with all UTILITY INFORMATION requests**
(See the Map & Utility Information Guidelines for map examples)

With this submittal, I agree to the following:

This information is furnished as a public service by East Bay Municipal Utility District. The District makes every effort to produce and publish the most current and accurate information possible. This information must be accepted and used by the recipient with the understanding that the District makes no warranties, expressed or implied, concerning the accuracy, completeness, reliability, or suitability for the use of this information. Furthermore, the District assumes no liability associated with the use or misuse of such information. Please notify the District if discrepancies are found.

By receipt of requested documents, the DOCUMENT RECIPIENT agrees that he or she, and/or any other authorized representatives of the DOCUMENT RECIPIENT, will provide no copy (nor partial copy) to any other person or agency, will not redistribute any document to any other entity, business or individual, nor use the document for other than the specified purpose. At the point the document is no longer required for use by the DOCUMENT RECIPIENT, the data shall be returned to the District or destroyed.



EAST BAY MUNICIPAL UTILITY DISTRICT
Map & Utility Information Request Guidelines
July 29, 2019

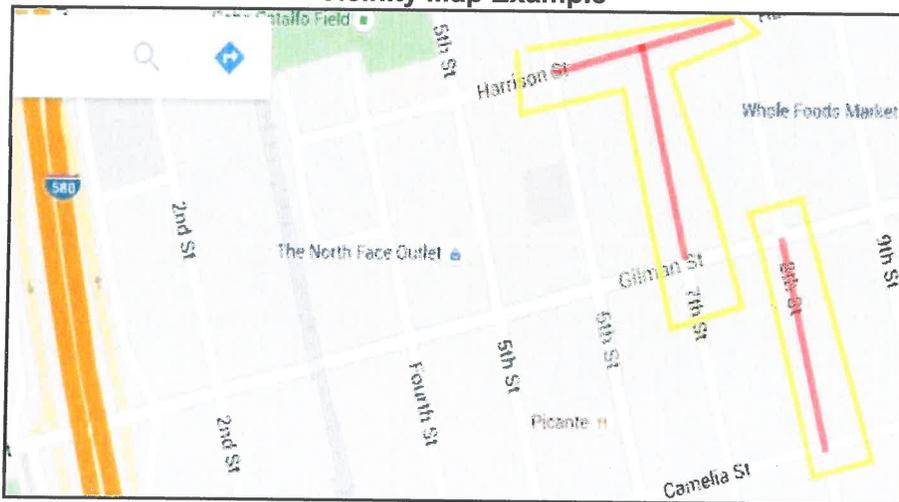
REQUESTING MAP INFORMATION FROM EBMUD

Mapping Services provides electronic PDF's of the WATER DISTRIBUTION SYSTEM map used by the District. Requests for maps showing other utilities should be submitted through the responsible agency. Water distribution pipelines and appurtenances will be shown as close as possible to actual field locations, but portions are often shifted or distorted to allow for visual clarity between graphic elements.

Complete the attached **Map & Utility Information Request Form** and include a **Site Vicinity Map** for the area being requested (see *Sample Vicinity Map* below).

Note to homeowners: Include a copy of personal identification, such as a Driver's License, with the request. The area being requested by residents must include the residence or property of the requestor. If the requested area does not specifically include the requestor, then the group or organization seeking this information must be properly identified.

Vicinity Map Example



Submit requests using one of the following methods (**email preferred**):

- Email: MapUnit@ebmud.com; Subject: **Mapping Information Request**
- Mail: *EBMUD Mapping Services Request, PO Box 24055, MS 805, Oakland, CA 94623-1055*

FAQs

How long will it take to process the request?

Requests are typically processed within five business days. The completeness of the information provided, the size of the area requested, and the volume of requests received each day may impact the processing time. Mapping Services may process requests on a rotating basis, so it is not necessary to address the request to a specific individual.

What if more detailed or accurate information is needed?

After receiving and reviewing the map provided, if more detail is needed, such as pipeline construction drawings showing pipe depth, please refer to **Page 2** of this guideline.



EAST BAY MUNICIPAL UTILITY DISTRICT
Map & Utility Information Request Guidelines
July 29, 2019

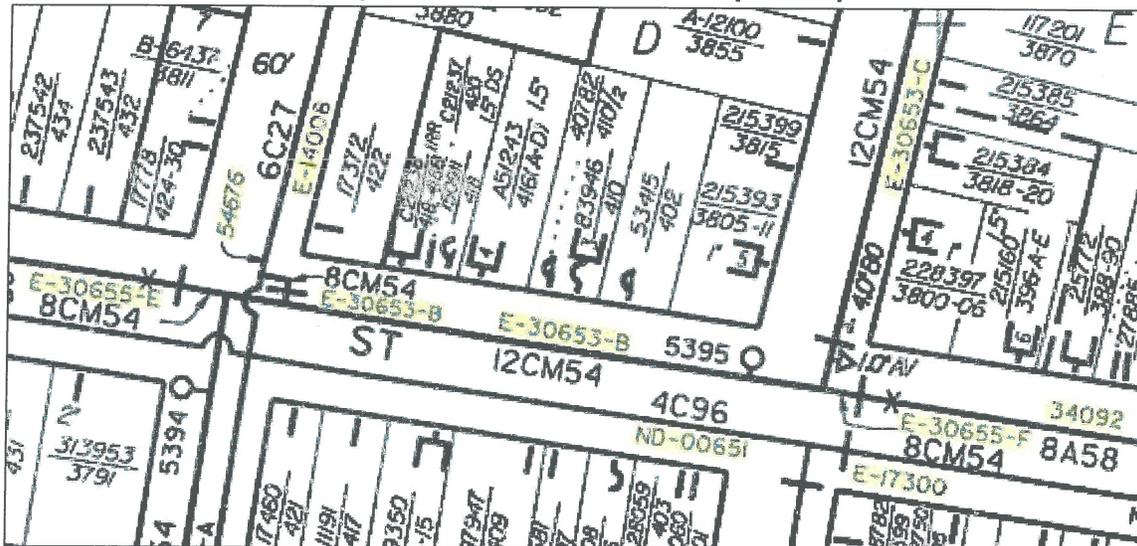
REQUESTING **UTILITY INFORMATION** FROM EBMUD

After receiving and reviewing the initial requested Water Distribution System map, if more detail is needed, such as detailed utility information, more accurate location, pipe depth, etc., please complete the attached **Map & Utility Information Request Form** and also include a map with **highlighted Extension Number(s)** to identify the construction drawing being requested (see example of highlighted map below).

Identifying Extension Numbers (Required for UTILITY INFORMATION requests)

An Extension Number is a number used to track the construction drawings for a pipe segment. The extension number may be five numbers only or five numbers with a one or two letter prefix and may include a single letter suffix. **NOTE: The "ND" designation means that EBMUD has "No Data" or construction drawings available for the pipeline.**

Highlighted Extension Number Map Example:



Submit requests using one of the following methods (**email preferred**):

- Email: utility.info@ebmud.com, Subject: Utility Information Request
- Mail: EBMUD Utility Information Request, PO Box 24055, MS 504, Oakland, CA 94623-1055

FAQ

What does the larger number near the Extension Number represent?

The Pipe Designation Number is the larger text, typically located below the pipe and near the extension number (e.g., 12CM54). This number represents the pipe's **NOMINAL DIAMETER**, **MATERIAL/LINING/COATING CODE**, and **INSTALLATION YEAR**, in that order.

LETTER A**East Bay Municipal Utility District (EBMUD), Neil Mock, Project Engineer, Public Works Engineering Division (March 13, 2024)**

Response A-1: This comment is introductory and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Initial Study/Mitigated Negative Declaration (IS/MND). No further response is required.

Response A-2: *This comment is regarding the potential presence of contaminated soils or groundwater within the project site boundaries. EBMUD states that they will not install piping or services in areas with contaminated soil or groundwater that pose a hazard to construction and maintenance personnel or exceed specified limits for discharge to the sanitary sewer system and sewage treatment plants. This comment states the EBMUD requires the City of Walnut Creek to provide all known information on soil and groundwater quality within or near the project area. Additionally, a comprehensive written plan detailing the methodology, planning, and design for the removal, treatment, and disposal of contaminated soil and groundwater must be submitted to EBMUD by the City.*

Please refer to Appendix F, Initial Site Assessment/Preliminary Site Investigation (ISA/PSI) in the IS/MND. On August 2–3 and September 6, 2017, WRECO conducted a Preliminary Site Investigation along the Las Trampas Creek Bridge as part of the Replacement Project. The ISA/PSI concluded that for excavated surface soils, the results were below the Resource Conservation and Recovery Act (RCRA) and California Hazard Waste classification levels for metals, petroleum hydrocarbons, and volatile organic compounds. Based on informal consultations with the San Francisco Bay Regional Water Quality Control Board (RWQCB) in April and May of 2018, the presence of perchloroethylene (PCE) and its breakdown products along sewer lines adjacent to the former Virginia Cleaners site (1305-1335 S. Main Street) is unknown. As a result, the ISA/PSI recommends that excavated soils be disposed of as Designated or Non-hazardous waste at Class II unit or Class III landfills depending on facility acceptance standards. Additionally, soils excavated along sewer lines adjacent to the former dry cleaner site should be screened for PCE and its breakdown products to properly classify excavated soils for disposal.

Further, the ISA/PSI tested groundwater samples, finding that these groundwater samples exceeded RWQCB Tier 1 Ecological Screening Levels (ESLs) for Total Petroleum Hydrocarbons, (TPHg, TPHd, TPHmo), ethylbenzene, xylenes, dichloroethylene (DCE), trichloroethylene (TCE), and vinyl chloride. Most of these constituents exceeded the RWQCB Water Quality Objectives (WQOs), the California Toxics Rule (CTR), and the

Environmental Protection Agency National Toxics Rule (EPA NTR) criteria for surface water. It was recommended in the ISA/PSI that any groundwater encountered during demolition or construction of the Las Trampas Creek Bridge must be contained and treated prior to discharge to surface waters under an appropriate RWQCB National Pollutant Discharge Elimination System/Waste Discharge Requirements (NPDES/WDR) permit or disposed of off-site at a wastewater treatment facility.

Finally, the City has reached out to EBMUD on February 27, 2024, March 14, 2024, and March 20, 2024, to provide information regarding the ISA/PSI as well as coordinate any actions required during pre-construction activities.

Response A-3:

This comment states that EBMUD requires soil and groundwater quality data, remediation plans, and documentation of remediation effectiveness before designing, starting underground work, or carrying out remediation. According to EBMUD, if sufficient data are not provided by the City, EBMUD may demand the City to conduct sampling and analysis. Alternatively, EBMUD may perform sampling and analysis at the project sponsor's expense. Additionally, if contamination is found during EBMUD's work on the project site, they may suspend operations until it's adequately characterized and remediated according to their standards.

Please refer to Appendix F, ISA/PSI, of the IS/MND. The ISA/PSI provides documentation showing the proposed cleanup and remediation plans. Additionally, remediation measures are included in Section 3.9(b) Hazards and Hazardous Materials in the IS/MND under Mitigation Measure HAZ-1. The City has reached out to EBMUD on February 27, 2024, March 14, 2024, and March 20, 2024, to provide information regarding the ISA/PSI as well as coordinate any actions required during pre-construction activities.

Response A-4:

EBMUD advises reviewing their Design Standards and Specifications for mains 20-inch and smaller on their website when considering relocating or adjusting infrastructure like pipelines, meters, valves, and fire hydrants. A link to the EBMUD website is provided in this comment.

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.

Response A-5:

This comment outlines EBMUD's requirements regarding the installation of water valve box covers and the protocol for addressing utility conflicts with existing EBMUD infrastructure during street improvement projects.

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.

Response A-6: *This comment notes that EBMUD is not required to adjust pipeline valve covers for the construction of street improvements pursuant to Streets and Highways Code Section 680, for grade changes less than 0.5 inches. EBMUD states that they will provide valve cover rings at no cost for valve cover adjustments as needed; however, the City must protect existing EBMUD pipeline valve covers, inspected by EBMUD staff after project completion.*

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.

Response A-7: *This comment notes that EBMUD would support the proposed project by adjusting valve covers one time to the final street grade if the grade change is greater than 0.5 inches. EBMUD notes that they are not obligated to adjust valves during construction pursuant to Streets and Highways Code Section 680. Additionally, EBMUD states the City must protect existing EBMUD pipeline valve covers, inspected by EBMUD staff after project completion.*

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.

Response A-8: *This comment states that if the City and EBMUD need to upgrade existing pipeline valve boxes to the new Christy G-05 Valve Boxes, a Gate Valve Pot Agreement will be required. EBMUD will provide the valve boxes and covers for the upgrade of identified facilities. Additionally, completion of the work by the City's contractor will require an EBMUD Union notification.*

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.

Response A-9: *This comment outlines EBMUD's process for water meter relocations and adjustments during projects. According to EBMUD the City is responsible for relocating the customer's private water service line. Additionally, the comment notes that EBMUD is not financially liable for work beyond the water meter.*

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.

Response A-10: *This comment outlines requirements for water meter placement and the management of utility conflicts between the proposed project and existing EBMUD meters.*

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.

Response A-11:

This comment outlines the procedures for hydrant relocations or adjustments required for the proposed project. According to EBMUD, the City must inform EBMUD of conflicting hydrant locations. Hydrants should be 5 feet from curb ramps and 20 to 24 inches from the street curb. The City must submit a Hydrant Relocation Application to EBMUD for approval, either through their New Business Office or via the online water service application. EBMUD also states that the City is responsible for obtaining fire department approval and covering relocation costs. EBMUD also states that the relocation process may take 3 to 6 months.

Comment noted. The City will continue ongoing coordination with EBMUD to plan for and mitigate any related issues during design.