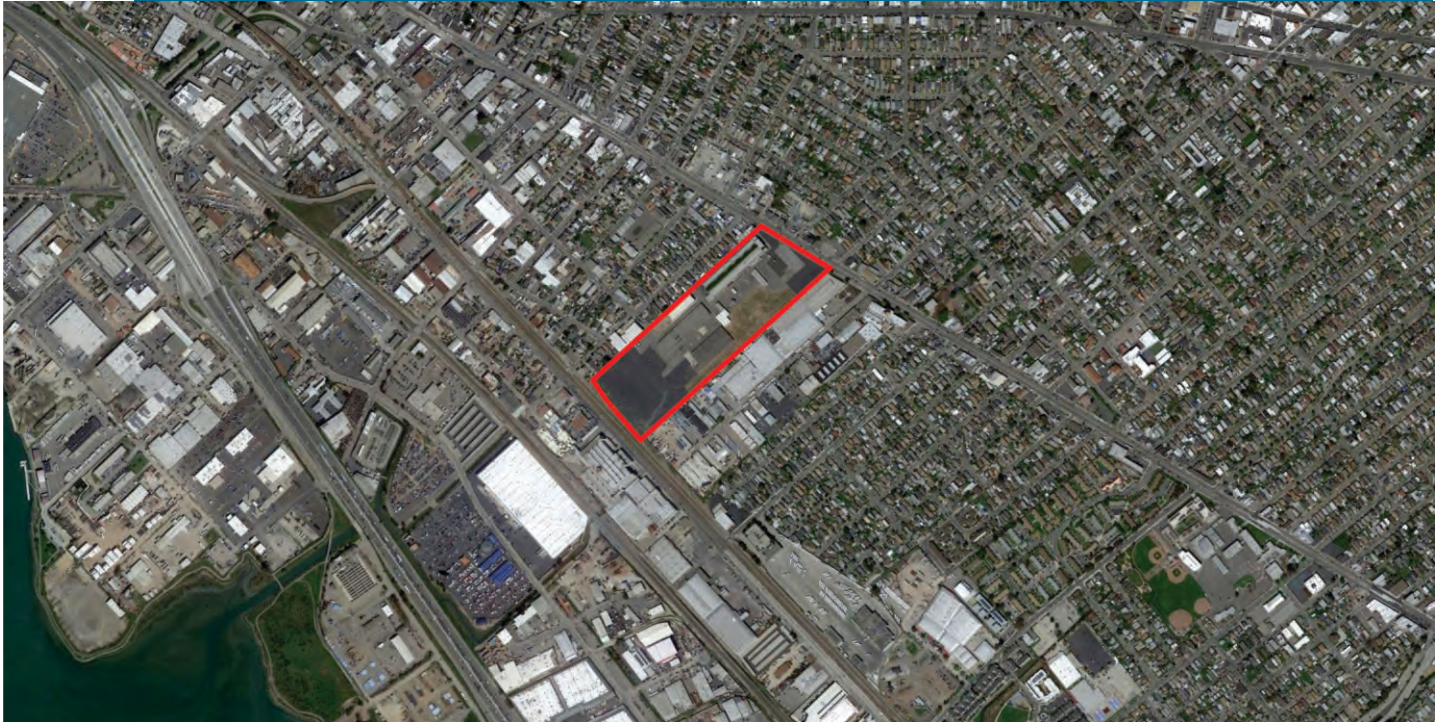


GE SITE REMEDIATION AND REDEVELOPMENT PROJECT (PLN19-076/ER18-013) RESPONSE TO COMMENTS AND FINAL ENVIRONMENTAL IMPACT REPORT



STATE CLEARINGHOUSE NO. 2018122043

March 2020

GE SITE REMEDIATION AND REDEVELOPMENT PROJECT (PLN19-076/ER18-013)

RESPONSE TO COMMENTS AND FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NO. 2018122043

Prepared for:

City of Oakland

Planning and Building Department, Bureau of Planning

250 Frank H. Ogawa Plaza, Suite 2114

Oakland, CA 94612

Prepared by:

Baseline Environmental Consulting

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Emeryville, CA 94608

March 2020

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BOULEVARD, OAKLAND, CALIFORNIA (DKI B70123.01)

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GLOSSARY

AC	Alameda-Contra Costa
ACDEH	Alameda County Department of Environmental Health
ACM	Asbestos-containing materials
AMP	Perimeter Air Monitoring Plan
APE	Area of Potential Effects
API	Area of Primary Importance
APN	Assessor Parcel Number
ASI	Area of Secondary Importance
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
Baseline	Baseline Environmental Consulting
BMPs	Best Management Practices
CAL/ARP	California Accidental Release Program
Cal/OSHA	California Occupational Safety and Health Administration
CAO	Cleanup and Abatement Order
CARB	California Air Resource Board
CCR	California Code of Regulations
CEDA	City of Oakland Community and Economic Development Agency
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
City	City of Oakland
CMU	Concrete masonry unit
CRHR	California Register of Historical Resources
CULT	Cultural Resources
CUPA	Certified Unified Program Agency
CVOCs	Chlorinated volatile organic compounds
Declaration	Declaration of Public Nuisance - Substandard
DHS	California Department of Health Services

DIR	California Department of Industrial Relations
DOSH	Division of Occupational Safety and Health
DOT	U.S. Department of Transportation
DPR 523	California Department of Parks and Recreation 523 series forms
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
GE	General Electric Company
GETS	Groundwater Extraction and Treatment System
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HAZ	Hazards and Hazardous Materials
HAZWOPER	Hazardous Waste Operations and Emergency Response
HMPB	Hazardous Materials Business Plan
HPE	Historic Preservation Element
I-880	Interstate 880
LPAB	Landmarks Preservation Advisory Board
LSA	LSA Associates, Inc.
LTS	Less-Than-Significant impact
MLD	Most Likely Descendent
MTC	Metropolitan Transportation Commission
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966, as amended
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center

OCHS	Oakland Cultural Heritage Survey
OHA	Oakland Heritage Alliance
OHP	California Office of Historic Preservation
OSHA	U.S. Department of Labor, Occupational Safety, and Health Administration
OVM	Organic vapor meter
PCBs	Polychlorinated biphenyls
PDHP	Potential Designated Historic Properties
PM	Particulate matter
ppm	Parts per million
PRC	California Public Resources Code
RAP	Remedial Action Plan
RCRA	Resource Conservation and Recovery Act
RDIP	Remedial Design and Implementation Plan
RMP	Risk Management Plan
RWQCB	California Regional Water Quality Control Board, San Francisco Bay Region
S	Significant impact
SCA	Standard Conditions of Approval
Section 106	Section 106 of the National Historic Preservation Act of 1966, as amended
SHPO	State Historic Preservation Officer
Status Code	California Historical Resource Status Code
SVOC	Semi- volatile organic compounds
SU	Significant and Unavoidable impact
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants
TCB	Trichlorobenzene
TIRG	City of Oakland Transportation Impact Review Guidelines
TPH	Total petroleum hydrocarbons compounds
TSCA	Toxic Substances Control Act
UPRR	Union Pacific Railroad

VIMS	Vapor Intrusion Management System
VOC	Volatile organic compounds
WCCM	Waste Characterization, Minimization, and Management Plan
WRRP	Waste Reduction and Recycling Plan

1.0 INTRODUCTION

1.1 ENVIRONMENTAL REVIEW PROCESS

An Environmental Impact Report (EIR) is an informational document prepared by a Lead Agency (in this case, the City of Oakland) that contains environmental analysis for public review and for agency decision-makers to use in their consideration of development proposals. This Response to Comments document has been prepared to respond to comments received on the Draft EIR prepared for the General Electric (GE) Site Remediation and Redevelopment Project at 5441 International Boulevard in Oakland, California (proposed project, Case Numbers PLN19-076/ER18 013). The Draft EIR identifies the likely environmental consequences associated with implementation of the proposed project, and recommends standard conditions of approval (SCAs) and mitigation measures to reduce potentially significant impacts. This document provides responses to comments on the Draft EIR and makes revisions to the Draft EIR, as necessary, in response to those comments or to make clarifications in the Draft EIR. This document, together with the Draft EIR and the Draft EIR Appendices, constitutes the Final EIR (or FEIR) for the proposed project. Due to its length, the text of the Draft EIR is not included with this Response to Comments document; however, it is included by reference as part of the Final EIR.

The City of Oakland circulated a Notice of Preparation (NOP), notifying responsible agencies and interested parties that an EIR would be prepared for the GE Site Remediation and Redevelopment Project and indicating the environmental topics anticipated to be addressed in the Draft EIR. A summary of the proposed project is presented in subsection 1.3 of this chapter. The NOP was published on December 21, 2018 (SCH# 2018122043) and the public comment period lasted from December 21, 2018 to January 22, 2019. The NOP was mailed to public agencies, organizations, and individuals likely to be interested in the potential impacts of the project. A public scoping meeting was held on January 14, 2019 before the Landmarks Preservation Advisory Board (LPAB) and another public scoping meeting was held on January 16, 2019 before the Oakland Planning Commission. The NOP, a summary of comments received at the scoping meetings and copies of each comment letter received are provided in Appendix A of the Draft EIR. Written comments received by the City and verbal comments received at the scoping meetings were taken into account during the preparation of the Draft EIR.

On December 20, 2019, the City of Oakland, as Lead Agency, released for public review a Draft EIR for the proposed project. The 45-day public review and comment period on the Draft EIR began on December 20, 2019. The City of Oakland held two public hearings on the Draft EIR, the first on January 13, 2020 before the Landmarks Preservation Advisory Board (LPAB), and the second before the Planning Commission on January 22, 2020. The public review and

comment period ended at 4:00 p.m. Monday, February 3, 2020. The City received four comment letters on the Draft EIR, that are included in this document.

The City of Oakland will consider the Final EIR before approving or denying the proposed project. Before the Lead Agency may approve the project, it must certify that the Final EIR adequately discloses the environmental effects of the proposed project, that the Final EIR has been completed in conformance with the California Environmental Quality Act (CEQA), and that the decision-making body of the Lead Agency independently reviewed and considered the information contained in the Final EIR. Certification of the Final EIR would indicate the City's determination that the Final EIR adequately evaluates the environmental impacts that could be associated with the proposed project.

The City of Oakland has prepared this document pursuant to CEQA Guidelines Section 15132, which specifies the following (and which also applies to Draft and Final EIRs):

"The Final EIR shall consist of:

- (a) The Draft EIR or a revision of that draft;
- (b) Comments and recommendations received on the Draft EIR either verbatim or in a summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- (d) The response of the Lead Agency to significant environmental points raised in review and consultation process; and
- (e) Any other information added by the Lead Agency."

This Final EIR incorporates comments from public agencies and the general public and contains the Lead Agency's responses to those comments.

1.2 CONSIDERATION OF THE FINAL EIR

If significant new information is added to an EIR after notice of public review has been given, but before final certification of the EIR, the lead agency must issue a new notice and re-circulate the EIR for further comments and consultation, (*Laurel Heights Improvement Association v. Regents of the University of California*, 6 Cal 4th 112 (1993)). The City has determined that none of the corrections or clarifications to the Draft EIR identified in this document constitutes significant new information pursuant to Section 15088.5 of the CEQA Guidelines. As a result, a recirculation of the Draft EIR is not required.

Specifically, the new information, corrections, or clarifications presented in this document do not disclose that:

- A new significant environmental impact would result from the project or from a new mitigation measure (or standard condition) proposed to be implemented;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures (or standard conditions) are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure (or standard condition) considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines Section 15088.5)

Information presented in the Draft EIR and this document support the City's determination that recirculation of the Draft EIR is not required.

1.3 PROPOSED PROJECT

The GE project site consists of approximately 24 acres on International Boulevard (State Route (SR) 185), between 54th and 57th Avenues, and is located east of San Leandro Street and the Bay Area Rapid Transit (BART) tracks in the Melrose neighborhood of Oakland, CA. As of February 2020, a bus rapid transit line (BRT) is being constructed on International Boulevard with stops within .01 mile of the project site. The BRT line is expected to be in operation in early 2020. The eight existing buildings on the site are vacant and were formerly used for manufacturing, although a portion of Building #1 fronting International Boulevard contained accessory office uses.

Nearly all of the site has a General Plan designation of General Industry and Transportation and a zoning designation of General Industrial (IG), which allows manufacturing and distribution uses. The northwestern portion of the site has a zoning designation of IG/S-19 General Industrial/Health and Safety Protection Overlay due to the residential uses adjacent to the site's northwestern boundary. An area of the site within approximately 100 feet from International Boulevard is within the Neighborhood Center Mixed Use General Plan designation and is zoned CN-3, Neighborhood Center Commercial Zone the intent of which is to create, preserve and enhance mixed-use neighborhood commercial centers.

The project site is included in the list of Hazardous Waste and Substances sites in the Department of Toxic Substances Control (DTSC) EnviroStor database, one of the lists meeting the "Cortese List" requirements. The buildings and site contain hazardous chemicals (including PCBs) in the soil, groundwater and building materials, and have been undergoing remediation and monitoring under the oversight of DTSC and the United States Environmental Protection

Agency (USEPA). In 1993 a deed restriction was imposed on the property by DTSC and only commercial or industrial uses are allowed and all other types of uses are prohibited.

The Oakland Cultural Heritage Survey (OCHS) assigned a property rating of “A1+” to Building #1, also listed on the California Register of Historical Resources on the site and “Dc1+” to Building #2, indicating that Building #1 is of “Highest Importance” and that both Building #1 and Building #2 are contributing elements to the 57th Avenue Industrial District Area of Primary Importance (API), and are therefore CEQA historic resources.

The remediation and redevelopment project would include demolition of the eight existing structures, foundations and associated equipment, including Building #2 and the majority (approximately 94 percent) of Building #1. The front “bulkhead” portion (i.e., the portion of the building that expresses early-20th century utilitarian Classical Revival-inspired industrial architecture and a portion of the sides of the building) would be preserved, treated or encapsulated to contain any contaminated materials, and incorporated into the design of the new building. The site would be sufficiently remediated to permit its reuse. The demolition, abatement, remediation and ongoing monitoring activities would be conducted with regulatory agency oversight by the USEPA and DTSC.

After demolition and remediation, an approximately 534,208-square-foot industrial building would be constructed, with 524,208 square feet of warehouse space, 5,000 square feet of accessory office uses, and 5,000 square feet of accessory mezzanine office. There would be 93,522 square feet of landscaping provided. The warehouse would have 85 dock doors and 219 parking stalls would be provided on the site. Building construction would include soil vapor barriers, clean utility corridors and other protections for construction workers and employees of the new facility and will be overseen by the USEPA and DTSC. New connections would be made to existing utility systems.

For the proposed project, automobile and heavy truck access to and from the site would occur on International Boulevard via new access points. As part of the project, the signal and striping at the intersection with 55th Avenue would be modified to allow for left in and left out vehicle access movements. A variant to the project, referred to as the San Leandro Street variant or access variant, is also being considered in this EIR. The access variant would include the same remediation and warehouse development as the project, but would expand the project site to include leased Union Pacific right-of-way along the southwestern site boundary sufficient to allow all project-related truck traffic to access the site to and from San Leandro Street via 54th Avenue. All project-related automobile and light trucks would continue to use the International Boulevard access as described above. Please see Chapter 3.0, Project Description, for a full description of the project and access variant.

1.4 ORGANIZATION OF THIS DOCUMENT

This Final EIR contains information about the proposed project, supplemental environmental information, and responses to comments raised during the public review and comment period on the Draft EIR. Following this introductory chapter, the document is organized into the following chapters:

Chapter 2.0 – Commenters on the Draft EIR: This chapter contains a list of agencies, individuals and organizations who submitted written comments during the public review period and comments made at the public hearing on the Draft EIR.

Chapter 3.0 – Comments and Responses: This chapter contains reproductions of all comment letters received on the Draft EIR, as well as a summary of verbal comments provided at the public meetings. A written response for each CEQA-related comment received during the public review period is provided. Each response is keyed to the corresponding comment.

Chapter 4.0 – Revisions to the Draft EIR: This chapter contains text changes and corrections to the Draft EIR initiated by the City as Lead Agency to clarify, refine and update information to the Draft EIR. No changes to the Draft EIR were identified as a result of comments on the Draft EIR, see responses in Chapter 3.0, Comments and Responses.

Appendices to this document follow Chapter 4.0 and include:

Appendix H: GE Site Remediation and Redevelopment Project – Non-CEQA Transportation Assessment Memorandum

Appendix I: Draft Final Explanation of Significant Differences 5441 International Boulevard, Oakland, California (EKL B70123.01)

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2.0 LIST OF COMMENTERS

This chapter presents a list of comment letters received during the public review period and describes the organization of the letters and comments that are provided in Chapter 3.0, Comments and Responses, of this document.

2.1 ORGANIZATION OF COMMENT LETTERS AND RESPONSES

Chapter 3.0 includes a reproduction of each comment letter received on the Draft EIR. The written comments are listed under the heading of Organizations and Agencies (A). Comments made at the Landmarks Preservation Advisory Board (LPA) and Planning Commission (PC) are listed under the heading of Public Hearing Comments.

The comment letters are numbered consecutively following the A designation and CEQA-related public hearing comments are listed consecutively and designated as LPA or PC, as shown below:

Organizations and Agencies: A#-#

Public Hearing Comments LPA#-#, PC#-#

Comment letters are numbered and comments within each letter are numbered consecutively after the hyphen.

2.2 LIST OF COMMENTERS ON THE DRAFT EIR

The following comment letters were submitted to the City during the public review period.

Organizations and Agencies

- A1 Mark Leong, District Branch Chief, Local Development - Intergovernmental Review, California Department of Transportation, District 4, Office of Transit and Community Planning, January 17, 2020
- A2 Tom Debley, President, Oakland Heritage Association, January 22, 2020
- A3 Yongsheng Sun, Hazardous Substances Engineer, Site Mitigation and Restoration Program, Berkeley Office, Department of Toxic Substances Control, January 27, 2020
- A4 Scott Morgan, Director, State Clearinghouse, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, February 4, 2020

Public Hearings

LPA Landmarks Preservation Advisory Board Hearing (January 13, 2020)

PC Planning Commission Hearing (January 22, 2020)

3.0 COMMENTS AND RESPONSES

Written responses to each comment letter received on the Draft EIR are provided in this chapter. All letters received during the public review period on the Draft EIR are provided in their entirety. Each letter is immediately followed by responses keyed to the specific comments. The written comments are listed under the heading of Organizations and Agencies (A). Comments made at the Landmarks Preservation Advisory Board (LPA) and Planning Commission (PC) are listed under the heading of Public Hearing Comments.

The comment letters are numbered consecutively following the A designation and CEQA-related public hearing comments are listed consecutively and designated as LPA or PC. Individual comments are numbered consecutively after the hyphen, as shown below:

Organizations and Agencies: A#-#

Public Hearing Comments LPA#-#, PC#-#

Because no transcripts were made for Draft EIR hearings, the comments made at the January 13, 2020 Landmarks Preservation Advisory Board public hearing on the Draft EIR and the January 22, 2020 Planning Commission public hearing on the Draft EIR are summarized from individual notes made during the hearings.

3.1 ORGANIZATIONS AND AGENCIES

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

TTY 711

www.dot.ca.gov



*Making Conservation
a California Way of Life.*

January 17, 2020

SCH #2018122043

GTS # 04-ALA-2019-00490

GTS ID: 13888

ALA/185/PM 9.82

Peterson Vollmann, Planner IV
City of Oakland, Department of Planning and
Building
Bureau of Planning
250 Frank Ogawa Plaza, Suite 2114
Oakland, CA 94612

**General Electric Site Remediation and Redevelopment Project- Draft
Environmental Impact Report (DEIR).**

Dear Peterson Vollmann:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the General Electric Site Remediation and Redevelopment 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 December 2019 DEIR.

Project Understanding

The project applicant, Bridge Development Partners, is proposing a remediation and redevelopment project on a 24-acre site (5441 International Boulevard), previously owned by GE and used for manufacturing. The proposed project would include demolition of the eight existing structures, foundations and associated equipment on the site, including Building #1 that has a City of Oakland historic rating of A1+ and is therefore a California Environmental Quality Act historic resource. The facade of Building #1 would be preserved, treated to contain any contaminated materials, and incorporated into the design of the new building. The site would be sufficiently remediated to permit its reuse with an industrial/warehouse building. After demolition and remediation, an approximately 534,208 square-foot industrial warehouse building, with 524,208 square feet of warehouse, 10,000 square feet of ancillary office and mezzanine,

A1-1

landscaping, 85 dock doors, 219 parking stalls and 16 bike stalls would be constructed. Building construction would include soil vapor barriers, clean utility corridors and other protections for construction workers and employees of the new facility and will be overseen by the United States Environmental Protection Agency and Department of Toxic Substances Control. The proposed off-site work is limited to connections to and monitoring of existing utility systems. The site is located adjacent to State Route (SR)-185/International Boulevard (Blvd).

A1-1
cont.

Traffic Safety

The proposed design of the driveways along SR-185 must be in accordance with standards from the Caltrans' Highway Design Manual, Standard Plans, and Standard Specifications. In addition, as a part of the work, all curb ramps and pedestrian facilities located within the limits of this project must be brought up to current American Disabilities Act (ADA) standards. During construction, Pedestrian access through the construction zone of this project must be in accordance with ADA guidelines.

A1-2

Transit Considerations

Please note that AC Transit is currently constructing a Bus Rapid Transit (BRT) project with a dedicated median bus lane along International Blvd across from the driveways of this project. Ensure that truck turning movements are adequate and can avoid the median transit lane. The AC Transit's BRT project is expected to be operational by March 2020.

A1-3

Cultural Resources

Although there are no known archaeological sites within Caltrans' right-of-way (ROW) for this project, should ground-disturbing activities take place within the ROW and there is an inadvertent archaeological or burial discovery, all construction within 50 feet of the find shall cease in compliance with CEQA, PRC 5024.5, and Caltrans Standard Environmental Reference (SER) Chapter 2 (at <https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-2-cultural-resources>). The Caltrans Office of Cultural Resource Studies, District 4, shall be immediately contacted at (510) 286-5416. A staff archaeologist will evaluate the finds within one business day after contact.

A1-4

Construction-Related Impacts

Potential impacts to Caltrans' ROW from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction should be identified, as needed. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation

A1-5

permit that is issued by Caltrans. To apply, visit:

<https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

If necessary, prior to construction, coordination is required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

A1-5
cont.

Utilities

Any utilities that are proposed, moved or modified within Caltrans' ROW shall be discussed. If utilities are impacted by the project, provide site plans that show the location of existing and/or proposed utilities. These modifications require a Caltrans-issued encroachment permit.

A1-6

Lead Agency

As the Lead Agency, the City of Oakland is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

A1-7

Encroachment Permit

Page 3-31 identifies signal timing and striping modifications to the new signal at 55th Avenue and SR-185, in addition to the removal of two on-street parking spaces on International Blvd. As currently stated in the DEIR, this would require a Caltrans encroachment permit, as any work or traffic control that encroaches onto the State ROW requires a Caltrans-issued encroachment permit. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed, dated and stamped (include stamp expiration date) traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

A1-8

Peterson Vollmann, Planner IV
January 17, 2020
Page 4

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Andrew Chan at 510-622-5433 or andrew.chan@dot.ca.gov.

A1-9

Sincerely,



Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

COMMENTER A1

California Department of Transportation, District 4
Office of Transit and Community Planning
Mark Leong, District Branch Chief
January 17, 2020

- Response A1-1: This comment provides a description of the commenter's understanding of the project, and that the project site is located adjacent to State Route (SR)-185/International Boulevard. No response is required.
- Response A1-2: The commenter notes that the proposed design of the driveways along SR-185 must be in accordance with standards from the Caltrans' Highway Design Manual, Standard Plans, and Standard Specifications; that all curb ramps and pedestrian facilities must be brought up to current American Disabilities Act (ADA) standards; and that during construction, pedestrian access in the project vicinity must be in accordance with ADA guidelines. No response is required.
- Response A1-3: In regards to the Bus Rapid Transit (BRT) project that AC Transit is constructing along International Boulevard, the commenter notes that project-related truck turning movements must be adequate to avoid the median transit lane. As described in Section 4.3, Transportation and Circulation on page 4.3-27 of the Draft EIR, trucks turning into and out of the project driveways on International Boulevard would not interfere with BRT operations along the corridor. Furthermore, the Non-CEQA Transportation Assessment memorandum completed for the project (included as Appendix H to this document) includes a detailed assessment of trucks turning into and out of the project driveways. As shown on Figure 1 of the memorandum, trucks can turn into and out of the center and south driveways on International Boulevard without conflicting with buses operating in the median-running BRT lanes along the corridor. Additionally, in coordination with the BRT Project, the proposed project would modify the new traffic signal on International Boulevard at 55th Avenue in order to accommodate left-turns for both passenger vehicles and trucks into and out of the proposed project driveway opposite 55th Avenue. Modifying the new signal would not interfere with BRT operations along the corridor since all signals along International Boulevard would be coordinated and timed for bus operations. In addition, trucks would be able to turn into and out of the

project driveways on International Boulevard without interfering with bus operations along the corridor.

- Response A1-4: The commenter notes that should ground-disturbing activities take place within the ROW and there is an inadvertent archaeological or burial discovery, all construction within 50 feet of the find shall cease in compliance with CEQA, PRC 5024.5, and Caltrans Standard Environmental Reference (SER) Chapter 2. The Caltrans Office of Cultural Resource Studies, District 4, shall also be immediately contacted at (510) 286-5416, and a staff archaeologist will evaluate the finds within one business day after contact. In the Draft EIR, Section 4.1 Cultural Resources and Tribal Cultural Resources, potential impacts to historical and archeological cultural resources are evaluated for the proposed project and SCAs and mitigation measures are identified. These measures include the notification of the City and regulatory agencies, including Caltrans, should unknown archeological or burials be identified within the site or Caltrans ROW.
- Response A1-5: The commenter notes that potential impacts to Caltrans' ROW from project-related temporary access points should be analyzed and mitigation for significant impacts due to construction should be identified. In the Draft EIR, Section 4.3 Transportation and Circulation provides an evaluation of construction and operation period impacts related to the proposed project. The evaluation determined that during construction and operation, the project is consistent with applicable plans, ordinances, and policies, and would not cause a significant impact by conflicting with adopted plans, ordinances, or policies addressing the safety and performance of the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths. Additionally, SCA-TRA-1 requires the project proponent to prepare a construction management plan (CMP). The CMP would include coordination with Caltrans and obtaining all necessary permits to minimize potential effects of project construction on Caltrans facilities.
- Response A1-6: In response to this comment, the location of the proposed utilities in the vicinity of International Boulevard are shown on Figure 3-15a in Chapter 3.0, Project Description of the Draft EIR. As shown and described in this chapter, the location and replacement of existing utilities within clean utility corridors and connections to existing utilities within International Boulevard would remain the same as they are today after project site remediation and construction. As noted above, SCA-TRA-1 requires the

project sponsor to prepare a construction management plan (CMP) and apply for any necessary Caltrans-issued encroachment permits prior to construction.

- Response A1-7: The comment that as Lead Agency, the City of Oakland is responsible for all project mitigation measures is noted. The City is responsible for the implementation of project mitigation measures, and will be preparing a Standard Conditions of Approval and Mitigation Monitoring and Reporting Program for the project as well.
- Response A1-8: This comment agrees with the Draft EIR at page 3-31 that the identified construction activities, new access locations and traffic control that encroaches onto the State ROW will require a Caltrans-issued encroachment permit, and provides a description of how to obtain an encroachment permit.
- Response A1-9: This comment provides Caltrans contact information for this comment letter. No further response is required.



January 22, 2020

(By electronic transmission)

Members of the Planning Commission
City of Oakland
Robert Merkamp
250 Frank H. Ogawa Plaza, 2nd Floor
Oakland, California 94612

Subject: 5441 International Boulevard - PLN 19-076

Dear Members of the Planning Commission and Mr. Merkamp,

Oakland Heritage Alliance regrets the longtime neglect of the GE site, its toxic condition, and the demolition of historic structures. However, in the present situation we support accepting the EIR, and the proposed project design, and moving forward on this new use.

A2-1

We are very pleased that the project proponents have come up with a re-use plan that will fill in this huge vacant gap on International Boulevard. We appreciate their willingness to preserve a remnant of the historic built site, for its own inherent value, for the historic context it provides, and to anchor the designed new structure in its neighborhood. We greatly appreciate their efforts.

A2-2

Moreover, we thank the city planning staff for their long and steadfast effort to arrive at a much better outcome than we had feared. We hope that the combination of cleanup, monitoring, and new activity will help the neighborhood recover from GE's mistreatment. We also hope that the façade improvement fund contribution will assist the neighborhood in upgrading some of the historic commercial buildings in the area.

A2-3

We would appreciate a vote to approve the EIR.

A2-4

Sincerely,

Tom Debley, President

By electronic transmission:

cc: William Gilchrist, Ed Manasse, Robert Merkamp, Pete Vollmann and Betty Marvin, Bureau of Planning/Zoning

COMMENTER A2

Oakland Heritage Alliance
Tom Debley, President
January 22, 2020

- Response A2-1: This comment notes the longtime neglect of the GE site, its toxic condition and the demolition of historic structures, and supports the acceptance of the Draft EIR and the proposed project. The City will consider the comment supporting the project and Draft EIR prior to taking action on the proposed project.
- Response A2-2: The comment provides support for the redevelopment plan for the site and especially the retention of the bulkhead of Building #1 for its inherent value, the historic context it provides, and its ability to “anchor” the new structure to the neighborhood. The City will consider the comment supporting the project prior to taking action on the proposed project.
- Response A2-3: This comment identifies Mitigation Measure CULT-1b: Contribution to Façade Improvement Program in the Draft EIR and supports that measure in hopes that it will assist the neighborhood in upgrading some historic commercial buildings in the area. No further response is necessary.
- Response A2-4: This comment provides support for approving the EIR. The City will consider the comment supporting the Draft EIR prior to taking action.



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
700 Heinz Avenue
Berkeley, California 94710-2721



Gavin Newsom
Governor

January 27, 2020

Mr. Peterson Vollmann
Planner IV
City of Oakland, Bureau of Planning
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, California 94612

GENERAL ELECTRIC SITE REMEDIATION AND REDEVELOPMENT
PROJECT (ER18-013) NOTICE OF PREPERATION COMMENTS FOR SITE
LOCATED AT 5441 INTERNATIONAL BOULEVARD, OAKLAND, CALIFORNIA
(SITE CODE: 202244-11-12018)

Dear Mr. Vollmann:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the General Electric Site Remediation and Redevelopment Project (ER18-013).

The project applicant, Bridge Development Partners and General Electric Company, are proposing a site remediation and redevelopment project that would include demolition of the eight existing structures, foundations and associated equipment on the site, including Building #1 that has a City of Oakland historic rating of A1+ and is therefore a CEQA historic resource. The facade of Building #1 would be preserved, treated to contain any contaminated materials, and incorporated into the design of the new building. The site would be remediated for reuse as a commercial and industrial facility.

The demolition and abatement activities would be conducted with appropriate regulatory agency oversight by the United States Environmental Protection Agency (USEPA) and the Department of Toxic Substances Control (DTSC). After demolition and remediation, an approximately 534,208-square-foot industrial building would be constructed with 85 dock doors and 219 parking stalls. There would also be 93,522 square feet of landscaping provided. Building construction would include soil vapor barriers, clean utility corridors and other protections for construction workers and employees of the new facility and will be overseen by both USEPA and DTSC.

A3-1

Mr. Peterson Vollmann
January 27, 2020
Page 2

The Draft EIR analyzes potential impacts related to the following topics and determined, with implementation of the City's standard conditions of approval and recommended mitigation measures, all potentially significant impacts would be reduced to a less-than-significant level: Hazards and Hazardous Materials; Transportation and Circulation; Air Quality; Noise and Groundborne Vibration; Geology, Soils and Seismicity; and Hydrology and Water Quality. The Draft EIR also concludes the proposed Project would result in significant and unavoidable project-level impacts associated with historical resources and greenhouse gas emissions.

A3-2

The DTSC is a Responsible Agency pursuant to CEQA and, therefore, reviewed portions of the environmental analysis which are germane to the Responsible agency's statutory responsibilities in connection with the proposed Project. DTSC's mission is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products. DTSC has determined that the environmental analysis, including recommended mitigation measures, effectively accomplishes DTSC's mission. In addition, the Draft EIR adequately and fully addresses the project's activities described in the proposed Explanation of Significant Differences (ESD) and Remedial Design Implementation Plan (RDIP) Addendum.

A3-3

Thank you for the opportunity to review the Draft EIR. Please contact Mr. John Hope, Senior Environmental Planner, DTSC Site Mitigation and Restoration Program at 916-255-3552 or at John.Hope@dtsc.ca.gov, with any questions.

Sincerely,



Yongsheng Sun
Hazardous Substances Engineer
Site Mitigation and Restoration Program – Berkeley Office

cc: John Karachewsk
Supervising Engineer Geologist
John.Karachewski@dtsc.ca.gov

Jose Salcedo
Supervising Hazardous Substances Engineer I
Jose.Salcedo@dtsc.ca.gov

John Hope
Senior Environmental Planner
John.Hope@dtsc.ca.gov

COMMENTER A3

State of California, Department of Toxic Substances Control
Yongsheng Sun, Hazardous Substances Engineer
January 27, 2020

- Response A3-1: This comment provides a description of the commenter's understanding of the project, and that the project's demolition, abatement and construction activities will be conducted with appropriate regulatory oversight by the United States Environmental Protection Agency (USEPA) and the Department of Toxic Substances Control (DTSC), as responsible agencies pursuant to CEQA. No response is required.
- Response A3-2: This comment provides a description of the commenter's understanding of the contents and findings of the Draft EIR in regards to significant and significant and unavoidable impacts. No response is required.
- Response A3-3: This comment identifies DTSC as a responsible agency pursuant to CEQA that reviewed portions of the Draft EIR which are germane to DTSC's statutory responsibilities. The comment also provides a description of DTSC's mission to "protect California's people and environment from harmful effects of toxic substance by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products." The comment supports the environmental analysis and recommended mitigation measures in the Draft EIR and finds that they effectively accomplish DTSC's mission. The comment also notes that the Draft EIR adequately and fully addresses the project's activities described in the Remedial Design Implementation Plan (RDIP) Addendum, contained in Appendix C of the Draft EIR, and the Draft Final Explanation of Significant Differences (ESD)¹ that is included as Appendix I to this document.
- The ESD is a document prepared for and required by DTSC that highlights the significant differences to the 2011 Remedial Action Plan

¹ EKI Environment & Water, Inc., 2019. Draft Final Explanation of Significant Differences 5441 International Boulevard, Oakland, California (EKI B70123.01). November 15.

(RAP), most notably the installation of a vapor intrusion mitigation system which helps to prevent volatile organic chemicals (VOCs) from impacting future occupants of the proposed warehouse building. DTSC published notices that the ESD was available for public review and comment (from December 20, 2019 to January 31, 2020) and that USEPA is considering a Toxic Substances Control Act (TSCA) application (included as part of the RDIP Addendum) to approve the cleanup and disposal of PCBs in soil, concrete and building materials at the project site. DTSC and USEPA will take all public comments into consideration prior to approving the RDIP Addendum and the TSCA application which would also occur after certification of this Final EIR. Please also see Draft EIR Chapter 3.0, Project Description and Section 4.2, Hazards and Hazardous Materials for a description and discussion of the project's demolition, abatement, construction and operation activities in regards to DTSC and USEPA oversight, the 2011 RAP, RDIP Addendum and other relevant documents concerning hazardous materials and proposed remediation activities.



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

February 4, 2020

Peterson Vollmann
Oakland, City of
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, CA 94612

Subject: General Electric Site Remediation and Redevelopment Project (ER18-013)
SCH#: 2018122043

Dear Peterson Vollmann:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on 2/3/2020, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2018122043/2>. Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

COMMENTER A4

State of California, State Clearinghouse, Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Director
February 4, 2020

Response A4-1: This comment from the State Clearinghouse confirms receipt of the Draft EIR and submission to State agencies for review. One agency, Caltrans, responded and posted their letter on the CEQA database at: <https://ceqanet.opr.ca.gov/2018122043/2>. The Caltrans letter is included in this document as comment letter A1. The letter also acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA. No further response is required.

3.2 PUBLIC HEARING COMMENTS

A. PUBLIC HEARING COMMENTERS LPAB

Landmarks Preservation Advisory Board

January 13, 2020

Nenna Joiner, Boardmember

Comment LPA-1: Commenter requested clarification on the project in regards to whether the site would be capped permanently and what the proposed use would be.

Response LPA-1: City staff responded that the proposed industrial/warehouse building and asphalt areas to be constructed on the site after remediation would serve as a permanent cap for the site.

Benjamin Fu, Boardmember

Comment LPA-2: Commenter asked whether the proposed industrial/warehouse project would “activate” the site (and by extension International Boulevard), and would there be potential adverse effects from truck movements during construction and operation.

Response LPA-2: City staff and the project applicant responded that the proposed project would assist in activating the area by renovating and maintaining the bulkhead portion of Building #1; providing improvements to the streetscape such as landscaping, and including the main entrance and office uses associated with the proposed building along International Boulevard.

As the project site for an industrial/warehouse use was chosen for its proximity to the port of Oakland, there would be the use of trucks associated with operation of the site. There are 85 truck docks proposed as part of the building design. Truck circulation and access on and off the site is shown on Figure 3-5, Conceptual Site Plan in the Draft EIR. During construction, trucks would be used to off-haul remediation materials from the site and bring construction materials to the site. In the Draft EIR, Table 3-1, Projected Number of Truck Trips for Export and Import of Materials provides a description of the estimated amounts of material, number of trips, and material disposal locations for the proposed project.

Draft EIR Section 4.3, Transportation and Circulation, provides an analysis of vehicular circulation (including trucks) associated with the proposed project. SCA-TRA-1 requires the project applicant to submit a

Construction Management Plan for review and approval by the City that would identified truck routes and a traffic control plan. With the implementation of the City's SCAs, all potential impacts were considered to be less than significant and no mitigation measures were required. See also Response to Comments A1-3 and A1-5 regarding truck turning movements and construction-related impacts.

Comment LPA-3: Regarding the significant unavoidable loss of historic cultural resources on the site (Building #1 rated A1+, API Anchor, and Building #2 rated Dc1+, API Contributor), as a result of the proposed project, what are the mitigation measures to be applied?

Response LPA-3: City staff directed the commenter to page 10 of the Staff Report that contained a summary of the mitigation measures recommended in the Draft EIR, Section 4.1 Cultural Resources and Tribal Cultural Resources, including Mitigation Measure CULT-1a: Historical Context Report, Mitigation Measure CULT-1b: Contribution to Façade Improvement Program, Mitigation Measure CULT-1c: Installation of a Commemorative Marker, and Mitigation Measure CULT-1d: Preparation of a Historic Property Treatment Plan. However, even with implementation of these mitigation measures and retention of the bulkhead of Building #1, the significant impacts associated with demolition of the historic resources would be unavoidable.

Comment LPA-4: The commenter supported the remediation and retention of the Building #1 bulkhead as part of the proposed project, and expressed concerns regarding the use of the building due to the hazardous materials within the building materials.

Response LPA-4: City staff and the applicant explained that there has been extensive testing of the interior and exterior of the bulkhead portion of Building #1, and proposals for identified remediation and potential reuse or encapsulation have all been and will be conducted with review and oversight by DTSC and USEPA as responsible agencies. The results of the testing and the final design to allow reuse will need to be approved by DTSC and USEPA and provided to the City for approval as well.

Klara Komorous, LPAB Vice Chair

Comment LPA-5: The commenter supported the remediation and retention of the Building #1 bulkhead as part of the proposed project, and reiterated that the building, as a whole, is the most historically significant building in the 57th

Avenue Industrial District API. The commenter also supported the mitigation measures identified in the Draft EIR.

Response LPA-5: City staff responded that the final design for the proposed warehouse project that incorporates the historic bulkhead was a reiterative process with City staff, applicant and OHA.

PUBLIC HEARING COMMENTERS

David Ruth, Artist

Comment LPA-6: The commenter is an artist and neighbor of the project site; who supports the proposed project, is glad that the site will not remain vacant, and believes that the project will be good for East Oakland.

Response LPA-6: The City will consider the comment supporting the project prior to taking action on the proposed project.

Alison Finlay, Oakland Heritage Alliance, Vice President

Comment LPA-7: The commenter supports approval of the Draft EIR and the proposed project, and believes that the proposal to remediate and incorporate the bulkhead portion of Building #1 into the proposed industrial/warehouse building is far superior to the 2017 proposed project that involved demolishing of all buildings, capping the site with asphalt and leaving it vacant. The commenter noted that due to the toxicity of the existing buildings, it is understandable why they would need to be demolished and would not be suitable for reuse due to public safety concerns.

Response LPA-7: The City will consider the comment supporting the project prior to taking action on the proposed project.

Close of the public hearing.

Nenna Joiner, Boardmember

Comment LPA-8: The commenter asks whether the homes on 54th Avenue adjacent to the project site were included in the Draft EIR.

Response LPA-8: City staff responded that there is a long history of remediation of hazardous materials by GE, the previous site owner, and adjacent

properties. All remediation activities have been overseen by the DTSC and USEPA. However, those past efforts are not the project being evaluated in the Draft EIR. The potential impacts on neighboring properties and the environment associated with demolition, remediation, construction and operation of the proposed project were identified and evaluated in the Draft EIR and Standard Conditions of Approval and mitigation measures were identified to reduce potential impacts to less-than-significant levels to the greatest degree possible. In particular, see Draft EIR Section 4.2, Hazards and Hazardous Materials, Section 4.4 Air Quality, and Section 4.6, Noise and Groundborne Vibration in regards to potentially significant impacts on neighboring uses. See also Draft EIR Appendix C, Remedial Design and Implementation Plan (RDIP) Addendum.

Comment LPA-9: The commenter asks what public notice concerning the project has been given to neighboring uses.

Response LPA-9: City staff responded that all neighboring uses received the notice of preparation of the Draft EIR (sent on December 21, 2018), and the notice availability of the Draft EIR (sent on December 19, 2019). Additionally, the project applicant has had a series of public meetings concerning the project in the neighborhood.

Comment LPA-10: Commenter expressed concern regarding the impacts associated with construction of the project and in particular impacts on the neighborhood from trucks accessing the site.

Response LPA-10: See response to comment LPA-2 and response to comment LPA-8.

Klara Komorous, LPAB Vice Chair

Comment LPA-11: The commenter noted support for Mitigation Measure CULT-1a: Historical Context Report and Mitigation Measure CULT-1d: Preparation of a Historic Property Treatment Plan, and wanted to make sure that documentation regarding the 57th Avenue Industrial District API was also included.

Response LPA-11: City staff responded that the Cultural Resources Study, included as Appendix D in the Draft EIR, contained extensive information and documentation concerning the API and all of the buildings on the GE site.

Vince Sugrue, LPAB Chair

Comment LPA-12: Commenter supports the Draft EIR and especially notes the review and analysis concerning hazardous materials at the site, and notes that he believes that the proposed project will activate that portion of Industrial Boulevard and benefit the community.

Response LPA-12: The City will consider the comment supporting the project prior to taking action on the proposed project.

B. PUBLIC HEARING COMMENTER'S PLANNING COMMISSION

January 22, 2020

Planning Commission Chair Amanda Monchamp recused herself from the hearing on this item.

Public Hearing

The Commission opened the public hearing after the staff presentation, and there were no public hearing commenters. The Commission closed the public hearing.

Jonathon Fearn, Boardmember

Comment PC-1: Will GE as the previous property owner have more responsibility for the clean up than what they are currently doing in regards to the groundwater extraction and treatment system (GETS)?

Response PC-1: City staff responded that per the information contained in the Draft EIR, Section 4.2, Hazards and Hazardous Materials as well as Chapter 3.0, Project Description, GE will be responsible for maintaining the GETS system and monitoring, but the remediation, redevelopment and continuous monitoring of the site will be Bridge Development Partners, LLC's (the project applicant) responsibility.

Comment PC-2: Even though the Draft EIR concluded that Variant A of the No Reuse alternative (i.e., protect all of Building #1 and Building #2 in place, and no reuse of the site or buildings) is the environmentally superior alternative, it would appear to be impractical and potentially infeasible to do.

Response PC-2: City staff responded that the feasibility of the alternatives was to be decided by decision-makers as part of the CEQA process and included as part of the Findings for the project.

Comment PC-3: Per the discussion in Draft EIR Section 4.3, Transportation and Circulation, the commenter notes that the project is consistent with the City's vehicle miles travelled thresholds and congestion management plans, and project-related transportation impacts are considered less-than-significant. If that is so, then why are there greenhouse gas (GHG) emission impacts that are significant and unavoidable?

Response PC-3: City staff responds that the City has identified interim GHG emissions goals for all proposed projects. For large projects that do not include a residential component (e.g., retail or warehouse projects) and have onsite

employees, there are only so many measures that can be implemented to reduce the vehicle trips and emissions to a low enough amount to meet the identified goals. As discussed in Draft EIR Section 4.5, after implementing all possible measures and still not meeting the goal, a proposed project may then have to purchase sufficient carbon credits. Because the future availability of sufficient carbon credits is unknown, the project's GHG impacts are considered significant and unavoidable.

Clark Manus Boardmember

Comment PC-4: The commenter noted that the Landmarks Preservation Advisory Board had reviewed the project's design, retention of the bulkhead portion of Building #1, and the Demolition Findings, and had made a recommendation in support of the Draft EIR.

Response PC-4: The comment is noted and no response is necessary.

Tim Limon, Vice-Chair

Comment PC-5: The commenter noted his appreciation for the outreach that staff and the applicant had undertaken in regards to the project and his support for the proposed project's site plan and circulation that kept trucks off 54th Avenue.

Response PC-5: The comment is noted and no response is necessary.

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4.0 DRAFT EIR TEXT REVISIONS

Chapter 4.0 presents contains text changes and corrections to the Draft EIR initiated by the City as Lead Agency to clarify, refine and update information to the Draft EIR. No changes to the Draft EIR were identified as a result of comments on the Draft EIR, see responses in Chapter 3.0, Comments and Responses. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double underlined text. Text deleted is shown in ~~strikeout~~.

The following text revision is made to page 4.5-16 of the Draft EIR:

~~Because the differences between the proposed project and the access variant would not affect GHG emissions from sources other than transportation, the discussion below regarding GHG emissions from non-transportation sectors from the proposed project is also applicable to the access variant. Similarly, the discussions regarding energy use of the proposed project is also applicable to the access variant.~~

The following text revision is made to page 4.5-17 of the Draft EIR after Table 4.5-3: Oakland Non-Transportation GHG Efficiency Thresholds:

The citywide efficiency metric (GHG emissions divided by the City's service population) makes several conservative assumptions to ensure that the impacts of the project on GHG emissions are fully assessed. First, the analysis assumes that in order for the City to reach the interim goal of a 56 percent reduction in total GHG emissions from 2005 levels by 2030, the City must similarly reduce non-transportation related emissions by 56 percent. Second, the analysis assumes that reduction obligations will be borne equally by new construction and existing buildings. According to the CURB Analysis conducted by the City, while a significant portion of the City's GHG emissions reduction goals will be achieved through grid decarbonization and other reductions from new residential and commercial buildings, the vast majority of emission reductions will need to come from passenger mode shift, vehicle electrification, and vehicle fuel efficiency. Of the 2,116,613 MTCO_{2e} in reductions identified in the 2030 emissions reductions scenario, only 468,581 MTCO_{2e} (22 percent of the total) are required to come from new commercial, new residential, and grid decarbonization. Remaining reductions will need to be achieved through efficiencies in existing buildings as well as through transportation-related GHG emissions reductions. Further, of the reductions anticipated to occur from building emissions between now and 2050, 71 percent will need to occur in existing buildings. Thus, by applying the efficiency threshold of 0.61, the City is ensuring that a project meeting the threshold will not have a significant impact relating to non-transportation emissions.

Because the differences between the proposed project and the access variant would not affect GHG emissions from sources other than transportation, the discussion below regarding GHG emissions from non-transportation sectors from the proposed project is also applicable to the access variant. Similarly, the discussions regarding energy use of the proposed project is also applicable to the access variant.

APPENDIX H

GE SITE REMEDIATION AND REDEVELOPMENT PROJECT – NON-CEQA TRANSPORTATION ASSESSMENT MEMORANDUM



MEMORANDUM

Date: February 12, 2020

To: Judith Malamut, Baseline Environmental Consulting

From: Sam Tabibnia

Subject: GE Site Remediation and Redevelopment Project – Non-CEQA Transportation Assessment

OK18-0274

This memorandum summarizes the non-CEQA transportation assessment that Fehr & Peers completed for the proposed GE Site Redevelopment (project) project in Oakland. This document provides a brief description of the project, an estimate of project trip generation, and a review of the project site plan and surrounding areas for access and circulation for various modes. This memorandum also includes recommendations to improve multi-modal access and circulation for the project.

PROJECT DESCRIPTION

The proposed project is located on the west side of International Boulevard between 54th and 57th Avenues in Oakland. The 24-acre project site, is occupied by vacant buildings, which used to be a General Electric manufacturing facility, and will be demolished as part of the proposed project. The proposed project would construct a single building providing 525,000 square feet of warehouse space and about 10,000 square feet of accessory office.

Automobile access would be provided through four driveways: three driveways on International Boulevard and one driveway at the end of East 12th Street, just south of 54th Avenue. Since trucks are prohibited on East 12th Street, 54th Avenue, and other adjacent streets, the driveway on East 12th Street would only be used by passenger vehicles. All trucks would use the driveways on International Boulevard to drive to and from the site. A project variant under consideration would



add a truck-only driveway on the northwest corner of the project just east of the railroad tracks on 54th Avenue to facilitate truck access between the site and San Leandro Street.

The project would accommodate 85 loading docks, along the south side of the building. The project would also provide 219 automobile parking spaces along the east and north side of the building.

TRIP GENERATION AND INTERSECTION COUNTS

Automobile Trip Generation

Trip generation is the process of estimating the number of vehicles that would likely access the project on any given day. **Table 1** summarizes the trip generation for the proposed project. Trip generation data published by the Institute of Transportation Engineers (ITE) in the *Trip Generation Manual (10th Edition)* was used as a starting point to estimate the vehicle trip generation.

TABLE 1
AUTOMOBILE TRIP GENERATION SUMMARY

Land Use	Units ¹	ITE Code	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Warehouse	525 KSF	150 ²	910	69	20	89	27	73	100
Truck Trips ³			340	12	4	16	6	15	21
Passenger Cars, unadjusted			570	57	16	73	21	58	79
Non-Auto Reduction (23%) ⁴			-130	-13	-4	-17	-5	-13	-18
Passenger Cars, adjusted			440	44	12	56	16	45	61
Office	10 KSF	710 ⁵	100	10	2	12	2	10	12
Non-Auto Reduction (23%) ⁴			-20	-2	0	-2	0	-2	-2
Passenger Cars, adjusted			80	8	2	10	2	8	10
Net New Project Trips			860	64	18	82	24	68	92
Truck Trips			340	12	4	16	6	15	21
Passenger Car Trips			520	52	14	66	18	53	71

1. KSF = 1,000 square feet.

2. ITE *Trip Generation (10th Edition)* land use category 150 (Warehousing):

Daily: $T = 1.74 * X$, AM Peak Hour: $T = 0.17 * X$ (77% in, 23% out), PM Peak Hour: $T = 0.19 * X$ (27% in, 73% out)

3. Based on truck trip generation data in *ITE Trip Generation Handbook* (3rd Edition), Appendix I.

4. Reduction of 23.1% assumed, based on City of Oakland *Transportation Impact Review Guidelines* using Census data for urban environments over one mile of a BART Station.

5. ITE *Trip Generation (10th Edition)* land use category 710 (General Office Building):

Daily: $T = 9.74 * X$, AM Peak Hour: $T = 1.16 * X$ (86% in, 14% out), PM Peak Hour: $T = 1.15 * X$ (16% in, 84% out)

Source: Fehr & Peers, 2019.



ITE's *Trip Generation Manual (10th Edition)* is primarily based on data collected at single-use suburban sites where the automobile is often the only travel mode. However, the project site is in a medium density mixed-use environment near some transit service, and it is expected to generate more walk, bike, or transit trips than typical suburban settings. Since the project is about 1.3 miles from both the Fruitvale and Coliseum BART stations, this analysis reduces the ITE based passenger car trip generation by about 23 percent to account for non-automobile trips. This reduction is consistent with the City of Oakland's Transportation Impact Review Guidelines (TIRG) and is based on US Census commute data for Alameda County from the 2014 5-Year Estimates of the American Community Survey (ACS), which shows that the non-automobile mode share for urban areas more than one mile from a BART Station is about 23 percent.

As presented in Table 1, the adjusted total trip generation for the proposed project and variant is approximately 860 daily, 82 AM peak hour, and 92 PM peak hour automobile trips. It is estimated that about 40 percent of the daily, 20 percent of the AM peak hour, and 23 percent of PM peak hour trips would be truck trips. This trip generation does not account for the TDM Plan required by the City's Standard Condition of Approval (SCA)-TRA-5, which is required to reduce the passenger car trips generated by the project by at least 10 percent.

Non-Automobile Trip Generation

Consistent with the City of Oakland TIRG, **Table 2** presents the estimates of project trip generation for all travel modes for the project site.

STUDY INTERSECTION SELECTION

According to the City of Oakland's TIRG, the criteria for selecting study intersections include:

- All intersection(s) of streets adjacent to project site;
- All signalized intersection(s), all-way stop-controlled intersection(s) or roundabouts where 100 or more peak hour trips are added by the project;
- All signalized intersection(s) with 50 or more project-related peak hour trips and existing LOS D-E-F; and
- Side-street stop-controlled intersection(s) where 50 or more peak hour trips are added by the project to any individual movement other than the major-street through movement.



TABLE 2
PROJECT TRIP GENERATION BY TRAVEL MODE

Mode	Mode Share Adjustment Factors ¹	Daily	AM Peak Hour	PM Peak Hour
Automobile and Trucks	0.769	860	82	92
Transit	0.179	121	15	17
Bike	0.019	13	2	2
Walk	0.02	14	2	2
Total Trips		1,008	101	113

Notes:

1. Based on *City of Oakland Transportation Impact Study Guidelines* using Census data for urban environments over one mile of a BART Station.

Source: Fehr & Peers, 2019.

Considering the trip generation for the project, the location of the project and its driveways, and the direction of approach and departure for the trips generated by the project, the project is estimated to add fewer than 100 peak hour trips to any intersection and fewer than 50 peak hour trips to any minor-street movement at a side-street stop-controlled intersection.

Therefore, following the criteria for selecting study intersections, the following four intersections are selected:

1. International Boulevard/54th Avenue
2. International Boulevard/55th Avenue
3. International Boulevard/56th Avenue
4. International Boulevard/57th Avenue

Automobile turning movements, pedestrian counts, and bicycle counts, were collected at the four intersections during the AM and PM peak commuting hours (7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM) on November 14, 2018, which are provided in **Appendix A**.

The TIRG requires a traffic operations analysis and a collision assessment at the study intersections. Considering that the currently under construction East Bay Bus Rapid Transit (BRT) project would modify the configuration and controls of the intersections along International Boulevard, a traffic operations analysis of current conditions, or a review of current collision data and predicting crash



frequencies based on current configurations would not be meaningful. Therefore, these items were not completed for this project.

SITE ACCESS AND CIRCULATION ANALYSIS

Fehr & Peers reviewed the project site plan and the existing street network within one block of the project site to evaluate safety, access, and circulation for all travel modes based on a project site plan dated October 23, 2019.

Automobile Access and Circulation

Primary automobile and truck access for the project would be provided through driveways along International Boulevard. International Boulevard is a designated truck route and would continue to be a truck route after the completion of the BRT Project, which is currently under construction.

Currently, all movements are allowed at the driveways along the project frontage on International Boulevard. The BRT Project, which will eliminate one automobile travel lane in each direction of International Boulevard to accommodate dedicated bus-only lanes, would restrict all project driveways along International Boulevard to right-in/right-out only. The BRT project will also install new signals along International Boulevard, including at 54th, 55th, and 57th Avenues in the project vicinity.

Automobile and truck access for the proposed project would be provided through four driveways: three driveways on International Boulevard and one on East 12th Street, which are described below:

- The north driveway on International Boulevard would be limited to right-in/right-out only and would be used by passenger vehicles only.
- The center driveway on International Boulevard, would be located opposite 55th Avenue. All movements would be allowed at this intersection and the intersection would accommodate both passenger vehicles and trucks. In coordination with the BRT Project, the project would modify the new signal that would be installed by the BRT Project at 55th Avenue to accommodate left-turns into and out of the driveway by both passenger vehicles and trucks.
- The south driveway on International Boulevard would be limited to right-in/right-out only and would accommodate both passenger vehicles and trucks.
- The existing driveway at the end of East 12th Street, just south of 54th Avenue, which would be used by passenger vehicles.



Gates in the southeast and northwest parts of the project site would limit access to the loading docks to trucks only.

As described above, the proposed project would coordinate with the BRT Project to modify the new traffic signal on International Boulevard at 55th Avenue in order to accommodate left-turns for both passenger vehicles and trucks into and out of the proposed project driveway. The proposed signal would result in loss of on-street parking on the east side of International Boulevard along the project frontage. Modifying the new signal would not interfere with BRT operations along the corridor since all signals along International Boulevard would be coordinated and timed for bus operations.

Figure 1 shows trucks turning left into and out of the center project driveway opposite 55th Avenue and turning right into and out of the south project driveway on International Boulevard. As shown on the figure, trucks would be able to turn into and out of the project driveways on International Boulevard without interfering with bus operations along the corridor.

The project variant would provide an additional driveway at the northwest corner of the project on 54th Avenue, just east of the railroad tracks, which would be used by trucks only to access San Leandro Street. Trucks would continue to be prohibited on 54th Avenue east of the driveway, and right turns from the driveway to eastbound 54th Avenue and left-turns from westbound 54th Avenue to the driveway also would be prohibited. Passenger vehicles would not be allowed to access the San Leandro Street driveway, and would continue to access the site via International Boulevard under the project variant.

If the project variant is implemented, the truck trips generated by the project would use the 54th Avenue driveway to access San Leandro Street, a designated truck route, and bypass International Boulevard. Although trucks are prohibited from using 54th Avenue between International Boulevard and San Leandro Street, trucks can use the street to access the 54th Avenue driveway because the California Vehicle Code (section 35703) allows truck access to and from local uses on streets with truck prohibitions.

Figure 2 shows trucks access for the proposed truck-only driveway on 54th Avenue under the project variant. As shown on the figure, trucks would be able to turn from either direction of San Leandro Street and turn right into the project driveway on 54th Avenue and also turn left out of the project driveway on 54th Avenue and then turn either right or left on San Leandro Street. However, the project driveway may not be able to accommodate large trucks turning into and out of the



driveway at the same time. It is expected that project would control truck operations to minimize the time that trucks would need to wait for the driveway to clear.

Bicycle Parking and Bicycle Access

Chapter 17.117 of the Oakland Municipal Code requires long-term and short-term bicycle parking for new buildings. Long-term bicycle parking includes lockers or locked enclosures, and short-term bicycle parking includes bicycle racks. The Code requires the minimum of one long-term space for each 40,000 square feet and zero short-term spaces for warehousing uses.

Table 3 presents the bicycle parking requirements for the project. The project would be required to provide a minimum of 13 long-term bicycle parking spaces and no short-term spaces. The proposed project would provide 16 long-term bicycle parking spaces, meeting Code requirements. Although the current project site plan does not identify the location for these bicycle parking spaces, the project will provide bicycle parking spaces consistent with the City's SCA-TRA-3.

**TABLE 3
BICYCLE PARKING REQUIREMENTS**

Land Use	Size ¹	Long-Term		Short-Term	
		Spaces per Unit ²	Spaces	Spaces per Unit ²	Spaces
Light Industrial	534.2 KSF	1:40 KSF	13	None Required	0
Total Required Bicycle Spaces			13		0
Total Bicycle Parking Provided			16		6
Bicycle Parking Met?			Yes		Yes

Notes:

1. KSF = 1,000 square feet
2. Based on Oakland Municipal Code Section 17.117.120

Source: Fehr & Peers, 2019.

There are no existing bicycle facilities adjacent to the project site. The nearest existing bicycle facilities are Class 2 Bicycle Lanes along Bancroft Avenue, about 0.5 miles east of the project site.

According to the City of Oakland 2019 Bike Plan (Let's Bike Oakland), planned bicycle facilities in the project vicinity include:



- Class 1 Path along the BART tracks between San Leandro Street and the project site which will be part of the East Bay Greenway, which will ultimately connect downtown Oakland and Fremont mostly along BART right-of-way. In the project vicinity, the East Bay Greenway may eliminate one automobile lane along San Leandro Street, which would result in San Leandro Street providing one automobile lane in each direction and a center left-turn lane.
- Class 2 Bicycle Lanes along International Boulevard south of 54th Avenue, which will be installed as part of the BRT Project
- Class 2 Bicycle Lanes along East 12th Street between 50th and 55th Avenues, which would continue as Class 4 Protected Bike Lanes north of 55th Avenue
- Class 3B Neighborhood Bike Route along 54th Avenue between San Leandro Street and Bancroft Avenue
- Class 3B Neighborhood Bike Route along 55th Avenue between International and MacArthur Boulevards

The nearest BayWheels bikeshare station is on Foothill Boulevard at 42nd Avenue, about one mile north of the project site.

Recommendation 1: While not required to address a CEQA impact, the following should be considered as part of the final design for the project:

- Explore the feasibility and if determined feasible by City of Oakland staff, consider implementing or contributing to the Class 3B Bicycle Boulevard Neighborhood Bike Route proposed along 54th Avenue between San Leandro Street and International Boulevard.
- Explore the feasibility and if determined feasible by City of Oakland staff, consider implementing or contributing to the segment of the East Bay Greenway Class I path proposed just west of the project adjacent to San Leandro Street.
- If the existing railroad tracks adjacent to the west of the project are abandoned, consider providing direct pedestrian/bicycle connection between the project site and the proposed East Bay Greenway.

Pedestrian Access and Circulation

Pedestrian facilities include sidewalks, crosswalks, and pedestrian signals. Most streets in the vicinity of the project site provide sidewalks along both sides of the street. No sidewalks are currently provided along 57th Avenue, west of International Boulevard. Most intersections along this segment of International Boulevard are currently stop-controlled with at least one marked



crosswalk across International Boulevard and diagonal curb-ramps at corners. Most curb-ramps do not have truncated domes.

The BRT Project would include pedestrian improvements, such as improved lighting and landscaping, directional curb-ramps, and signal-protected crossings at BRT Stations and several intersections in the project vicinity, including at 54th, 55th, and 57th Avenues.

The City's 2017 Pedestrian Master Plan does not include any planned or proposed improvements in the project vicinity.

Recommendation 2: While not required to address a CEQA impact, the following should be considered as part of the final design for the project:

- Upgrade the pedestrian amenities on International Boulevard adjacent to the project, including the installation of amenities such as lighting; pedestrian-oriented green infrastructure, trees, or other greening landscape; and trash receptacles per the Pedestrian Master Plan and any applicable streetscape plan.

Transit Access

Transit service providers in the vicinity of the proposed project include Bay Area Rapid Transit (BART) and AC Transit.

BART provides regional rail service throughout the East Bay and across the Bay. The project is about 1.3 miles from both the Fruitvale and Coliseum BART stations. The project would not modify access between the project site and the BART Station.

AC Transit is the primary bus service provider in the City of Oakland. AC Transit operates Routes 1 (10-minute peak headway) and 801 (60-minute headway, night service) along International Boulevard and Route 45 (15 to 30-minute headways) along Seminary Boulevard. The nearest bus stops to the project site are on northbound International Boulevard just north of 57th Avenue and on southbound International Boulevard just south of 57th Avenue. Neither stop currently provides any amenities such as benches.

AC Transit is currently constructing the East Bay Bus Rapid Transit (BRT) Project, which would replace Routes 1 and 801, along International Boulevard. BRT buses would operate in mostly dedicated bus lanes between downtown Oakland and San Leandro. BRT station platforms will allow level boarding and pre-payment so loading and unloading passengers is more efficient. It is estimated that BRT buses will arrive every seven minutes during the daytime.



The nearest BRT stations will be located on International Boulevard just north of 54th Avenue, about 500 feet north of the project, and on International Boulevard just north of 58th Avenue, about 750 feet south of the project. Both stations will be median stations and bus riders will access them through signal-controlled crosswalks on International Boulevard at 54th and 58th Avenues, respectively.

Automobile Parking Requirements

The *City of Oakland Municipal Code* sets minimum and maximum parking requirements. According to Section 17.116.090, the proposed project has minimum required off-street parking of 1.0 spaces per 3,500 square feet of floor area for industrial activities. Since the office component of the project is an accessory part of the warehouse, the parking requirement for industrial use applies to the whole project. No maximum parking requirement is applicable to the site.

Table 4 presents the off-street automobile parking requirements for the proposed project. The project is required to provide a minimum of 153 spaces, with no maximum amount. The proposed project would include 219 off-street parking spaces, exceeding the City Code requirement.

TABLE 4
AUTOMOBILE PARKING CODE REQUIREMENTS

Land Use	Size ¹	Required Off-Street Parking Supply		Provided Off-Street Parking Supply	Within Range?
		Minimum	Maximum		
Warehouse ²	534.2 KSF	153	-	219	Yes

Notes:

1. KSF = 1,000 square feet
2. City of Oakland off-street parking requirement for industrial activities is a minimum of 1.0 space for each 3,500 square feet of floor area (Section 17.116.090).

Source: Fehr & Peers, 2019.

CONCLUSION

Per the site plan review, the project would have adequate automobile, bicycle, pedestrian, and transit access and circulation with the inclusion of **Recommendations 1** through **3**.

Please contact Sam (stabibnia@fehrnadpeers.com or 510.835.1943) with questions or comments.

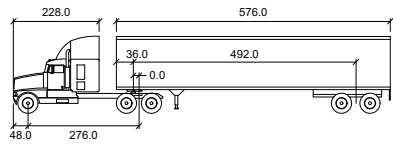


ATTACHMENTS

Figure 1 – Truck Access on International Boulevard

Figure 2 – Truck Access on 54th Avenue

Appendix A – Traffic Counts



STAA - STANDARD

inches			
Tractor Width	: 102.0	Lock to Lock Time	: 6.0
Trailer Width	: 102.0	Steering Angle	: 26.3
Tractor Track	: 102.0	Articulating Angle	: 70.0
Trailer Track	: 102.0		

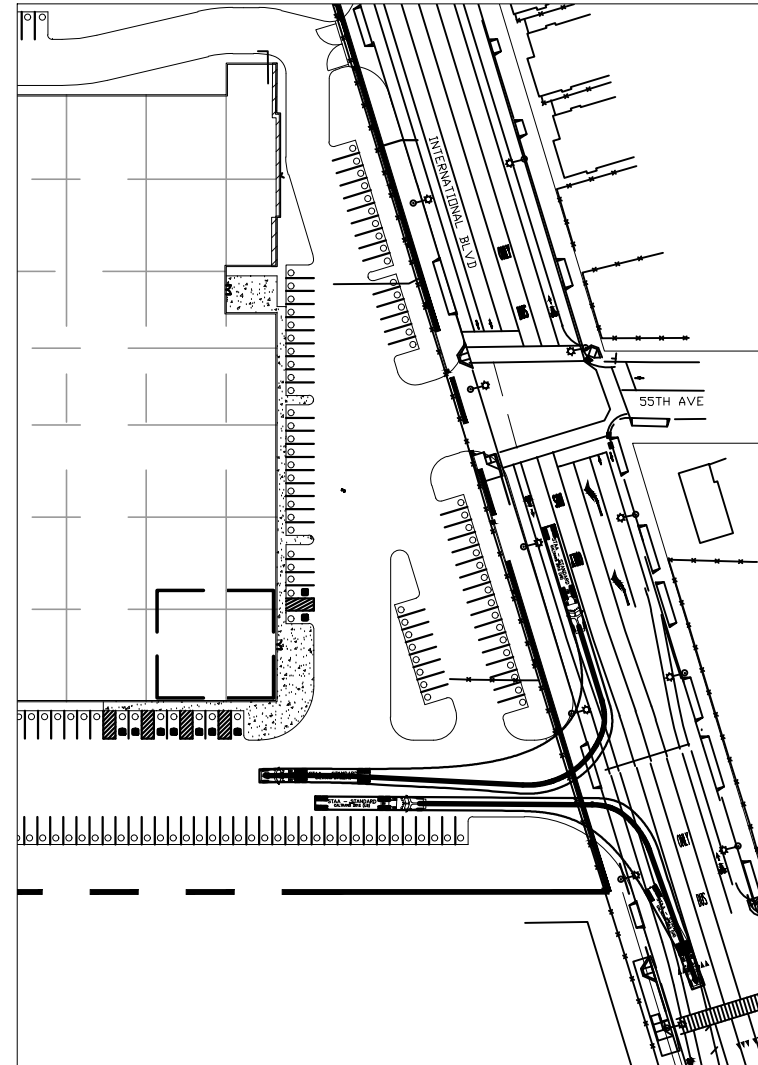
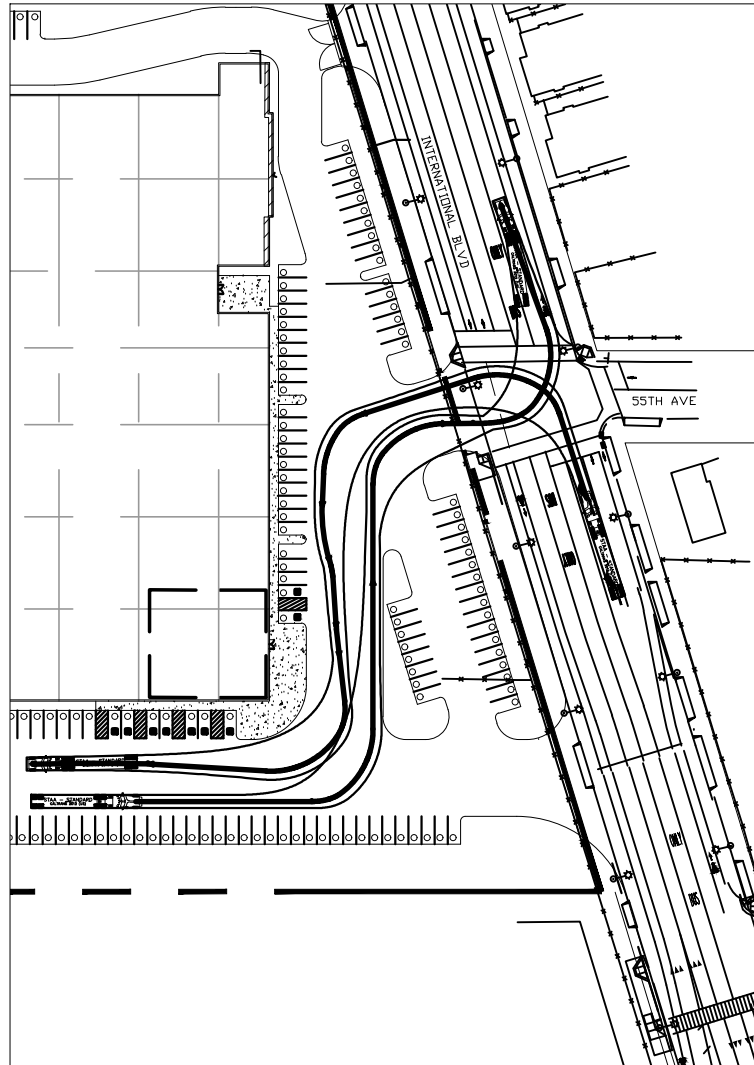
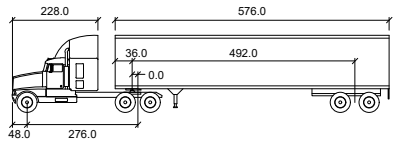


Figure 1

Truck Access on International Boulevard



CONCEPTUAL - NOT FOR CONSTRUCTION. ADDITIONAL
DETAILED ANALYSIS AND ENGINEERING DESIGN REQUIRED.



STAA - STANDARD

	inches		
Tractor Width	: 102.0	Lock to Lock Time	: 6.0
Trailer Width	: 102.0	Steering Angle	: 26.3
Tractor Track	: 102.0	Articulating Angle	: 70.0
Trailer Track	: 102.0		

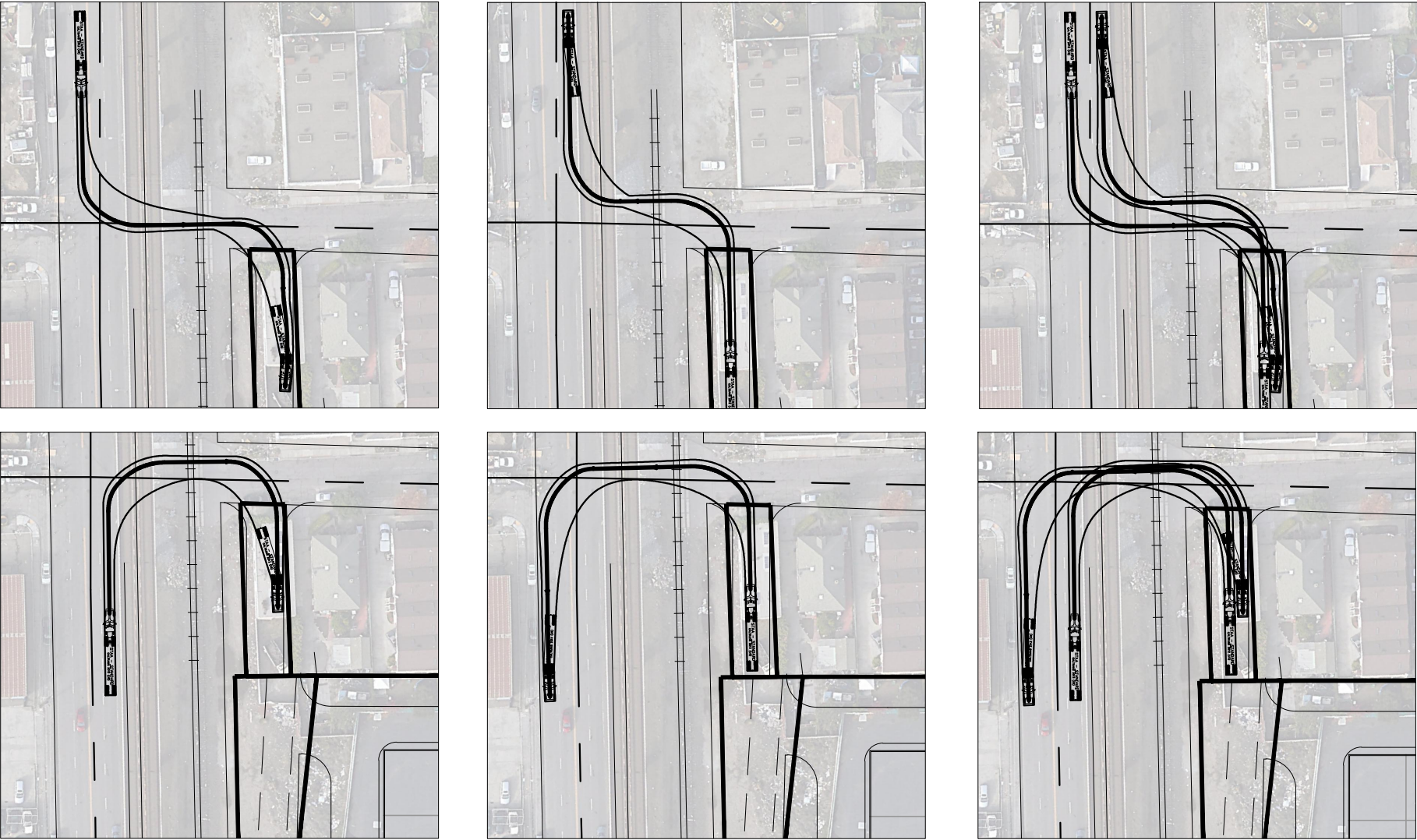


Figure 2

Truck Access on 54th Avenue



CONCEPTUAL - NOT FOR CONSTRUCTION. ADDITIONAL
DETAILED ANALYSIS AND ENGINEERING DESIGN REQUIRED.

APPENDIX A
TRAFFIC COUNTS

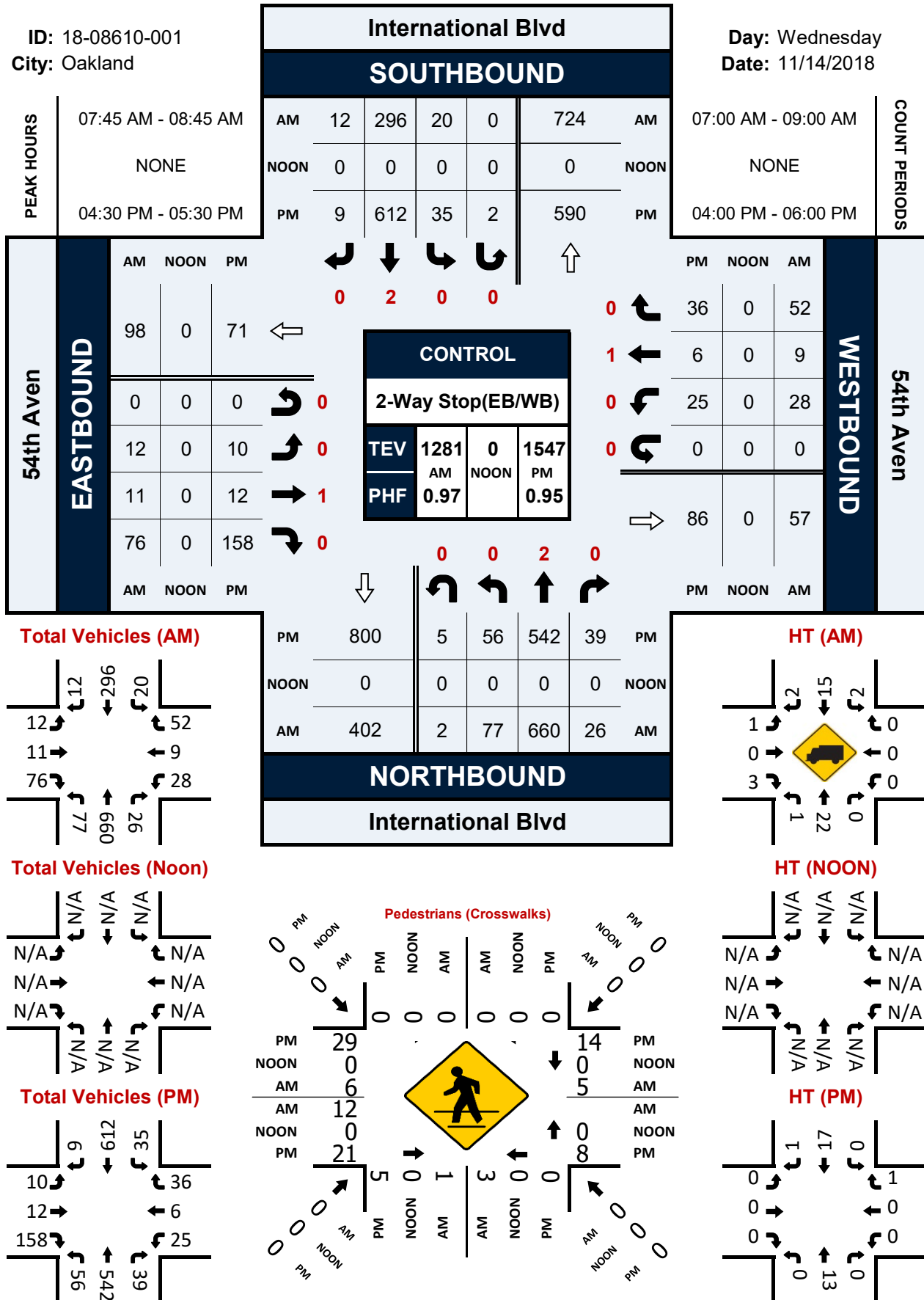


International Blvd & 54th Ave

Peak Hour Turning Movement Count

ID: 18-08610-001
City: Oakland

Day: Wednesday
Date: 11/14/2018

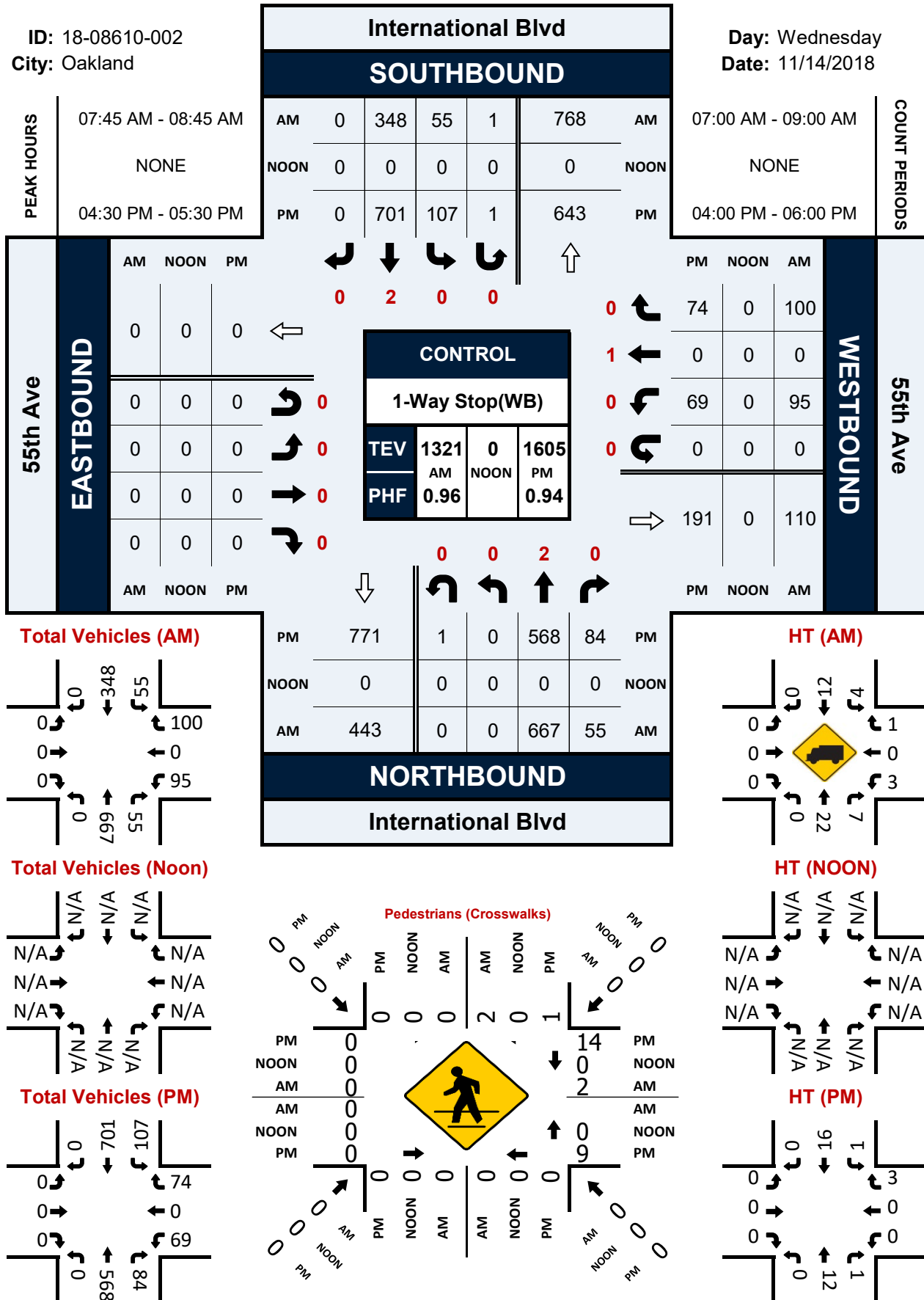


International Blvd & 55th Ave

Peak Hour Turning Movement Count

ID: 18-08610-002
City: Oakland

Day: Wednesday
Date: 11/14/2018

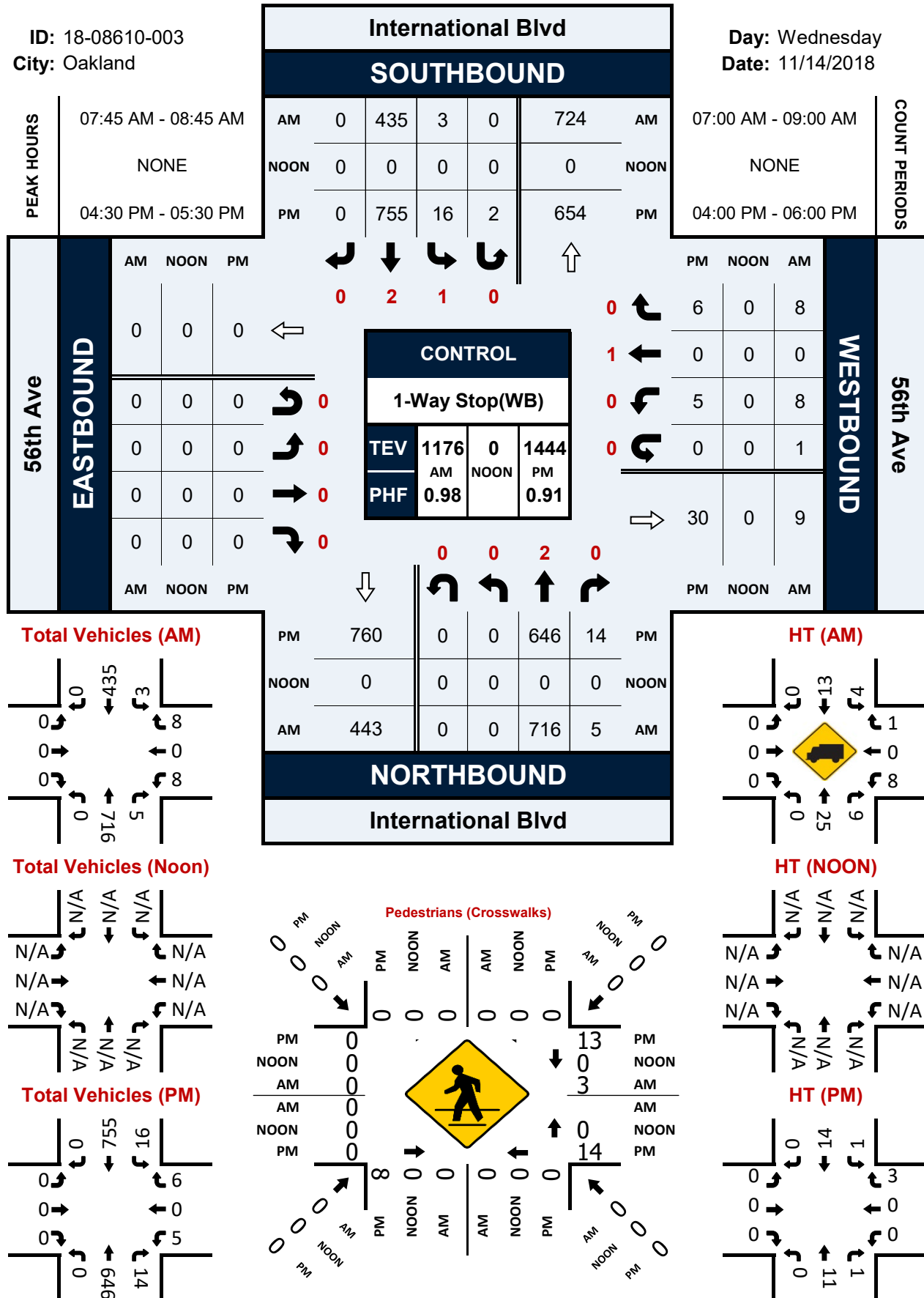


International Blvd & 56th Ave

Peak Hour Turning Movement Count

ID: 18-08610-003
City: Oakland

Day: Wednesday
Date: 11/14/2018

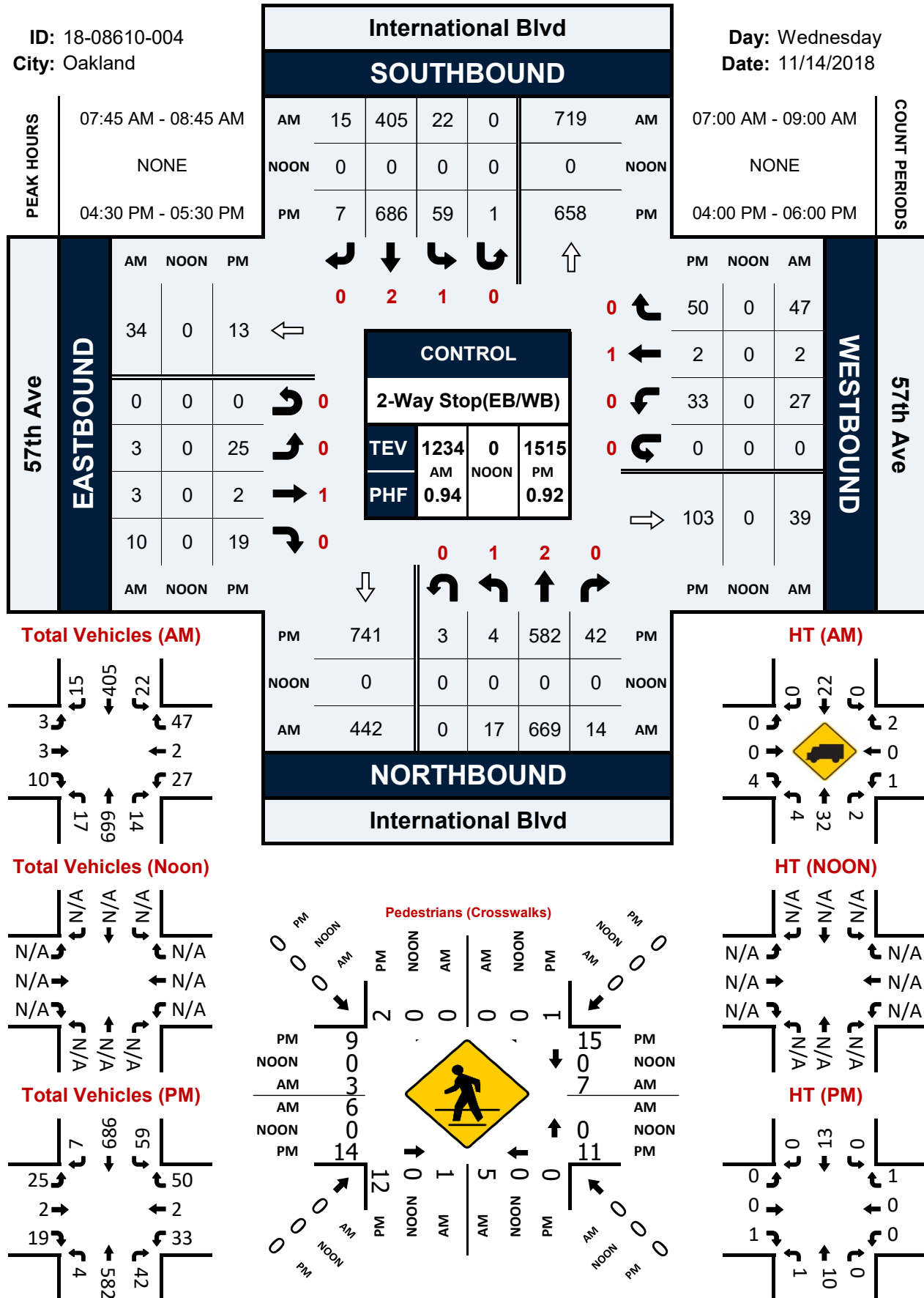


International Blvd & 57th Ave

Peak Hour Turning Movement Count

ID: 18-08610-004
City: Oakland

Day: Wednesday
Date: 11/14/2018



APPENDIX I

**DRAFT FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES 5441
INTERNATIONAL BOULEVARD, OAKLAND, CALIFORNIA (EKI B70123.01)**

Transmitted Electronically

15 November 2019

Mr. Yongsheng Sun
Department of Toxic Substances Control ("DTSC")
Site Mitigation and Restoration Program
700 Heinz Avenue
Berkeley, California 94710

Subject: Draft Final Explanation of Significant Differences
5441 International Boulevard, Oakland, California
(EKI B70123.01)

Dear Mr. Sun,

EKI Environment & Water, Inc. ("EKI") has prepared this draft final Explanation of Significant Differences ("ESD") on behalf of Bridge Point Oakland, LLC ("Bridge") the current owner of the property located at 5441 International Boulevard in Oakland, California ("site"). Bridge is interested in redeveloping this former General Electric Company ("GE") facility with an approximately 530,000-square foot warehouse building. The purpose of this draft final ESD is to enhance the existing, DTSC-approved remedy described in the 2011 Remedial Action Plan being implemented by GE to include a vapor intrusion mitigation system ("VIMS"). Because DTSC considers the VIMS a significant difference to the existing remedy, this ESD has been prepared to summarize the basis and conceptual plan for the VIMS and other minor differences that are proposed to allow for the planned redevelopment of the site. Implementation details for the remedy, as modified by the ESD, are provided in the new Remedial Design and Implementation Plan Addendum submitted by Bridge.

Please call if you have any questions or wish to discuss this ESD in greater detail.

Very truly yours,
EKI ENVIRONMENT & WATER, INC.

Deepa Gandhi, PE
Supervising Engineer



Michelle K. King, PhD
President

Copies to: Brendan Kotler, Bridge
Lance Hauer, GE
Pamela Andes, Allen Matkins Leck Gamble Mallory & Natsis LLP
Attachment: Draft Final ESD

Formerly known as Erler & Kalinowski, Inc.

EXPLANATION OF SIGNIFICANT DIFFERENCES

from Final Remedial Action Plan (RAP), Dated 30 June 2011

1. INTRODUCTION

Site Name: General Electric - Oakland

Location: 5441 International Boulevard, Oakland, California

Lead Agency: California Department of Toxic Substances Control ("DTSC")

Support Agency: U.S. Environmental Protection Agency ("EPA")

General Electric Company ("GE") is conducting investigation and remediation of the former GE - Oakland facility ("site") under the oversight of DTSC under a 1997 Consent Order ("Order"). The U.S. Environmental Protection Agency ("EPA") also has an environmental oversight role at the site with respect to polychlorinated biphenyls ("PCBs"). Bridge Point Oakland, LLC ("Bridge") plans to purchase and redevelop the site into an approximately 530,000-square foot ("sf") warehouse building. The DTSC- and EPA-approved remedial action plan ("RAP") (Geosyntec, 2011) considered the current land use (vacant) and a future land use (occupancy of existing buildings onsite), but did not contemplate a new onsite building.

The remedy, as modified by this ESD, will involve minor and significant changes to the remedy described in the 2011 RAP to accommodate the redevelopment. The significant difference will be inclusion of a vapor intrusion mitigation system ("VIMS") for the new building. DTSC has determined that this is a significant, but not a fundamental change to the remedy as described in the 2011 RAP and requires that an ESD be prepared for Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") and National Oil and Hazardous Substances Pollution Contingency Plan ("NCP") compliance. While the site is not regulated under CERCLA, the general framework for CERCLA sites has been used to develop the remedy (i.e., the RAP is based on the NCP).

2. SITE HISTORY, CONTAMINATION, SELECTED REMEDY, AND LAND USE

The site is approximately 24 acres and entirely covered by buildings, asphalt, or asphalt/bentonite caps. As described in the 2012 remedial design and implementation plan ("RDIP"), "[b]etween 1924 and 1975, GE operated a transformer manufacturing facility at the site. Between 1975 and the mid-1990s, GE Apparatus Service Department ("ASD") operated an electrical equipment maintenance and repair operation in portions of the site" (Geosyntec, 2012). The site is currently vacant and inactive, and no industrial activities have occurred since 2005. PCBs in soil and chlorinated volatile organic compounds ("cVOCs"), including trichloroethene ("TCE"), cis-1,2- dichloroethene ("cDCE"), and vinyl chloride ("VC") in soil, soil gas, and groundwater are the primary chemicals and media of concern.

A RAP for the site was approved by DTSC on 30 June 2011, with conditional approval of the PCB cleanup plan contained in the RAP received from EPA on 23 May 2013 under the Toxic Substances Control Act ("TSCA") Section 761.61(c), risk-based cleanup, for the submitted TSCA application (GE, 2013).¹ As described in the RAP, "[t]he selected remedial alternative ... consists of groundwater extraction and treatment at the downgradient property boundary; groundwater extraction and treatment in cVOC hot spots; monitored natural attenuation ("MNA") for other areas of groundwater; targeted excavation of a

¹ A new TSCA application will be prepared for the redevelopment.

cVOC hot spot in soil; capping for PCBs in soil; and institutional controls. The selected remedial alternative offers the best combination of mass removal, effective containment for the protection of human health and the environment, and level of cost certainty compared to the other alternatives.” (Geosyntec, 2011)

All of these elements of the approved remedy, with the changes discussed in this ESD, will be implemented as part of the redevelopment. An addendum to the Remedial Design Implementation Plan is being prepared to describe the specific measures being taken to implement the RAP for the redevelopment project, including the actions described in this ESD.

3. BASIS FOR REMEDY CHANGE

Residual VOCs and PCBs remain in soil and groundwater beneath the site. Under the planned development, the site will change from a vacant property with no on-site receptors to a warehouse building with building occupants. Some minor changes will be made to the remedy selected in the 2011 RAP, as described below, to accommodate the redevelopment. To address potential vapor intrusion risks from VOCs, a VIMS for the new building planned as part of the redevelopment has been proposed to protect occupants. The VIMS is a significant difference to the remedy described in the 2011 RAP.

4. DESCRIPTION OF MINOR DIFFERENCES

The following minor changes will be made to the remedy in conjunction with the redevelopment:

- The existing site-wide cap will be removed, and a new cap will be constructed for the redevelopment, to vary depending on the planned ground surface: (1) concrete pavement; (2) concrete building slab; and/or (3) in-ground landscaping, if any, consisting of clean fill underlain with low-permeability geotextile. Drainage for the new cap (i.e., surface water control system) will be functionally equivalent to the existing system;
- The existing onsite components of the groundwater remedy (treatment system, extraction wells, monitoring wells, and related infrastructure) will be modified as needed to allow for the construction of the planned building. Some monitoring wells will be destroyed and new wells will be installed after construction of new building. The modified network will continue to provide VOC source control and containment as described in the 2011 RAP;
- The VOC excavation will be expanded to include an additional area near existing Building 1 in the vicinity of borehole 5GP5 for mass removal and to reduce potential impacts to soil gas and groundwater in the area; and
- Soil with the highest known concentrations of PCBs remaining on the property will be excavated. A total estimated volume of 2,650 cubic yards of soil will be excavated for off-site disposal at a permitted facility

5. DESCRIPTION OF SIGNIFICANT DIFFERENCES

The VIMS will supplement and enhance the approved remedy described in the 2011 RAP (Figure 1). The VIMS will be a sub-slab depressurization system (“SSD”) with components that are integral to the new building design. The integrated components of the SSD system will be installed during building construction and will be active and tested prior to building occupancy. The SSD system will consist of the following elements:

- sub-slab liner;
- sub-slab permeable aggregate layer;
- seven suction trenches;
- conveyance piping from suction trenches to an SSD blower system;
- treatment system, if needed;
- SSD blower system; and,
- sub-slab probes (“SSPs”) for sub-slab vapor sampling and vacuum monitoring.

The SSD system will cover the entire ground-floor footprint of the new building, approximately 530,000 sf. Testing will consist of indoor air and sub-slab soil vapor sampling. Based on testing, chemicals of concern (COCs) for indoor air and sub-slab vapor will be identified and site-specific commercial/industrial cleanup goals for COCs in soil gas beneath and indoor air within the new building will be developed under DTSC oversight consistent with DTSC’s Human Health Risk Assessment Note 3. The expected outcome from the addition of the VIMS is to continue to have a remedy in place that is protective of human health (i.e. future building occupants) and the environment.

6. STATUTORY DETERMINATIONS

The remedy as changed and modified by this ESD and supporting documents complies with the Health and Safety Code and sections of the NCP and other federal laws to the extent applicable and satisfies statutory requirements for remedy selection and public participation as outlined therein. No fundamental modifications are proposed to the remedy outlined in the approved RAP. The remedy remains protective of human health and the environment, complies with federal and State requirements that are applicable or are relevant and appropriate to the remedial action and is cost effective. An Operation and Maintenance Plan will be developed, and ongoing operation and maintenance activities will be conducted as described therein. Five-year reviews of the remedy will be conducted to ensure that the remedy is protective of human health and the environment.

7. PUBLIC PARTICIPATION

Pursuant to 40 CFR 300.435(c)(2)(i), a formal public comment period is not required for an ESD when the difference does not fundamentally alter the remedy with respect to scope, performance, or cost. This ESD does not propose a fundamental change to the remedy as described in the RAP with respect to scope, performance, or cost; therefore, no formal public comment period is required. However, DTSC will send a community update to the site mailing list and hold a comment period of at least 30 days that may be extended by DTSC, based on public interest.

As required by the NCP, 40 CFR 300.435(c)(2)(i), DTSC will publish a public notice in the local newspaper and will make this ESD and supporting information available for public review through EnviroStor and the local information repository for the site.

Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, California 94710
(510) 540-3800
Call for an appointment.

Oakland Public Library
Martin Luther King Jr. Branch,
6833 International Blvd.,
Oakland, CA 94621,
(510) 615-5728

DRAFT FINAL

The ESD and other site documents can also be downloaded at the following web address:

(EnviroStor) https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=01360059

All documents made available to the public by DTSC can be accessed in alternate formats or in another language as appropriate, in accordance with State and federal law. Please contact DTSC at the phone number(s) or e-mail address(es) listed below for assistance with alternative format documents.

8. WHO TO CONTACT FOR ADDITIONAL INFORMATION

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Yongsheng.Sun@dtsc.ca.gov

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DTSC Public Information Officer,
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If you have any questions about the EPA TSCA application, please contact
Ronald Leach, P.E.
U.S. EPA Environmental Engineer
Phone: (415) 972-3362
Leach.Ronald@epa.gov

