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Reply to: 802 Balra Drive
El Cerrito, CA 94530

March 9, 2019

Alameda Planning, Building & Transportation Department
ATTN: Andrew Thomas
City of Alameda
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501
athomas@alamedaca.gov

Re: Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting Veterans Affairs Alameda Multi-specialty Outpatient Clinic and National Cemetery Project

Dear Mr. Thomas,

The Sierra Club makes the following comments on the proposed EIR.

Comment #1: On-Site Wetland Mitigation

The current proposal mitigates only 70 percent on site and calls for purchasing credits for the remainder in an off-site mitigation bank that manages an already completed wetland restoration parcel.

Evaluate the impact of mitigating 100 percent of the project's wetland impacts on site. Current proposal calls for purchasing credits for three acres of wetland mitigation in the San Francisco Wetland Mitigation Bank.

Purchasing credits in a mitigation bank is only warranted when on-site mitigation is either impossible, or would have poor quality or no quality due to poor chances for success. The area surrounding the Runway Wetland, where seven acres of wetland are being proposed as mitigation for project impacts, can easily accommodate another three acres. The San Francisco Bay Wetland Mitigation Bank is a wetland project in Redwood City that is already completed. Purchasing credits in a completed wetland project is contrary to the goals of the San Francisco Bay Restoration Authority to increase the amount of wetland acreage around San Francisco Bay. Purchasing credits in this mitigation bank does not add more wetland. Producing another three acres at Alameda Point will produce another three acres. Co-benefits include added carbon sequestration, habitat enhancement and mammalian predator barrier for nesting birds.

Comment #2: Impacts of VA Wetland Mitigation on City of Alameda Wetland Plans

The Runway Wetland, where the VA is proposing to locate its on-site mitigation, is adjacent to City of Alameda property where a sea level rise adaptive shoreline is planned as part of the Town Center

and Waterfront Specific Plan. De-Pave Park is also on the list of projects eligible for funding from the San Francisco Bay Restoration Authority.

Evaluate the impact of the proposed VA wetland mitigation on the viability of the proposed adjacent Alameda shoreline plan. Also evaluate drainage issues and potential linkage of the City of Alameda adaptive shoreline with the existing Runway Wetland on VA property.

One way to avoid these conflicts is to form a cooperative agreement between the VA and the City of Alameda on cross-jurisdictional wetland and climate adaptation planning.

Comment #3: Stormwater Impacts

The current proposal is to send storm water runoff from the project area via two new storm water drains northward to the Oakland Estuary.

Evaluate sending storm water runoff from the VA developed area to natural storm water basins or wetland/marshland on the Undeveloped Area, rather than the two proposed storm water drains that would empty into the Oakland Estuary.

Comment #4: Water Drainage Constraints

The northeastern segment of the VA Undeveloped Area is lower in elevation than adjacent landscape and will end up with stagnant water on top of pavement when the VA site is elevated and the city property is blocked by a levee.

Evaluate the cumulative water drainage impact of (a) the proposed site elevation of the VA Developed Area and (b) the proposed levee around the city property described in the Alameda Point Master Infrastructure Plan.

A suggested mitigation measure is to remove pavement and create a seasonal wetland or storm water basin that could accept storm water runoff as suggested in #3 above. Co-benefits would include carbon sequestration, increased wildlife habitat, and an additional mammalian predator barrier for least terns and other nesting birds.

Comment #5: Traffic Impacts

The impact of traffic to and from the proposed regional park with 800 parking spaces has not been evaluated.

Evaluate the cumulative impact of (a) VA traffic, (b) the regional park traffic (which was not included in the Alameda Point EIR, even though the plans call for 800 parking spaces), and (c) the current traffic impacts already identified for the city's development area. Evaluate an alternative traffic scenario if the VA clinic/benefits/admin building is located in the Enterprise District (where there will be many transit services).

Comment #6: Alternative Site

CEQA requires that the EIR evaluate the impacts of an alternative site. Other suitable space at Alameda Point is available for part of the project, namely, the health clinic and benefits office, provided the city offers 20 acres at no cost to the VA. In 2011, the City of Alameda offered 45 acres at no cost to UC Berkeley for a proposed second campus of its research lab. The offered land was in the Enterprise District of Alameda Point. This subdistrict at the southeast corner of Alameda Point is located within walking distance (quarter mile) of planned transit services at Seaplane Lagoon, and (approx. one mile) to the proposed cemetery. Another feature of the Enterprise District is that it is out of the foraging flight path of the California Least Terns that nest on the VA Undeveloped Area from April to August.

Evaluate a 20-acre alternative site for the outpatient clinic and benefits office in the Enterprise District at Alameda Point. Evaluate the impacts to the Least Terns if the two-story clinic and benefits building was moved to the Enterprise District vs the impacts at the current proposed location, which are identified in the 2012 U. S. Fish and Wildlife Service Biological Opinion. Evaluate vehicle miles travelled to the Enterprise District and associated greenhouse gas emission impacts versus vehicle miles traveled and impacts to the proposed clinic site.

Evaluate the impact of not having to truck in several hundred thousand cubic yards of soil to raise the elevation of the clinic and benefits office footprint on the VA Developed Area on the Northwest Territories, if the main structure was in the Enterprise District. Evaluate the impact of moving the main structure to the Enterprise District in terms of freeing up at least 10 acres on the VA Developed Area that would be available for future wetland or grassland conversion that would sequester carbon.

Sincerely yours,

Norman La Force

Norman La Force,
Chapter Legal Chair

cc Nancy McPeak NMcPeak@alamedaca.gov
City clerk Lara Weisiger LWEISIGER@alamedaca.gov,