FINAL ENVIRONMENTAL IMPACT REPORT

CAMP SWEENEY REPLACEMENT PROJECT

SCH # 2015102054

PREPARED FOR:

County of Alameda
General Services Agency
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April 2016

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INTRODUCTION

PURPOSE OF THE FINAL EIR

The California Environmental Quality Act and the Guidelines (together "CEQA") require an Environmental Impact Report (EIR) to be prepared for any project which may have a significant impact on the environment. An EIR is an informational document, the purposes of which, according to CEQA are "to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project." The information contained in this EIR is intended to be objective and impartial, and to enable the reader to arrive at an independent judgment regarding the significance of the impacts resulting from the proposed project.

This document, together with the Draft Environmental Impact Report (Draft EIR) published in January 2016, shall constitute the Final Environmental Impact Report (Final EIR) prepared pursuant to CEQA (commencing with Section 21000 of the California Public Resources Code) for the proposed Camp Sweeney Replacement Project ("Project") located at 2400 Fairmont Drive, within the unincorporated Fairmont Campus above the City of San Leandro, California. The applicant is the General Services Agency of Alameda County, on behalf of the Alameda County Probation Department. The Lead Agency is the County of Alameda.

EIR REVIEW PROCESS

Draft EIR

A Draft EIR was made available for public review on January 27, 2016. During the public review period for the Draft EIR (ending March 14, 2016), the County received verbal and written comments.

Final EIR

This Final EIR contains all comments received by the County on the Draft EIR and also includes responses to these comments. None of the comments or responses result in the need to change, correct or revise the text of the Draft EIR document and therefore the Draft EIR stands without modification.

This Final EIR will be presented to the County Board of Supervisors at a public hearing to consider certification of this document as a technically adequate, full disclosure document consistent with the requirements of CEQA. Assuming certification of this EIR as complete and adequate under CEQA, this document together with the Draft EIR and the Draft EIR Appendices will constitute the EIR for this

Project. The Board of Supervisors may require additional changes or modifications to this EIR prior to certification.

In accordance with California law, the EIR must be certified before any action on the Project can be taken. EIR certification does not constitute Project approval and does not control the County's ultimate discretion with regard to the Project.

NEW SIGNIFICANT INFORMATION

If significant new information is added to a Draft EIR after notice of public review has been given, but before certification of the Final EIR, the lead agency must issue a new notice and re-circulate the Draft EIR for further comments and consultation.[1]

None of the Comments require corrections or clarifications to information presented in the Draft EIR and therefore none of the comments result in "significant new information" as defined under Section 15088.5 of the CEQA Guidelines. None of the comments have identified new significant environmental impacts that were not already identified and addressed in the Draft EIR; no new mitigation measures have been proposed as a result of the public review process.

There is no feasible alternative or mitigation measure considerably different from others previously analyzed in the Draft EIR that would clearly lessen the significant environmental impacts of the Project that the Project applicant declines to adopt.

The Draft EIR was not so fundamentally or basically inadequate or conclusory in nature that meaningful public review and comment were precluded.

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

REPORT ORGANIZATION

This Final EIR consists of the following chapters, commencing after Chapter 19 of the Draft EIR:

Chapter 20: Introduction to the Final EIR. This chapter outlines the purpose, organization and scope of the Final EIR document and important information regarding the public review and approval process.

Chapter 21: Project Summary. This chapter summarizes the proposed Project as presented in the Draft EIR, as the County has not made any substantial changes to the proposed Project since publication of the Draft EIR.

Chapter 22: Commenters on the Draft EIR. This chapter provides a list of all agencies, organizations and individuals that submitted written comments on the DEIR during the public review and comment period, and/or that commented at the public meeting held on February 24 to take public comment and input.

[1] *Laurel Heights Improvement Association v. Regents of the University of California*, 6 Cal 4th 112, (1993)

Chapter 23: Master Responses to Recurring Comments. This chapter provides common responses to the same or similar comments received from different commenters. Among others, master responses are provided in response to the concerns raised in a form letter that was signed and submitted by thirty-four (34) local residents.

Chapter 24: Responses to Individual Comments. This chapter contains each of the comment letters received on the Draft EIR and summaries of the comments made at the public comment hearing, and presents individual responses to the specific comments raised.

Chapter 25: Revisions to the Draft EIR. This chapter presents changes to the text of the Draft EIR at specific locations to correct or clarify what was stated initially in light of information provided in the comments received.

USE OF THE FINAL EIR

Pursuant to CEQA, this is a public information document for use by governmental agencies and the general public. The information contained in this Final EIR is subject to review and consideration by the County of Alameda, prior to its decision to approve, reject or modify the proposed Project. The Alameda County Board of Supervisors must ultimately certify that it has reviewed and considered the information in the EIR and that the EIR has been completed in conformity with the requirements of CEQA before making any decision of the proposed Project.

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PROJECT SUMMARY

PROJECT OVERVIEW

Site Location

The Project would be located at 2400 Fairmont Drive, just off Interstate 580 (I-580) in an unincorporated area of Alameda County in the hills above and adjacent to the City of San Leandro, California. The site is within the 206-acre Fairmont Campus, which is Alameda County's site for several public health, social service and criminal justice facilities and institutions. The Fairmont Campus currently includes the Juvenile Justice Center (the "JJC," developed in 2007), the existing Camp Sweeney campus (developed 1957–1958), the Las Vistas Training Center (developed in 1958), the General Services Agency's Building Maintenance Department operation center (1996), the Fairmont Hospital, and the John George Psychiatric Hospital, as well as several smaller structures that offer a range of social services.

Existing Camp Sweeney

As it exists today, Camp Sweeney is a minimum security residential program for adolescent males ranging in age from 15 to 18 who have been adjudicated by the Juvenile Court for minor non-violent criminal offenses and assigned to the Camp for a 6- to 12-month placement. Camp Sweeney is administered by the Alameda County Probation Department in partnership with the Alameda County Office of Education, the Alameda County Health Care Services Agency, local community-based service providers, and supportive volunteers. The overall goal of Camp Sweeney is to return each minor to his community as a positive and productive citizen.

Existing facilities at Camp Sweeney consist of six buildings: an administration building, a boy's dormitory, a kitchen and dining facility, an educational classroom building, and a multi-purpose recreation building. A free-standing gymnasium building, the only remaining structure from the former Juvenile Hall campus, is located just outside the Camp Sweeney grounds and serves Camp Sweeney youth for athletic activities (basketball, volleyball, boxing, etc.). Open spaces at the campus site include outdoor fields for athletic activities including soccer, basketball, baseball, and other activities.

By the early 2000s, the accumulation of physical and programmatic deficiencies at Camp Sweeney prompted Probation Department staff to acknowledge pressing concerns related to the existing facilities. The following statements were included in the 2008 application to the State for funding:

(1) Serious safety issues caused by structural deterioration and the critical need for retrofitting of the existing buildings; structural and seismic issues had begun to erode Camp Sweeney security, heightening concerns for resident and community safety.

(2) Camp Sweeney's residential population was shifting toward more high-risk youth whose experiences and behaviors were an increasing challenge to the effectiveness of existing programs, minimizing rehabilitation and contributing to recidivism.

(3) The population of female offenders was growing and post-adjudication residential facilities to serve them were absent.

To address these concerns, County staff and elected officials initiated actions which resulted in the proposed Camp Sweeney Replacement Project ("Project").

Key Components of the Project

In February 2009, Alameda County was awarded grant funding under SB 81 (2007; "Juvenile Justice Realignment" bill) from the California Board of State and Community Corrections for the construction of a new Camp Sweeney. As it has evolved, the design concept is for a "camp-like" setting providing dormitory-style beds for 64 boys, 30 girls and a secured 24 bed Special Programming building. The plan includes a total of seven buildings – two one-story dormitories for boys, one for girls, a two-story building for food service (ground floor) and gymnasium (2nd floor), a two-story administration building, a two-story programs building (for classrooms) and a one-story Special Programming building. The buildings would be arranged around an open center landscaped courtyard spine for pedestrian circulation consistent with the small-scale camp-like design concept, providing open spaces between the buildings for recreation, group meetings, and educational purposes integral to the new Camp Sweeney rehabilitative agenda. (See **Figure 21.1**)

The arrangement of buildings and site topography are used to separate the boys and girls without the need for internal fencing; only the Special Programming Unit would have fencing all the way around the indoor and outdoor spaces, and would have its own outdoor recreation area and secured access from Fairmont Drive via the South Access Road.

The Administration building would be located at the north end of the campus site adjacent to the main entry point and accessible parking. Visitors and community groups would enter through the Administration building and would be screened there. The intake and discharge of youths would also be located near the site entry point. The other common-use functions would include the Food Services building, the Programs building and the gym; these would be grouped around and would open onto the common outdoor area.

The Project site is a vacant, 10-acre site adjacent to and accessed via two roads from Fairmont Drive, connected internally to the JJC. The site is currently used as open paved parking lots. Across Fairmont Drive is Hillcrest Knolls, a residential neighborhood of single-family homes that are screened from the Project site by mature trees along the western edge of Fairmont Drive.

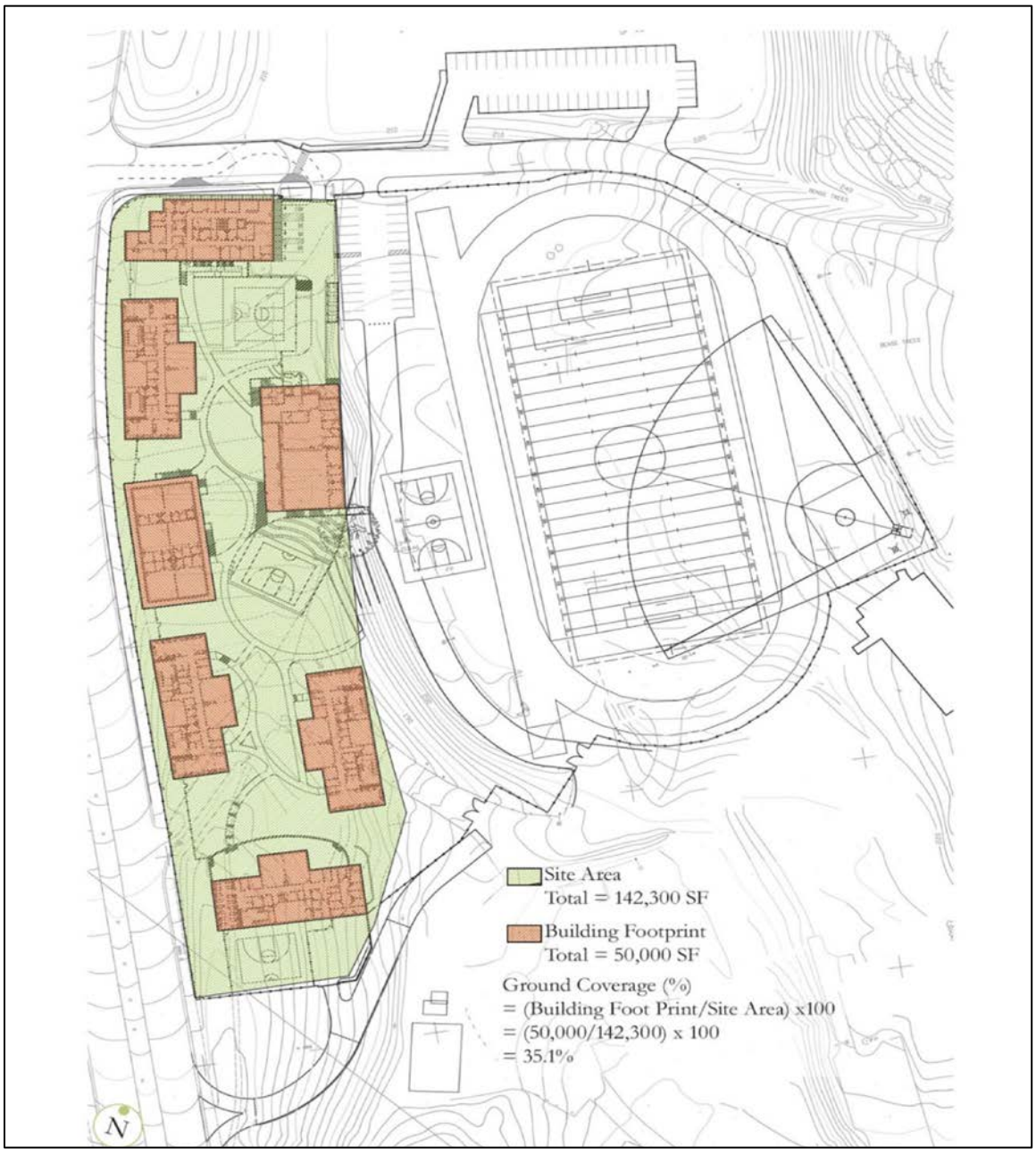
Once the new campus is in operation, the existing Camp Sweeney buildings would be removed and the site would be restored to its approximate original condition.

PROJECT OBJECTIVES

The Project Objectives remain the same as stated in the Draft EIR:

1. To produce a new Camp Sweeney campus capable of serving both male and female youth in a safe and secure environment with an occupancy capacity of 120 beds consistent with the Needs Study, including facilities for 64 males, 32 females and a 24-bed Special Programming building.
2. To retain close physical proximity to the Juvenile Justice Center and its juvenile court facilities for program operating efficiencies and service interdependencies.

3. To create a campus setting that would be "campus-like" in feeling and atmosphere, with small-scaled buildings of one and two stories, maximum.
4. To create a physical environment through careful site planning and design, creating positive opportunities for staff to work with youth and provide guidance and counseling in small group settings that promote the Program's behavioral and educational goals.
5. To create an environment that projects the rehabilitative goals of positive and lasting change in the lives of the youths and avoids the look and feel of a detention/ incarceration facility.



Source: Komorous-Towey Architects, Dec. 21, 2015

Figure 21.1. Site Plan

GOVERNMENTAL APPROVALS

Because the Project is sponsored by agencies of the County of Alameda, the approval process is different from what would be required of a private party. In this case, governmental approvals involve a three-step process:

a) Alameda County Board of Education

Pursuant to the California Education Code Section 48645.6, the Alameda County Board of Education will be asked to review and comment on the Project plans.

b) County Certification of Environmental Compliance

The Alameda County Board of Supervisors at a noticed public hearing will be asked to certify the EIR thereby completing the environmental review process, as required by CEQA, and then to approve the Project.

c) Technical Approvals

Alameda County and its third party plan check and permit reviewers will internally provide clearance and sign-off on plans related to grading and site excavation, construction and structural plans, mechanical, electrical, plumbing and other plans and specifications, including compliance with the C.3 provisions of the Alameda County Clean Water Program. This step will include providing a Notice of Intent (NOI) to the San Francisco office of the Regional Water Quality Control Board (RWQCB).

The Project is also subject to the review and approval by the State of California Department of Public Works, the State Fire Marshal and the Alameda County Fire Marshal.

Project Implementation

Implementation of the Project through its final design and construction phases would involve on-going project management and oversight by the Alameda County General Services Agency (GSA) who will coordinate reviews and inspections by appropriate local agencies (e.g., Public Works Department, RWQCB) for compliance with adopted site grading, structural, electrical, mechanical, plumbing, building, drainage, and clean water standards and requirements throughout the construction process.

AREAS OF CONCERN

The following topics were raised in comments received in response to the October 13, 2015 Notice of Preparation (NOP) of this EIR, at the November 5, 2015 EIR scoping meeting and again during the public review period for the Draft EIR. Each of these topics is addressed in this EIR. Issues of concern (including some non-CEQA issues) include, but are not limited to the following:

- Light and glare – Concerns have been expressed regarding the potential for the Project to have the same level of nighttime lighting as is used at the Juvenile Justice Center (JJC). The JJC was built in 2007 on a site higher up the slope from the proposed Camp Sweeney site. The JJC is a youth correction facility requiring the highest level of security including chain link fencing with razor wire and significant high intensity lighting. Members of the public

have commented that security lighting at the JJC is so bright that it illuminates the entire area, severely limiting normal star-gazing. Local residents are concerned that night lighting at the new Camp Sweeney campus will be similar to what is used at the JJC and would be much closer to their homes and therefore would impact them to a far greater extent.

- Noise. Local residents have expressed concerns that noise from construction activities and from the future operation of the relocated Camp Sweeney, including noise from outdoor sports activities at the proposed athletic field, will adversely impact them given the proximity of the proposed site to the Hillcrest Knolls neighborhood.

- Geotech and Seismic Risks. Local residents are well aware that the Hayward Fault runs through the site and they question the validity of placing the new Camp Sweeney buildings on such a seismically vulnerable site. They also question whether, given the heightened level of seismic hazard risk at the proposed site, whether the costs to construct the new campus would be higher than if located farther from an active fault zone.

- Traffic. Some have raised concerns about the level of construction-related traffic and its impact on local circulation.

- Project Need. Local residents have questioned the need for the project, citing that the population at the existing Camp Sweeney is only about 40 youth (versus a design capacity of over 100) and that the occupancy level at the JJC is only about one-third of its design capacity. Residents have argued that the level of juvenile offenders is on a lowering trend line and therefore they question the need for a new facility designed to accommodate 120 youth.

- Visual. Local residents have expressed concerns that the proposed campus buildings, sited immediately adjacent to Fairmont Drive, as proposed, will result in a visual blight that will adversely affect property values in the Hillcrest Knolls neighborhood.

- Alternatives. Hillcrest Knolls residents have asked that if new Camp Sweeney facilities are truly needed the County should rebuild at the existing Camp Sweeney site, not immediately across the street from their community. The existing site is farther away and substantially hidden from view and therefore potential impacts related to light and glare, noise and visual effects would be much less.

- Land Use. Neighbors consider the proposed new Camp Sweeney as an undesirable and incompatible land use that will conflict with the peaceful enjoyment of their status quo, increasing the possibility of criminal activity encroaching into their neighborhood, creating a land use conflict and lowering their property values.

SUMMARY OF IMPACTS, MITIGATION MEASURES AND ALTERNATIVES

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Draft EIR concluded that all potentially significant impacts resulting from the Camp Sweeney Replacement Project can be avoided or reduced to less than significant levels through implementation of mitigation measures imposed as conditions of approval of the Project. The Project would not result in any significant and unavoidable impacts.

SIGNIFICANT IMPACTS THAT CAN BE AVOIDED OR REDUCED TO LESS THAN SIGNIFICANT LEVELS

The Draft EIR stated that the Project would have potentially significant impacts related to the following topics: visual resources, air quality and noise during construction, biological resources including potential wetland areas, cultural resources, geotechnical and hydrological considerations, public services and utilities. Each of these impacts was identified in the Draft EIR, and mitigation measures were recommended that are capable of reducing the severity of potential impacts to less than significant levels. Potentially significant impacts and the recommended mitigation measures are set forth in Table 2.1 in the Draft EIR and are repeated below as Table 21.1.

ALTERNATIVES

Chapter 16 of the Draft EIR considered six potential alternatives to the Project. Three of the six were rejected due to infeasibility; two of the other three involved alternative sites, and the third was the CEQA-required No Project Alternative. The following alternatives were analyzed:

- Alternative 1: No Project
- Alternative 2: Reuse of the Existing Site
- Alternative 3: Off Site Location

The Draft EIR found that the Project would not result in any significant and unavoidable impacts and that all potential impacts would either be less than significant or would be reduced to less than significant levels with implementation of the recommended mitigation measures. Accordingly, the Draft EIR concluded that any of the differences between the proposed Project and these Alternatives are marginal, rather than substantial.

Of the three Alternatives, Alternative 2 (which involves replacement of the existing Camp Sweeney facilities with new buildings at the existing site) has certain environmental benefits because of its more remote location which may resolve or reduce many of the concerns raised by members of the nearby residential community. In comparing the Project to Alternative 2, the Draft EIR found that the impacts of both would be similar (i.e., either less than significant, or able to be mitigated to a level of less than significant with similar mitigation measures), with only marginal differences in the degree to which these effects approach the significance thresholds. Alternative 2 would avoid or substantially reduce aesthetic and construction-period impacts to nearby neighbors as compared to the Project, but the Project's aesthetics and construction-period effects would not be significant with implementation of required mitigation measures. The key difference between the Project and Alternative 2 is the certainty of known geologic hazards at the Project site, and the Project's layout which is specifically designed to address those geologic hazards, versus the uncertainty of potential geological hazards at the Alternative

2 site and therefore the lack of a precise design plan that can be known as being fully capable of appropriately addressing potential geologic hazards. Additional site investigations of the Alternative 2 site would be necessary to determine whether sufficient seismically safe building sites are present; such investigations have not been conducted. Because of the certainty of the design of the Project in addressing known geologic hazards, the Project is marginally environmentally superior to all other alternatives considered in this EIR.

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TABLE 21.1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Significance	Mitigation Measures	Impact after Mitigation
Aesthetics and Visual Quality			
IMPACT 5.1: Creation of a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.	Potentially Significant	**Mitigation Measure Visual – 5.1: Compliance with Lighting Standards.** The Project shall limit exterior lighting for outdoor parking areas and walkways to light sources not higher than 24 feet, that create a cone of direct illumination not greater than 60 degrees from a light source higher than 6 feet, and that allow exterior light to shine directly onto an adjacent street or property; maximum illumination at ground level should not exceed 3 foot-candles or 0.5 foot-candles measured at the closest residential property line. Shielding shall be used where feasible and effective to prevent glare or direct illumination on adjacent properties	Less Than Significant
Geology, Soils, and Seismicity			
IMPACT 6.1: Risk of Loss, Injury or Death Involving Rupture of a Known Earthquake Fault	Potentially Significant	**Mitigation Measure Geology – 6.1: Site Design for Fault Avoidance.** The development at the site shall be designed to avoid placing any structures for human occupancy within 25 feet of the surveyed location of any active fault traces. Design-level investigations and construction monitoring shall verify that the project conforms to all applicable codes and regulations. Areas where active faults have been identified shall be used only for open space or other non-habitable developments. Utilities, if built within the geologic setback zone or cross the fault zone, shall be equipped with specific design features, such as shut-off valves or other measures to limit disruption by surface rupture to the extent practicable.	Less Than Significant
IMPACT 6.2: Risk of Loss, Injury or Death Involving Strong Seismic Ground Shaking	Potentially Significant	**Mitigation Measure Geology – 6.2: Seismic Design.** The Project shall be designed to address the projected seismic shaking hazards present at the site, in conformance with the Uniform Building Code and the California Building Code.	Less Than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
IMPACT 6.3: Risk of Loss, Injury or Death Involving Liquefaction/Densification	Potentially Significant	**Mitigation Measure Geology – 6.3: Soil Remediation**. The recommendation of the geotechnical engineer to remediate the soil conditions shall be implemented as the first phase of site preparation. This includes removal of all undocumented fill and loose alluvial material beneath the building areas followed by replacement with quality controlled low expansion engineered fill in accordance with the engineer's criteria for moisture content and compaction. The material shall be removed to a minimum distance of 5 feet (horizontally) outside of the building footprints. The native, potentially expansive fill can then be compacted to within 36 inches of planned finished grade. Within the upper 36 inches, non-expansive imported fill or chemically modified (i.e., lime-treated) native fill can be placed within the upper 36 inches of finished grade.	Less Than Significant
IMPACT 6.4: Risk of Loss, Injury or Death Involving Landslides	Less than Significant	None required	Less than Significant
IMPACT 6.5: Soil Erosion	Potentially Significant	**Mitigation Measure Geology – 6.5 Implementation of a SWPPP.** The SWPPP will need to include stormwater quality BMPs that will reduce runoff of sediment and other pollutants during construction to less than significant levels. Some of the post-construction source control BMPs that could be included in the SWPPP would reduce the generation of pollutants from activities such as lawn maintenance, vehicle use, material storage, and waste collection/recycling. In order to be approved by the RWQCB, the SWPPP will need to demonstrate that implementation will reduce potential soil erosion to a level of less than significant.	Less Than Significant
IMPACT 6.6: Soil Instability	Potentially Significant	**Mitigation Measure Geology – 6.6: Implement Mitigation Measure 6.3** (as described above).	Less Than Significant
IMPACT 6.7: Expansive Soils	Potentially Significant	**Mitigation Measure Geology – 6.7: Implement Mitigation Measure 6.3 (as described above).**	Less Than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
Hydrology and Water Quality			
IMPACT 7.1: Violation of Water Quality Standards	Potentially Significant	**Mitigation Measure Hydrology/Water Quality – 7.1: Preparation and Implementation of a SWPPP.** The County of Alameda shall prepare and implement a SWPPP as required by the NPDES General Permit. The SWPPP shall be consistent with the terms of the General Permit, the Manual of Standards for Erosion and Sedimentation Control Measures by the Association of Bay Area Governments, policies and recommendations of the local urban runoff program (city and/or county) and the Staff Recommendations of the RWQCB. The SWPPP shall incorporate specific measures to reduce and treat runoff from developed areas of the site by means of vegetative buffers, grassy swales or other means, to be effective for the life of the Project, and shall incorporate BMPs to control sediment and erosion, both during the building process and in the long-term.	Less Than Significant
IMPACT 7.2: Exceed Capacity of Stormwater Infrastructure / Contribute Polluted Runoff	Potentially Significant	**Mitigation Measure Hydrology/Water Quality – 7.2: Implement Mitigation Measure 7.1, Preparation and Implementation of a SWPPP** (as described above).	Less Than Significant
Biological Resources			
IMPACT 8.1: Special-Status Species	Potentially Significant	**Mitigation Measure Biology – 8.1a: Preconstruction Nesting Bird Surveys.** To the extent feasible, construction activities shall occur during the non-nesting season (September 1 to January 31). For any construction activities conducted during the nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction nest survey of all trees or other suitable nesting habitat in and within 250 feet of the limits of work. The survey shall be conducted no more than 15 days prior to the start of work. If the survey indicates the presence of nesting birds, the biologist shall determine an appropriately sized buffer around the nest in which no work shall be allowed until the young have successfully fledged. The size of the nest buffer shall be determined by the biologist and shall be based on the nesting species and its sensitivity to disturbance. In general, buffer sizes of up to 250 feet for raptors and 50 feet for other birds should	Less Than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
		suffice to prevent substantial disturbance to nesting birds, but these buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest. **Mitigation Measure Biology – 8.1b: Preconstruction Roosting Bat Surveys.** Preconstruction surveys for roosting bats shall be conducted prior to demolition of buildings on the site. The surveys shall be conducted by a qualified biologist no more than 15 days prior to demolition. If bat roosts are encountered, demolition shall be postponed until bats have been relocated. Roost entrances shall be fitted with one-way doors that allow exits but prevent entrance for a period of several days to encourage bats to relocate. If maternity roosts are found, the structure with the maternity roost shall be avoided and bat relocation efforts postponed until the offspring have fledged.	
IMPACT 8.2: Loss or Modifications to Wetlands	Potentially Significant	**Mitigation Measure Mitigation Measure Biology – 8.2a: Wetland Setback.** The seasonal wetland adjacent to the visitor's parking lot shall have a minimum 20-foot setback from the parking lot or other proposed structures, roads, or project-related development. **Mitigation Measure Biology – 8.2b: Exposed Ditch Setback.** The exposed ditch situated between the North Access Road and the proposed visitor's parking lot where the headwall, culvert, and willow are present, shall have a minimum 5-foot buffer setback from the parking lot or other proposed structures, roads, or project-related development.	Less Than Significant
IMPACT 8.3: Loss of Wildlife Habitat	Less than Significant	None required	Less than Significant
IMPACT 8.4: Conflict with Local Policies or Ordinances	Potentially Significant	**Mitigation Measure Biology – 8.4a: Standard Tree Protection Measures.** The following standard tree protection measures should be implemented to protect retained trees on or immediately adjacent to the site during project construction: • **Tree Avoidance.** The proposed Project shall avoid any impacts on as many trees as feasible. The proposed Project shall also	Less Than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
		incorporate placement of tree protection fencing outside of the drip line of retained trees. • **Tree Protection Zone.** All on-site trees to be retained shall be enclosed within a Tree Protection Zone (TPZ) in order to prevent direct damage to the trees and their growing environment. The TPZ (as shown on the figure in the Tree Survey Report) will be constructed from blaze orange barrier fencing supported by metal "T rail" fence posts. The TPZ will be placed at a distance that is at or outside of the drip lines of retained trees to the extent feasible based on the limits of the area to be graded. TPZ fencing will be installed before site preparation, construction activities, or tree removal/trimming begins and will be installed under the supervision of a qualified arborist. • **Use of Heavy Equipment.** Heavy machinery will not be allowed to operate or park within or around areas containing retained trees (unless these areas are currently a paved surface). If it is necessary for heavy machinery to operate within the dripline of retained trees, then a layer of mulch or pea gravel at least 4 inches in depth will be placed on the ground beneath the dripline. A ¾-inch sheet of plywood will be placed on top of the mulch. The plywood and mulch will be removed once construction is complete. • **Storage of Construction Materials and Debris.** Construction materials (e.g., gravel, aggregate, heavy equipment) or project debris and waste material will not be placed adjacent to or against the trunks of retained trees. Furthermore, no poison or other substance harmful to trees shall be allowed to lie, leak, pour, flow, or drip upon or into the soil within the dripline of any tree located within the County ROW. • **Incidental Damage to Protected Trees.** The attachment of wires, nails, tacks, staples, advertising posters or signs, and ropes to any County ROW tree is strictly prohibited. This restriction is not intended to apply to staking or other material used to secure a tree.	

Impact	Significance	Mitigation Measures	Impact after Mitigation
		• **Trimming.** Although no specific branch or branches are recommended for removal from retained trees, tree trimming may be required to allow the movement of construction machinery. • Unless exempted by the Public Works Agency Director in writing in the encroachment permit or otherwise, removal of any tree located in the County ROW for which an encroachment permit is required shall be performed by a contractor holding a valid license of the appropriate classification as described by the California Business and Professions Code and such other additional valid license(s) required under federal or State law to do the proposed work. In addition to the requirements established by the Public Works Agency Director, the licensed contractor shall be familiar with International Society of Arboriculture pruning guidelines and shall comply with these guidelines established by their publication, *Best Management Practices, Tree Pruning*. • All branches to be removed will be pruned back to an appropriate sized lateral or to the trunk by following proper pruning guidelines. • All trimming will be conducted by or under the supervision of a certified arborist. removed reduce compaction of the soil within the dripline. The plywood and mulch will be removed once construction is complete. **Mitigation Measure Biology – 8.3b: Replacement of Trees within the Alameda County Right-of-Way or Elsewhere on the Project Site.** Five mana gum [*Eucalyptus viminalis*] trees that are protected by the Alameda County tree ordinance may be impacted by the Project. All impacted trees within the County ROW or trees within the Project Site that must be removed to accommodate the Project will be mitigated at a 1:1 replacement ratio by planting the same tree species that was removed at a location to be determined through consultation with the Alameda County Public Works Agency Director.	Less than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
Transportation			
IMPACT 9.1: Increased Traffic on Local Roadways and Intersections	Less than Significant	None required	Less than Significant
IMPACT 9.2: Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	Less than Significant	None required	Less than Significant
IMPACT 9.3: A Substantial Increase in Hazards Due to a Design Feature or Incompatible Uses	Less than Significant	None required	Less than Significant
IMPACT 9.4: Result in inadequate Emergency Access	Less than Significant	None required	Less than Significant
IMPACT 9.5: Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Less than Significant	None required	Less than Significant
Noise			
IMPACT 10.1: Noise and Land Use Compatibility	Potentially Significant	**Mitigation Measure Noise – 10.1: Assure Acceptable Interior Noise Levels.** The following mitigation shall be included in the Project's design to maintain interior noise levels at or below 45 dBA L_{dn}: Residential units within 200 feet of the center of Fairmont Drive shall be provided with forced-air mechanical ventilation, so that windows can be kept closed at the occupant's discretion to control noise.	Less Than Significant
IMPACT 10.2: Vehicular Traffic Noise Increase	Less than Significant	None required	Less than Significant
IMPACT 10.3: Operational Noise Increases	Potentially Significant	**Mitigation Measure Noise – 10.3: Performance Criteria for Mechanical Equipment.** Mechanical equipment shall be designed so that noise levels shall not exceed 50 dBA L_{eq} at the property lines of the Project site adjoining noise-sensitive land uses.	Less Than Significant
IMPACT 10.4: Construction Noise	Less than Significant	None required	Less than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
Air Quality and Greenhouse Gas Emissions			
IMPACT 11.1: Construction Period Dust, Emissions, and Odors	Potentially Significant	**Mitigation Measure Air Quality/GHG – 11.1: Basic Construction Management Practices.** The Project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD Basic Construction Mitigation Measures. • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust	Less Than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
		complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.	
IMPACT 11.2: Operational Emissions	Less than Significant	None required	Less than Significant
IMPACT 11.3: Carbon Monoxide	Less than Significant	None required	Less than Significant
IMPACT 11.4: Construction-Period Exposure of Sensitive Receptors	Less than Significant	None required	Less than Significant
IMPACT 11.5: Operational-period Exposure of Sensitive Receptors	Less than Significant	None required	Less than Significant
IMPACT 11.6: Increased Greenhouse Gas Emissions	Less than Significant	None required	Less than Significant
Hazards and Hazardous Materials			
IMPACT 12.1: Hazard Related to Routine Transport, Use or Disposal of Hazardous Materials	Potentially Significant	**Mitigation Measure Hazards – 12.1: Safe Removal of Asbestos During Demolition.** The California Health and Safety Code requires that employees and contractors working in buildings constructed before 1979 and known to include asbestos-containing materials are notified of their presence. Demolition of existing Camp Sweeney buildings should be undertaken by contractors equipped and trained in the safe removal of asbestos-containing materials. This would reduce the health risks of asbestos containing materials during demolition to a level of less than significant.	Less Than Significant
IMPACT 12.2: Hazard Related to Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials	Less than Significant	None required	Less than Significant
Public Services			
IMPACT 13.1: Indirect Effects on Public Services	Less than Significant	None required	Less than Significant
IMPACT 13.2: Need for Additional Facilities to Provide Adequate Fire Protection Services, Emergency Medical	Less than	None required	Less than

Impact	Significance	Mitigation Measures	Impact after Mitigation
Response Services and Hazardous Materials Response Services	Significant		Significant
IMPACT 13.3: Need for Additional Facilities to Provide Adequate Police Services	Less than Significant	None required	Less than Significant
IMPACT 13.4: Need for Additional Facilities to Provide Adequate School Services	Less than Significant	None required	Less than Significant
IMPACT 13.5: Need for Additional Facilities to Provide Adequate Parks and Recreation Services	Less than Significant	None required	Less than Significant
IMPACT 13.6: Need for Additional Facilities to Provide Adequate Solid Waste Services	Potentially Significant	**Mitigation Measure Public Services – 13.6a: Demolition Debris Recycling.** Demolition of the existing Camp Sweeney buildings and facilities should include a plan to capture as much material as feasible and recycle it for other uses. Concrete and asphalt should be reused as part of the construction of building slabs or parking lots at the new facility. Asbestos disposal and other Class I or II hazardous wastes would be disposed of in accordance with Bay Area Air Quality District and Department of Toxic Substance Control requirements, as appropriate. **Mitigation Measure Public Services – 13.6b: Waste Reduction and Diversion.** The Alameda County Probation Department, in cooperation with the County's GSA, should prepare a plan that demonstrates good faith efforts at diverting at least 50 percent of the solid waste generated by the new facility from landfill disposal via waste reduction and recycling.	Less than Significant
IMPACT 13.7: Need for Additional Facilities to Provide Adequate Library Services	Less than Significant	None required	Less than Significant
Utilities			
IMPACT 14.1: Availability of Water Supplies to Serve the Project from Existing Entitlements and Resources	Less than Significant	None required	Less than Significant
IMPACT 14.2: Need for Additional or Expanded Wastewater Treatment and or Disposal Facilities to Provide Adequate Service	Less than Significant	None required	Less than Significant
IMPACT 14.3: Need for Additional or Expanded	Less than	None required	Less than

Impact	Significance	Mitigation Measures	Impact after Mitigation
Wastewater Collection Facilities to Provide Adequate Service	Significant		Significant
IMPACT 14.4: Need for Additional Facilities to Provide Adequate Storm Drainage Services	Less than Significant	None required	Less than Significant
IMPACT 14.5: Increased Demand for Electrical, Gas and Telecommunication Services	Less than Significant	None required	Less than Significant
Cultural and Historic Resources			
IMPACT 15.1: Disturbance of Previously Undisturbed Archaeological Resources, Paleontological Resources and/or Human Remains	Potentially Significant	**Mitigation Measure Cultural – 15.1: Halt Construction/Assess Significance of Find.** Prior to the initiation of ground-disturbing activities, the County of Alameda shall inform all supervisory personnel and all contractors whose activities may have subsurface soil impacts of the potential for discovering archaeological resources, paleontological resources and/or human remains and of the procedures to be followed if these previously unrecorded cultural resources are discovered. These procedures shall include: • halting all ground-disturbing activities within 100 feet of the area where a potential cultural resource has been found; • notifying a qualified archaeologist of the discovery; and • following a treatment plan prescribed by the appropriate professional if the cultural resource is deemed significant, in accordance with federal or state law. The County of Alameda shall retain an on-call archaeologist to periodically review the excavation work, assess the significance of the potential cultural resource and prescribe a treatment plan for it. The archaeologist will consult with a paleontologist as required. The archaeologist shall report any finds in accordance with current professional protocols. The archaeologist shall meet the Professional Qualifications Standards mandated by the Secretary of the Interior and the California Office of Historic Preservation. In the event that any human remains are uncovered at the Project site during construction there shall be no further excavation or disturbance of the site or any nearby area until after the Alameda	Less than Significant

Impact	Significance	Mitigation Measures	Impact after Mitigation
		County Coroner has been informed and has determined that no investigation of the cause of death is required, and (if the remains are determined to be of Native American origin) the descendants from the deceased Native American(s) have made a recommendation to the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.	
IMPACT 15.2: Loss of Historic Resources Resulting from the Demolition of Existing Camp Sweeney	Less than Significant	None required	Less than Significant

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LIST OF COMMENTERS ON THE DRAFT EIR

Public Agencies

The following is a list of written correspondence received by the County of Alameda from public agencies providing comments on the Camp Sweeney Replacement Project Draft EIR:

- Letter #1: California Department of Transportation, District 4 (Caltrans) – Letter from Patricia Maurice, District Branch Chief, Local Development – Intergovernmental Review; dated March 9, 2016

Organizations and Individuals

In addition to the comments received from public agencies, one private organization and a number of individuals have submitted written comments on the Draft EIR. These organizations and individuals include the following:

- Letter #2: Hillcrest Knolls Association, represented by Dawn Clark-Montenegro, President – Letter dated March 14, 2016
- Letter #3: Henryka Szudelski, email dated March 12, 2016
- Letter #4: Ivona Szudelski, Letter dated June 13, 2016 (sic)
- Letter #5: Form Letter with identical text, signed by the following individuals:
    - Henryka Szudelski, March 11, 2016
    - Ivona Szudelski, March 12, 2016
    - Guo Ping Fan**,** Zhi Yan Weng**,** Min Xing Fan**,** Xu Ting Li, Yue E Li, March 9, 2016
    - Lori Tebo, March 10, 2016
    - Doug Tebo, March 10, 2016
    - Marlene Friedlander, March 10, 2016
    - Hoi Pui Lam, March 11, 2014
    - Rosario Briones, March11, 2016
    - Jeff Walling, March 11, 2016
    - Tanya Walling, March 11, 2016
    - Robert Huaco, March 11, 2016
    - Teresa Huaco, March 11, 2016

  - Sardino Martinez, March 10, 2016
  - Auraly Martinez, March 10, 2016
  - William Sexty, March 11, 2016
  - Josh Martinez, March10, 2016
  - Sia Bayat, March 10, 2016
  - Raul Herrera, March 11, 2016
  - Raul Espinosa, March 11, 2016
  - Philip Denst, March 9, 2016
  - Aaron Zhou, March 9, 2016
  - Jimmy Zhou, March 9, 2016
  - Vivien Zhou, March 9, 2016
  - Bonnie Zhou, March 9, 2016
  - Brian Nguyen, March 10, 2016
  - Iona Popa, March 9, 2016
  - George Popa, March 9, 2016
  - Robert Holeman, March 7, 2016
  - Emile Awwad, March 8, 2016
  - Nancy Awwad, March 8, 2016
  - Tim Foster, March 9, 2016
  - Kevin Lau, March 10, 2016
  - Alexander Ramirez, March 11, 2016
  - Jane Lau, March 9, 2016
- Letter #6: Bill McCormick, CEG, Principal Engineering Geologist, Kleinfelder, email dated April 12, 2016 to which several pages from Chapter 6 of the Draft EIR were attached and on which hand-written edits were suggested as corrections or clarifications to the original text.
- Letter #7 Thomas Towey, AIA, Principal, Komorous-Towey Architects, in an attachment to an email received from Maritza Delgadillo, dated March 11, 2016, in which Mr. Towey noted the need for text changes to correct certain provisions in the original versions of Mitigation Measures 6.1, 6.2 and 6.3.

Speakers at the February 24, 2016 Public Meeting

The following persons provided verbal comments on the Draft EIR at the public meeting held on February 24, 2016 at the County Planning Commission Hearing Room (Room 150) at the County offices located at 224 W. Winton Avenue, Hayward. Speakers are listed in order of presentation and are identified as Speaker #1, Speaker #2, etc.

- Speaker #1: Henryka Szudelski
- Speaker #2: Doug Tebo
- Speaker #3: Philip Denst
- Speaker #4: Lori Tebo
- Speaker #5: Robert Holeman

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MASTER RESPONSES TO RECURRING COMMENTS

The multiple copies of a 1-page form letter and other written comments received by the County, as well as verbal comments expressed at the February 24 public meeting address the same, or very similar, issues associated with the proposed Project. Of the forty (40) written comment letters received, thirty-four (34) are identical form letters that express concerns and objections to the Project, differing only by the name of the commenter. An example of the form letter is presented as Comment Letter #5 in Chapter 24. This Chapter of the Final EIR contains master responses to comments that address these frequently raised issues.

Form Letter Comments

The 34 identical form letters raise a number of issues that express concerns shared by local residents – namely, that the Project is an incompatible land use juxtaposed next to an existing residential community. Restated below is the exact text of the form letter, quoted verbatim; an example of the form letter is included in Chapter 24.

"*I am a resident of Hillcrest Knolls, who will be directly affected by your project in a negative way. Your report does not take under consideration the impact the project would have on us, residents of Hillcrest Knolls. It seems that the study of impact on birds, trees, water and air was given much more weight, than on us, people living here.*

"There are 4 major issues with this project that are important to us, that can't be mitigated.

1. *Ethical and social stigma from living across the street from another penitentiary, that will have an effect on our peace of mind, sense of safety and will be forever imprinted on our conscience, not to mention the negative impact on our home values.*

2. *The visual impact of this massive complex concentrated on the edge of Fairmont Drive, across the street from us, taking away the open space we now enjoy. It would take next 30 years to have it obscured by trees.*

3. *The daily noise coming from the sports field that 120 young people would generate while engaging in sports activities. We all know very well how noisy sports activities can get.*

4. *The 30+ months of relentless construction noise that would be even worse than when JJC building was built, as it would be happening much closer to us, the horror of which many of us still remember.*

"It is inappropriate to build prisons so close to the residential neighborhood. This project is also too big for the needs of the Probation Department, not to mention that building Club Med facility for young criminals is sending a wrong message.

"Your Alternative #2 is more sensible if adjusted. Rebuilding on an existing site in a scaled down form to meet your needs not your wants and utilizing existing ball park for the new sports field makes more sense, and also takes care of all the above issues.

"I STRONGLY OPPOSE YOUR PROJECT AS OUTLINED IN EIR"

Similar Concerns Expressed in Other Letters

1. Positioning a criminal justice facility across the street from an established residential neighborhood will disturb the sense of security currently experienced, impose a stigma on the area with attendant psychological impacts on residents and cause home values to drop.

2. The Project results in a loss of open space.

3. The Project involves visual impacts to the Scenic Corridor.

4. The scale and magnitude of proposed project exceeds the actual need based on recent downward trends in juvenile crime.

5. Construction activity and noise will be unbearable.

Master Response #1- Responses to Concerns Raised in the Form Letter

Below are responses to those comments expressed in the form letter that are relevant to the environmental effects of the Project and therefore are subject to CEQA. Comments that address emotional, psychological or economic concerns are outside of the scope of the environmental review process and responses are not required under CEQA but are addressed at the end of this section for informational purposes. The non-CEQA comments will be brought to the attention of County decision-makers for their consideration in determining the merits of the Project

CEQA Related Comments

Comment 1: **"***Your report does not take under consideration the impact the project would have on us, residents of Hillcrest Knolls. It seems that the study of impact on birds, trees, water and air was given much more weight, than on us, people living here."*

Response: CEQA is concerned with the impact of a project on direct physical changes in the environment, including those that could have a direct effect on humans including aesthetics, air quality, hazardous materials, noise and traffic and including indirect effects such those that could result from land use, geology/soils, hydrology/water quality, public services, and utilities. Each of these areas of potential impact is addressed in separate chapters of the Draft EIR. The information presented in the Draft EIR is intended to disclose to the public, and to the County's decision-makers, the nature and extent to which impacts could potentially affect the public as well as environmental and cultural resources. The effects of the Project are evaluated against significance criteria

applicable to each of the environmental topic areas. The Draft EIR concluded that most impacts would be below significance levels, and for impacts that could be potentially significant, mitigation measures are included to reduce the severity of the impact to less than significant levels.

Comment 2a: **Visual Impact. "***The visual impact of this massive complex concentrated on the edge of Fairmont Drive, across the street from us, taking away the open space we now enjoy. It would take next 30 years to have it obscured by trees."*

Response: Chapter 5 of the Draft EIR addresses visual and aesthetic impacts of the Project. The nearby Interstate 580 freeway (I-580) is identified on page 5-9 of the Draft EIR as a designated Scenic Highway; the Draft EIR notes that the Project site is not visible from – and therefore has no impact on – scenic qualities viewed from the highway. Fairmont Drive itself is not a designated scenic highway and is not part of a scenic corridor. There are no significant natural resources such as trees, rock outcroppings or historic resources that are visible from the freeway and that would be adversely affected by the Project.

As noted in the Draft EIR, there is a dense stand of mature trees and a nearly continuous chain link fence along the east edge of Van Drive separating the Hillcrest Knolls homes from Fairmont Drive and the Project site. These trees substantially block or obscure views into the Project site from the community from most locations along Van Drive except as shown in Figure 5.8 in the Draft EIR. Outside of the Hillcrest Knolls community, cars and pedestrians using Fairmont Drive will be able to see the proposed new buildings, but views into the site will be obscured, in part, by proposed perimeter landscaping that would be integrated with perimeter security fencing along that edge of the Project site. As indicated in the latest design package by the County's architects, all perimeter fencing would be 10 feet in height.[1]

Buildings along Fairmont Drive will all be 1-story, with the lowest part of the roof overhang at approximately 10 feet above grade, rising to a height of 30 feet at the peak of the pitched roof. Two story buildings using a flatter pitch to the roof will also rise to 30 feet except the Food Service/Gym building will reach 55 feet. The illustrations provided in Figure 5.11 in the Draft EIR depict the intended "camp like" architectural character of the proposed campus buildings, some of which, such as the dormitory buildings, would be not unlike homes in the Hillcrest Knolls community. Unlike the Juvenile Justice Center (JJC), which is a high security facility, designed intentionally to convey a more imposing institutional appearance, the small-scale wood-frame structures proposed for Camp Sweeney would appear in sharp contrast. As indicated in the Draft EIR, the Project would enhance the visual character of the current deteriorated asphalt parking lots and perimeter chain link fencing; views of the site from off-site viewpoints would change but would not degrade the visual character of the site or area.

Comment 2b: **Open Space**. "*…taking away the open space we now enjoy…"*

[1] Komorous Towey Architects, *Bridging Documents – Task 2 Programming and Basis of Design Narratives, Administrative Review Set – No. 1,* December 21, 2015, p. 10.5

Response: The existing parking lots at the Project site are substantially underutilized by the various institutional uses arrayed within the Fairmont Campus. While there are no structures on the site, conveying an appearance of openness, the term "open space" as used in planning and land use documents generally refers to areas that are undeveloped and in their natural condition. Most often, open spaces are protected from future development or urban use by various forms of land use controls or conservation easements. The parking lots are not natural, have been modified in the past, and are not subject to any land use restrictions that apply for the purpose of preserving open space.

The *Castro Valley General Plan* (2012), referenced in the Draft EIR (see page 4-2), includes an exhibit that shows the entire Fairmont Campus in a category identified as "Castro Valley Urbanized Area/General Plan Area."[2] The area surrounding and uphill from the Fairmont Campus is shown as "Protected Open Space & Regional Parks." The proposed Project site is not protected open space under the applicable provisions of the *Castro Valley General Plan*, and use of the site as proposed would have no effect on loss of open space as that term is used in CEQA.

Comment 2c: **Trees. "…***It would take next 30 years to have it obscured by trees."*

Response: Figure 3.5 in the Draft EIR depicts an illustrative landscape plan for the Project, the details of which are found in the Project Architects' latest set of design documents which call for periphery planting to include "…a 15' wide dense planting buffer along Fairmont Drive, to block visual access from the residential neighborhood and create an intimate campus site. This will enhance site security and mediate sound." [3]

Comment 3: **Noise from Athletic Activities:** *"The daily noise coming from the sports field that 120 young people would generate while engaging in sports activities. We all know very well how noisy sports activities can get."*

Response: Chapter 10 of the Draft EIR considered all aspects of potential noise impacts resulting from the Project, including (a) operational noise from mechanical equipment that would be installed to serve the new Camp Sweeney buildings (b) noise from cars entering and leaving the Camp Sweeney site and parking lots; and (c) noise from the use of the athletic fields. With regard to the athletic fields, the Draft EIR included quantitative estimates of noise levels from field activities including from soccer, track, baseball, and football that would mostly occur during the day, between the hours of approximately 8:00 a.m. and 4:00 p.m. The fields would not be lighted, so evening or nighttime use is not anticipated. Further, at no time would all 120 youth be actively using the field at the same time. The Draft EIR stated that: "Athletic field noise would be expected to generate noise levels of approximately 63 dBA L_{eq} at a distance of 50 feet from the noise source assuming free-field conditions. Noise levels at the closest residences would be about 14 dBA lower due to the distance between the source of the noise and the receptors, located 400 feet to the west. Shielding provided by the proposed buildings would provide an additional 5 to 10 dBA of attenuation to these receptors. As a result,

[2] *Castro Valley General Plan*, Figure 1-1, Page 1-7.

[3] Komorous Towey Architects, Op. Cit., Page 10.6

noise levels at these residences during athletic field activities are calculated to range from approximately 39 to 44 dBA L_{eq}. The calculated noise levels generated by athletic activities at these receptors would not exceed existing ambient noise levels or substantially increase noise levels at these adjacent sensitive receivers (increase during hours containing field activity noise would be less than 1 dBA L_{eq}). This is a less than significant impact."

Comment 4: **Construction Noise: "***The 30+ months of relentless construction noise that would be even worse than when JJC building was built, as it would be happening much closer to us, the horror of which many of us still remember."*

Response: Chapter 10 of the Draft EIR included an assessment of noise impacts associated with construction activities. It described the level at which construction noise would be considered as having a significant impact on nearby sensitive receptors when "…noise from construction activities exceeds 60 dBA Leq and exceeds the ambient noise environment by at least 5 dBA Leq at noise-sensitive uses in the Project vicinity for a period exceeding one year…" The Draft EIR concluded that construction noise impacts would be less than significant because of several reasons:

a) No pile driving is expected to be required;

b) The noisiest activities would be when heavy earth moving equipment would be on site during a 6-8 month period at the beginning of the construction activities (i.e. less than one year);

c) Hourly average construction noise levels associated with the erection of the buildings, such as hammer and drilling related noise, range from approximately 63 to 71 dBA at a distance of 50 feet (i.e. less than 5 dBA above the 60 dBA ambient level);

d) Noise levels associated with construction of the buildings would be substantially less than noise levels associated with grading and paving activities;

e) Construction-generated noise levels drop off at a rate of about 6 dBA per doubling of the distance between the source and receptor and the closest sensitive receptor at the nearby Hillcrest Knolls residential community is approximately 450 feet away;

f) Shielding by buildings or terrain often result in lower construction noise levels at distant receptors; and

g) The County and its construction contractors would be required to implement and abide by standard noise controls as specified in the Draft EIR at Page 10-10:

- Construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m. on weekdays, and between 8:00 a.m. and 5:00 p.m. on Saturday or Sunday.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.

- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors. Construct temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses. Temporary noise barriers could reduce construction noise levels by 5 dBA.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

The Draft EIR concluded that noise levels from construction activities would be less than significant.

With respect to what was experienced by local residents during the construction of the JJC, noise impacts could have been substantially higher because of the nature and site conditions of that project. It required much more earth movement, 20+ foot tall concrete retaining walls and construction of a much larger concrete building and extensive surface parking lots. The smaller scale wood-frame buildings proposed for Camp Sweeney would not involve the same level of construction noise or duration of construction time as was required for the JJC.

Comment 5: **Incompatible Land Use:** *"It is inappropriate to build prisons so close to the residential neighborhood."*

Response: The 206-acre Fairmont Campus has been a County-owned property since the early 1860s: Fairmont Hospital admitted its first patient in August 1864.[4] The campus provides locational opportunities for a wide range of institutions that serve broad public needs, including health, mental health, juvenile detention and correction, training

[4] http://www.fairmontahs.org/about-us

facilities and others. Many of the County's facilities located at the Fairmont Campus pre-date the development of the nearby Hillcrest Knolls community; proximity to the Fairmont Campus and its varied institutional uses are well-established aspects of local land use.

The County has the authority to use its land resource in its discretion to meet identified public service needs, within the limits of applicable regulations and restrictions. Alameda County and the agencies charged with the design, construction and operation of the proposed Camp Sweeney Replacement Project have taken into consideration all aspects of the Project, from the level of need, to the physical attributes and challenges of the proposed site, and have determined that the Project site is appropriate for the intended use. There are no policies or restrictions in the Castro Valley General Plan that would restrict the County from use of this site, as proposed. The final decision as to the appropriateness of the Project site as proposed rests with the Alameda County Board of Supervisors.

Comment 6: **Alternatives: "***"Your Alternative #2 is more sensible if adjusted. Rebuilding on an existing site in a scaled down form to meet your needs not your wants and utilizing existing ball park for the new sports field makes more sense, and also takes care of all the above issues."*

Response: The preference for Alternative #2 by the signers of the form letter is noted. The comparative level of environmental effects of Alternative #2 to those of the Project are fully documented in the Draft EIR which concludes that that, on the whole, there are only minor differences in the environmental effects of the Project and Alternative #2. The key difference between the Project and Alternative #2 is the certainty of known geologic hazards at the Project site, and the Project's layout which is specifically designed to address those geologic hazards, versus the uncertainty of potential geological hazards at the Alternative #2 site and therefore the lack of a precise design plan that can be known as being fully capable of appropriately addressing potential geologic hazards. The Draft EIR concluded that the Project is marginally environmentally superior to Alternative #2 because of the certainty of the design of the Project in addressing known geologic hazards.

CEQA Considerations Related to Socio-economic Effects

CEQA Guidelines define the parameters under which consideration of socio-economic impacts is included in an EIR. Section 15131(a) of the Guidelines states that; ". . . economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project, through anticipated economic or social changes resulting from the project, to physical changes caused in turn by the economic or social changes. . . The focus of the analysis shall be on the physical changes." Thus, the creation of a social or psychological stigma that might lead to a drop in the value of houses near a proposed project, are generally characterized for CEQA purposes as social and economic effects, not physical effects on the environment and not a part of the County's CEQA considerations. Based on the CEQA Guidelines, the Draft EIR does not, and is not required to address the effects of the Project on the potential for adverse social or economic conditions.

The Draft EIR does not speculate on the extent to which potential indirect socio-economic effects on homes in the Hillcrest Knolls community may result in physical changes as a result of implementation of the Project. The extent to which indirect effects may occur in the vicinity of Camp Sweeney will depend on the extent to which the Project is implemented as planned and becomes a 'good neighbor' in not allowing noise, traffic or security breaches to adversely change the status quo that residents of Hillcrest Knolls currently enjoy. The EIR cannot assess or attempt to quantify the magnitude of potential indirect effects resulting from the Project because the ultimate relationship between the new Camp Sweeney and the existing residential community cannot be known, and it would be speculative to assess potential negative effects on nearby housing values. The EIR does not speculate on potential secondary physical impacts (such as deterioration or abandonment of homes, or increased local criminal activity) that might result from placement of the Project, as proposed, closer to Fairmont Drive, because the magnitude of potential indirect change is not known, and cannot reasonably be predicted. Quantifying these impacts would be overly speculative.

The Draft EIR concludes that implementation of the Project would not result in significant effects such as noise or air pollution or visual effects on nearby sensitive receptors. The Project does not propose any changes in the vicinity of the Project site outside the proposed site itself.

Master Response #2: Merits of the Project and Related Non-CEQA Topics

The form letters and most of the other comments received in response to the Draft EIR speak to the merits of the Project. These Project-related comments include, without limitation, questions about the actual need for the Project and expressions of support for Alternative #2 which would utilize the existing site of Camp Sweeney, farther removed from their community, in lieu of the proposed site adjacent to Fairmont Drive. The Master Response to comments regarding the merits of the Project and questions relating to the underlying need for the Project in light of current low occupancy levels – these comments raise non-CEQA issues that clearly do not affect the physical environment or pertain to the adequacy of the analysis in the EIR or that address the Project's physical impacts on the environment pursuant to CEQA. The majority of Project-related comments and concerns are not related to quantifiable, physical environmental issues that are addressed in an EIR document, and cannot be objectively assessed against the significance criteria used in this EIR. None of the comments have suggested or provided any basis to anticipate that economic or social effects of the Project would result in physical changes to the environment. Consequently, none are analyzed in the Draft EIR.

Each of the Project-related comments and comments that address topics outside the purview of the EIR or CEQA is noted in this document for the public record of this process. These concerns will be considered by the County decision-makers prior to taking action on the Project, as it deliberates on the Project, its merits and the issues raised by the comments.

Comment 7: **Socio-economic Impacts.** "*Ethical and social stigma from living across the street from another penitentiary, that will have an effect on our peace of mind, sense of safety and will be forever imprinted on our conscience, not to mention the negative impact on our home values.*"

Response: The potential effects of the Project on social, psychological or economic factors (i.e., home values) are not within the framework of the environmental review process

pursuant to CEQA. Appropriately, the Draft EIR does not include consideration of such effects and no specific response is required under CEQA or provided in this Final EIR.

Comment 8: **Project Need: "***This project is also too big for the needs of the Probation Department, not to mention that building Club Med facility for young criminals is sending a wrong message."*

Response: The merits of the proposed Project, and specifically its proposed size and capacity, are issues that lie outside the environmental review process pursuant to CEQA and do not bear on the validity or completeness of the Draft EIR. No response is required under CEQA.

Nevertheless, the Draft EIR includes a brief history of how the size and capacity of the Project was determined. Alameda County first commissioned a private consultant in 2008 to assess the space and capacity needs regarding the County's juvenile justice program and physical needs at Camp Sweeney. The initial needs study provided the underpinning for the design and scope of the proposed Project. The original Needs Study was updated in early 2015 to re-assess and confirm the validity of the original conclusions. The consultant, GCL Companies (formerly Carter Goble Lee) re-considered relevant data and trends including population growth, crime and arrest data, law enforcement action, juvenile felony and misdemeanor data and other factors, and concluded that the need exists to support the Project as currently designed, even though current occupancy level at Camp Sweeney is well below capacity. Following is an excerpt from the Executive Summary:

"In this report, updated data has been compiled and analyzed for the base period of 1999 to 2013. As explained in data and conclusive analysis, the current caseload supports a bed count of 120. In 2014, Camp Sweeney had an average daily population (ADP) of 35 males. Currently there are 161 juveniles in placement not including Camp Sweeney that could be housed locally at Camp Sweeney if beds were available. Additionally there are 40 juveniles currently in the Juvenile Hall awaiting placement.

"As shown in Table ES-1 the projected status quo ADP projection for Camp Sweeney combined with juveniles that would be housed in the new Camp Sweeney instead of group homes creates a need exceeding 120. This takes into account the recommended 50 percent of group home males that would be better served at the new Camp Sweeney and 90 percent of females at group homes that would be better served at the new Camp Sweeney.

"The focus of the 2008 Needs Assessment and the 2015 update is the bed space need for the juveniles in placement, not at Camp Sweeney that could be placed in Camp Sweeney in the future, with the appropriate security necessary. This shift in placement would keep juveniles in Alameda County and closer to family and services, while potentially saving the county money that is currently used to pay for out-of-county placements. The trend analysis confirms that the need for 120 beds at the new Camp Sweeney."[5]

[5] CGL Companies, *Needs Assessment Update for Camp Sweeney*, April 17, 2015, p. ES-1.

Alameda County intends to rely on the findings of the updated Needs Study to support the bed space capacity, as designed.

Comment 9: "I STRONGLY OPPOSE YOUR PROJECT AS OUTLINED IN EIR"

Response: The statement at the end of the form letter expresses the commenters' opposition to the Project and is not a comment on its environmental effects. The signers' opposition to the Project is noted.

24

RESPONSES TO INDIVIDUAL COMMENTS

INTRODUCTION

This chapter presents copies of the four written comment letters received via the U.S. Postal Service and/or electronic mail during the public review period on the Draft EIR, and a summary of oral comments made at the February 24, 2016 public meeting. Consistent with the list of commenters presented in Chapter 22 (Commenters on the DEIR), correspondence received from public agencies is presented first, followed by correspondence from organizations, followed by correspondence from individuals; finally presented are comments made at the February 24, 2016 public meeting.

Each piece of correspondence, such as a letter or email, is identified numerically as Letter #1, Letter #2, etc. and each individual comment within each piece of correspondence is identified by a sub-numeric designator for the comment within the correspondence (e.g., #1-1, for the first comment in Letter #1, #1-2 for the second comment in Letter 1, and so on). Responses are denoted similarly so the reader can relate the response to the comment it addresses. Responses to each Letter are grouped together following each piece of correspondence.

Comments made at the February 24, 2016 meeting are identified by name; and the specific comments of each speaker are identified by a sub-numeric designator corresponding to the sequence of the speaker's comments (e.g. "1-1" for the first comment from the first speaker at the meeting). Responses follow each separate comment.

In accordance with CEQA Guidelines Section 15088, responses to comments focus on the adequacy of the analysis in the Draft EIR or other aspects pertinent to the environmental analysis of the proposed Project. Comments that address topics outside the purview of the Draft EIR or CEQA (e.g., those that address the merits of the Project but not its environmental effects) are noted for the public record; and while no response to such comments is required, an informational response is often provided.

Comment Letter #1

Letter #1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

March 9, 2016

ALA580891
ALA-580-PM 32.98
SCH# 2015102054

Ms. Maritza Delgadillo, Senior Project Manager
Alameda County General Services Agency, Technical Services Division
County of Alameda
1401 Lakeside Drive, 11th Floor
Oakland, CA 94612

Camp Sweeney Replacement Project – Draft Environmental Impact Report

Dear Ms. Delgadillo:

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The proposed project would relocate and rebuild the Camp Sweeney Juvenile Justice Center campus to accommodate 120 individuals. The proposed campus would construct seven new buildings, which would include various administration, dormitories, programming, food services, and athletic uses on a currently vacant 10-acre site within the larger Fairmont Campus. The project site would be accessed via Fairmont Drive, which directly connects to Interstate (I-) 580. Our comments seek to promote the State's smart mobility goals that support a vibrant economy and build active communities rather than sprawl. We have reviewed the Draft Environmental Impact Report (DEIR) and have the following comments to offer.

Mitigation Responsibility
As the lead agency, the County of Alameda c/o General Services Agency (County) is responsible for identifying and ensuring the coordinated implementation of all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. 1-1

Transportation Operations
According to the DEIR, the project's forecasted net trip generation causes average delay to the worst approach at Intersection #4 (I-580 westbound off-ramp and Foothill Boulevard) to increase from 51.3 seconds to 55.0 seconds during the AM peak hour under the Existing Plus Project Conditions (DIER, pg. 9-19). We encourage the County, in partnership with other jurisdictions, to 1-2

participate in the funding and development of regional transportation improvements proportional to the travel demand associated. Future development should contribute appropriate fair share traffic impact fees to a regional impact fee program as applicable and multimodal programs. These contributions would be used to towards upgrading the intersection evaluated, lessen future traffic congestion, and improve transit in the project vicinity.

1-2 (con't)

Vehicle Trip Reduction

Caltrans encourages the County to locate future housing, jobs and employee-related services near major mass transit centers with connecting streets configured to facilitate walking and biking. This would promote mass transit use thereby reducing regional vehicle miles traveled (VMT) and traffic impacts. Suggested Travel Demand Management (TDM) strategies include lower parking ratios, dedicated car-sharing or carpool parking, designated bicycle parking and facilities, and providing transit subsidies to residents and staff employees. The Alameda County Transportation Commission provides a Guaranteed Ride Home program for all permanent full-time and part-time employees who are employed within Alameda County. TDM programs are recommended to identify a transportation coordinator and should be monitored and documented with annual reports to demonstrate effectiveness. The Caltrans Strategic Management Plan aims to increase the percentage of non-auto mode shares through tripling bicycle, and doubling pedestrian and transit by 2020. This strategic objective is consistent with MTC's Regional Transportation Plan/Sustainable Community Strategy goals of both increasing non-auto mode transportation, and reducing per capita VMT by 10 percent each.

1-3

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State Right-of-Way (ROW) requires an encroachment permit that is issued by Caltrans. Where construction-related traffic restrictions and detours affect State highways, a Transportation Management Plan or construction Traffic Impact Study may be required. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. See the following website for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits.

1-4

Ms. Maritza Delgadillo, County of Alameda c/o General Services Agency
March 9, 2016
Page 3

Should you have any questions regarding this letter or seek additional information, please contact Sherie George at (510) 286-5535 or sherie.george@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

Responses to Letter #1 – California Department of Transportation

1-1: The Draft EIR found no transportation impacts requiring mitigation. Consequently, the Draft EIR did not include a discussion of fair share contribution, financing, scheduling, or mitigation implementation responsibilities.

1-2: The commenter has correctly described the findings of the Draft EIR with regard to the increment of average delay at Intersection #4 (I-580-westbound off-ramp at Foothill Boulevard) from Project-related traffic. The average delay, as stated in the Draft EIR, would increase by 3.7 seconds, from 51.3 to 55.0 seconds during the morning peak period. Because the increased delay is less than 5.0 seconds the delay is not considered a significant impact under the significance criteria applicable to the Project. On that basis, the Draft EIR concluded that no mitigation is required.

In addition, the Draft EIR found that the level of traffic at the stop-controlled intersection in question does not warrant the signalization of the intersection. Even though the Draft EIR found that no mitigation is required, and the intersection does not meet warrant criteria for signalization, the County may elect voluntarily to participate with others in the funding and implementation of signalization, should that be determined in the future to be a desired or required intersection improvement. There is no funding mechanism at this time for the allocation of proportionate responsibilities, based on the level of traffic generated by different projects. If such mechanism were to be established, the contribution from the Camp Sweeney Project would be approximately 1.7 percent of total costs based on the level of Project traffic in relation to total trips at that intersection.

1-3: Alameda County recognizes the need to reduce vehicle trips through the use Travel Demand Management (TDM) strategies referenced in this comment, although there is no TDM plan proposed as part of the Project because of the limited number of peak period vehicle trips expected even at full occupancy and staffing levels, as documented in Table 9.2 in the Draft EIR (Page 9-15). Nevertheless, as part of the County's commitment to reducing vehicle miles travelled and emission of greenhouse gasses, it operates a shuttle bus program under the County's Alameda Sustainability Program. The shuttle buses serve the JJC, Camp Sweeney and other facilities within the Fairmont Campus with connecting trips to the San Leandro, Bay Fair and Lake Merritt BART stations; there is no charge for use of the County's shuttle bus service. In addition, and as noted in the Draft EIR at page 9-10, Camp Sweeney is served by AC Transit line 89 which stops on Fairmont Avenue adjacent to the site and provides service to the San Leandro and Bay Fair BART stations.

1-4: There is no aspect of the Project that would require an encroachment permit for construction work within a state Right of Way and none are anticipated to be required. Construction–related traffic restrictions and/or detours are not anticipated to be necessary. Should such measures become necessary, Alameda County will comply with all applicable requirements of Caltrans including the filing of encroachment permit applications, environmental documentation and Transportation Management Plan, as appropriate.

Comment Letter #2

Letter #2

HILLCREST KNOLLS ASSOCIATION

www.HillcrestKnolls.org

The Hillcrest Knolls Association
P.O. Box 717
San Lorenzo, CA 94580

March 14, 2016

Re: DEIR for Camp Sweeney Replacement Project

The purpose of this letter from the Hillcrest Knolls Association is to oppose several findings within the Draft Environmental Impact Report (DEIR) for the Camp Sweeney replacement project proposal. The proposed site was selected as a matter of convenience for construction per the itemizations on page 2-3. This is an unacceptable standard considering the aggressive and expansive nature of the proposed Camp Sweeney project and its proximity to a residential neighborhood, its position within the I-580 Scenic Corridor, and its inclusion as a prominent development along the Castro Valley/San Leandro gateway to Lake Chabot and East Bay Regional Park district along the Fairmont Ridge. Camp Sweeney's current location should have been studied in-depth rather than selecting a more 'convenient' location on Fairmont Drive. For this project, the DEIR neglects to adequately discuss the impacts of eliminating open space within the Scenic Corridor which includes the excavation and flattening of natural 'hillside' terrain, nor does it address the public view of a mile long 10-ft high secured fence, doubled in some areas, along Fairmont Drive. Interestingly, the fence simulation proposals include Pixar's fence; a fence that is backed by a man-made grass knoll designed solely to block the view of Pixar's campus buildings from the public right of way. Here, the Camp Sweeney proposal seeks to excavate naturally occurring hillside terrain in favor of buildings massing along Fairmont Drive.

2-1

2-2

2-3

2-4

2-5

Also at issue is the scale and magnitude of the Camp Sweeney proposal as identified in the Needs Analysis (pp. 1-1, 1-2). The expansion is unsupported by the fact that juvenile arrests are at a 40-year low which follows a steady 10-year decline in juvenile crime; a trend reflected by the current number of youth at Camp Sweeney—15 males, falling well below its capacity of 80 beds. In

2-6

HILLCREST KNOLLS ASSOCIATION
www.HillcrestKnolls.org

addition, the need for the 24-bed Special Programming Unit for state re-alignment youth phased out in 2013 according to the data available on the California Department of Corrections website. The 'area photos' of the proposed site and nearby areas both misrepresents and under-represents the aesthetics and visibility of this location to I-580, the Ashland community, the City of San Leandro, the western view from Castro Valley/Fairmont Ridge, and the Hillcrest Knolls homes located on the eastern and southeastern side of the community. If approved, the current Camp Sweeney proposal joins the recently built JJC on a combined 27 acres along the Fairmont Ridge in what looks like a **'prison city'** from the available simulations. The DEIR does not consider the psychological impact of expanding a prison use next to one of the poorest communities in Alameda County nor is the 'stigma' of a prison expansion considered.

2-6 Con't

2-7

2-8

Despite the opposition to the 'preferred' Camp Sweeney replacement project, the Hillcrest Knolls community strongly recommends that Camp Sweeney be re-constructed in its current location on the Fairmont Campus, in a reduced size, that is on par with the current juvenile justice system needs: **Alternative 2: "Existing Site Reuse" Alternative**. We advocate that the funding for this project be adjusted to include more/ongoing staff training, better education programs, and an emphasis on the rehabilitative services the youth need to avoid recidivism.

2-9

Sincerely,

Dawn Clark-Montenegro
President, Hillcrest Knolls Association

Response to Comment Letter #2:

2-1: As explained in the Draft EIR, the Project site was selected as the third choice after first considering two other alternatives. One of the underlying requirements of any site for the Project is that it be in close physical proximity to the JJC for reasons explained in the Draft EIR, including shared staffing and food and medical services. Accordingly, the County initially considered replacing Camp Sweeney at its existing location until it received the initial Needs Assessment report and recommendations of its consultant, Carter Goble Lee. The Needs Assessment included reference to potential seismic problems at that site and for that and other reasons the County turned its attention to the site of the former Juvenile Hall complex. Extensive geologic investigations at that site identified several traces of the Hayward Fault which the engineers concluded were so extensive as to make that site infeasible for the proposed

Project. The third site considered for the Project became the proposed Project site, as identified and described in the Draft EIR. Further detailed geotechnical investigations were conducted there and sufficient portions of the site were determined to be far enough removed from the fault traces as to be acceptable to support the proposed buildings.

The Draft EIR acknowledges that in-depth studies or specific mapping of fault traces on the existing Camp Sweeney site were not done and that if such studies were done, they might determine that there are sufficiently safe building sites within that general area to accommodate the proposed Camp Sweeney site plan. However, the lack of certainty regarding detailed seismic conditions at the existing site compared with what is now known about the proposed site is the reason that the Draft EIR concludes that the proposed site is the marginally superior alternative.

2-2: Please see Response to Comment 5, Land Use, in Chapter 23, Master Responses.

2-3: Please see Response to Comment 2b, Open Space, in Chapter 23, Master Responses.

2-4: As explained in the Draft EIR, the soil beneath the asphalt paving that covers most of the Project site consists of undocumented fill material that has been determined by the County's geotechnical consultants to be unacceptable as the base for the proposed Camp Sweeney buildings. The material will need to be excavated, processed with clean fill and replaced in accordance with engineered compaction criteria. When replaced, the topography of the site will nearly match the existing contours of the site, as shown in Figure 3.6 in the Draft EIR. The terraced and slightly sloping site is a feature that works well with the intended site plan, as explained in the Draft EIR.

2-5: The Draft EIR describes the proposed perimeter fence and includes Figure 3.7 on Page 3-13 to illustrate the types of fences intended for the Project. Additional clarification is provided in the latest version of the Project architect's design package.[1] Final specifications and selection of fence materials will be determined by the County's design/build contractor in the next phase of the Project. The length of the site's frontage along Fairmont Drive is approximately 880 feet, less than $2/10^{th}$ of a mile. The Draft EIR bases its conclusion that the Project would not result in significant visual impacts because of the quality and character of the design intent as expressed in the illustrations in the Draft EIR, along with the proposed landscaping plans that, taken together, represent a dramatic positive change from existing conditions. As stated in the Draft EIR, the physical and visual changes, while significant, would enhance the visual character of the area and not degrade the site or its surroundings.

2-6: See Response to Comment 8, Project Need, in Chapter 23, Master Responses.

2-7: See Response to Comment 2a, Visual Impact, in Chapter 23, Master Responses.

The Project site is not a protected open space resource, sits below the Fairmont Ridge, and is not visible from the 580 Freeway. In addition, the Camp Sweeney Replacement Project would have a significantly different visual appearance compared with the JJC. Camp Sweeney buildings will be small scale wood-frame structures in a softly landscaped setting, as described in the Draft EIR. In comparison, the JJC is an imposing concrete structure that is appropriate for its high security needs. Despite these differences in architectural character and scale, and as stated in the Draft EIR, it is vitally important that the Camp Sweeney remain in close physical proximity to the JJC for operational interdependencies, including for food and medical services.

[1] Komorous-Towey Architects, Op. Cit.; see Footnote 1 in Chapter 23.

2-8: See Response to Comment 7, Socio-economic Impacts, in Chapter 23, Master Responses.

2-9: See Responses to Comment 6, Alternatives, and Comment 8, Project Need, in Chapter 23, Master Responses. The commenter's suggestion that funding for the Project might be better spent on staff training, better education programs, and an emphasis on rehabilitation services to reduce recidivism is not relevant to CEQA but will brought to the attention of the County's decision-makers.

Comment Letter #3

Letter #3

From: Henryka Szudelski <henrykaszudelski@gmail.com>
Date: 3/12/2016 12:45 AM (GMT-08:00)
To: "Delgadillo, Maritza GSA- Technical Services Department" <Maritza.Delgadillo@acgov.org>
Subject: Comments on DEIR regarding Camp Sweeney relocation

Dear Maritza,

Feb 24th hearing left us, attending residents, disappointed at how little DEIR actually deals with the impact of the Project on us , Hillcrest Knolls residents. It seems that in this study we are not even on par with other species whose welfare is being protected, while this is precisely us and the taxes we pay that fund the project and the salaries of people involved. Isn't that pathetic? What's wrong with this picture? 3-1

Much to our chagrin we find that DEIR is grossly lacking proper assessment of real human toll the proposed project would have on this neighborhood. Somebody is deciding for us that another prison, regardless how it's called, is good for us as a neighbor. Somebody knows better what we want to look at for the next 30 years (density or open space), how much noise we can take, weather we like the roar from the sports field or not, or if we want to live in construction zone for 3 years. Who is making those judgements? Definitely not somebody living here and having already been bruised by experience during JJC construction. Why would this one been any different? If anything, it would be worse. 3-2

Many, very important to us, aspects of The Project can't be mitigated at all: stigma of the prison, cluster of the buildings off the road in lieu of now open space, noisy sports field, prolonged construction nightmare. There are many more, but these specifically would have a very significant impact on us and none of them can be mitigated. 3-3

We have the same right to enjoy peace, comfort and safety in our homes as you do in yours, and we have chosen to live here because of what this neighborhood had to offer. The Project would change our lives forever, for the worse.

We do understand your needs and support your Alternative#2 in a scaled down form on the existing Camp Sweeney site. With current occupancy of the Camp at 15 juveniles and 40 at the peak, a 120 bed facility is not needed. The existing ball field can be developed for sports field. To rebuild at the existing site would seem to be an obvious choice to me. It is really puzzling why no one had considered this option in the first place? 3-4 3-5

People in Hillcrest Knolls are waking up to the enormity of the impact The Project would have on their lives and they are strongly opposing The Project as outlined in DEIR. 3-6

A letter opposing The Project has been circulated in the neighborhood and some 30+ people have signed it so far.

Some of the letters were directly mailed to you, some emailed, most were returned to me signed. I have mailed one batch to you Thursday (registered mail with return receipt), the second batch is being mailed on Saturday. If there is a third batch, I will mail it to you on Monday, March the 14th.

The DEIR needs to be revised to reflect the true impact of the proposed project on our neighborhood, so powers that be can see that.

Please, pass it on to whoever should see it.

Best regards,
Henryka Szudelski
2300 Upland Rd
Hillcrest Knolls

Responses to Comment Letter #3:

3-1 CEQA is concerned with the impact of a project on direct physical changes in the environment, including direct effects on humans including aesthetics, air quality, noise and traffic and indirect effects such as that could result from land use, geology/soils, hydrology/water quality, hazardous materials, public services, and utilities. Impacts related to subject other than the physical environment are outside the parameters of CEQA. The Draft EIR examined the potential effects of the Project against significance criteria applicable to each of the required CEQA topic areas and found most impacts to be below significance criteria levels, and for those impacts that are found to be potentially significant, mitigation measures are included in the Draft EIR to reduce the severity of the impact to less than significant levels.

See also Response to Comment 1 in Chapter 23, Master Responses.

3-2: See Response 3-1 above and Response to Comment 7, Socio-economic Impacts, in Chapter 23, Master Responses.

3-3: See Responses to Comments 2a, Visual impacts, Comment 2b, Open Space, and Comment 3, Noise from Athletic Activities in Chapter 23, Master Responses.

3-4: See Response to Comment 6, Alternatives, in Chapter 23, Master Responses.

3-5: See Response to Comment 8, Project Need, in Chapter 23, Master Responses.

3-6: See Response to Comment 9, Opposition to the Project, in Chapter 23, Master Responses. The commenter's opposition to the Project is noted.

Comment letter #4

Letter #4

June 13th, 2016

Good afternoon,

There are several points I feel need to be addressed regarding the Environmental Impact Report of Camp Sweeny, specifically, it's bias nature and tone for the support of moving the location of the camp to it's proposed location.
Point 1:

4-1

Throughout the entire report, the Report aggressively tries to convince me of the benefits the new location will have. This is false. There are NO benefits to my community for the relocation of Camp Sweeny. We do not want the noise it will bring to out community, the nightmare of traffic we will be subjected to for the MINIMUM of 30 months, and the noise starting at 7AM bellowing through the canyon, not to mention the lights that will destroy our dark tranquil neighborhood at night time once this place is built.

4-2

4-3

4-4

You want to make it larger, yet you DON'T EVEN HAVE IT AT FULL CAPACITY TODAY! We send away people out of state because the Camp is grossly understaffed and lacks appropriate funding to run at half capacity. Why on Earth are you building a larger facility? I feel like what is really at play here is a reorganization of this facility to accommodate something other than low level criminal offenders.
Susan S. Muranishi, the country Administrator wrote a memorandum to the County of Alameda on November 30th, 2015 stating the camp population in Alameda County as, " In 2009 to 2014, the 2nd Quarter distribution of charges showed an average of 76% of youth with felony offenses, an increase of two percentage points from 75% in 2013 to 77% in 2014. The remaining percentage reflected misdemeanor charges."

4-5

So what is really going on here? I thought this placed housed low level criminal offenders, which is clearly not true. If you are planning to change the very nature of Camp Sweeny's purpose, then this decision needs to be agreed upon with the community it will affect, and not by you.

4-6

Point Two:

You are not taking into consideration the people affected by this move and the impact it will have on their daily lives. This community is the one that elected you as officials to represent us and our needs as a community. It is clear that the impact of this new facility will have devastating costs to our wellbeing ie. Noise, traffic, light pollution. Additionally, it will devastate the value of our property by having a jail so close In proximity to our home. As I am sure you know from your own lives, the value of your home is sometimes one of your only assets in life. I ask again, would you want a jail rebuilt closer to your home? Why do you feel justified to hinder our well being with this new location? Your job is one to serve your community, yet you aren't serving us by having this jail or "camp" placed closer to our homes.

4-7

In closing, I strongly encourage you to keep the camp at its current location and have some respect for our neighborhood. 4-7, Con't

Thank you.

Ivona Szudelski

2300 Upland Rd

Responses to Comment Letter #4:

4-1**:** As required by CEQA, the Draft EIR is a disclosure document, intended to inform the Lead Agency decision-makers and the public about the environmental consequences of a proposed project. Its assessment of environmental effects is based on available information and facts learned from research and analysis. The information is presented in an objective, fair minded and neutral manner, with no bias. It is not an advocacy document and does not support or oppose the project. Consideration of and arguments for or against a project do not belong in an EIR and none are included here. The Draft EIR does not attempt to 'aggressively convince' the reader of anything beyond the facts and assessment, as presented.

4-2: The effects of project construction and operational noise on local sensitive receptors have been measured and discussed clearly and without bias in the Draft EIR (Chapter 10) and found to be less than significant.

4-3: The impacts of project-related traffic have been fully evaluated and documented in Chapter 9, Transportation, and the Draft EIR has concluded that all potential impacts are less than significant.

4-4: The potential for nighttime light or glare from the Project is discussed and evaluated in Chapter 5, Aesthetics and Visual. With implementation of Mitigation Measure Visual – 5.1, impacts will be less than significant.

4-5: The reasoning behind the County's determination as to the size and capacity of the proposed Project, while not a CEQA issue, per se, is fully disclosed and explained in the Draft EIR and in Response to Comment 8, Project Need, in Chapter 23, Master Responses. This information is included because it is deemed to be relevant for the public and decision-makers to consider as it forms the basis for the scale and scope of the Project. The Draft EIR does not comment on the accuracy or validity of this information.

4-6: The intent underlying the proposed scale and design of the Project has not changed from the initial concept described and reflected in the funding application document except that the overall capacity (i.e., number of beds) was reduced from the original concept of 150 to the current design which would accommodate 120 youth. The nature and characteristics of the intended youth population that Camp Sweeney is being designed to serve – i.e., low level offenders of non-violent criminal acts - has not changed.

4-7: This comment appears to be aimed at the decision-makers in their consideration of the merits of the Project and not at any deficiency or inaccuracy in the Draft EIR. The comments will be brought to the attention of the decision-makers when the Project is before them for approval.

Comment Letter #5

The letter depicted below is one of 34 identical letters received from different individuals living in the Hillcrest Knolls community. The names of all signers to the form letter are listed in Chapter 22 of this Final EIR. Responses to the comments raised in the form letter are presented in Chapter 23, Master Responses.

Name MARLENE FRIEDLANDER

Address 14755 VAN AVE, SL

RECEIVED
COUNTY OF ALAMEDA
MAR 14 2016
GSA - TECHNICAL SERVICES DEPARTMENT
DESIGN AND CONSTRUCTION

To:

Maritza Delgadillo, senior project manager
1401 Lakeside Drive, 8th floor, Oakland, Ca 94612

Re: Environmental Impact Report for the relocation of Camp Sweeney

I am a resident of Hillcrest Knolls, who will be directly affected by your project in a negative way. Your report does not take under consideration the impact the project would have on us , residents of Hillcrest Knolls. It seems that the study of impact on birds, trees, water and air was given much more weight, than on us, people living here.

There are 4 major issues with this project that are important to us, that can't be mitigated.

1. Ethical and social stigma from living across the street from another penitentiary, that will have an effect on our peace of mind, sense of safety and will be forever imprinted on our conscience, not to mention the negative impact on our home values.
2. The visual impact of this massive complex concentrated on the edge of Fairmont Drive, across the street from us, taking away the open space we now enjoy. It would take next 30 years to have it obscured by trees.
3. The daily noise coming from the sports field that 120 young people would generate while engaging in sports activities. We all know very well how noisy sports activities can get.
4. The 30+ months of relentless construction noise that would be even worse than when JJC building was built, as it would be happening much closer to us, the horror of which many of us still remember.

It is inappropriate to build prisons so close to the residential neighborhood. This project is also too big for the needs of the Probation Department, not to mention that building Club Med facility for young criminals is sending a wrong message.

Your Alternative#2 is more sensible if adjusted. Rebuilding on an existing site in a scaled down form to meet your needs not your wants and utilizing existing bail park for the new sports field makes more sense, and also takes care of all the above issues.

I STRONGLY OPPOSE YOUR PROJECT AS OUTLINED IN EIR>

Sincerely,

Signature M Friedlander

Date 3/10/16

Comment Letter #6

From: Bill McCormick [mailto:BMcCormick@kleinfelder.com]
Sent: Tuesday, April 12, 2016 4:18 PM
To: Delgadillo, Maritza GSA- Technical Services Department
Cc: Richard Feller
Subject: RE: Camp Sweeney - EIR - Geotechnical section WVM Edits

Maritza/Richard

Attached please find my suggested edits to the pertinent geological sections of the EIR. Please call if you have any questions or need further assistance or clarifications.

Thanks

Bill McCormick, CEG
Sr. Principal Engineering Geologist
Kleinfelder
2240 Northpoint Parkway
Santa Rosa, CA 95407
(O) 707.543.8225
(C) 707.953.1837

Response to Comment Letter 6:

The pages from Chapters 6 and 16 of the Draft EIR on which Mr. McCormick's edits appear are reproduced on the following pages. Each of the suggested edits has been accepted and included in Chapter 25, Revisions to the Draft EIR.

Local Physical Setting

Geotechnical reports prepared by Kleinfelder provide a solid understanding of seismic and soil conditions regarding the proposed use of the site for the Camp Sweeney Replacement Project. The findings of the Kleinfelder reports are summarized in this section.[1]

Site History

Review of aerial photographs shows that parts of the site have been occupied since the 1930s and have undergone significant modification and grading. In 1939, a government facility occupied the location of the existing Chabot Boy's Camp and a hog farm operated on the land currently used by Camp Sweeney. Site alterations include episodes of grading, quarrying, and fill placement. Extensive fill consisting of gravel and clay was placed along the north and northeastern margins of the site in the 1970s during construction of Fairmont Drive, located directly west of the site area. Bedrock topographic highs consisting of gabbro were excavated along the alignment of Fairmont Drive and the excavated material was used to fill an abandoned rock quarry located in the east-central part of the site, as well as several steep, west-flowing drainages that cross the site. Estimated fill thickness ranges between less than 10 feet up to at least 70 feet, based on the comparison of topographic maps prepared before and after construction of Fairmont Drive, as well as trench exposures from geotechnical studies.

Geology and Seismicity

The Project site lies west of the active trace of the Hayward Fault. Elevations at the site range from a high of about 214 feet to a low of 170 feet above mean sea level. The site drops in elevation from north to south with a difference of about 45 feet over an approximate distance of 600 feet. The three main parking lots are relatively flat and are terraced to accommodate the change in elevation.

Based on interpretation of topographical maps, geologic field reconnaissance, trench exposures, and borehole information, the site consists of alluvial deposits inset into weathered gabbro at the west-facing mountain front. Field reconnaissance and review of previous geotechnical reports prepared for buildings in this part of the site shows that the alluvium was locally graded and removed exposing underlying gabbro bedrock in places.

The Hayward Fault, which traverses the site, is considered a major active fault. Other major active faults in the Bay Area include the San Andreas, San Gregorio, Rodgers Creek, Concord-Green Valley, Calaveras, and Greenville faults. The site will likely experience minor earthquakes and possibly a major earthquake on one of the nearby active faults during the life of any development.

The site is within the Alquist–Priolo Earthquake Hazard Zone (A-P Zone) surrounding the Hayward Fault (**Figure 6.2**). Published geologic maps show active and potentially active strands of the Hayward Fault at the site.

[1] Kleinfelder, *Preliminary Geotechnical Investigation Proposed Camp Sweeney Rebuild Supplemental Site 2400 Fairmont Drive San Leandro, California,* November 14, 2014

Kleinfelder, *Phase 3 Fault Investigation Proposed Camp Sweeney Rebuild 2400 Fairmont Drive, San Leandro, California,* February 24, 2015

Kleinfelder, *Final Geotechnical Investigation, Proposed Camp Sweeney Rebuild Supplemental Site 2400 Fairmont Drive San Leandro, California,* December 9, 2015

Upper Jurassic/Lower Cretaceous rocks of the Great Valley Sequence, and in the vicinity of the study area are intruded by Mesozoic mafic and ultramafic rocks (gabbro, gabbro-diabase). Bedrock in the study area has been intensely sheared and folded, and many of the rocks are serpentinized. The bedrock at the site is predominantly composed of highly fractured, sheared and weathered gabbro of Jurassic age. The depth to bedrock varies, but it exists close to or at the ground surface throughout much of the site.

Subsurface conditions at the site were explored by Kleinfelder on October 14, 2014 by drilling ~~three~~ borings to depths ranging from about ~~25~~ 15 to ~~26~~ 15.5 feet below the existing ground surface. Subsurface conditions are comprised of layers of undocumented fill placed on native gabbro bedrock and/or alluvial deposits. ~~A highly weathered to decomposed gabbro bedrock was encountered in all three borings beneath the fill and soil.~~

The site is blanketed with undocumented fill material extending to depths of less than 1 foot to more than 20 feet. The fill is highly variable and appears to be the result of past earthwork related primarily to the installation of the north-south oriented storm drain which allowed filling of the site for parking. The fill includes expansive clay, silt, sand and gravel of variable density and composition. Although much of the fill appeared to be relatively dense and granular, areas of soft clay and minor amounts of debris in the fill are also present. Undocumented fill can vary substantially over short distances and may contain organic matter, debris and/or voids that are not detected in small diameter explorations or widely spaced trenches and if left in its present condition, the material can experience random and differential settlements from a wide variety of sources including: settlement/densification due to new building or fill loads, vibrations, or seismic events; collapse of voids; deterioration of organic material; or similar events. The undocumented fill is not considered suitable for the support of shallow foundations or other facilities. It is also considered generally undesirable for areas that will receive concrete slabs or concrete pavement as it can result in significant cracking and the need for continuing repairs and higher than normal maintenance.

Information provided in the Environmental Site Assessment prepared for the Project suggests that there may also be outcrops of Ultra-mafic "serpentine' bedrock which is known to occur in some areas of the East Bay Hills. Serpentine bedrock can be the source of naturally-occurring asbestos, and excavation or other disturbance of Site soils may require compliance with the California Air Resources Board regulations codified in the California Code of Regulations, Title 17, Section 93105.[2]

Expansive Soil

Potentially expansive soils were encountered in test borings in a number of areas at the site. Beneath surficial asphalt pavement most of the site is blanketed with clayey sand and highly expansive ~~sandy~~ clay. The near surface clay has a very high expansion potential. Expansive soils are not suitable for support of shallow foundations in their native condition. When they undergo seasonal variation in moisture content expansive soils will experience significant volume changes that generate cycles of heave and settlement with resultant distress to lightly loaded footings as well as concrete slabs, pavements and other improvements.

Groundwater

Groundwater was not encountered at the time of drilling or at the time of trenching activities. In general, groundwater levels at the site are below the depth of planned excavation. However,

[2] RGA Environmental Site Assessment Report, 2200 Fairmont Drive, San Leandro, California, April 15, 2015, p. 1

groundwater is likely present at shallower elevations in the form of isolated seepage zones or locally perched conditions, particularly during the rainy season.

Landslides

Large-scale landsliding occurred throughout the Bay Area during the Pleistocene Age (more than 10,000 years ago) when the local climate was significantly wetter than it is today. Locally, these ancient massive bedrock landslides are common in areas of inherently weaker bedrock, such as might be expected close to the Hayward Fault. In the generally drier climate of the past 10,000 years, these massive bedrock landslides have typically become inactive. However, secondary landsliding continues to occur within generally weakened rock masses comprising the ancient landslide complexes. Old landslides are present in the hills east of the site.

AS WELL AS ACTIVE LANDSLIDES

Fault Traces

The site is characterized by a multilevel, graded and paved parking lot that is bounded by Fairmont Drive on the west, and a moderately steep slope on the east. Extensive grading operations and utility construction in the past, to create these parking areas, has obliterated much of the natural topography. A drainage channel exists at the northern boundary, which is captured and transmitted beneath and across the parking lot in a north-south fashion via a 60-inch diameter concrete storm drain pipe that is buried deep under the site. The County is permitting new structures to be constructed over this line.

Investigation of the initial site considered for the new Camp Sweeney (i.e., the site of the former Juvenile Hall; CTS 2014) identified several active faults which precluded development for human habitation. In an effort to identify a viable building site, Alameda County authorized the investigation of the parking lot area located immediately west of the initial site (i.e., the proposed Project site).

Kleinfelder conducted further geologic assessments specifically related to active faulting at the proposed site. Their initial investigation (November 2014) delineated three zones site for conceptual planning purposes. The three zones were color coded as described below.

- Green Zone – Clear of active faulting and suitable for development with structures intended for human habitation
- Orange Zone – Area that might be cleared of active faulting, provided additional detailed subsurface explorations are conducted in these areas to more accurately define the subsurface geologic structure and character
- Red Zone – Area that contains evidence of active faulting and should be avoided for structures intended for human habitation

Subsequently, Kleinfelder's *Phase 3 Fault Investigation* (February 2015) was performed to provide additional exploration in the Orange Zone for signs indicative of active faulting. After the Phase 3 investigation and assessment was complete, the Orange Zone was determined to be clear of active faulting and became part of the Green habitable zone. A graphic depicting the final delineation of the red and green zones and the resulting site plan showing building footprints and other data is presented in **Figure 6.3**.

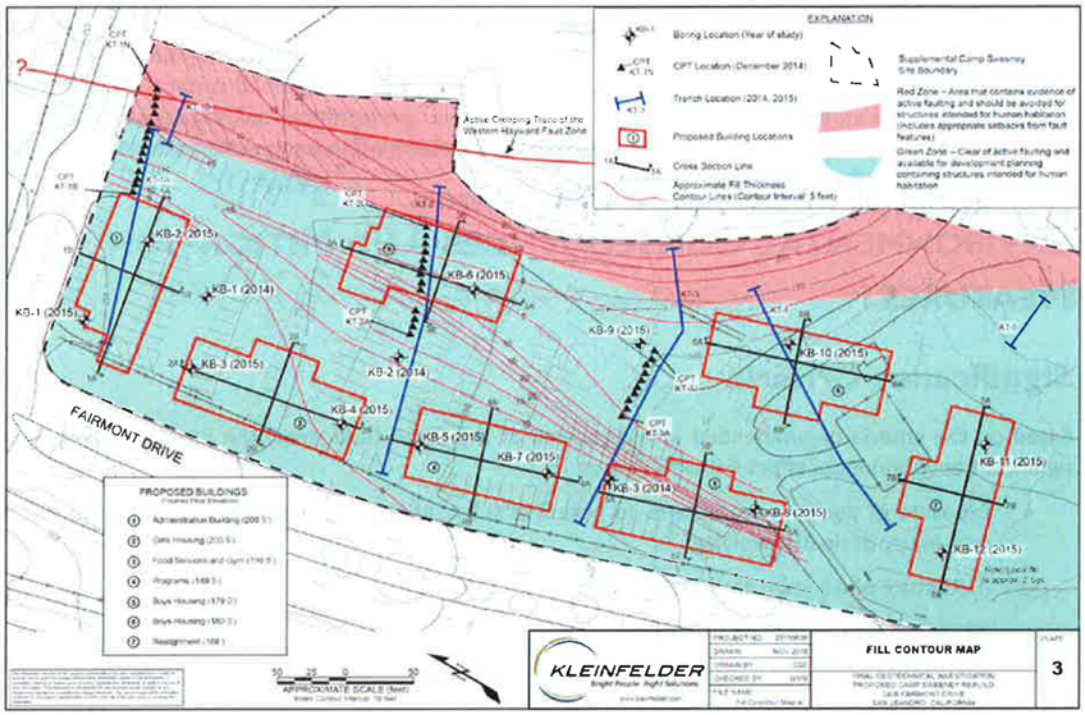

Figure 6.3 Results of ~~Seismic~~ Investigations to Determine Zones Safe for Buildings

GEOTECHNICAL AND FAULT

REGULATORY SETTING

In 1973, the Alquist–Priolo Earthquake Fault Zoning Act went into effect. Alquist-Priolo regulates development near active faults so as to mitigate the hazard of surface fault rupture. As part of the Alquist-Priolo Fault Evaluation Program, the State Geologist in conjunction with the California Division of Mines and Geology has delineated Earthquake Hazard Zones around known active faults.

In April 2008, scientists and engineers released a new earthquake forecast for the State of California called the Uniform California Earthquake Rupture Forecast. It was compiled by the U.S. Geological Survey (USGS), Southern California Earthquake Center, and the California Geological Survey, with support from the California Earthquake Authority. The forecast updates the earthquake forecast made for the greater San Francisco Bay Area by the 2002 Working Group for California Earthquake Probabilities. The report evaluates the probabilities for earthquakes of magnitude 6.7 or greater in the next 30 years. The overall probability of a magnitude 6.7 or greater earthquake in the Greater Bay Area is 63%, about 2 out of 3, which is very close to the probability of 62% obtained by the 2002 Working Group. The earthquake probability is highest for the Hayward-Rodgers Creek Fault system, 31%, or nearly 1 out of 3. The last damaging earthquake on the Hayward Fault was in 1868. The 140 years since 1868 is the same length of time as the average interval between the past 5 large earthquakes on the southern Hayward Fault. There is an estimated 32 percent chance that at least one magnitude 6.7 or greater earthquake will occur on the Hayward Fault before 2030 and an estimated 70 percent chance that one magnitude 6.7 or greater earthquake will occur in the San Francisco Bay region before 2030 (USGS 1999).

According to the Alquist–Priolo Earthquake Fault Zoning Act, construction of new buildings and/or alteration of existing structures located within the A-P Zone require geologic investigation to assess the presence of faults, their activity level, and the potential for fault related ground surface rupture at the building site. Consistent with this requirement, extensive geotechnical investigations have been undertaken at the Project site to identify fault traces and determine those specific parts of the Project site that would be ~~safe from seismic hazards~~ cleared of surface rupture hazard.

geologic

ENVIRONMENTAL CONSEQUENCES AND MITIGATION MEASURES

Significance Criteria

Based on the criteria recommended in Appendix G of the CEQA Guidelines, the Project could have a significant environmental effect if it would result in:

- Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

  (i) Rupture of a known earthquake fault

  (ii) Strong seismic ground shaking

  (iii) Seismic-related ground failure, including liquefaction

  (iv) Landslides

- Substantial soil erosion or the loss of topsoil.
- Placement of structures on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- Placement of structures on expansive soil, creating substantial risks to life or property.

Impacts and Mitigation Measures

IMPACT 6.1: Risk of Loss, Injury or Death Involving Rupture of a Known Earthquake Fault

active

POTENTIALLY SIGNIFICANT AND MITIGABLE IMPACT. Active fault traces have been identified on the site of the former Juvenile Hall which was originally considered as the site for the Camp Sweeney Replacement Project. However, the presence of the trace faults has ruled that part of the site unusable for structures. As a consequence, the Project proposes that part of the Project site be limited to athletic activities such as soccer, baseball, and similar sports; no structures would be built where traces of the Hayward Fault have been identified.

for human habitation

The site plan for the Camp Sweeney Replacement Project was prepared based on the findings of extensive subsurface geological investigations. Core samples from test boring and trenching conducted across the site informed the boundary between buildable portions of the site and unbuildable portions, as shown in **Figure 6.3**. The project has been designed to accommodate the constraints imposed by those fault traces, and subsequent design-level investigations and construction monitoring will ensure

Delineated

that the project is constructed in a manner that conforms to all applicable codes regarding seismic safety.

Mitigation Measure Geology – 6.1: Site Design for Fault Avoidance. The development at the site shall be designed to avoid placing any structures for human occupancy within 25 feet of the surveyed location of any active fault traces. Design-level investigations and construction monitoring shall verify that the project conforms to all applicable codes and regulations. Areas where active faults have been identified shall be used only for open space. Utilities ~~shall not be~~ built within the geologic setback zone or cross the fault zone.

Resulting Level of Significance: Implementation of **Mitigation Measure Geology – 6.1** would reduce the potentially significant impact of fault rupture hazards to a less than significant level.

IMPACT 6.2: Risk of Loss, Injury or Death Involving Strong Seismic Ground Shaking

POTENTIALLY SIGNIFICANT AND MITIGABLE IMPACT. The Project site is located in a seismically active region of California. Significant earthquakes in the Bay Area have been associated with movements along well-defined fault zones. Earthquakes occurring along the Hayward Fault, San Andreas Fault, or any of a number of other Bay Area faults have the potential to produce strong ground shaking at the site, which could result in risk of loss, injury or death. The proximity to the Hayward Fault makes it highly likely that strong seismic ground shaking will occur at the Project site. This represents a potentially significant environmental impact.

Mitigation Measure Geology – 6.2: Seismic Design. The Project shall be designed to address the projected seismic shaking hazards present at the site, in conformance with the Uniform Building Code, California Building Code, and Board of Corrections design standards for juvenile detention facilities.

Resulting Level of Significance: Compliance with current seismic codes and standards would reduce potential impacts associated with strong ground shaking to levels generally considered acceptable according to engineering standards for projects of this type in the seismically active San Francisco Bay region. Therefore, implementation of **Mitigation Measure Geology – 6.2** would reduce this impact to a level of less than significant.

IMPACT 6.3: Risk of Loss, Injury or Death Involving Liquefaction/Densification

POTENTIALLY SIGNIFICANT AND MITIGABLE IMPACT. Soils beneath the proposed Project site have been extensively studied and have been found to consist largely of undocumented fill material that is unsuitable to support the proposed structures. The undocumented material extends generally to depths ranging from 2 feet to approximately 20 feet where underlying gabbro bedrock material has been found. Construction of Camp Sweeney buildings on the undocumented fill material would expose the buildings to differential settlement and potential damage. Although Kleinfelder has concluded that the risk of liquefaction at the Project site is low, based on conditions encountered throughout the site and expected groundwater conditions,[3] mitigation of the potential risk is recommended.

Mitigation Measure Geology – 6.3: Soil Remediation. The recommendation of the geotechnical engineer to remediate the soil conditions shall be implemented as the first phase of site

[3] Ibid.

preparation. This includes removal of all undocumented fill and alluvial material beneath the building areas followed by replacement with quality controlled engineered fill in accordance with the engineer's criteria for moisture content and compaction. The material shall be removed to a minimum distance of 5 feet (horizontally) outside of the building footprints. The native, potentially expansive fill can then be compacted to within 36 inches of planned finished grade. Within the upper 36 inches, non-expansive imported fill or chemically modified (i.e., lime-treated) native fill can be placed within the upper 36 inches of finished grade.

Resulting Level of Significance: Compliance with the geotechnical engineer's recommendations would reduce potential structural impacts resulting from unacceptable soil conditions beneath the Project sites to a level considered acceptable to support the proposed buildings. Implementation of **Mitigation Measure Geology – 6.3** would reduce this impact to a level of less than significant.

IMPACT 6.4: Risk of Loss, Injury or Death Involving Landslides

LESS THAN SIGNIFICANT IMPACT. The Project site is located in hilly terrain where landslides have occurred in the past. A deep ancient landslide underlies the area to the east of the site where the Juvenile Justice Center now stands. That landslide has been inactive for thousands of years and has a very low to negligible risk of renewed movement. The new Juvenile Justice Center building complex, and the substantial retaining wall that supports it, provide a secondary benefit to the lower elevation Project site by protecting it from potential landslide impacts should one occur upslope from the Juvenile Justice Center. Consequently, risk of damage or other impacts from landslides is considered slight and impacts are less than significant.

IMPACT 6.5: Soil Erosion

During site preparation and excavation, there may be an increase in soil erosion from site development work unless measures to limit erosion are effectively implemented. Regulations under the federal Clean Water Act require that a National Pollutant Discharge Elimination System (NPDES) storm water permit be obtained for projects that would disturb more than 10,000 square feet during construction. Prior to construction, the RWQCB will require preparation of a Storm Water Pollution Prevention Plan (SWPPP) that contains specific actions (best management practices, or BMPs) to control the discharge of pollutants (including sediment) into the local surface water drainages. Following development, ongoing soil erosion may take place unless site-specific measures to control it are incorporated within the site design.

POTENTIALLY SIGNIFICANT AND MITIGABLE IMPACT. Site preparation could result in an increase in soil erosion. Unless suitable site-specific erosion control features are incorporated, the ongoing operation of the facilities proposed could also result in soil erosion. This represents a potentially significant environmental impact.

Mitigation Measure Geology – 6.5 Implementation of a SWPPP. The SWPPP will need to include stormwater quality BMPs that will reduce runoff of sediment and other pollutants during construction to less than significant levels. Some of the post-construction source control BMPs that could be included in the SWPPP would reduce the generation of pollutants from activities such as lawn maintenance, vehicle use, material storage, and waste collection/recycling. In order to be approved by the RWQCB, the SWPPP will need to demonstrate that implementation will reduce potential soil erosion to a level of less than significant.

Resulting Level of Significance: Implementation of a SWPPP would reduce the potential impact to a level of less than significant.

IMPACT 6.6: Soil Instability

POTENTIALLY SIGNIFICANT AND MITIGABLE IMPACT. As noted above, the geotechnical investigations have determined that the site is underlain by undocumented fill and alluvial material above the gabbro bedrock. The undocumented and alluvial material is considered unsuitable to support the proposed Camp Sweeney buildings due to the high potential for differential settlement and resulting structural damage. Consistent with the discussion in **Impact 6.3** above, failure to remediate the unstable soil conditions underlying the Project site would be considered a potentially significant impact.

Mitigation Measure Geology – 6.6: Implement **Mitigation Measure Geology – 6.3** regarding the replacement of undocumented fill materials underlying the Project site and replacing it with engineered fills in accordance with the geotechnical engineer's recommendations.

Resulting Level of Significance. Implementation of **Mitigation Measure Geology – 6.6** would reduce potential impacts associated with soil instability and differential settlement to a level of less than significant.

IMPACT 6.7: Expansive Soils

POTENTIALLY SIGNIFICANT AND MITIGABLE IMPACT. Expansive soils have the potential to damage surface-mounted improvements such as buildings on shallow foundations, sidewalks, pavements, retaining walls, and underground utilities. Highly expansive soils were encountered in test borings in a number of areas at the Project site. Construction of foundations and slabs close to the expansive soils has the potential to undergo variable and detrimental settlement or heave and result in property damage. This would represent a potentially significant environmental impact.

Mitigation Measure Geology – 6.7: Remediation of Expansive Soils. Implement Mitigation Measure 6.3 regarding the replacement of undocumented fill materials underlying the Project site and replacing it with engineered fills in accordance with the geotechnical engineer's recommendations.

Resulting Level of Significance: Implementation of **Mitigation Measure Geology – 6.7** would reduce the potential effects associated with expansive soils to a level of less than significant.

meaningful reduction in potentially significant environmental effects and (2) it would fail to meet the Project Objective 1 which calls for capacity levels consistent with the updated Needs Analysis. For these two reasons, the Lead Agency has determined that a Reduced Scale Alternative would not be a viable alternative and therefore it is not considered further in this EIR.

The Former Juvenile Hall Site Alternative

The site of the former Juvenile Hall was initially considered to be an ideal replacement site for a new Camp Sweeney campus. The positive attributes of this site included that it remained very close to the new Juvenile Justice Center and was relatively far away from the nearby Hillcrest Knolls community. This site was the assumed site and the focus during the early planning stages of the Project because it was considered large enough to accommodate new Camp Sweeney buildings in a campus like arrangement. As with the Project and other alternatives, the existing Camp Sweeney buildings would be removed after the new campus was built and occupied. However, before determining where outdoor athletic fields might be developed, this site was rejected from further consideration because of the presence of multiple traces of the Hayward Fault throughout the site which were identified in the early ~~geotechnical~~ investigations following the removal of the former Juvenile Hall buildings. Seismic considerations as a potential site for new buildings early on led to the rejection of this site as a viable candidate site for the Project. On the other hand, while not a suitable site for future buildings, the former Juvenile Hall site was identified as an ideal location for outdoor athletic fields, in support of new campus facilities at the Project site.

Other Fairmont Campus Sites Alternative

The entire Fairmont Campus is owned by Alameda County, but areas within its boundaries have been placed under the jurisdiction of different county agencies, each using its portion of the Campus to carry out its respective public service mission. The County Sheriff's Office has control of a large portion of the currently undeveloped land which is used, in part, by Dig Deep Farms for agricultural purposes. The County Health Department operates the Fairmont Hospital and related facilities. The Mental Health Department operates the John George Psychiatric Hospital and its related parking lots and facilities. Other agencies operate their respective facilities. Each of the County agencies has plans for future uses or existing commitments that attach to and encumber their respective portion of the Fairmont Campus, making it unavailable to other agencies or purposes. Although the lines of agency jurisdiction are not as fixed as private property parcels lines are (since the entire area is owned by the County), for the purposes of this EIR, areas of the Fairmont Campus that are subject to jurisdictional commitments are considered unavailable sites for the Project. Having surveyed all currently unbuilt sites within the overall Fairmont Campus, the Lead Agency has determined that, aside from the sites discussed in Alternative 2 , there are no other on-campus sites, whether vacant or not, that would have the availability, the size and/or the physical characteristics (e.g., topography, ease of access) that would make them feasible. For this reason, other Fairmont Campus sites are not considered worthy of further evaluation in this EIR.

CRITERIA FOR SELECTING PROJECT ALTERNATIVES

The following were the primary criteria used to select alternatives for evaluation in this EIR:

A. Reducing or Avoiding Significant Environmental Impacts of the Project

Alternatives that would have less severe impacts than are identified for the Project would be considered under this criterion to be environmentally superior to the Project.

Alternative 2 assumes that new replacement buildings, including dormitories, administration building, food service, educational and gymnasium facilities could all be accommodated within the general bounds of the existing Camp Sweeney site. New buildings would be constructed in accordance with current code standards and with appropriate features designed to reduce seismic or other geologic risks to acceptable levels (i.e., comparable to what would be expected at the proposed Replacement Site) and designed to accommodate females and a Special Programming facility. Enhanced perimeter fencing and other security devices and systems, comparable to what is proposed with the Project, would be constructed to prevent unauthorized walk offs or contraband intrusion from outside. The existing roadway is not sufficient to handle typical construction-related vehicles including equipment used in geotechnical investigations and would have to be re-built to accommodate them prior to the commencement of geotechnical investigation as well as any construction.

Impacts

Land Use. This alternative would use the same site as the current Camp Sweeney. There would be no land use conflicts or related impacts. Retaining the use of the existing site would maintain the same distance separation to the nearby Hillcrest Knolls residential neighborhood. Although the proposed Project would have no land use impacts, maintaining the existing physical separation to Hillcrest Knolls would remove the perception of a potential land use compatibility impact.

Aesthetics and Visual Quality. Alternative 2 would reduce the magnitude of visual changes compared to the proposed Project because the existing site is substantially obscured from off-site views due to its distance from Fairmont Drive and intervening stand of mature trees that surround the site. The overall visual effect of the project would be minimal as would the potential for light and glare impacts. Aesthetic impacts of the proposed Project, which are less than significant, would be less with Alternative 2.

Geology, Soils and Seismicity. One of the primary reasons for relocating new Camp Sweeney buildings and facilities to the proposed Replacement Site adjacent to Fairmont Drive is that the existing site is seismically vulnerable and new facilities should be located where the risk of seismically induced hazards would be greatly reduced. However, detailed geotechnical investigations to validate that assumption were not conducted at the time the Project was initially conceived, leaving the question of geologic and seismic feasibility largely undetermined. None of the extensive geotechnical investigations involving trenching and boring work that has been undertaken at the Project site has involved the existing campus site.

To shed some light on the issue, the Project's geotechnical consultant, Kleinfelder, was asked to compile known information about the existing campus site; the engineer's letter report provides a summary of prior investigations.[3] This report confirms that the A-P Zone extends through a portion of the existing Camp Sweeney campus, with approximately two-thirds of the area outside the Zone altogether, one-third inside the Zone, and none of the campus within the most seismically vulnerable central part of the Zone (see **Figure 16.1**). With regard to seismic risks, and based on inferences from prior site investigations, the Kleinfelder letter report concludes that "...that there is a low to moderate probability of active faulting crossing the site."[4] The Kleinfelder letter report also notes the presence of potential risks associated with dormant landslides uphill from the existing campus site (See **Figure 16.2**). From this

[3] Kleinfelder, *Preliminary Geologic Assessment Existing Camp Sweeney Site 2400 Fairmont Drive, San Leandro, California.* January 12, 2016, p. 1.

[4] Ibid., p. 1.

Alternative 2 assumes that new replacement buildings, including dormitories, administration building, food service, educational and gymnasium facilities could all be accommodated within the general bounds of the existing Camp Sweeney site. New buildings would be constructed in accordance with current code standards and with appropriate features designed to reduce seismic or other geologic risks to acceptable levels (i.e., comparable to what would be expected at the proposed Replacement Site) and designed to accommodate females and a Special Programming facility. Enhanced perimeter fencing and other security devices and systems, comparable to what is proposed with the Project, would be constructed to prevent unauthorized walk offs or contraband intrusion from outside. The existing roadway is not sufficient to handle typical construction-related vehicles including equipment used in geotechnical investigations and would have to be re-built to accommodate them prior to the commencement of geotechnical investigation as well as any construction.

Impacts

Land Use. This alternative would use the same site as the current Camp Sweeney. There would be no land use conflicts or related impacts. Retaining the use of the existing site would maintain the same distance separation to the nearby Hillcrest Knolls residential neighborhood. Although the proposed Project would have no land use impacts, maintaining the existing physical separation to Hillcrest Knolls would remove the perception of a potential land use compatibility impact.

Aesthetics and Visual Quality. Alternative 2 would reduce the magnitude of visual changes compared to the proposed Project because the existing site is substantially obscured from off-site views due to its distance from Fairmont Drive and intervening stand of mature trees that surround the site. The overall visual effect of the project would be minimal as would the potential for light and glare impacts. Aesthetic impacts of the proposed Project, which are less than significant, would be less with Alternative 2.

Geology, Soils and Seismicity. One of the primary reasons for relocating new Camp Sweeney buildings and facilities to the proposed Replacement Site adjacent to Fairmont Drive is that the existing site is seismically vulnerable and new facilities should be located where the risk of seismically induced hazards would be greatly reduced. However, detailed geotechnical investigations to validate that assumption were not conducted at the time the Project was initially conceived, leaving the question of geologic and seismic feasibility largely undetermined. None of the extensive geotechnical investigations involving trenching and boring work that has been undertaken at the Project site has involved the existing campus site.

To shed some light on the issue, the Project's geotechnical consultant, Kleinfelder, was asked to compile known information about the existing campus site; the engineer's letter report provides a summary of prior investigations.[3] This report confirms that the A-P Zone extends through a portion of the existing Camp Sweeney campus, with approximately two-thirds of the area outside the Zone altogether, one-third inside the Zone, and none of the campus within the most seismically vulnerable central part of the Zone (see **Figure 16.1**). With regard to seismic risks, and based on inferences from prior site investigations, the Kleinfelder letter report concludes that "...that there is a low to moderate probability of active faulting crossing the site."[4] The Kleinfelder letter report also notes the presence of potential risks associated with dormant landslides uphill from the existing campus site (See **Figure 16.2**). From this

[3] Kleinfelder, *Preliminary Geologic Assessment Existing Camp Sweeney Site 2400 Fairmont Drive, San Leandro, California*. January 12, 2016, p. 1.

[4] Ibid., p. 1.

Impact	Proposed Project Site	Glenn Dyer site, Downtown Oakland	Pardee / Swan Site
Aesthetics and Visual Quality			
Substantial Degradation in Visual Character	Beneficial Impact	Less than Significant	Less than Significant
Substantial Adverse Effect on Scenic Vista	No Impact	No Impact	Significant Unavoidable
Creation of New Source of Substantial Light	Potentially Significant, Mitigable	Less than Significant	Less than Significant
Geology, Soils, and Seismicity			
Fault Rupture	Potentially Significant, Mitigable	No Impact	No Impact
Ground Shaking	Potentially Significant, Mitigable	Potentially Significant, Mitigable	Potentially Significant, Mitigable
Liquefaction	Less than Significant	Less than Significant	Potentially Significant, Mitigable
Landslides LESS THAN	~~Potentially Significant~~, Mitigable	No Impact	No Impact
Soil Erosion	Potentially Significant, Mitigable	Potentially Significant, Mitigable	Potentially Significant, Mitigable
Soil Instability	Potentially Significant, Mitigable	Less than Significant	Potentially Significant, Mitigable
Expansive Soils	Potentially Significant, Mitigable	Less than Significant	Potentially Significant, Mitigable
Hydrology and Water Quality			
Violation of Water Quality Standards	Potentially Significant, Mitigable	No Impact	Potentially Significant, Mitigable
Depletion of Groundwater Resources	No Impact	No Impact	No Impact
Alternation of Drainage Patterns	No Impact	No Impact	No Impact
Exceed Capacity of Stormwater Infrastructure	Potentially Significant, Mitigable	No Impact	Potentially Significant, Mitigable
100 Year Flood Hazard Area	No Impact	No Impact	No Impact

CAN'T COMMENT ON THESE SINCE I HAVE NOT SEEN THESE SITES! Wm. MCDONNOUGH

Comment Letter #7

Set forth below are excerpts from the draft EIR that have been highlighted by Thomas J. Towey, the principal architect on the Project, commenting on the wording of Mitigation Measures 6.1, 6.2 and 6.3. Mr. Towey's comments are indicated in **red font;** the text he was concerned about is highlighted in yellow.

Mitigation Measure Geology – 6.1: Site Design for Fault Avoidance. The development at the site shall be designed to avoid placing any structures for human occupancy within 25 feet of the surveyed location of any active fault traces. Design-level investigations and construction monitoring shall verify that the project conforms to all applicable codes and regulations. Areas where active faults have been identified shall be used only for open space. Utilities shall not be built within the geologic setback zone or cross the fault zone. **We do have utilities in the setback zone and crossing the fault zone. It is unavoidable. This looks like a problem. May need Geology to change recommendations with a mitigation.** 7-1

Mitigation Measure Geology – 6.2: Seismic Design. The Project shall be designed to address the projected seismic shaking hazards present at the site, in conformance with the Uniform Building Code, California Building Code and Board of Corrections design standards for juvenile detention facilities. **We have always understood that this is not under the Board of Corrections. This may cause difficulties, as we assumed a non-detention standard as the youths are not locked in.** 7-2

Mitigation Measure Geology – 6.3: Soil Remediation. The recommendation of the geotechnical engineer to remediate the soil conditions shall be implemented as the first phase of site preparation. This includes removal of all undocumented fill and alluvial material **(that is 10K material, correct? Thought it could be excavated to "natural grade")** beneath the building areas followed by replacement with quality controlled engineered fill in accordance with the engineer's criteria for moisture content and compaction. The material shall be removed to a minimum distance of 5 feet (horizontally) outside of the building footprints. The native, potentially expansive fill can then be compacted to within 36 inches of planned finished grade. Within the upper 36 inches, non-expansive imported fill or chemically modified (i.e., lime-treated) native fill can be placed within the upper 36 inches of finished grade. 7-3

Responses to Comment Letter 7:

7-1: The comment is pointing out that utilities that are required to serve the project will unavoidably need to cross the fault zone and therefore, compliance with Mitigation Measure 6.1, as written in the Draft EIR, needs to be modified to accommodate the technical needs of the project. A similar concern with the wording of Mitigation Measure 6.1 was addressed in Comment Letter #6 (see page 24-21, above). Changes to the wording of Mitigation Measure 6.1 that resolves the concern is set forth in item 18 on Page 25-3 in Chapter 25, Revisions to the Draft EIR.

7-2: The commenter is correct that some of the design standards issued by the Board of Corrections for juvenile detention facilities, such as the JJC, are for locked high security detention facilities. Camp Sweeney is not a locked high security detention facility; in the event of an earthquake, youth within the new Camp Sweeney buildings may need to vacate the buildings quickly. Thus, requiring the design of the Camp Sweeney buildings to comply with the higher seismic standards of the Board of Corrections for full lock-down detention facilities is not appropriate. As indicated in Item 25 on page 25-4 in Chapter 25, the wording of Mitigation Measure 6.2 is modified to delete the reference to the Board of Corrections design standards for juvenile detention facilities.

7-3: The commenter points out that a strict interpretation of Mitigation Measure 6.3, as originally written in the Draft EIR, could result in unintended consequences, potentially requiring a greater amount of fill to be removed than is necessary or is recommended by the geotechnical engineer. A similar concern was inferred in the suggested edits to Mitigation Measure 6.3 as shown in Letter #6 (see Page 24-22, above). This concern is resolved by the insertion of the words "any loose" or "loose" before the word "alluvial" which has the effect of limiting the material to be removed from the site to only what is problematic – i.e., loose, as opposed to all alluvial material that may be fully compacted and not in need of removal. The wording of Mitigation Measure 6.3 is changed – see Item 24 on page 25-4 in Chapter 25, Revisions to the Draft EIR.

Public Meeting Comments

Speaker #1: Henryka Szudelski:

Comment 1-1: The speaker stated she disagreed with the significance thresholds used in the EIR which found all impacts to be less than significant. She felt that the proposed Project would result in significant impacts because it would place a prison next to a residential area. The presence of another prison facility would have unmitigable impacts on the community, resulting in residents' homes losing value.

Response: Concerns regarding proximity of a correctional facility next to a residential area, per se, are not impacts for which CEQA has established significance thresholds. Further, a project's potential adverse effect on home values is also outside the framework of environmental analysis. The significance criteria used in the Draft EIR are consistent with the criteria provided in the Environmental Checklist, CEQA Guidelines Appendix G except for those relating to air quality and greenhouse gas emissions which are the significance criteria accepted for use by Alameda County, acting as the Lead Agency.

Comment 1-2: The speaker pointed out that local residents are exposed to significant nighttime light and glare from the JJC complex; she is concerned that there will be a comparable level of nighttime light closer to their homes once the new Camp Sweeney is in operation. She said this level of nighttime light from the JJC is a huge impact on the community. She said that the trees and landscaping that were supposed to shield and mitigate nighttime light from the JJC is, after 10 years, still not sufficient to soften the brightness from the JJC.

Response: The Draft EIR identified nighttime light and glare as a potentially significant impact for the same reasons as suggested by the commenter. Accordingly, **Mitigation Measure Visual 5.1** requires the County and its final design/build contractors to select and install lighting fixtures that conform to specific design criteria that limit the amount and extent of illumination that will be permitted. Shielding of exterior lighting fixtures will be used to prevent glare or direct illumination on adjacent properties.

Comment 1-3: The speaker mentioned that the proposed 30-month construction period will be intolerable in terms of noise impacts.

Response: Please see Response to Comment 4, Construction Noise, in Chapter 23, Master Responses.

Comment 1-4: The speaker mentioned and objected to the proposed use of the former Juvenile Hall site for athletic fields because of the noise that will be generated from outdoor activities. She recalled the annoying noise from when the Juvenile Hall occupied the site and early morning outdoor calisthenics by the youth used to wake them up; she

envisions that use of the fields for Camp Sweeney youth will be equally annoying. She suggests that Camp Sweeney should continue to use the outdoor athletic fields at the existing Camp Sweeney site for outdoor activities so that whatever noise is generated there will be farther away from their community and less bothersome.

Response: Please see Response to Comment 3, Noise from Athletic Activities, in Chapter 23, Master Responses.

Comment 1-5: The speaker questioned the scale and need for the proposed 120-bed campus, pointing out that existing Camp Sweeney holds only about 40 youth currently; a reduced scale facility would be less impacting.

Response: Please see Response to Comment 8, Project Need, in Chapter 23, Master Responses.

Comment 1-6: The speaker stated her preference for Alternative 2 as described in the Draft EIR although she would prefer a new campus at that location to be at a reduced scale (i.e., less than the proposed 120 beds).

Response: Please see Response to Comment 6, Alternatives, in Chapter 23, Master Responses.

Comment 1-7: The speaker pointed out the philosophical argument that as a society, and as applied to this particular project, we should be mindful of what we truly need, not what we may want, and that we should scale back our plans and expectations to what is truly needed, not what we may want.

Response: This comment does not address an environmental topic within the framework of CEQA and therefore no response is required. The comment is noted and will be available to the County decision-makers in their consideration of the Project.

Comment 1-8: The speaker stated that her main concerns were about Traffic and Noise, their experience with house break-ins (allegedly by youth who may have escaped from Camp Sweeney) and mail taken from their mail boxes – all given as examples of how the proximity to the correctional facilities on the Fairmont Campus adversely affects her community. She would like the size of Camp Sweeney reduced to serve a population of 80 instead of 120 and that it be relocated somewhere other than where it is proposed. Her preference is that the County use the existing site, as suggested in Alternative 2 in the Draft EIR. She strongly objects to the placement of criminals in a prison-like institution adjacent to her community.

Response: As noted, the Draft EIR concluded that all impacts of the Project would be either less than significant under applicable significance criteria, or would be reduced to that level through mitigation. The commenter's opposition to the Project is noted as well as her preference for Alternative #2 as described in the Draft EIR.

Speaker #2: Doug Tebo

Comment 2-1: The speaker asked about the source of funding for the Project.

Response: County staff answered by indicating that funding involved the use of Lease Revenue Bonds issued pursuant to SB81 through the California Board of State and Community Corrections and the State Public Works Board, and local funding from Alameda County.

Comment 2-2: The speaker asked whether there would be any funding to address rehabilitation or improvement needs at the John George Psychiatric Hospital or at the old Fairmont Hospital.

Response: The funding for the Project is specific to the needs of juvenile justice facilities and not to any other institutional use currently operating at the Fairmont Campus.

Speaker #3: Philip Denst

Comment 3-1: The speaker noted that traces of the Hayward Fault run throughout the entire Fairmont Campus and questioned the intelligence of locating hospitals and jail facilities at such an unstable and vulnerable site. He noted that residents of the area are all aware of the seismic risks attendant near the Hayward Fault. He suggested that the County should initiate geologic testing at the existing Camp Sweeney site to determine if the site would be feasible.

Response: County staff responded by saying it would take a lot of time to do such testing, requiring existing Camp Sweeney operations to be relocated temporarily and the need to upgrade the access road which they said is incapable of supporting the weight of testing vehicles and equipment. Further, County staff indicated that the time required for such an effort would have a major impact on the current Project schedule, likely jeopardizing the funding commitments that the County has already obtained.

Comment 3-2: The speaker noted that the recent rains have resulted in some landslides on the slope of Fairmont Ridge above the roadway.

Response: Chapter 6 in the Draft EIR addresses potential impacts related to geology and soils and notes that the slope of the Fairmont Ridge, above Fairmont Drive is known to be vulnerable to landslides based on historical evidence, but that the proposed Project site is protected from such threats by virtue of its location beneath the newly constructed JJC facility and its significant retaining wall.

Speaker #4: Lori Tebo

Comment 4-1: The speaker referenced and indicated her support for everything that Speaker #1 had said. The speaker described the fact that local residents in Hillcrest Knolls have been experiencing frequent intrusion by people in cars who find themselves on Van Avenue, in their community, not knowing Van Avenue is a dead-end street; the people appear to be lost because they ask for directions to the Juvenile Justice Center. Some of these people spend the night in their cars and leave litter and garbage when they leave. The speaker questioned why this recent phenomenon is happening and expressed concern that with the creation of a larger Camp Sweeney, right across the street, this pattern of lost vehicles roaming through their neighborhood would likely get worse. The speaker noted the need for better signage and way-finding so that people would be less likely to wander mistakenly into their community.

Response: These comments address matters that are outside the framework of the environmental review process and therefore no response is required. The information provided by the commenter, however, will be made available to the decision-makers who may be able to provide an appropriate response to the concerns through the action of the County Sheriff's Office.

Speaker #5: Robert Holeman

Comment 5-1: The speaker expressed his concern that construction of the Project would result in significant construction related traffic from construction workers and the in-and out-movement of heavy construction equipment.

Response: The Draft EIR did not identify construction period traffic as a potentially significant impact. Nevertheless, the County will ensure that the selected design/build contractor manages the flow of construction traffic by workers, suppliers and equipment in a manner so as not to cause significant congestion on local streets and intersections.

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REVISIONS TO THE DRAFT EIR

Only comments and text edits submitted on the pages attached to Comment Letter #6 require changes to the text in the Draft EIR. These suggested edits clarify and correct certain portions of Chapters 6 and 16 of the Draft EIR and trigger the need to make corresponding edits to Table 2.1 in Chapter 2 and Table 21.1 in Chapter 21. The marked pages submitted by Kleinfelder are included in Chapter 24 and are presented below. Text insertions are shown in single underline format; text deletions are shown in ~~strikeout~~ format. A revised Summary Table of Impacts and Mitigation Measures, which shows the changed text of Mitigation Measures 6.1 and 6.3, is presented in Chapter 21 of this document.

1. Chapter 6, Page 6-2, 2nd paragraph, under the heading "Site History," line 10:

   "Estimated fill thickness ranges between less than 10 feet up to at least ~~70~~ 20+ feet, based on the comparison…"

2. Chapter 6, Page 6-2, 1st paragraph under the heading "Geology and Seismicity," lines 1 – 3:

   "The Project site lies at and west of the active Hayward Fault Zone. Elevations at the site range from a high of about 214 feet to a low of 170 feet above mean sea level. The site drops in elevation from north to south with a difference of about ~~45~~ 40 feet over an approximate distance of 600 feet…"

3. Chapter 6, Page 6-2, 2nd paragraph under the heading "Geology and Seismicity," line 2:

   "…the site consists of alluvial deposits ~~inset into~~ on top of weathered gabbro at the…"

4. Chapter 6, Page 6-5, 2nd paragraph:

   "Subsurface conditions at the site were explored by Kleinfelder ~~on~~ in October ~~14,~~ 2014 and October 2015 by drilling ~~three~~ fifteen borings to depths ranging from about ~~25~~ 15 to ~~26~~ 51.5 feet below the existing ground surface. ~~A highly weathered to decomposed gabbro bedrock was encountered in all three borings beneath the fill and soil."~~

5. Chapter 6, Page 6-5, 4th paragraph, line 3:

   …"East Bay Hills, although none was found at the site proper in the geotechnical investigations. Serpentine…"

6. Chapter 6, Page 6-5, 1st paragraph under the heading "Expansive Soil," lines 2 and 3:

   "…and highly expansive ~~sandy~~ clay with sand. The near surface clay…"

7. Chapter 6, Page 6-6, 1st paragraph under the heading "Groundwater," lines 1 & 2:

"Groundwater was not encountered at the time of drilling or at the time of trenching activities, with the exception of Boring KB-6, which encountered groundwater at approximately 40 feet. In general…"

8. Chapter 6, Page 6-6, 1st paragraph under the heading "Landslides," last line:

"Old landslides as well as active landslides are present in the hills east of the site…"

9. Chapter 6, Page 6-7, change the wording of Figure 6.3:

Figure 6.3 Results of ~~Seismic~~ Geotechnical and Fault Investigations to Determine Zones Safe for Buildings

10. Chapter 6, Page6-8, 1st full paragraph, last sentence:

"Consistent with this requirement, extensive ~~geotechnical~~ geologic investigations have been undertaken at the Project site to identify fault traces and determine those specific parts of the Project site that would be ~~safe from~~ exposed to surface rupture hazard."

11. Chapter 6, Page 6-8, 1st paragraph under Impact 6.1, last sentence:

"As a consequence, the Project proposes that part of the Project site be limited to athletic activities such as soccer, baseball, and similar sports; no structures for human habitation would be built where active traces of the Hayward Fault have been identified."

12. Chapter 6, Page 6-8, 2nd paragraph under Impact 6.1, 2nd sentence:

"Core samples from test boring and trenching conducted across the site ~~informed~~ delineated the boundary between buildable portions of the site and unbuildable portions, as shown in **Figure 6.3."**

13. Chapter 6, Page 6-9, Mitigation Measure Geology – 6.1:

"**Mitigation Measure Geology – 6.1: Site Design for Fault Avoidance.** The development at the site shall be designed to avoid placing any structures for human occupancy within 25 feet of the surveyed location of any active fault traces. Design-level investigations and construction monitoring shall verify that the project conforms to all applicable codes and regulations. Areas where active faults have been identified shall be used only for open space or other non-habitable developments. Utilities ~~shall not be~~, if built within the geologic setback zone or across the fault zone shall be equipped with specific design features, such as shut-off valves or other measures to limit disruption by surface rupture to the extent practicable."

14. Chapter 6, Page 6-10, Mitigation Measure Geology-6.3: Soil Remediation, 2nd sentence:

"This includes removal of all undocumented fill and loose alluvial material beneath the building areas followed by replacement with quality controlled low expansion engineered fill…"

15. Chapter 6, Page 6-10, Impact 6.4:

LESS THAN SIGNIFICANT IMPACT. The Project site is located ~~in~~ west of hilly terrain where landslides have occurred in the past. A ~~very~~ deep ancient landslide underlies the area to the east

of the site where the Juvenile Justice Center now stands. That landslide has been inactive for thousands of years and has a very low to negligible risk of renewed movement. The new Juvenile Justice Center building complex, and the substantial retaining wall that supports it, provide a secondary benefit to the lower elevation Project site by protecting it from potential landslide impacts should one occur upslope from the Juvenile Justice Center. Consequently, risk of damage or other impacts from landslides is considered slight and impacts are less than significant at the Project site.

16. Chapter 6, Page 6-11, under the heading Impact 6.6: Soil Instability, 2nd sentence:

"…The undocumented and any loose alluvial material is considered unsuitable to support the proposed Camp Sweeney buildings due to the high potential for differential settlement and resulting structural damage…"

17. Chapter 6, Page 6-11, Mitigation Measure Geology-6.7: Remediation of Expansive Soils:

Mitigation Measure Geology – 6.7: Remediation of Expansive Soils. Implement Mitigation **Measure 6.3** regarding the replacement of undocumented fill materials underlying the Project site and replacing it with low expansion engineered fills in accordance with the geotechnical engineer's recommendations.

18. Chapter 2, Page 2-5, Revise Mitigation Measure 6.1 as presented in Table 2.1 so that it is consistent with the text shown above at item 13:

"**Mitigation Measure Geology – 6.1: Site Design for Fault Avoidance.** The development at the site shall be designed to avoid placing any structures for human occupancy within 25 feet of the surveyed location of any active fault traces. Design-level investigations and construction monitoring shall verify that the project conforms to all applicable codes and regulations. Areas where active faults have been identified shall be used only for open space or other non-habitable developments. Utilities ~~shall not be~~, if built within the geologic setback zone or across the fault zone shall be equipped with specific design features, such as shut-off valves or other measures to limit disruption by surface rupture to the extent practicable."

19. Chapter 2, Page 2-6, Revise Mitigation Measure 6.3 as presented in Table 2.1 so that it is consistent with the text shown above at item 14:

"This includes removal of all undocumented fill and loose alluvial material beneath the building areas followed by replacement with quality controlled low expansion engineered fill…"

20. Chapter 16, Page 16-3, under the heading "The Former Juvenile Hall Site Alternative," 5th sentence:

"…However, before determining where outdoor athletic fields might be developed, this site was rejected from further consideration because of the presence of multiple active traces of the Hayward Fault throughout the site which were identified in the early ~~geotechnical~~ geologic investigations following the removal of the former Juvenile Hall buildings…."

21. Chapter 16, Page 16-7, in the paragraph labeled "Geology, Soils and Seismicity," 2nd sentence:

"…However, detailed geologic and geotechnical investigations to validate that assumption were not conducted at the time the Project was initially conceived…

22. Chapter 16, Page 16-13, in Table 16.3 revise the line in Table 16.3 regarding Landslides to say "Less than Significant":

Landslides	~~Potentially Significant, Mitigable~~ Less than Significant	No Impact	No Impact

23. Chapter 21, Page 21-7, Revise Mitigation Measure 6.1 as presented in Table 21.1 so that it is consistent with the text shown above at items 13 and 18:

"**Mitigation Measure Geology – 6.1: Site Design for Fault Avoidance.** The development at the site shall be designed to avoid placing any structures for human occupancy within 25 feet of the surveyed location of any active fault traces. Design-level investigations and construction monitoring shall verify that the project conforms to all applicable codes and regulations. Areas where active faults have been identified shall be used only for open space or other non-habitable developments. Utilities ~~shall not be~~, if built within the geologic setback zone or across the fault zone shall be equipped with specific design features, such as shut-off valves or other measures to limit disruption by surface rupture to the extent practicable."

24. Chapter 21, Page 21-8, Revise Mitigation Measure 6.3 as presented in Table 21.1 so that it is consistent with the text shown above at items 14 and 19:

"This includes removal of all undocumented fill and loose alluvial material beneath the building areas followed by replacement with quality controlled low expansion engineered fill…"

25. Chapter 6, Page 6-9, Revise Mitigation Measure 6.2 to delete the reference to the Board of Corrections design standards for juvenile detention facilities:

"**Mitigation Measure Geology – 6.2: Seismic Design.** The Project shall be designed to address the projected seismic shaking hazards present at the site, in conformance with the Uniform Building Code~~, and~~ the California Building Code~~, and Board of Corrections design standards for juvenile detention facilities~~.

The revised wording of Mitigation Measure 6.2 also applies in Table 2.1 in Chapter 2 and in Table 21.1 in Chapter 21.
