



Housing Authority
of the
City of Alameda

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December 18, 2023

Port of Oakland
Environmental Programs and Planning Division
Ms. Khamly Chuop
530 Water Street
Oakland, CA 94607

Re: Written Comments to the Draft Environmental Impact Report, Port of Oakland/Oakland Harbor
Turning Basins Widening State Clearinghouse No. 2022050647 dated October 2023

Dear Ms. Chuop:

We appreciate the opportunity to comment on the Draft Environmental Impact Report dated October 2023.

The Housing Authority of the City of Alameda (AHA), in partnership with the entire community, advocates and provides quality, affordable, safe housing; encourages self-sufficiency; and strengthens community inclusiveness and diversity in housing. AHA owns and operates over 740 affordable rental homes serving low-income families, seniors, and vulnerable populations throughout the City. The Housing Authority currently has ownership interest and operates 89 units of affordable housing within a quarter mile of the site. AHA has broken ground on master plan work for an additional 154 rental homes for seniors and formerly homeless individuals in late 2023 within 1000 feet of the proposed basin. These 154 units at our North Housing Master Planned are expected to be fully leased by mid-2026. In addition, the Housing Authority has an additional 400+ units planned in the area after these units are constructed.

The senior and special needs affordable housing that AHA is undertaking will serve highly vulnerable populations, include seniors age 62+, formerly homeless veterans, homeless households referred as 'chronically homeless' from the County of Alameda Coordinated Entry System, disabled, and extremely low-income individuals. Many of these households will have health issues based on their age and trauma from living on the streets. These individuals may be sensitive to disruption, noise, contaminated air and other conditions mentioned in the EIR. Our residents tend to be transit-dependent and spend a considerable amount of time on foot or bicycling to attend to their daily needs or get to transit. Our residents live in apartments and are enthusiastic users of the City's park areas. Reliant on the outdoors for recreation and transportation, they are highly vulnerable to the surrounding air quality.

Our concerns are twofold. The EIR has identified air contamination and noise as two main issues. To this we would add the length of time of construction and site of the project.



1. Air Contamination – With vulnerable residents, we are very concerned that resident respiratory conditions may be stressed by the environmental hazards lifted by the dredging. We ask the Port to specifically identify additional mitigations to air contamination, including:
 - a. Pushing the removal of dredging residues to the Oakland side of the project.
 - b. Require that the barges discharge to trucks in the already-industrial Howard Terminal area, rather than the predominately residential and recreational area on the Alameda side. This will push the airborne particle releases away from residential uses.
 - c. Perform air and soil testing before, during and after the project to understand the long-term effects of dust and contamination on Estuary Park, the North Housing Master Plan sites. Set aside a fund for clean up when activities cease.
 - d. Research the potential to upgrade filtration systems at all residential buildings in operation or in construction at the time of the work to allow for safer indoor air conditions. Pay for these upgrades.

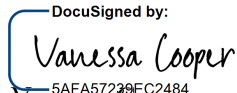
2. Noise – Again, we have and expect to have additional residents who are suffering from decades of trauma and homelessness. Strong noises, as well as long-term ongoing noises, can trigger PTSD and other traumatic stress. We ask the Port to provide additional protection from noise issues identified in the EIR including:
 - a. Push the truck routes for discharge of contaminants to the already-industrial Howard Terminal area. This will reduce street traffic noise and conditions.
 - b. Increase the noise wall to provide additional decibel shelter. Research methods to limit or decrease the amount of proposed high-decibel activities to the residential areas within $\frac{1}{4}$ of a mile of the proposed project.
 - c. Provide a notification method so that residents can expect when and for how long noise stress will continue. Limit noise stresses to only a few hours a day.

3. Length of proposed activities – The proposed activities on the Alameda side are listed as 20 months, which is the majority of the time period. We ask the Port to seek ways to reduce the length of stress in these residential neighborhoods by:
 - a. Pushing truck routes and discharge activities to the Oakland side.
 - b. Moving the proposed activities further away from the Alameda residential neighborhoods that predominate the $\frac{1}{4}$ mile radius.
 - c. Research other methods to reduce the exposure of the residential neighborhoods to the impacts of the activities.

4. Site and Scope of project – We ask the Port to consider ways to minimize the scope, even if it does not gain all of the original objectives and to re-consider locating the project such that a significant portion of the proposed activities are not so close to hundreds of residences and residents that include families with children, seniors, and vulnerable populations. As a developer in this area, we are intensely familiar with the requirements for working within the DTSC and Bay mud footprint. We have had to re-design and accommodate multiple residential code, OSHA, EBMUD clean corridor, and DTSC requirements on our own sites. Because of this experience, we understand that there are many opportunities for protecting workers and resident that we do not believe have been fully investigated or fleshed out in this EIR.

The Housing Authority has been an owner of multiple properties in the vicinity of the proposed Turning Basis project since 2019. We understand that as the owner, we likely did not receive notice of the proposed development at any of our properties. We respectfully request that we be noticed in the future at 701 Atlantic Avenue, Alameda, CA 94501 and the Port notice all owners and residents within at least ¼ of a mile of the area, specifically. We also believe that the Port should hold additional public meetings focusing on the impact on Alameda. We offer to host one public meeting at Independence Plaza, 703 Atlantic Avenue, Alameda, CA 94501. You may contact Sylvia Martinez, smartinez@alamedahsg.org, 510-747+4343 regarding scheduling.

Thank you for your consideration.

DocuSigned by:

 Vanessa Cooper
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 Executive Director

CC: Carly Grob, Board President, Housing Authority of the City of Alameda
 Doug Biggs, Executive Director, Alameda Point Collaborative
 Liz Varela, Executive Director, Building Futures
 Mayor Marilyn Ezzy Ashcroft and City Council of the City of Alameda

Housing Authority Affordable Properties List

Properties	Address	City	Population	Units	Year Built
Stargell Commons	2700 Bette Street	Alameda	Family	32	2017
Pulte Condos (1-18)	441 Mitchell Ave (18 various)	Alameda	Family	18	2021
Shinsei Gardens	401 Stargell Avenue	Alameda	Family/Homeless	39	2019
Linnet Corner	420 Lakehurst Circle	Alameda	Seniors/Vets	64	2025
Estuary I	500 Mosely	Alameda	Family/Homeless	45	2025
Estuary II	520 Mosely	Alameda	Family/Homeless	46	2026