

APPENDIX E – RESPONSE TO COMMENTS

Project No.: C40368601

Date: November 7, 2002

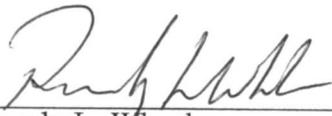
Mr. Stephen Rodgers
U.S. Department of the Interior
Bureau of Reclamation
5520 Knoxville Road
Napa, California 94558

**RE: Response to Comments,
Draft Report
Lake Berryessa Facility Condition Assessment Report**

Steve,

Kleinfelder has received both written and verbal comments from Reclamation and from David Dornbusch & Associates. Our reponse to comments are provided below. We will revise the draft report to incorporate these comments and issue a final report upon concurrence from you that these comments have been adequately addressed. If you have any further questions, please contact me at 707-429-4070.

Sincerely,
KLEINFELDER, INC.



Randy L. Wheeler
Project Manager

RLW/mlc

RESPONSE TO COMMENTS
DRAFT REPORT
LAKE BERRYESSA FACILITY CONDITION ASSESSMENT REPORT

Dornbusch & Associates Comments received via email (September 20, 2002)

(1) Future Plan: On p. 11, the report said, "The cost information provided represents the future plan for the concession areas..." I assume that "future plan" refers to the USBR's preferred alternative, as your report referenced by the words "desired future plan," on p. 105, paragraph 3. True?

Response: Correct. Although specific information regarding detailed plans for such things as building placement, concession types, locations, etc, were/are not available at this time, these future plans could alter our planning level cost analysis significantly.

(2) Roads: How was it determined which roads to *demolish and remove* versus the roads to be *repaired and modified*? Does the "demolition and removal of roads" refer only to roads that are not needed for the preferred USBR alternative, and therefore are removed and not replaced? Are some of the roadway geometrics beyond being susceptible to repair and modification, and are therefore removed? Both?

Response: We made no recommendations regarding demolition and removal of roads since we have no information on what the final design/use/ etc for each facility will be. We made recommendations for repair/modifications to existing roads to bring them up to code.

(3) Are any of the removed roads (for which costs are estimated under Miscellaneous Costs, Table D-1) replaced with new roads for which costs are estimated separately in the first line entry (Table D-1)? I ask that because on p.105, the report says the roadway conclusions and recommendations (and therefore I presumed the costs) are "for repair/modification necessary..." So, it seemed to me that road improvements involve only repair and modification, and not replacement as well.

Response: Correct. Our cost estimates involved only repair and modification, and not replacement (i.e., demo/remove)

(4) Referring to the Pavement Geometry section (13.4.1, p.105): Do the words "We recommend..." mean the costs of the road and parking lot improvements (Table D-1) were estimated to meet the recommendations? Or, do the recommendations go beyond the repair and modifications for which costs were estimated?

Response: The costs summarized on Table D-1 and shown on tables D-9 through D-15 take into account the recommendations on page 105, with the exception of roadway width. We didn't estimate costs for roadway width (or roadway widening), since we don't know what the final design will be and which roads will be one-way and what roads will be two-way. Tables 2 through 8 show the roadway width and the overall classification of these roads.

(5) Costs not Addressed: I understand that you performed a planning level study, and therefore did not include some cost estimates - such as for asbestos and lead paint abatement. However, having inspected the sites, could your staff offer any comments about the nature and possible magnitude of problems that might become evident in the future and might represent significant costs, *or visa versa*?

For example, might asbestos and lead paint be a costly problem, or do the potential asbestos and lead paint problems go away with the trailers when they're hauled away? Are there some, few, or no underground fuel tanks that might have leaking problems? Are there areas where you suspect contaminants might have been spilled into the ground?

In short, are there any possible conditions that might become expensive problems and deserve special study?

Response: Our building condition assessment was to provide limited inspections of permanent concession structures in an effort to identify and address deteriorated or otherwise unsatisfactory building component and material conditions. Our inspections include opinions specific to useful service life expectancy and identify deferred maintenance items, which are considered above and beyond the standard of normal maintenance and/or repairs over the long term. Due to the range of the age of the buildings at each resorts and the age of the trailers, there is the potential for asbestos/lead based paint to be present in the building materials of these structures. During our building inspection survey, we did not make note of any hazardous materials issues (such as asbestos or lead-based paint issues). If the buildings, trailers, etc are to be demolished, then an asbestos survey will be required. Asbestos/LBP abatement specifications typically are required for the demo contractor so that proper health and safety issues can be addressed. The potential asbestos/LBP issues do not simply go away when the trailers are hauled away. As for potential underground storage tanks, based on the interviews conducted with each resort owner/manager, only the Putah Creek Resort has an underground storage tank issue (contamination from previous underground storage tanks). However, based on the information supplied by the resort owners/managers, this was the only resort that had underground storage tank issues.

USBR Verbal Comments:

(1) Provide section headers on each page for each resort.

Response: Kleinfelder can provide this header information on each resort specific page.

(2) Wastewater Table Summary. Expand the summary table for the wastewater systems to include such items as overall condition of wastewater system (poor, fair, good, etc) for each components such as lift stations, ponds, etc.

Response: Kleinfelder will provide an updated summary table for the wastewater systems.

(3) Topographic Maps – the topographic map for Pleasure Cove was not included in Appendix B. The topographic maps do not appear to have legends on them.

Response: The topographic map for Pleasure Cove will be included in the final report. The topographic maps do not have legends due to the original USBR AutoCAD files didn't have legends in the original files.

(4) Task 5 – Preliminary Environmental Survey – Most issues or contents specified in the scope of work were not addressed in this section of the report, or the report specific sections, such as endangered species, natural hazards, cultural resources, slide potential, etc.

Response: The scope for Task was originally written and scoped to do a preliminary facility environmental assessment, which was intended to assist Reclamation in scoping the full Environmental Assessment (EA) or Environmental Impact Study (EIS) in compliance with NEPA. The execution of Task 5 was significantly delayed by lack of funding and by the time funding became available, the EIS had been awarded to another firm, and the scoping for the EIS already completed. For this reason Task 5 was refocused to address environmental hazards due to past use of hazardous materials. This was an issue that David Dornbusch was vitally interested in and important to the overall costing issue of code compliance for each facility. Task 5 consisted of a site visit, observations of environmental conditions, interviews, and assessment of past practices and the potential for the use of hazardous materials at each facility. These changes were discussed with Bruce Waddlington and fit the project needs to a greater extent. It was felt at the time that the hazardous materials assessment fit the scope. Budget for either assessment is approximately the same consisting of site visits, etc.

(5) Executive Summary – Prepare an executive summary to summarize the overall conditions, costs to bring them up to current standards, and costs to remove structures.

Response: Kleinfelder will prepare an executive summary for the report. The executive summary will be an overview of the facility conditions, relative costs to bring the facilities up to current standards and costs to remove or demolish such structures. Note that our cost estimate specifically excludes costs associated with rehabilitation, upgrades, or demolition of the existing permanent structures that were surveyed as part of the building condition assessment.

(6) Standards related to Spray Fields – Are there any standards, codes or criteria that address the legality of using/operating spray fields.

Response: According to Winzler & Kelley, *“There are no direct codes that specifically deal with the spray fields, or with any other wastewater disposal technology. The common philosophy of the regulators is not to regulate specific technologies, but to specify the requirements that the treatment facility must meet. The user/operator is then free to use any generally accepted technology to meet those requirements. For all entities that dispose of wastewater -- called a “discharger” -- the discharge must be permitted unless it falls into one of several very specific exemptions (which the Lake Berryessa concessionaires do not). Requirements of dischargers are identified in the Code sections (Clean Water Act, Title 33, U.S. Code, Section 1251, California Water Code, Sections 13260-13274, and the Porter-Cologne Water Quality Control Act, Ch. 4, Article 5. INDIVIDUAL DISPOSAL SYSTEMS). As long as the concessionaires are not discharging wastewater (treated or not) from the ponds, they are not a discharger. As soon as they hook up a spray field, they become a discharger. As a part of the permit, the Regional Water Quality Control Board will specify the allowable upper limits of key constituents of the discharge (typically Biological Oxygen Demand [BOD], suspended solids, and coliform). The only way to meet the coliform limits is by disinfecting the effluent”.*

USBR Written Comments – September 25, 2002, Bruce Wadlington

(1) General 2: Throughout the report in all the sections on Marine Fuel, it keeps referring to “threaded joints” that need to be *gaged*. I have never seen this term and have no idea what it means. It is not in the glossary.

Response: The definition of “gaged” joints will be included in the glossary. The term "gaging" threaded joints is a method of checking the tolerances in the threads done by the pipe fitter to make sure the joint is tight. In the context of our report, we were referring to the loose joints in the fuel lines to the marina fuel docks which appeared to be poorly fitted.

(2) Page 21, Section 3.4.1: There is a reference to Table 9 but there is no Table 9 in the report.

Response: Table 9 was inadvertently left out of the report and will be included in the final version. This table summarizes the Napa County Guidelines and AASHTO Guidelines with regards to roadway geometry. Reference to Table 9 will be inserted into page 22, Section 3.4.1, last paragraph.

(3) Page 30, Section 4.4: There is a reference to Table 11, but I believe it should be Table 10 since 11 refers to Rancho Monticello.

Response: The correct reference should be Table 10.

(4) Page 31, Section 4.6: Are the 6 trailer sites we told the concessionaire to eliminate in the areas that Kleinfelder indentified as “properly maintained”. Does the \$3.5M on page 100 for road demolition refer to ALL roads in the resorts

Response: The \$3.5M cost for removal of roads only covers the roads that are located within the trailer park areas.

(5) Page 98, Section 12, Cost Estimates and Table D-1: This is a little confusing. It seems that there are costs mixed together in the TOTAL for both road demolition and for road/parking lot repair.

Response: The costs summarized in Table D-1 and detailed in Tables D-9 through D-15, represent the costs to repair and/or modify the listed roads to meet current codes and standards and to meet the recommendations presented within the text of the report (for each resort). The costs summarized in Tables D-9 through D-15 do not include costs associated with roadway demolition or removal. The costs for roadway removal under "Miscellaneous Costs, Table D-1" reflect the costs associated with the removal of the roadways located within the trailer park areas.

(6) Action Items: In my review of the report, the following items that seem to require some immediacy in regard to Kleinfelder's comments.

Page 28	Sparty disposal at Putah Creek
Page 37	Road 8 system, damaged joints in the overflow pipe
Page 48	Spray disposal at lake Berryessa Marina
Page 54	Violation of CFC, Section 5202
Page 59	Spray disposal at Spanish Flat
Page 80	Section 9.3, significant risk of landslides (Pleasure Cove)
Page 87	Waste water at Markley Cove, possible big sewage leak on force main system
Page 89	Closing os some roadsat Markley Cove because of fire hazard
Page 90	Electrtical code violations at Markley Cove

Response: Kleinfelder is working on a separate cost estimate and scope of work to address the issues of "hazard determination".