

ALAMEDA POINT PROJECT

Response to Comments on the
Draft Environmental Impact Report
SCH No. 2013012043

Prepared for
City of Alameda

December 2013



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TABLE OF CONTENTS

Alameda Point Project Response to Comments on the Draft EIR

	<u>Page</u>
1. Introduction	1-1
A. Process	1-1
B. Organization	1-2
2. Agencies and Persons Commenting on the Draft EIR	2-1
A. Agencies and Persons Commenting in Writing	2-1
B. Commenters at the Public Hearing	2-3
3. Written Comments on the Draft EIR and Responses to Comments	3-1
Letter 1. United States Department of Veterans Affairs (Douglas Roaldson, Environmental Program Manager)	3-2
Letter 2. Department of Transportation (Erik Alm, AICP, District Branch Chief)	3-5
Letter 3. Public Utilities Commission (Ken Chiang, Utilities Engineer)	3-11
Letter 4. San Francisco Bay Regional Water Quality Control District (Shin-Roei Lee, Division Chief, Watershed Division)	3-13
Letter 5. San Francisco Bay Trail (Lee Chien Huo, Bay Trail Planner)	3-19
Letter 6. Alameda Unified School District (Kirsten Vital, Superintendent)	3-22
Letter 7. City of Oakland Department of Planning, Building, and Neighborhood Preservation (Rachel Flynn, Director of Planning and Building)	3-25
Letter 8. East Bay Municipal Utility District (William R. Kirkpatrick, Manager of Water Distribution Planning)	3-48
Letter 9. East Bay Regional Park District (Larry Tong, Interagency Planning Manager)	3-53
Letter 10. Alameda Architectural Preservation Society (Karin Sidwell, Preservation Action Committee Chairmen)	3-56
Letter 11. Alameda Point Collaborative (Doug Biggs, Executive Director)	3-63
Letter 12. Bayview Estates Homeowners Association (Michael Karp, President)	3-75
Letter 13. Bike Walk Alameda (Lucy Gigli, President)	3-77
Letter 14. Center on Urban Environmental Law (Paul Stanton Kibel, Associate Professor and CUCEL Co-Director)	3-83
Letter 15. Golden Gate Audubon Society (Michael Lynes, Executive Director)	3-102
Letter 16. Housing Opportunities Make Economic Sense (Helen L. Sause, President)	3-116
Letter 17. Oakland Chinatown Coalition (Oakland Chinatown Coalition)	3-128
Letter 18. Sierra Club (Norman La Force, Legal Committee for the Sierra Club San Francisco Bay Area Chapter)	3-144
Letter 19. Richard Bangert	3-146
Letter 20. Homeowners on Bayview Drive	3-150

	<u>Page</u>
3. Written Comments on the Draft EIR and Responses to Comments (continued)	
Letter 21. Slow Factory (Todd Edelman, Director)	3-202
Letter 22. Selina Faulhaber	3-212
Letter 23. David Gaskin and Phil McPherson	3-214
Letter 24. D. Kakimoto	3-216
Letter 25. Khyber Investments (Craig Miott, MBA)	3-219
Letter 26. Darcy Morrison	3-222
Letter 27. Dee Rosario	3-227
Letter 28. William Smith	3-231
Letter 29. Jon Spangler	3-260
Letter 30. Eugenie Thompson	3-321
Letter 31. Philip Tribuzio	3-371
Letter 32. Philip Tribuzio	3-373
Letter 33. Ewart Wetherill	3-375
Letter 34. John Knox White	3-379
Letter 35. Brian Schumacher	3-391
4 Responses to Comments at the Public Hearing on the Draft EIR	4-1
A. Responses to Comments from September 9, 2013 Hearing	4-1
B. Responses to Comments from September 25, 2013 Hearing	4-2
5. Revisions to the Draft EIR	5-1
A. Staff-Initiated Changes to the Draft EIR	5-2
B. Changes to the Draft EIR in Response to Comments	5-7
Appendices	
A. Freeway and Ramps Analysis	
B. MMLOS Output Data	

CHAPTER 1

Introduction

A. Process

On September 3, 2013 the City of Alameda (Lead Agency) released for public review a Draft Environmental Impact Report (Draft EIR) for the City's proposed Alameda Point Project (SCH# 2013012043). The public review and comment period on the Draft EIR, which began on September 3, 2013 and closed on October 21, 2013, was 48 days.

The Draft EIR for the proposed Alameda Point Project (proposed project) together with this Response to Comments on the Draft EIR volume, this document constitutes the Final EIR for the proposed project. The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving the proposed project and must reflect the Lead Agency's independent judgment and analysis of the significant environmental effects of the proposed project on the environment (California Environmental Quality Act (CEQA) *Guidelines*, Section 15090). CEQA *Guidelines* Section 15132 specifies the following:

“The final EIR shall consist of:

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

This document has been prepared pursuant to CEQA and in conformance with the CEQA *Guidelines*. This Response to Comments Document reproduces the written comments from public agencies and the general public and also contains summaries of oral comments, and contains good faith, reasoned responses by the Lead Agency to those comments.

B. Organization

This EIR Response to Comments Document for the proposed project contains information in response to comments raised during the public comment period.

Chapter 1, *Introduction*, describes the CEQA process and the organization of this Response to Comments Document.

Chapter 2, *Agencies, Organizations and Individuals Commenting on the Draft EIR*, lists all agencies, organizations, and persons that submitted written comments on the Draft EIR during the public review and comment period. The list also indicates the receipt date of each written correspondence.

Chapter 3, *Responses to Written Comments on the Draft EIR*, contains comment letters received during the review and comment period. The responses to the comments are provided following each letter.

Chapter 4, *Responses to Comments Received at the Public Hearings on the Draft EIR*, contains a summary of all environmental topics raised regarding the Draft EIR at the public hearings held at the Planning Board meeting and joint City Council-Planning Board meeting on September 9 and September 25, 2013, respectively.

Chapter 5, *Revisions to the Draft EIR*, contains text changes to the Draft EIR. Some changes were initiated by the City; others were made in response to comments received on the Draft EIR.

CHAPTER 2

Agencies and Persons Commenting on the Draft EIR

A. Agencies and Persons Commenting in Writing

The following agencies, organizations and individuals submitted written comments on the Draft EIR during the public review period. The 48-day public review and comment period on the Draft EIR began on September 3, 2013 and closed at 5:00 p.m. on October 21, 2013.

Letter	Person/Agency and Signatory	Date
Federal Agency		
1	United States Department of Veterans Affairs (Douglas Roaldson, Environmental Program Manager)	October 22, 2013
State Agency		
2	Department of Transportation (Erik Alm, AICP, District Branch Chief)	October 21, 2013
3	Public Utilities Commission (Ken Chiang, Utilities Engineer)	September 9, 2013
Regional and Local Agencies		
4	San Francisco Bay Regional Water Quality Control District (Shin-Roei Lee, Division Chief, Watershed Division)	October 17, 2013
5	San Francisco Bay Trail (Lee Chien Huo, Bay Trail Planner)	October 21, 2013
6	Alameda Unified School District (Kirsten Vital, Superintendent)	October 18, 2013
7	City of Oakland Department of Planning, Building, and Neighborhood Preservation (Rachel Flynn, Director of Planning and Building)	October 18, 2013
8	East Bay Municipal Utility District (William R. Kirkpatrick, Manager of Water Distribution Planning)	October 17, 2013
9	East Bay Regional Park District (Larry Tong, Interagency Planning Manager)	October 21, 2013

Letter	Person/Agency and Signatory	Date
Regional and Local Agencies (cont.)		
10	Alameda Architectural Preservation Society (Karin Sidwell, Preservation Action Committee Chairmen)	October 21, 2013
11	Alameda Point Collaborative (Doug Biggs, Executive Director)	October 21, 2013
12	Bayview Estates Homeowners Association (Michael Karp, President)	October 18, 2013
13	Bike Walk Alameda (Lucy Gigli, President)	October 17, 2013
14	Center on Urban Environmental Law (Paul Stanton Kibel, Associate Professor and CUEL Co-Director)	October 3, 2013
15	Golden Gate Audubon Society (Michael Lynes, Executive Director)	October 21, 2013
16	Housing Opportunities Make Economic Sense (Helen L. Sause, President)	October 21, 2013
17	Oakland Chinatown Coalition (Oakland Chinatown Coalition)	October 21, 2013
18	Sierra Club (Norman La Force, Legal Committee for the Sierra Club San Francisco Bay Area Chapter)	October 20, 2013
Individuals		
19	Richard Bangert	October 21, 2013
20	Homeowners on Bayview Drive	October 15, 2013
21	Slow Factory (Todd Edelman, Director)	October 18, 2013
22	Selina Faulhaber	October 1, 2013
23	David Gaskin and Phil McPherson	September 25, 2013
24	D. Kakimoto	September 19, 2013
25	Khyber Investments (Craig Miott, MBA)	October 21, 2013
26	Darcy Morrison	October 21, 2013
27	Dee Rosario	October 20, 2013
28	William Smith	October 21, 2013
29	Jon Spangler	September 9, 2013
30	Eugenie Thompson	October 21, 2013
31	Philip Tribuzio	September 15, 2013

Letter	Person/Agency and Signatory	Date
Individuals (cont.)		
32	Philip Tribuzio	October 18, 2013
33	Ewart Wetherill	October 21, 2013
34	John Knox White	September, 2013
35	Brian Schumacher	October 28, 2013

B. Commenters at the Public Hearing

Planning Board

The following persons offered public comment during the City of Alameda Planning Board Public Hearing on the Draft EIR held at the Alameda City Hall on September 9, 2013:

- Ethan Clifton
- Doug deHaan
- Karen Bey

Joint City Council and Planning Board

The following persons offered public comment during the joint City of Alameda City Council and Planning Board Public Hearing on the Draft EIR held at the Alameda City Hall on September 25, 2013:

- Dorothy Kamimoto
- Susan Galleymore
- Helen Sause
- Chuck Kapelky
- Bill Smith
- John Spangler
- Karen Bey
- Diane Lichtenstein
- Adrian Lackadat
- Alex Danenbaum
- Doug deHann
- Bob Sacuria
- Doug Biggs
- Craig Miott
- Amanda Shepard

CHAPTER 3

Written Comments on the Draft EIR and Responses to Comments

This chapter contains copies of the comment letters submitted during the public review period on the Draft EIR, and the responses to those comments. Each written comment letter is designated with a number (1 through 35) in the upper right-hand corner of the letter. The letters are grouped by agency, organization, and individuals, as presented in Chapter 2 of this Final EIR. They are further organized alphabetically; however, Letter 35 was received after the close of the comment period and does not appear in the alphabetic sequence.

Within each written comment letter, individual comments are labeled with a number in the margin. Immediately following each comment letter is an individual response to each numbered comment. Where responses have resulted in changes to the Draft EIR, these changes also appear in Chapter 5 of this response to comments document.

Comment Letter 1

>>> "Janes, Larry G." <Larry.Janes@va.gov> 10/22/2013 2:30 PM >>>

Please see below for Department of Veterans Affairs, VA Sierra Pacific Network, comments on your EIR.

Larry Janes
Capital Asset Manager
VA Sierra Pacific Network

Dear Mr. Thomas:

The United States Department of Veterans Affairs (VA) applauds the City of Alameda (City) in preparing a Draft Environmental Impact Report (EIR) that proposes to adopt and implement a comprehensive zoning amendment, an associated general plan amendment, a Master Infrastructure Plan, and a Town Center and Waterfront Precise Plan at Alameda Point.

The VA offers the following EIR clarifications:

- The VA's Transfer Parcel does not include any San Francisco Bay submerged water areas. Figures 3-1, 3-2, 3-3, 3-5, 3-6, 3-7, 3-8, 3-10 inaccurately reflect that the land transfer as including submerged waters beyond the rip-rap. Your figures 3-11, 3-12, 3-13, 3-14 factually depict the actual 623.6 acre Navy to VA Transfer Parcel up to and including the shoreline rip-rap. 1-1
- Throughout your EIR and in Figures 3-1, 3-6, 3-7, 3-10: the term "Nature Reserve" is used to identify the undeveloped portion of the VA Transfer Parcel. The VA would like to make clear that it will not provide a "Nature Reserve". Instead, the VA uses the term "Managed Undeveloped Area". The Managed Undeveloped Area is identified as a 511.2 acre area reserved for the long-term persistence and sustainability of the Federal listed endangered California Least Tern (CLT) as managed pursuant to the VA's 2012 Biological Opinion. This Managed Undeveloped Area will only be actively managed for the CLT. It will not be actively managed for other species. 1-2
- The VA would like to clarify that with the exception of the possible seasonally administered shoreline trail immediately adjacent to and inside the shoreline rip-rap (Figure 3-7); the remainder of the managed undeveloped area will not be publically accessible. 1-3
- Please correct page 3-18 to indicate that the VA's 623.6 acre Transfer Parcel is made up of a 112.4 acre Development Area; and a 511.2 Undeveloped Area. The 112.4 acre Development area will include a Clinic on 20 acres, a National Cemetery on 80 acres, and utilities and other support buildings on the remaining 12.4 acres. 1-4

The VA believes the zoning outlined in the EIR aligns with and is complementary to our shared commitment to responsibly re-invigorating Alameda Point.

Respectfully,

Larry

Doug

Douglas Roaldson

Comment Letter 1

Environmental Program Manager
Green Environmental Management Systems
VA Sierra Pacific Network (VISN 21)
201 Walnut Ave, Room 1020
Mare Island CA 94592-1107
707-562-8426 (office)
707-235-4602 (BB)
douglas.roaldson@va.gov

Letter 1. United States Department of Veterans Affairs (Douglas Roaldson, Environmental Program Manager)

- 1-1 The City acknowledges that the VA's Transfer Parcel does not include submerged waters beyond the rip-rap.
- 1-2 The City acknowledges the requirements of the Biological Opinion, which is discussed in detail on pages 3-10 of the Project Description, on page 4.K-6 related to visual resources, and throughout Section 4.E, *Biological Resources* of the Draft EIR. The Draft EIR acknowledges that the portion of the VA Transfer Area referred to in the Draft EIR as "Natural Reserve" will be actively managed consistent with that document.
- 1-3 As stated on page 3-18 of the Draft EIR, access to the Natural Reserve will be limited to a seasonally accessible trail.
- 1-4 The City acknowledges that the VA's 623.6 acre Transfer Parcel is made up of a 112.4 acre Development Area; and a 511.2 Undeveloped Area. The 112.4 acre Development area will include a Clinic on 20 acres, a National Cemetery on 80 acres, and utilities and other support buildings on the remaining 12.4 acres. Pages 4-4 to 4-5 of the Draft EIR accurately describe the VA project under "Cumulative Context." The text on page 3-18 of the Draft EIR describes the overall open (undeveloped) space areas, and the reference to "30 acres of Veterans' facilities" is intended to encompass the 20-acre clinic grounds plus the approximately 12 acres of utilities serving the clinic as well as the supporting buildings noted by the commenter. The following bullet is revised on page 3-18 of the Draft EIR as follows:
- Approximately 624 acres ~~Over 700 acres~~ of former runways to the west of the urban areas of Alameda Point, which are planned for a Nature Reserve, ~~30~~ 112.4 acres of Veterans' facilities, and public park lands;

DEPARTMENT OF TRANSPORTATION

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October 21, 2013

ALA260026
ALA-260-R0.26
SCH#2013012043

Mr. Andrew Thomas
City of Alameda
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Dear Mr. Thomas:

Alameda Point General Plan and Zoning Amendments, Master Infrastructure Plan, and Old Town Center and Waterfront Plan – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the Alameda Point project. The following comments are based on the Draft Environmental Impact Report (DEIR).

Transportation Impacts on State Facilities

We are concerned that the DEIR did not include grandfathered segments in the impact analysis. From Table 4.C-3, the proposed plan will generate approximate 33,429 daily, 2,928 AM and 3,294 PM peak hour trips. Caltrans believes that majority of new trips generated to and from the proposed plan will significantly impact State Route 260 (Webster and Posey Tubes) since it is the most direct link between the development in Alameda and Oakland. Please discuss these impacts.

2-1

On page 4C-16, one of the policies the DEIR refers to is the development of TSM/TDM fees collection mechanism. As mentioned in the previous comment, the DEIR describes certain segments of state facilities that are ‘grandfathered’ segments since it was already operating at level of service (LOS) F when the CMP network was established. Please discuss how TSM/TDM fees would be allocated for improvements for ‘grandfathered’ segments.

2-2

On page 4C-25, the DEIR indicates that it analyzed six freeway mainline locations but only one segment of I-980 and one segment of I-580 were included in the DEIR since only those segments had any meaningful traffic increase (increase over existing volumes of more than 2.5 percent). As the owner and operator of the State Highway System (SHS), we would like to review the analysis for the four mainlines that were not included in the DEIR. Any traffic increase to State facilities that are already operating at poor levels of service can potentially increase delays and queue lengths which can jeopardize safety on the SHS. Any additional traffic impacts on State facilities also require mitigation.

2-3

Referring to the previous comment, page 4C-48 includes freeway analysis only for Interstate (I-) 980 segment but not the I-580 segment. Furthermore, it indicated that the LOS will drop from C

2-4

Mr. Andrew Thomas/City of Alameda
 October 21, 2013
 Page 2

to D and with density increase from 25.8 to 26.6. However, the DEIR found this impact insignificant because the change of volume is less than 3 percent. If the assessment is such that 3 percent change of volume is insignificant, please clarify why 2.5 percent was used in the previous comment. 2-4
cont.

On pages 4C-54 and 4C-55, it provides cumulative conditions for mainline facilities. Please include SR-260 cumulative conditions. 2-5

On page 4C-55 & 4C-55, it states, “no change in LOS and minimal, if any, in density under existing conditions.” However, Table 4.C-21 clearly shows a number of ramp locations during both AM and PM peaks with one LOS degradation. At one particular location, northbound Interstate 880 Broadway off-ramp, the LOS degrades from E (without project) to F (with project) in PM peak. 2-6

On page 4C-92, it indicates that State Route 260 Volume/Capacity ratio would increase by 2.5 percent for northbound and 1.2 percent for southbound. On Page 4C-23, the proposed project will generate 3,294 in the PM peak hour. Assuming a majority of these trips will access the project site through SR-260, please verify how the 2.5 and 1.2 percentages were derived. 2-7

State Route 260 Transportation Concept Report

In our Notice of Preparation comment letter, we recommended that the DEIR consider issues that were addressed in Caltrans’ SR 260 Transportation Concept Report (TCR). The TCR identified a number of factors contributing to congestion on this particular route. Please reference the TCR as Caltrans’ 25-year vision statement for this route. 2-8

Transportation Demand Management Strategies

For Mitigation Measure 4.C-2a, it requires sponsors to develop a Transportation Demand Management program aimed at meeting the General Plan peak-hour trip reduction goals. However, to provide uniformity throughout the proposed plan, we recommend the City develop and guide trip reduction strategies for projects within the proposed plan. Some strategies could include improving public transit, bicycling, and pedestrian facilities, residents & employees receiving transit passes at a reduced rate in lieu of free parking, and reducing the parking requirements. 2-9

We also recommend that the City refer to, “Reforming Parking Policies to Support Smart Growth¹,” an MTC study funded by the Department, for sample parking ratios and strategies that support compact growth and Transit Oriented Development. Also consider applying for Transform’s GreenTRIP certification to further implement TDM strategies². Doing so will encourage alternate forms of transportation, reduce regional vehicle miles traveled and lessen future traffic impacts on the state highways. 2-10

The document has should also expound on opportunities to improve non-auto transportation connection from Alameda to Oakland and SF. Current pedestrian and bicycle access to/from Alameda is limited and future developments at the Point could exact some mitigation fees to fund 2-11

¹ http://www.mtc.ca.gov/planning/smart_growth/parking_study.htm

² <http://transformca.org/GreenTRIP>

Mr. Andrew Thomas/City of Alameda
October 21, 2013
Page 3

pedestrian/bike capital improvements. This would also be an opportunity to implement some of the goals and recommendations from the 2009 Alameda Estuary Crossing report.

↑ 2-11
| cont.

For Mitigation Measure 4.C-2b, the DEIR states that the City shall adopt a Transportation Network Monitoring and Improvement program to identify fair share contribution for roadway improvements. Please coordinate with Caltrans in the development of this program.

| 2-12

Should you have any questions regarding this letter, please call Yatman Kwan, AICP of my staff at (510) 622-1670.

Sincerely,



ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Letter 2. California Department of Transportation (Erik Alm, AICP, District Branch Chief)

- 2-1 The “grandfathered segments” were included in the freeway segments identified for analysis and are described in the Significance Criteria, as noted on page 4.C-21 of the Draft EIR. The “grandfathered segment” includes arterial segments of SR 260 (Webster Tube) from Seventh and Webster Streets in Oakland to Atlantic Avenue in Alameda.

The traffic analysis was undertaken using the Alameda County Transportation Commission (CTC)’s Alameda Countywide Travel Demand Model (“the Model”). Use of the Model is recommended by Alameda CTC for the analysis of large, mixed use projects, and is standard industry practice for evaluation of the transportation impacts of such projects in Alameda County.

Regarding the results of the analysis, as noted in the comment, the Webster and Posey Tubes (SR 260) provide the most direct route between the project site and Oakland, where traffic can reach Interstate 880 and other destinations. Because the Model takes into account congestion (which translates to travel time), among other factors, the modeling showed that because the Webster and Posey Tubes do not have additional capacity to accept significantly more automobile trips during the peak hour commute periods, the addition of project traffic to the network would not substantially increase peak-hour, peak-direction volumes in the Tubes (i.e., outbound from Alameda in the morning and inbound to Alameda in the afternoon). This is because, although the Model assigned many of the project trips to the tubes, the Model also projects that many of the additional peak-direction trips will be diverted to the other less congested Estuary crossings, such as the Park Street Bridge, the Fruitvale Bridge, the High Street Bridge and the Bay Farm Bridge or would alter their travel time.

- 2-2 The TDM program fees would be used to implement the travel reduction strategies, not to implement physical improvements to “grandfathered” segments. It is anticipated that the TDM program would provide a certain degree of relief from congestion that would otherwise occur, as a result of the reduction in vehicle trips generated by the project. Please also see response to Comment 7-9.
- 2-3 According to the Alameda CTC model forecasts, used to estimate the future peak hour volumes on the State highway system, the peak hour traffic volumes on the freeway mainline exhibited very little increases with the development of the project as increases less than 2.5 percent were considered to occur within the normal daily fluctuations in volumes. The methodology and freeway analysis is presented on pages 4.C-25, 4.C-34, 4.C-48, and 4.C-55 of the Draft EIR. As explained in response to Comment 2-1, this can be attributed to capacity constraints on the system and peak spreading¹ since the analysis

¹ Peak spreading means that as traffic congestion grows during the peak travel times, motorists may shift their departure time to a non-peak hour.

covered only the one hour peak during the morning and evening. For additional information, please see the technical memorandum entitled Freeways and Ramps Analysis – Impacts and Mitigations, to City Staff dated June 30, 2013, which documents the freeway analysis, presented in **Appendix A** of this Final EIR. Please also see response to Comment 7-9.

- 2-4 The freeway analysis for both of the segments referred to by the comment is presented on page 4.C-34 and summarized in Table 4.C-13 of the Draft EIR. Page 4.C-48 presents the freeway impact finding, which is only for the one mainline segment of I-980. The change in LOS occurs since the 0.8 increase in passenger car per hour per lane happens to fall at the threshold between LOS C and D. The discussion of the I-580 segment was not included in the discussion on page 4C-48 since the LOS did not change.

The three percent change in volumes on the freeway mainline is considered a threshold that is within normal daily variation in peak hour traffic volumes on a freeway segment, and a threshold upon which the driver would perceive a difference in traffic conditions, which in this case is based on density. The 2.5 percent change in peak hour volume with the project was used to screen freeway segments for further impact analysis due to the project (see page 4.C-25 and response to Comment 2-4) and not to determine impacts.

- 2-5 Pages 4.C-54 and 4.C-55 of the Draft EIR present the results for freeway mainline conditions. SR 260 was considered as part of the Congestion Management Program Analysis starting on page 4.C-88 and detailed in Appendix G3 of the Draft EIR.
- 2-6 The comment is correct that page 4.C-54 of the Draft EIR incorrectly presents the result of the existing condition when this section was meant to describe the results of the “cumulative” impacts to freeway ramps. As shown in Table 4.C-21, under the cumulative condition, the LOS designation changes at several ramp locations. Impact 4.C-7 on page 4.C-82, is also mislabeled as “existing” condition when it should be labeled “cumulative.” These cumulative impacts to the freeway ramps are correctly described under Impact 4.C-7, which found that the proposed project would have a less-than-significant impact on freeway ramps. The significance finding is based on the magnitude of change in traffic volumes associated with the proposed project at the ramps and on the mainline, which are considered to be imperceptible to the driver. Please see Chapter 5 for text edits to pages 4.C-54 and 4.C-82. These edits do not affect the conclusions of the analysis.
- 2-7 As described on page 4.C-91 of the Draft EIR, the traffic baseline forecasts for 2035 were extracted at the required CMP and MTS highway segments from the Alameda CTC Model for the PM peak hour. The “With Project” forecasts at the roadway segments for the proposed project were obtained by manually adding the proposed project trips to the “No Project” forecasts. The minimal increase in peak hour traffic at the Webster-Posey Tubes (SR260) can be attributed to capacity constraints on the system and peak

- spreading² since the analysis covered only the one hour peak during the evening. Please also see response to Comment 7-9.
- 2-8 The SR 260 Transportation Concept Report (TCR) provides the 25-year vision Caltrans has established for SR 260. The planned and programmed capital improvements from the TCR were included in the Model.
- 2-9 Mitigation Measure 4.C-2a on page 4.C-37 of the Draft EIR requires a TDM program which would be developed and monitored specifically to reduce vehicular trips to and from Alameda Point as a whole and not a project-by-project basis. The intent of the TDM program is to incorporate strategies, such as improved public transit, bicycling and pedestrian facilities, and reduced parking on a scale that would generate synergy between developments that occur on the site.
- 2-10 These comments are noted. Mitigation Measure 4.C-2a on page 4.C-37 of the Draft EIR requires a TDM program, which would be developed and monitored specifically to reduce vehicular trips to and from Alameda Point.
- 2-11 These comments are noted. Mitigation Measure 4.C-2a on page 4.C-37 of the Draft EIR requires a TDM program, which would be developed and monitored specifically to reduce vehicular trips to and from Alameda Point.
- 2-12 Mitigation Measure 4.C-2b, requires the implementation of a monitoring and improvement program that would be established to regularly assess the success of the TDM program. Regarding coordination related to the development of the program, the City will involve Caltrans on an as-needed basis. The City will continue to coordinate with Caltrans and the Alameda CTC on regional solutions to the regional transportation system to accommodate the region's priority development areas as identified in the regional Sustainable Communities Strategy Plan Bay Area.

² Peak spreading means that as traffic congestion grows during the peak travel times, motorists may shift their departure time to a non-peak hour.

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083



September 9, 2013

Andrew Thomas
City of Alameda
2263 Santa Clara
Alameda, CA 94501

Dear Mr. Thomas:

Re: SCH 2013012043 Alameda Naval Air Station Point General Plan Project, DEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Section (RCES) is in receipt of the Draft *Environmental Impact Report (DEIR)* for the proposed City of Alameda (City) Naval Air Station Point General Plan project.

The project area includes active railroad tracks. RCES recommends that the City add language to the Naval air Station Point General Plan so that any future development adjacent to or near the railroad/light rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian/bike circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

3-1

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

C: State Clearinghouse

Letter 3. Public Utilities Commission (Ken Chiang, Utilities Engineer)

- 3-1 The comment is not correct. While the Beltline Railroad operated on the project site in the past, all tracks were removed and no active railroads exist on the site.



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR ENVIRONMENTAL PROTECTION

San Francisco Bay Regional Water Quality Control Board

October 17, 2013
CIWQS Place ID No. 799853

City of Alameda
Community Development Department
2263 Santa Clara
Alameda, CA, 94070

Attn: Andrew Thomas (athomas@alamedaca.gov)

Subject: Comments on the Draft Environmental Impact Report for the Alameda Point Project, Alameda, California
State Clearinghouse Number (SCH #) 2013012043

Dear Mr. Thomas:

Thank you for the opportunity to comment on the *Draft Environmental Impact Report for the Alameda Point Project, Alameda, California* (DEIR), dated September, 2013. The DEIR evaluates the potential environmental impacts associated with the redevelopment and reuse of the 878 acres of land and approximately 1,229 acres of water at the former Naval Air Station Alameda (NAS Alameda). San Francisco Bay Regional Water Quality Control Board (Water Board) staff has the following comments on the DEIR.

Comment 1, Section E. Biological Resources, Impacts to Special Status Birds, pages 4.E-56 through 4.E-62.

Special status birds discussed in this section of the DEIR include the California least tern colony in the former NAS Alameda runways and birds that roost on the Breakwater Island. One of the mitigation measures proposed for reducing impacts to breeding terns and roosting birds is the establishment of a no wake zone during the least tern breeding season (USFWS Biological Opinion mitigation measure BO-AMM-10f). However, the use of Breakwater Island as a roosting site by special status bird species is a year round activity that occurs outside of the least tern breeding season. Therefore, mitigation measures that may be effective at minimizing impacts to breeding success at the least tern colony, may not be effective at sustaining roosting at Breakwater Island.

4-1

Many of the mitigation measures presented in the DEIR for reducing impacts to roosting birds rely on voluntary compliance by members of the boating public. For example, USFWS Biological Opinion mitigation measures BO-AMM-10e and BO-AMM-10f establish 300 foot watercraft exclusion zones from breakwaters and the least tern colony and no wake zones. But it is not clear how compliance with these mitigation measures will be enforced.

4-2

Mitigation Measure 4.E-1e also relies on providing information to the public about sensitive biological resources and assuming near complete compliance on the part of the public. It does not seem likely that a mitigation measure that relies significantly on complete compliance on the part of the general public can actually be successful in reducing impacts to sensitive species to a less than significant level.

Mitigation Measure 4.E-2b (page 4.E-65) requires marina operators to provide educational information on sensitive species and habitats to boaters. The DEIR should provide documentation of the success of such voluntary compliance measures on reducing impacts to sensitive habitats and species. Without a study of the effectiveness of such mitigation measures, it is not possible to establish that the mitigation measure can reduce impacts to sensitive species and habitats to less than significant levels.

4-3

Comment 2, Section E. Biological Resources, Impacts to Eelgrass Beds, pages 4.E-63 through 4.E-65.

The discussion of potential impacts to eel grass beds relies too heavily on mitigation measures, and should be revised to place a greater emphasis on avoidance of eelgrass beds.

Mitigation Measure 4.E-2a requires eel grass beds to be relocated, if feasible. Where relocation is not feasible, project proponents are required to provide compensatory mitigation consistent with the California Draft Eelgrass Mitigation Policy (CDEMP) for eelgrass. However, in the experience of Water Board staff, the timing of eelgrass surveys in the CDEMP is problematic for the usual timelines for obtaining Clean Water Act Section 401 water quality certifications from the Water Board. The CDEMP requires eelgrass surveys to be conducted within 60 days of any in-water work near potential eelgrass beds. If eelgrass beds are detected, project proponents are supposed to redesign projects as much as possible to avoid impacts to eelgrass. By the time such project revisions are made and permits are revised to accommodate revised designs, the 60-day period in which the survey is valid is likely to have expired.

4-4

Successful eelgrass beds are dependent on proper substrate materials and appropriate depths below the water surface. The science of relocating eelgrass beds is still fairly new and attempts to relocate eelgrass beds have a mixed record of success. Therefore, mitigation measures that rely on relocating eelgrass beds should include an assessment of the feasibility of eelgrass relocation when evaluating whether or not the mitigation measure is actually capable of reducing impacts to eelgrass beds to a less than significant level. Due to the high level of uncertainty associated with relocating eelgrass beds, mitigation ratios for eelgrass beds are likely to be fairly high.

A reliance on translocating eelgrass beds and/or providing offsite mitigation will also have the effect of exporting eelgrass habitat from the project area. Eelgrass beds provide important primary productivity, foraging habitat, and refuge habitat for aquatic species. The habitat values provided by eelgrass beds are more valuable when they are distributed in many locations throughout San Francisco Bay. Exporting this habitat from the project area will have the unintended effect of reducing general habitat quality in the local aquatic environment, since local foraging and refuge options will be reduced.

4-5

When future projects apply to the Water Board for permits to impact eelgrass beds, the Water Board will require that all practicable options for avoiding impacts to eelgrass beds have been explored, including relocation or redesign of the proposed project, before permits are issued that would allow impacts, with appropriate mitigation, to the eelgrass beds. Since permitting will emphasize avoidance over mitigation, the DEIR would be of more use to future project proponents if it was revised to place a greater emphasis on avoiding eelgrass beds. Text on page 4.E-68 states that impacts to eelgrass beds would be reduced to less than significant levels through compliance with Mitigation Measure 4.E-3a and compliance with regulatory

4-6

requirements. Since regulatory requirements emphasize avoidance and the CDEMP emphasizes avoidance, mitigation measures in the DEIR should have also emphasized avoidance.

4-6
cont.

Comment 3, Section E. Biological Resources, Mitigation Measure 4.E-3a, page 4.E-69.

This mitigation measure addresses mitigation for impacts to wetlands at former NAS Alameda. The first bullet item of this mitigation measure requires that, “existing wetlands in the Northwest Territories be preserved and incorporated into compatible open space to the maximum extent feasible.” The term “maximum extent feasible” is not defined in this mitigation measure, and, therefore, this clause weakens the protection of the existing wetlands that is implied by the mitigation measure. Please revise this sentence to remove, “to the maximum extent feasible.” Since the Northwest Territories are in the process of being redeveloped and there are no known constraints on future uses that would preclude avoidance of existing wetlands, it should be feasible to design redevelopment in the Northwest Territories to avoid the existing wetlands.

4-7

The second bullet item in Mitigation Measure 4.E-3a requires that, “a minimum 300-foot wetland buffer shall be incorporated into project design wherever possible.” However the basis of establishing that a buffer is not possible may take into account, “the quality of the wetlands, actual or potential wildlife use, existing and proposed future uses, amount and type of vegetation within the buffer, and angle and direction of slope in proximity to the wetland.” The large list of potential extenuating circumstances may render the assurance of 300-foot buffers meaningless. Even where wetlands may appear to have low quality, such wetlands are often prime candidates for enhancement, since they possess appropriate hydrology and soils for sustaining wetlands. Also, vegetation in the buffer can usually be enhanced with minimal effort. The phrase “existing and proposed future uses” is not clear; does this refer to use of the wetland or use of the land for redevelopment. Please delete, “wetland quality”, “amount and type of vegetation within the buffer”, and “existing and proposed future uses” from the factors that may be used to justify reducing the size of the surrounding buffer.

4-8

If you have any questions regarding our comments, please contact Brian Wines (bwines@waterboards.ca.gov) at (510) 622-2342.

Sincerely,



Shin-Roei Lee
Division Chief
Watershed Division

Digitally signed by
Shin-Roei Lee
Date: 2013.10.17
14:57:57 -07'00'

cc: State Clearinghouse (state.clearinghouse@opr.ca.gov)

Letter 4. San Francisco Bay Regional Water Quality Control District (Shin-Roei Lee, Division Chief, Watershed Division)

- 4-1 Comment noted. The City agrees that special-status birds use Breakwater Island for roosting year-round, and that measures designed solely to protect nesting California least terns would not necessarily protect birds using Breakwater Island outside the tern nesting season. Accordingly, the Draft EIR includes Mitigation Measure 4.E.4a on page 4.E-73, which states:

“The City shall deploy buoys between Breakwater Island and the shoreline to create a 500-foot access corridor for all marine craft, including pleasure crafts and ferries, under non-emergency situation, in order to minimize disturbance to biological habitat on the shoreline and on the breakwater. Signs shall be posted that include a speed limit of 10 mph on the harbor side of Breakwater Island.”

- 4-2 Mitigation measures that rely on compliance by the public are frequently used to reduce impacts to less-than-significant levels. In the case of the Alameda Point project, the use of buoys to indicate the edge of watercraft exclusion zones and no-wake zones, the distribution of educational materials at marinas, the posting of signage at marinas and on the breakwater, and education of marina operators are the most effective means of conveying the importance of, and limits of, such zones to boat operators.

In addition, CEQA requires the City to adopt a Mitigation Monitoring and Reporting Program (MMRP) that is designed to ensure compliance with the mitigation measures. Public Resources Code § 21081.6(a)(1). See Public Resources Code § 21080.6(b) (“The lead agency shall provide the measures to mitigate or avoid significant effect on the environment are fully enforceable through permit conditions, agreements, or other measures.”) The conditions of the Conditional Use Permit (CUP) and the lease between the City and marina operators will require that marina operators perform such compliance monitoring and enforcement. Monitoring by City staff, by property management staff acting on behalf of the City, and by biologists monitoring the least tern colony (who will report observations of non-compliance to the City), in addition to monitoring in response to any complaints the City receives, will allow the City to determine whether the marina operators are adequately enforcing these zones in compliance with their leases and use permits. If enforcement is inadequate, the City can rely on the conditions of the CUP and lease to ensure enforcement or terminate the CUP and lease. Therefore, it is anticipated that compliance with Mitigation Measure 4.E-4a can be adequately monitored and enforced.

- 4-3 Please refer to the response to Comment 4-2 for a discussion of how these measures will be implemented, monitored, and enforced.
- 4-4 The City appreciates the Regional Board’s comments regarding the challenges of permitting in-water projects while conforming to California Draft Eelgrass Mitigation

Policy (CDEMP) timelines for eelgrass surveys. The City agrees that conducting the survey within 60 days of the start of construction does not allow sufficient time for project modification to avoid any eelgrass beds (to the extent feasible) and for agency consultation regarding the effects on the eelgrass beds. Therefore the following revisions to Mitigation Measure 4.E-2a are made:

Mitigation Measure 4.E-2a: Prior to marina or ferry terminal construction, the City shall ensure that the project applicant conducts a pre-construction survey to determine if native oysters and eelgrass are present in Seaplane Lagoon.

- The eelgrass survey shall be conducted according to the methods contained in the California Draft Eelgrass Mitigation Policy (CDEMP) (NMFS 2011), with the exception that the survey shall be conducted within 120 days (rather than 60 days, as recommended in the CDEMP) prior to the desired construction start date, to allow sufficient time for modification of project plans (if feasible) and agency consultation.
- If found within or immediately adjacent to the construction footprint, the project applicant shall first determine whether avoidance of the beds is feasible. If feasible, impacts to the oyster or eelgrass bed shall be avoided. If complete avoidance is not feasible, the applicant shall request guidance from the National Marine Fisheries Service (or other applicable agency) as to the need and/or feasibility to move affected beds....

Compensatory mitigation through eelgrass bed restoration can be successful. For example, Boyer and Wyllie-Echeverria (2010), which are cited in Mitigation Measure 4.E-2a, describe eelgrass restoration techniques and goals for San Francisco Bay and describe some methods that have been successful for eelgrass restoration.

4-5 Eelgrass beds are distributed in a number of locations around the South and Central San Francisco Bay areas (Boyer and Wyllie-Echeverria 2010) and, at most, a very small proportion of available eelgrass beds in the region would be impacted by in-water activities. As a result, even if eelgrass beds are impacted, eelgrass habitat sufficient to support fish populations and thereby provide prey for piscivorous birds such as the California least tern will remain in the vicinity of Alameda Point. Nevertheless, the City agrees that relocation or compensatory mitigation should remain within San Francisco Bay in order to continue to support a healthy Bay ecosystem. Accordingly, the following bullet has been added to Mitigation Measure 4.E-2a:

- The relocation or compensatory mitigation site for eelgrass or oyster beds shall be located within San Francisco Bay.

4-6 Please refer to the response to Comment 4-4.

4-7 Although the City clearly desires that wetlands in the Northwest Territories be avoided where feasible, as indicated by the inclusion of this bullet it may not be feasible, or even ecologically beneficial, for all wetlands in that area to be avoided. For example, it is possible that future wetland restoration or enhancement may be performed in the

Northwest Territories, or that wetlands may be consolidated into larger, more contiguous areas to allow for the overall enhancement of habitat conditions in that area while allowing increased human activity as well. Some wetland impacts may be necessary during wetland restoration or enhancement activities. Further, it is possible that impacts to small areas of lower-quality wetlands in one area (e.g., from a trail) would be necessary to allow for avoidance, enhancement, or restoration of higher-quality wetlands elsewhere in the Northwest Territories. A complete prohibition on any wetland impacts in the Northwest Territories would not provide the flexibility necessary for the City to allow both human use and wetland avoidance, enhancement, or restoration. In consultation with the regional agencies, the City will determine whether avoidance has been achieved “to the maximum extent feasible.” The Regional Board will have regulatory oversight over any plans to impact wetlands, and the Regional Board will thus have the ability to comment through the permitting process on whether avoidance has been performed to the maximum extent feasible.

- 4-8 The City disagrees that anticipating that there may be extenuating circumstances which affect whether a 300-foot buffer can be provided around all wetlands would “render the assurance of 300-foot buffers meaningless.” The City intends to require 300-foot buffers where such buffers are possible, but the mitigation measure also recognizes that there are circumstances in which a reduced buffer may be necessary for the various reasons described in Mitigation Measure 4.E-3a. For example, some wetland areas within the Northwest Territories are less than 600 feet apart and, as a result, maintenance of a strict 300-foot buffer would preclude any new activities, such as the creation of trails, between those wetlands. Creation of narrow trails or other passive recreational uses with large buffers, even if those buffers are less than 300 feet, would not impair water quality or habitat quality within those wetlands. If a 300-foot buffer cannot be established, Mitigation Measure 4.E-3a requires the largest possible buffer taking those extenuating circumstances into account. Flexibility in buffering would allow the City to ensure that human uses can be accommodated in areas such as the Northwest Territories while allowing for effective avoidance, enhancement, and restoration of the highest-quality wetland areas. For these reasons, the City does not agree that wetland quality, amount and type of vegetation within the buffer, and existing and proposed future uses, should be ruled out as factors pertinent to the size of effective wetlands buffers. The phrase “existing and proposed future uses” refers to the use of the land for redevelopment or any other activity associated with reuse of Alameda Point.

The City concurs that even low-quality wetlands can be enhanced. However, a 300-foot buffer is not necessary to maintain quality in a low-quality wetland.³

³ McElfish, J.M. Jr., Kishlinger, R.L., and S. Nichols, 2008. *Setting Buffer Sizes for Wetlands*, National Wetlands Newsletter, 30(2).



October 21, 2013

Andrew Thomas, City Planner
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501

Subject: Comments on the Alameda Point Project and Draft Environmental Impact Report (DEIR)

Dear Mr. Thomas:

On behalf of the San Francisco Bay Trail Project, I am writing to submit comments on the Alameda Point Project located in the City of Alameda. The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that plans, promotes, and advocates for the implementation of the Bay Trail. The Bay Trail is a planned 500-mile continuous network of multi-use bicycling and hiking paths that, when complete, will encircle San Francisco and San Pablo Bays in their entirety. It will link the shoreline of all nine Bay Area counties, as well as 47 cities. To date, 333 miles of the proposed Bay Trail system has been developed.

The Alameda Point Project provides a unique opportunity seldom seen in the Bay Area to open a significant stretch of Bay shoreline with dramatic vistas to the public. As such, the Bay Trail Project is very supportive of the City of Alameda's plans to add nearly eight miles of waterfront trails with the Alameda Point Project. We are interested in adopting the proposed waterfront trail along Alameda Point as part of the official Bay Trail alignment, however we are concerned that two segments of the waterfront trail as currently proposed do not conform with Bay Trail goals and would not be approvable as part of the Bay Trail alignment. The first segment is the seasonal trail proposed around the waterfront perimeter of the proposed Nature Preserve, and the other segment is the proposed trail adjacent to the U.S. Maritime Administration's (MARAD) site near the U.S.S. Hornet and reserve fleet docks.

5-1

It is the goal of the Bay Trail Project to provide bicycling and walking trails that run adjacent to the Bay's shoreline, are separated from roadways, and are accessible 24 hours a day and 365 days of the year. In order for the trail proposed around Alameda Point to be considered for adoption as part of the Bay Trail system, the long term vision and alignment of the Alameda Point trails must be modified to be consistent with the Bay Trail goals and preserve the

Comment Letter 5

Mr. Andrew Thomas

October 21, 2013

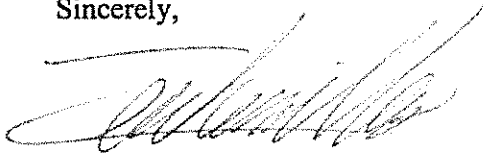
opportunities to eventually develop year round trail access along the waterfront perimeter of the proposed Nature Preserve and trail access along the water's edge of the docks at the MARAD site.

↑
5-1
cont.

The Bay Trail Project understands that the seasonality of the trail is due to concerns by the resource agencies regarding trail impacts on the Least Tern colony and that MARAD has security concerns related to a trail running through their lease site, however we believe that these concerns can be addressed through trail designs that mitigate these concerns. As such, we request that the City of Alameda modify its trail proposal for the Alameda Point Project to preserve the opportunity for a waterfront trail alignment along the MARAD site and for year round access along the entire waterfront trail proposed for Alameda Point. These changes will allow the entire waterfront trail to be considered for addition to the Bay Trail system and would also make these trails eligible for a variety of funding sources since completing the Bay Trail is identified as a priority within the Alameda County Transportation Commission's County-wide Bicycle and Pedestrian Plans and the Metropolitan Transportation Commission's Regional Bicycle Plan.

The Bay Trail Project appreciates the opportunity to comment on the Alameda Point Project, and we look forward to our continued partnership with the City to develop the Bay Trail and improve recreational and commute opportunities for bicyclists and walkers in Alameda. Please do not hesitate to call me at (510) 464-7915 if you have any questions regarding the above comments or the Bay Trail.

Sincerely,



Lee Chien Huo
Bay Trail Planner

Cc: Jennifer Ott, Chief Operating Officer – Alameda Point

Letter 5. San Francisco Bay Trail (Lee Chien Huo, Bay Trail Planner)

- 5-1 The comments do not address the adequacy of the environmental analysis presented in the Draft EIR. The comments do address the proposed locations for the Bay Trail in areas that are constrained due to proximity to habitat for special status species and in areas where the U.S. Maritime Administration and US Hornet are located. The comment from the Bay Trail Project will be forwarded to the City of Alameda Planning Board and City Council for their deliberations on the location of the Bay Trail where limitations on public access may be necessary to protect special status species and/or maintain a safe and secure environment for maritime industrial uses and Bay Trail users.

Andrew THOMAS - Fwd: proposed language

From: Jennifer Ott <jott@alamedaca.gov>
To: ATHOMAS@alamedaca.gov, KHeisler@esassoc.com, LLowe@esassoc.com, Garber@s...
Date: 10/18/2013 3:33 PM
Subject: Fwd: proposed language

FYI - please add to the group.

Jen

Sent from my iPhone

Begin forwarded message:

From: "Vital, Kirsten" <kvital@alameda.k12.ca.us>
Date: October 18, 2013, 1:57:39 PM PDT
To: "Jennifer Ott" <JOtt@alamedaca.gov>
Cc: "John Russo" <JRusso@alamedaca.gov>
Subject: proposed language

Dear Jennifer:

It was a pleasure to talk with you on Wednesday regarding AUSD's input on the wording of Impact 4.L-3. Below are my suggested changes. AUSD is generally amenable to the current draft language, and we are hopeful that the City will be agreeable to the added sentence regarding our working cooperatively together to address school impacts.

Best, Kirsten

Public Schools Impacts

Impact 4.L-3: Development facilitated by the proposed project could potentially result in new students for local schools, but would not and potentially require new or physically altered school facilities to maintain acceptable performance objectives. (Less than Significant)

Students generated from development of the proposed project would be within the boundaries of Paden or Ruby Bridges Elementary School, Wood Middle School, and Encinal High School. The Alameda Unified School District (AUSD) employs a student generation factor as a basis for determining the number of students generated by proposed residential development projects. The results of applying AUSD generation factors to the proposed project are shown in **Table 4.L-4**. As shown, the proposed project is anticipated to result in 427 new students: 186 elementary school students, 96 middle school students, and 145 high school students.



6-1

Comment Letter 6

Even though Paden Elementary, Ruby Bridges Elementary, Wood Middle School and Encinal High School would generally serve students resulting from development of the proposed project, AUSD has reported that the aforementioned school sites have all long exceeded their true capacities (McPhetridge, 2013). To mitigate potential impacts resulting from an increase of approximately 427 new students, AUSD levies development fees for residential and commercial development at the proposed project. Although pursuant to SB 50, payment of the development fees for schools is considered full and complete mitigation for the impacts of a development project on school facilities, the City and AUSD agree to work cooperatively with one another to identify additional, legally appropriate ways to alleviate costs of construction and ensure that all school impacts are adequately addressed. As a result, the proposed project's impacts on schools would be less than significant.

↑
6-1
cont.

Mitigation: None required.

Kirsten Vital
 Superintendent
 Alameda Unified School District
 2060 Challenger Drive
 Alameda, California 94501
 (510) 337-7060

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Letter 6. Alameda Unified School District (Kirsten Vital, Superintendent)

6-1 The City of Alameda is committed to working with Alameda Unified School District (AUSD, the State of California, and/or other parties to identify resources for providing educational facilities at Alameda Point. As described starting on page 4.L-5 of the Draft EIR, pursuant to Senate Bill 50, payment of school district impact fees by new development is full mitigation for potential impacts to school facilities from new development. All new development at Alameda Point will be required to pay the AUSD impact fees.

In addition, the text changes are made to Impact 4.L-3 on page 4.L-10 of the Draft EIR:

Impact 4.L-3: Development facilitated by the proposed project could potentially result in new students for local schools, ~~but would not~~ and potentially require new or physically altered school facilities to maintain acceptable performance objectives. (Less than Significant)

Students generated from development of the proposed project would be within the boundaries of Paden or Ruby Bridges Elementary School, Wood Middle School, and Encinal High School. The Alameda Unified School District (AUSD) employs a student generation factor as a basis for determining the number of students generated by proposed residential development projects. The results of applying AUSD generation factors to the proposed project are shown in **Table 4.L-4**. As shown, the proposed project is anticipated to result in 427 new students: 186 elementary school students, 96 middle school students, and 145 high school students.

Even though Paden Elementary, Ruby Bridges Elementary, Wood Middle School and Encinal High School would generally serve students resulting from development of the proposed project, ~~However, the~~ AUSD has reported that the aforementioned school sites have all long exceeded their true capacities (McPhetridge, 2013). To mitigate potential impacts resulting from an increase of approximately 427 new students, AUSD levies development fees for residential and commercial development. Pursuant to SB 50, payment of the development fees for schools is considered full and complete mitigation for the impacts of a development project on school facilities. As a result, the proposed project's impacts on schools would be less than significant. While ~~payment of the adopted development fees ensures that the project would result in less than significant impacts related to the provision of school facilities, the City, together with AUSD, is committed to working with the State of California and/or other parties to identify additional, legally appropriate ways to alleviate costs of construction. As a result, the proposed project's impacts on schools would be less than significant.~~

CITY OF OAKLAND



DALZIEL BUILDING • 250 FRANK H. OGAWA PLAZA, SUITE 3315 • OAKLAND, CALIFORNIA 94612-2032

Department of Planning, Building and Neighborhood Preservation
Planning & Zoning Services Division

(510) 238-3941
FAX (510) 238-6538
TDD (510) 238-3254

October 21, 2013

Andrew Thomas, Planning Services Manager
City of Alameda
Community Development Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

RE: **Comments on the Draft Environmental Impact Report for Alameda Point General Plan and Zoning Amendments, Master Infrastructure Plan, and Town Center and Waterfront Plan**

Dear Mr. Thomas:

The City of Oakland ("Oakland") appreciates the opportunity to comment on the Draft Environmental Impact Report ("DEIR") for the Alameda Point Project ("Project") located in the City of Alameda ("Alameda"). Overall, we believe the DEIR does not adequately address the impacts of development of the Project, including most notably, impacts on Oakland, which is immediately adjacent to the Project site.

7-1

Please fully address the following City Of Oakland comments in the Final EIR:

- 1. Pg. 4.B-3
City of Alameda General Plan Housing Element
Policy 5.5.e: *Minimize commuting by balancing jobs and nearby housing opportunities.*

Comment: The DEIR states that the Project is designed to accommodate the rehabilitation, reuse, and new construction of approximately 5.5 million square feet of commercial and workplace facilities for approximately **8,900 jobs**; and the rehabilitation and new construction of 1,425 residential units for approximately **3,240 residents**. This jobs/housing imbalance in the Project is not in conformance with the City of Alameda's General Plan Housing Element Policy 5.5.e, and is likely to generate a large number of employment-related trips to Alameda Point from off the island of Alameda.

7-2

Andrew Thomas, Planning Services Manager
October 21, 2013
Page 2

2. Pg. 3-41

...the initial flood protection system would provide flood protection for up to 18-inches of sea level rise. These initial flood protection measures would be designed to be adapted if the amount of future sea level rise exceeds 18-inches...

Comment: The DEIR states that the flood protection system to be built around the perimeter of the Project Site may also be extended around the island perimeter to provide island-wide flood protection. The Final EIR should evaluate the potential for both the Project Site and island-wide flood protection systems to displace flood waters in the case of sea level rise onto similar low-lying waterfront lands within Oakland.

7-3

3. Pg. 3-45

Comment: Given that development of the Project would cause severe impacts to Oakland, especially to the Chinatown community, related to increased traffic on Oakland's streets around I-880 and the Webster and Posey Tubes, a share of the proceeds from the Alameda Point Infrastructure Fee Program being established to facilitate infrastructure implementation should be dedicated to the City of Oakland for improvements to pedestrian safety and other measures to reduce impacts to local residents from increased vehicle traffic.

7-4

4. Pg. 3-63

It is anticipated that buildout of the project site is likely to take many years and thus sequential, logical, phasing of development and infrastructure is necessary to minimize uncertainty and improve the economic feasibility of infrastructure development.

Comment: This is an important point, and yet, the DEIR does not include an analysis of the feasibility and impacts of a proposed sequential phasing plan of development and infrastructure for the Project Site. The Final EIR should address this point, and analyze a sequential phasing plan of development and infrastructure for the Project Site from the commencement of construction through buildout in 2035.

7-5

5. Pg. 4.C-7

Comment: What is the source for the crash data?

7-6

Andrew Thomas, Planning Services Manager
October 21, 2013
Page 3

6. Pg. 4.C-22

Comment: Are the land use projections the most recent available?

| 7-7

7. Pg. 4.C-23

Comments:

- More detail is required on the trip generation, particularly the resulting mode split. In particular, given that the site is currently served only by a single bus line (with 30-minute headway), transit mode split may be expected to be significantly lower than elsewhere on Alameda.
- How does model trip generation compare to ITE trip generation? The Final EIR should show a comparison to ensure results are reasonable.
- Project Vehicle Trip Generation: Provide details on the land use type and formula used from the travel demand model. The Final EIR should mention the multi-modal reduction taken in the project compared to the ITS trip generation base rates.

| 7-8

| 7-9

| 7-10

8. Pgs. 4.C-28-31

Comments:

- Many intersections show improved operations in Existing plus Project. This is counter-intuitive, since the project generally is adding more traffic. The Final EIR should incorporate additional detail on assignment of project trips (eg, select zone assignment or other figures) that allow assessment of reasonableness for model assignment.
- The Final EIR should address why the existing conditions analysis in the Alameda Point EIR is significantly different from that in Oakland's Lake Merritt Station Area Plan in many cases.
- Existing + Project: Project seems to be causing an improvement at several locations, it appears to be a result of re-optimizing the signal operations in the analysis. Please note that only existing signal timing shall be used in the analysis. Signal optimization is considered a mitigation measure for existing plus project, that requires associated hardware upgrades.

| 7-11

| 7-12

| 7-13

9. Pg. 4.C-29

Comment: Table identifies significant impact at 29th/8th/9th, but does not address potential mitigation. Would a traffic signal at the intersection mitigate the impact?

| 7-14

Andrew Thomas, Planning Services Manager
October 21, 2013
Page 4

10. Pg. 4.C-36-37

Impact 4.C-2: Development facilitated by the proposed project would potentially result in a transportation impact at study intersection under Existing plus Project conditions. (Significant)

Comment: Mitigation Measure 4.C-2b states that prior to issuance of the first building permits for any development project at Alameda Point, the City of Alameda shall adopt a Transportation Network Monitoring and Improvement Program to: 1) determine the cost of the transportation network improvements identified in this EIR; 2) identify appropriate means and formulas to collect fair share financial contributions from Alameda Point development; 3) monitor conditions at the locations that will be impacted by the redevelopment of Alameda Point; 4) monitor traffic generated by Alameda Point; and 5) establish the appropriate time to implement the necessary improvements described in this EIR to minimize or eliminate significant transportation impacts prior to the impacts occurring.

7-15

This Transportation Network Monitoring and Improvement Program discussed in Mitigation Measure 4.C-2b should be more fully developed and analyzed in the EIR, and include a discussion of the specific measures to protect and mitigate transportation impacts in Oakland. Further, a share of the funds received to implement the Transportation Network Monitoring and Improvement Program should be allocated to the City of Oakland for infrastructure improvements to mitigate the additional vehicle trips through Oakland.

7-16

11. Pg. 4.C-38

Comments:

- Jackson and Sixth Street: signalized intersections with significant and unavoidable impacts shall be brought up to current signal standards to aid the signal in handling the impact caused by the project traffic and bring a nominal improvement to the LOS at the intersection. Please note this applies to all signalized intersections with significant but unavoidable impacts.
- Brush and 11th: See comment above.

7-17

7-18

12. Pg. 4.C-39

Comment: 23rd Avenue and Seventh Street, see comment for pg. 4.C-38 above.

7-19

Andrew Thomas, Planning Services Manager
October 21, 2013
Page 5

13. Pg. 4.C-51

Comments:

- At several intersections the Cumulative + Project v/c ratio is lower than the cumulative v/c ration. Please explain.
- Please note that the comments from pg. 4.C-38 apply to Cumulative + Project Intersections with cumulative impacts as well.

7-20

7-21

14. Pg. 4.C-90

Comment: EIR identifies a significant impact to pedestrian safety, but does not identify reasonable interventions (eg, countdown signals, curb extensions).

7-22

15. Overall Transportation Chapter

Comment: Overall there appears to be a discrepancy in the treatment of intersections with significant but unavoidable impacts between the City of Oakland and Alameda. In Oakland the consistent mitigation measure is the TDM plan often with the majority of intersection receiving no proposed improvements. On the other hand in Alameda many options are proposed in addition to the TDM plan that includes signal optimization, repurposing existing lanes, and alteration of the signal phasing. At a minimum signal optimization, and upgrades to current standards should be proposed to reduce the delays caused by project traffic.

7-23

16. Page 4.F-38

Impact 4.F-2: Development facilitated by the proposed project could potentially generate operational emissions that would result in a considerable net increase of criteria pollutants and precursors for which the air basin is in nonattainment under an applicable federal or state ambient air quality standard.

Comment: The impact discussion explains the increase in criteria air pollutant and precursor emissions from a variety of emission sources including onsite area and energy sources and mobile sources. The discussion explains that a Transportation Demand Management (TDM) program would be developed and implemented for the proposed project to reduce use of single occupancy vehicles, and to increase the use of rideshare, transit, bicycle and pedestrian modes for project-related trips. The mitigation measure also references the TDM program and includes an incorrect reference to the location of a more comprehensive discussion of the TDM program in the Transportation Chapter (the correct reference is 4.C-2a).

7-24

The future TDM program mentioned in the Transportation and Project Description Chapters should be more fully developed and include a discussion of the specific measures to protect and mitigate impacts to the Oakland Chinatown community in addition to measures geared toward future project residents. Further, a share of the funds received to implement and monitor the TDM should be allocated to the City of Oakland for infrastructure improvements to mitigate the additional vehicle trips in the Oakland Chinatown area.

Andrew Thomas, Planning Services Manager

October 21, 2013

Page 6

17. Pg. 4.F-39

Impact 4.F-3: Operation of the development facilitated by the proposed project could potentially expose sensitive receptors to substantial concentrations of toxic air contaminants or respirable particulate matter (PM2.5).

Project traffic would also increase DPM and PM2.5 emissions near residences in Oakland Chinatown, although the volumes added, and therefore the increased cancer risk and PM2.5 concentrations, would be less than for the locations discussed above, which are adjacent to the project site. Conservatively assuming that receptors are as close as 10 feet from the edge of the curb, Chinatown receptors along Seventh, Eighth, Jackson, Harrison, and Webster Streets would be subject to a project-generated increase in cancer risk of up to 0.3 in one million and an increased PM2.5 concentration of up to 0.1 µg/m3. Each of these would be well below the significance criteria of 10 in one million and 0.3 µg/m3, respectively, and would also be less than significant. Chinatown receptors are close to I-880, and thus subject to both DPM and PM2.5 emissions from freeway traffic. Residential receptors on Seventh Street, for example (at a distance of about 300 feet from the freeway), are exposed to lifetime cancer risk of approximately 22 in one million and PM2.5 concentration of 0.13 µg/m3 from freeway emissions, based on BAAQMD's Google Earth-based screening tool. Vehicular emissions from cumulative traffic, including project traffic, would add a lifetime incremental cancer risk of approximately 14 in one million and a PM2.5 concentration of 0.5 µg/m3 to the existing baseline, for a total incremental cumulative cancer risk from traffic of up to about 36 in one million and total cumulative PM2.5 concentration of up to 0.63 µg/m3. Both of these totals would be below the BAAQMD cumulative thresholds of 100 in one million cancer risk and 0.8 µg/m3, respectively. Moreover, the project's incremental contribution of 0.3 in one million incremental lifetime cancer risk and PM2.5 concentration of 0.1 µg/m3 would not be considered substantial. Therefore, the impact would be less than significant. Mitigation: None required

Comment: Although exposure to traffic generated TACs in the Chinatown community have been deemed less-than-significant, a framework for addressing the minimization of impacts to this community must be included in the mitigation measures. Goals, policies, and objectives to minimize potential TAC impacts in areas located within 500 ft. of freeways and high-volume roadways containing 100,000 or more average daily trips must be included in the Alameda Point EIR, as access from Oakland's Chinatown is essential to the project. Such a framework is required for consistency with the City of Oakland CEQA Thresholds of Significance.

7-25

18. Pg. 4.I-25

Impact 4.I-6: Development facilitated by the proposed project would potentially place housing and other structures in an area subject to 100-year flooding, however would not subject people or structures to a substantial risk of loss from a 100-year storm event.

Comment: The DEIR reports that a system of levees, detention ponds and pumps will mitigate possible flooding caused by rare storm events and sea level rise. Possible impacts to the Port of Oakland from the Alameda Point flood protection system should be studied in detail to determine whether a system of levees will displace flood waters and jeopardize Port operations. Further, the EIR should reference the SF Bay Conservation Development Commission (BCDC) Adapting to Rising Tides (ART) Strategy. If the ART Strategy includes possible strategies for Alameda Point, these should be included in the EIR. As BCDC notes in its ART Strategy, sea level rise and storm adaptation

7-26

7-27

Andrew Thomas, Planning Services Manager
October 21, 2013
Page 7

strategies should include a variety of scales – from site-specific strategies incorporated into development projects to regional and state strategies addressing larger issues like building codes, financing and governance. 7-27 cont.

AB 375 calls for regional coordination in land use and transportation planning. It is imperative that the cities of Oakland and Alameda (and other surrounding jurisdictions) collaborate around climate adaptation strategies. Additionally, since Oakland’s Chinatown provides the primary regional access to Alameda Point, impacts to the City of Oakland residents and infrastructure should be mitigated in addition to project mitigation measures. 7-28

19. As stated in the City Of Oakland’s NOP comments - Include comprehensive cumulative analysis in the Final EIR that considers the following Oakland projects:

- **Lake Merritt Station Area Plan:** The development program includes up to 4,917 new housing units, 4,084 new jobs, 403,790 square feet of additional retail space, 57,787 square feet of institutional, and 1,229,277 square feet of additional office space within the Planning Area as geographically delineated by 14th Street, I-880, Broadway/Franklin Street, and 4th/5th Avenue.
 - **West Oakland Specific Plan:** 413-acre Planning Area generally defined by I-580, I-980, and I-880; includes strategies for transit-oriented development at the West Oakland BART Station, to better link transportation choices with new housing, and employment options within the community. The development program includes up to 4,999 new housing units, 10,988 new jobs, and 4,705,000 square feet of new non-residential building space.
 - **Broadway/Valdez Specific Plan:** 96 acre site bounded by I-580, Grand Avenue, Webster/Valley Street, and Harrison Street/Bay Place/27th Street/Richmond Avenue/Brook Street. The development program includes up to 1.4 million square feet of retail/commercial, 900,000 square feet of office, 120,000 square feet of hotel, and 1,800 housing units.
 - **Central Estuary Area Plan:** Planning Area bounded by 19th Avenue, 54th Avenue, I-880, and the Estuary. The development program includes up to 391 dwelling units, 31 live/work units, 268,071 square feet of retail/commercial, 443,950 square feet of Office/R&D space, and 374,857 square feet of industrial.
 - **Other Plans and Projects in Oakland,** such as the Oak-to-Ninth Street Project, Oakland Army Base Master Plan, Planned Priority Development Areas (PDAs), and other Active Major Projects in Oakland
- 7-29

Andrew Thomas, Planning Services Manager

October 21, 2013

Page 8

20. Also as stated in the City Of Oakland's NOP comments: in 2004, Alameda entered into an Agreement with Oakland, the Oakland Chinatown Chamber of Commerce and Asian Health Services regarding its obligations to study and to mitigate traffic and related impacts of potential development of Alameda Point ("Agreement"). The Agreement established the Oakland Chinatown Advisory Committee ("OCAC"), comprised of representatives from Oakland and Alameda. Alameda must provide the OCAC with opportunities to make recommendations to Alameda regarding traffic studies, mitigation measures, and alternatives, among other things. In addition, the Agreement obligates the City of Alameda to make certain payments to the City of Oakland to mitigate traffic impacts.

7-30

The Agreement imposes these obligations in recognition that development of the Project would cause severe impacts to Oakland, especially to the Chinatown community, related to increased traffic on Oakland's streets around I-880 and the Webster and Posey Tubes. The contractual obligations in the Agreement supplement and are consistent with Alameda's statutory obligations under the California Environmental Quality Act ("CEQA") to study and to avoid or minimize impacts to the extent feasible.

It is our understanding that ACTC will soon be conducting a traffic study of the Oakland Chinatown area. The City of Oakland will be participating the selection of the consultant for this ACTC study and will be incorporating the traffic concerns of Jack London Square, Chinatown, and the overall downtown.

7-31

21. The EIR fails to include an adequate project description and environmental setting, adequate analysis of all environmental impact topics, including but not limited to land use and planning, transportation, and infrastructure, adequate analysis of the cumulative impacts of the project, and an adequate discussion of alternatives and feasible mitigation measures. Given the impacts on Oakland have not been adequately studied in the DEIR, the new information required to be included would be significant and would require recirculation of the DEIR.

Many of the impacts are determined in the DEIR to be significant and unavoidable in the City of Alameda; while similar impacts are to occur in Oakland, they are not adequately identified or analyzed. As a result, there are almost certainly significant and unavoidable effects in Oakland that have not been addressed in the DEIR. A lead agency is required to recirculate an EIR when new information is added to the EIR after public notice is given of the availability of the draft EIR for public review but before certification. *See CEQA Guidelines 15088.5(a)*. "Information" includes additional data or other information, such as impacts on Oakland, including without limitation traffic and hydrological impacts.

7-32

Instead of in-depth analysis, the DEIR simply concludes certain impacts to be significant and unavoidable without adequately analyzing the impacts on Oakland. The City of Alameda must adequately analyze Project impacts on Oakland to comply with CEQA.

Andrew Thomas, Planning Services Manager

October 21, 2013

Page 9

22. Given these deficiencies, the DEIR is so fundamentally flawed that it does not provide opportunity for meaningful public review and must be recirculated pursuant to CEQA Guidelines 15088.5.

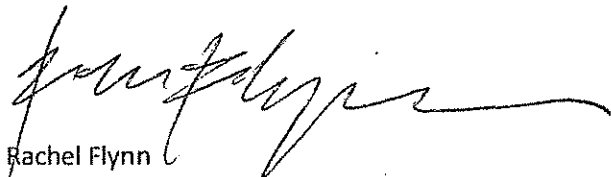
The DEIR's discussion of how the Project will impact Oakland, its immediately adjacent neighbor, and the associated environmental impacts is so fundamentally flawed as to not provide meaningful opportunity for meaningful public review. *See CEQA Guidelines 15088.5(a)(4)* (recirculation is required when the Draft EIR is so "fundamentally and basically inadequate and conclusory in nature that meaningful public review is precluded").

7-33

The City of Alameda must consider the Project's environmental impacts on Oakland to ensure proper CEQA review and study suitable alternatives or mitigation measures to alleviate environmental impacts rather than rely on "significant and unavoidable impacts" that will more detrimentally impact Oakland. For these reasons, the DEIR needs to address the deficiencies set forth above and must be recirculated in order for the public, particularly Oakland, to make an informed review of the Project.

If you have any questions concerning this response, please contact Ed Manasse, Strategic Planning Manager, at (510) 238-7733 or emanasse@oaklandnet.com.

Sincerely,



Rachel Flynn
Director of Planning and Building

Letter 7. City of Oakland Department of Planning, Building, and Neighborhood Preservation (Rachel Flynn, Director of Planning and Building)

7-1 The City of Alameda disagrees with the City of Oakland's comments. The Draft EIR includes an extensive analysis of the impacts of the project in both Alameda and Oakland. For example, the Alameda Point EIR analyzes traffic at 24 Oakland intersections, and uses Oakland's own significance criteria for this analysis (see Draft EIR Tables 4.C-8, 4.C-9, 4.C-15, and 4.C-16). In contrast, the Lake Merritt Station Area Plan EIR⁴ released by the City of Oakland for public review on November 1, 2013 considered the impacts of the proposed Oakland development on only three intersections in Alameda.

The Alameda Point Project Draft EIR used the Alameda County Transportation Commission (CTC)'s Alameda Countywide Travel Demand Model ("the Model"), which is the recommended and industry standard tool for analysis of large, mixed use projects in Alameda County and is used by the City of Oakland for its environmental documents. A comparison of the environmental conclusions in this EIR and the City of Oakland's environmental analyses reveals that the conclusions of this EIR with regard to traffic impacts in Oakland Chinatown are very similar to the City of Oakland's conclusions with regard to impacts in Oakland Chinatown in Oakland's recently released Lake Merritt Station Area Plan EIR.⁵

The Alameda Point Project Draft EIR contains an analysis of the additional traffic due to the proposed Alameda Point Project on Oakland Chinatown pedestrian circulation (Draft EIR, pages 4.C-83 – 4.C-87); an analysis of air quality impacts along streets in Chinatown (Draft EIR, pages 4.F-39 – 4.F-40); and a roadway noise analysis (Draft EIR, pages 4.G-18 – 4.G-20), which includes Oakland street segments.

As discussed in Section 4.C, *Transportation and Circulation*, of the Draft EIR, the Alameda Point project would result in impacts to transportation facilities in Oakland and Chinatown. The EIR identifies mitigation measures to reduce automobile trips and optimize signal timing in Oakland. These conclusions and mitigations are consistent with the City of Oakland's conclusions in the Lake Merritt Station Area Plan Draft EIR.⁶ By comparison to the Lake Merritt Station Area Plan project, the Alameda Point Draft EIR found that the proposed Alameda Point project traffic would represent a fraction of the new traffic currently being proposed by the City of Oakland in locations immediately adjacent to I-880 and Chinatown. As documented on page 7 of the City of Oakland comment letter, the City of Oakland is currently planning over 15,119 new housing units and over 10 million square feet of non-residential new development in the Lake Merritt Station Area Plan, the West Oakland Specific Plan, the Broadway/Valdez Specific Plan, the Central Estuary Area Plan,

⁴ CEQA State Clearinghouse No. 2012033012.

⁵ Ibid.

⁶ Ibid.

and the Oak to Ninth Project. The Oak to Ninth Project also includes approximately 5,000 new parking spaces. The Alameda Point project would have approximately 1,200 new housing units and three million square feet of new non-residential development (two million of the 5.5 million square feet of non-residential development is already occupied with non-residential uses and businesses in existing buildings at the former NAS Alameda). The Lake Merritt Station Area Plan EIR evaluates Oakland's plans for approximately 5,000 new residential units and approximately two million square feet of additional non-residential development in the Lake Merritt/Chinatown neighborhood. The Lake Merritt Station Area Plan EIR finds that the traffic generated from the Oakland project would not impact pedestrian safety, that additional traffic at a number of Oakland intersections would result in automobile level of service impacts, and that at most of those locations the only feasible mitigation is signal retiming and that is not always feasible (see pages 3.2-130, 3.2-131, 3.2-134 3.2-135, 23.2-150, 3.2-151, and 3.2-153 of the Lake Merritt Area Plan EIR). The analysis in the Alameda Point EIR is consistent with Oakland's conclusions. These similar conclusions should be expected, because the Alameda Point EIR used City of Oakland's own thresholds of significance for the analysis. Accordingly, there is no basis for Oakland's "critique" of the traffic analysis in the Alameda Point Project Draft EIR.

Please also see responses to Comment 7-2 through 7-33, below.

- 7-2 This comment misrepresents the facts about the City of Alameda and the City of Alameda General Plan. The proposed Alameda Point project is consistent with the City of Alameda General Plan. The General Plan establishes a citywide jobs housing balance as a policy objective to reduce off-island commute hour traffic. As stated on page 4.B-2 of the Draft EIR, the City of Alameda currently has more employed residents than jobs. The City of Alameda has approximately 26,970 jobs and 37,799 employed persons, which indicates that many of Alameda's employed residents commute to work outside of the City. A major cause of the existing imbalance is that Alameda lost 18,000 jobs when the U.S. Navy closed NAS Alameda. Therefore a project with 5.5 million square feet of non-residential development and only 1,425 residential units at Alameda Point would improve the jobs-housing balance in Alameda in conformance with the policies of the General Plan.
- 7-3 The commenter is mistaken. The proposed project does not include flood protection around the entire perimeter of the City of Alameda. The proposed flood protection system is designed to protect the project site. As discussed in Section 4.I, *Hydrology and Water Quality*, of the Draft EIR, the sea level rise is an effect from global warming (as a referenced in recent technical studies such as that of the BCDC and the IPCC) – a phenomenon that is occurring and is anticipated to continue with time in the future. The San Francisco Bay Area is but only a part of the global phenomenon and Alameda Point and the areas in the vicinity, being located in the Bay Area would be subject to sea level rise. Therefore, preventing rising Bay levels from encroaching on portions of the 1,229-acre Alameda Point site must be viewed in the following context - that displacement of sea level rise from the entire project site of approximately 2 square miles (which is not proposed – only portions of the project site are proposed for flood protection) would represent

approximately 0.000001 percent of the earth's 139 million square miles of oceans and approximately 0.028 percent of the Bay Area, and thus would have no perceptible effect on the amount of sea (Bay) level rise in Oakland or anywhere else on earth. Were Oakland's position to be taken to its logical conclusion, no Bay Area community would be permitted to address sea level rise.

The project's proposed Alameda Point flood and sea level rise protection system is consistent with the San Francisco Bay Conservation and Development Commission's (BCDC) Adapting to Rising Tides (ART) objectives and adaptation strategies. Page 3-41 of the Draft EIR states that the adaptive measures for the Development Areas would include constructing a perimeter system of levees and floodwalls. The adaptive measures for the Reuse Areas would include elevating the initially constructed perimeter levees and floodwalls. The adapted perimeter measures would be elevated to meet the Federal Emergency Management Agency's (FEMA) guidelines plus protect for sea-level rise as recommended by regional policies. As also described in the analysis of cumulative impacts under Impact 4.I-9, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact to people and/or property from a 100-year event in combination with sea level rise. The strategy for the proposed project includes raising the elevation of the site above the existing high tide flood levels plus accounting for projections of sea level rise. The proposed strategy would make approximately one-half of the entire land mass at the former NAS Alameda (the Northwest Territories and the federal Nature Reserve areas), approximately 655 acres, available as open space areas (i.e., undeveloped) and would allow these areas to inundate in a high tide event or higher sea levels. These open space areas would also be potentially designed as seasonal wetlands. There is no evidence that the flood protection system would result in the flooding of low-lying areas in Oakland.

- 7-4 This comment does not address the adequacy of the environmental analysis in the Draft EIR. Please also see response to Comment 7-1. The traffic from Alameda's Alameda Point project represents a fraction of the additional traffic that the City of Oakland is proposing to introduce onto the Oakland Chinatown roadway network. If the City of Oakland considers the Alameda Point contribution to the overall increase in traffic in Chinatown to be "severe", then logic demands that the City of Oakland disclose the "severity" of its Plan's impact on the Oakland Chinatown community. The Lake Merritt Station Area Plan Draft EIR⁷ fails to identify the impacts from the Oakland projects as "severe." Furthermore, the City of Alameda cannot impose mitigation obligations on the City of Oakland. Over the last 10 years, the City of Oakland has released a number of EIRs that examine the impacts of Oakland development on the Chinatown community. All of these EIRs, including the most recent Lake Merritt Station Area Plan EIR, conclude that with the exception of some signal timing adjustments, impacts to Chinatown intersections are significant and unavoidable. If the City of Oakland cannot identify feasible mitigation for these intersections, the City of

⁷ Ibid.

Oakland cannot demand that the City of Alameda project fund a fair-share of the costs of the improvements.

- 7-5 The Draft EIR provides an analysis of the impacts of full buildout of the proposed development and recommends mitigation measures to lessen or avoid the impacts of the proposed development. Those measures are all designed to be implemented and monitored throughout the implementation of the proposed project, to ensure that any impacts associated with the project are mitigated when they occur during the 20 to 30 year buildout period. This approach provides maximum protection for the environment and ensures that no interim impacts occur prior to implementation of mitigation measures.
- 7-6 The crash data was obtained from the California Highway Patrol's Statewide Integrated Traffic Records System, for the period January 2009 through August 2012.
- 7-7 The land use projections relied upon for the transportation analysis of the proposed project are those used in the most current version of the Alameda County Transportation Commission (CTC)'s Alameda Countywide Travel Demand Model ("the Model"), which is the model recommended by Alameda CTC and is the industry standard tool for analysis of large, mixed use projects in Alameda County. The projections for Oakland are the same land use projections for 2030 that the City of Oakland provided to the CMA for the regional model and that are used for Oakland EIRs. As is the case throughout its letter, Oakland complains about the validity of data that Oakland itself compiled.
- 7-8 The Travel Demand Model used in the analysis reflects current and future transit services, including specific routes, bus stop locations, and frequency of service as part of the inputs. For more details on the trip generation and the mode split, see response to Comment 7-9, below.
- 7-9 The project vehicle trip generation shown in Table 4.C-3 is from the Alameda County Transportation Commission (CTC)'s Alameda Countywide Travel Demand Model ("the Model"), which, as noted above in the response to Comment 7-7, is the recommended and industry standard tool for analysis of large, mixed use projects in Alameda County (and is the same approach used by the City of Oakland for such large projects). The following describes the Model methodology and approach.

The Alameda CTC recommends the use of the Model for the analysis of large, mixed use projects, such as the proposed project. The Model is maintained and updated by Association of Bay Area Governments (ABAG) to ensure consistency and coordination between regional and local land use and transportation planning efforts and projects. The value of a travel demand model is that it can incorporate a wide variety of land uses and transportation infrastructure to forecast future travel patterns based on input and output information, which then can assist decision makers in making informed transportation planning decisions. The Model, like other such models developed by transportation agencies elsewhere in the Bay Area and throughout the United States, is generally thought to provide a more realistic assessment of large, mixed-use projects than would be

achieved through use-by-use application of trip generation rates provided by standard industry reference materials such as the Institute of Transportation Engineers (ITE) *Trip Generation* manual. The reason for this is that a model can account for a certain amount of interaction among different land uses, whereas the ITE manual provides estimated traffic for each use individually and, therefore, typically results in an overestimate of travel demand. The ITE rates and formulas, for example, require manual adjustments to account for mixed-use development that internalize a certain percentage of on-site trips. Accordingly, when using the Model (or any comparable model) to forecast trip generation from large, mixed-use projects, it is neither customary nor relevant to compare the Model results to the use-by-use trip generation calculations that would be obtained from the use of the ITE rates.

The Model is a computer-based tool to assist in the development of large-scale transportation, or travel, forecasting. Inputs to the Model include the transportation network and variables such as population, employment, households, dwelling units, trip rates, transit fares, and local transportation system characteristics. Among other statistics and reports, outputs from the Model include plots of the transportation system with peak hour traffic volumes for every roadway segment.

The Model allows for the capture of interactions between a mix of uses (in this case, the proposed residential, commercial, manufacturing, recreational, and service uses) both internal to the project site as well as externally in the rest of Alameda, Oakland and the surrounding cities. Among other statistics and reports, outputs from the Model are maps of the transportation system with traffic volumes for every roadway segment.

The Model follows the four-step process of trip generation, trip distribution, mode split, and trip assignment. Starting with the inputs of land use and socioeconomic data (e.g., households, household residents, and employment by sectors) for existing conditions and future conditions based on the ABAG projections, the model calculates the number of person trips by traffic analysis zone (TAZ). Then, travel routes are estimated based on the travel time and distances on the roadway and transit networks between each TAZ pair. The Model separates the daily person trips by mode, including transit and park & ride, and then applies daily adjustments developed during model validation to estimate a.m. and p.m. peak hour vehicle and transit trips. Those peak hour automobile and transit trips are assigned to the networks based on the travel routes between TAZs assuming capacity constraints at key locations. This constrained model results in spreading the demand from the one single hour to more realistically represent future (2035) peak hour conditions.⁸ The Model provides forecasts of a.m. and p.m. peak hour volumes on the roadways and at the intersections and transit ridership. The Model accounts for both the new vehicle trips generated by the proposed project as well as the diversion to alternate routes of traffic due to capacity constraints in the roadway network.

⁸ A memorandum describing the constrained model methodology can be found on the Alameda County Transportation Commission website at: http://www.alamedactc.org/files/managed/Document/8974/Memo_Constrained_Methodology_120702.pdf

Thus, in the case of the proposed project, although the Webster and Posey Tubes are the closest automobile access points to the regional transportation network and I-880, because the Tubes are currently operating near capacity and do not have additional capacity to accept significantly more automobile trips during the peak commute periods, the Model assigned many project trips that would use the Tubes, if capacity were available, to other routes. (It is noted that the Tubes would still be the route of choice during non-peak periods, when capacity exists; however, the analysis in the EIR focuses on the peak periods of commute traffic, as is common and appropriate in CEQA analysis.) Instead, the Model projects that many of the additional trips will be diverted to the other Estuary crossings at the Park Street Bridge, the Fruitvale Bridge, the High Street Bridge and the Bay Farm Bridge.

- 7-10 The project vehicle trip generation, shown in Table 4.C-3 is derived from the Model by summing the vehicle trips generated by the traffic analysis zones that represent the project. The Model does not provide details on trip generation by land use types as provided by ITE *Trip Generation*. Please see response to Comment 7-9 related to the trip generation and mode split in the Model.
- 7-11 Improved operations at some analysis intersections can be attributed to the *Highway Capacity Manual* methodology, which bases the operations on average delay per vehicle for the overall intersection. A lower average intersection delay can result in situations where the increase in vehicles due to the project is added to a particular movement with less delay, such that the overall intersection average delay per vehicle decreases. That is, if the project is adding more trips to a through movement, which has less delay, the average delay for the intersection would decrease. Improved operations at some intersections can also be attributed to existing traffic being diverted to other roadways, as described in response to Comment 7-7. Printouts showing the Model's assignment of project trips on the roadway network are available at the city offices for review.
- 7-12 The existing conditions for Oakland intersections reported in the Alameda Point EIR were prepared using traffic count data gathered for recent environmental impact analysis documents completed by the City of Oakland⁹ and the Department of Veterans Affairs¹⁰ or were the result of a 2012 traffic count. The City of Oakland rejected the City of Alameda's requests to the City of Oakland for existing traffic count data from the Lake Merritt Station Area Plan. Given that the City of Oakland would not share the data requested, the City of Alameda had to conduct additional traffic counts. Typically, traffic volumes do vary from day to day, so the City of Oakland should expect that different traffic counts on different days would result in different counts.

In the future, if the City of Oakland would like the existing traffic count data to be consistent among City of Alameda and City of Oakland EIRs, the City of Oakland should

⁹ Central Estuary Implementation Guide Supplemental EIR (2012)

¹⁰ Draft Environmental Assessment Transfer of Excess Property and Development of an Outpatient Clinic, Offices, and National Cemetery at the Former Naval Air Station Alameda, California (2013)

- provide the data requested and required. Regional cooperation would save time and taxpayer dollars. The City of Oakland should not refuse to share data and then complain about the accuracy of data in its neighbors' documents.
- 7-13 The comment is not correct. As explained on page 4.C-27 of the Draft EIR, the impact analysis assumed no change in the signal timings to accommodate the addition of project traffic.
- 7-14 Note "d" of Table 4.C-8 of the Draft EIR reads, "The 29th Ave./I-880 NB off-ramp intersection will be reconstructed beginning in late 2013. With completion scheduled for 2017, before the project would add substantial traffic, this new intersection will avoid the project's otherwise significant impact; therefore, no significant impact is identified in this EIR." This interchange improvement would also modify the existing at-grade stop-controlled intersection at 8th and 9th streets.
- 7-15 The TDM program, and the required monitoring of its effectiveness, are required mitigation measures to reduce the automobile trips that are projected to be generated by the proposed project. Mitigation Measure 4.C-2b requires a monitoring program to regularly assess the success of the TDM program; depending on the success of the TDM program, the City would determine which of the physical intersection improvements identified in the EIR and incorporated into the Mitigation Monitoring and Report Program would be required to address residual transportation impacts based on the operation conditions of a particular intersection that can be attributed to vehicle traffic from Alameda Point. These locations include the Oakland intersections where actual improvements were determined to be feasible by the City of Oakland.

Consistent with the City of Alameda General Plan policy 4.4.2.f, the Draft EIR recommends Transportation Demand Management (TDM) as the primary mitigation measure for automobile related transportation impacts. See Mitigation Measure 4.C.2a. The Draft EIR describes the TDM program as part of the proposed project starting on page 3-22, under the Circulation Framework. Mitigation Measure 4.C-2a in the Draft EIR requires implementation of the TDM program to mitigate the impacts of the proposed project on the local roadway network. See in Draft EIR, Chapter 4.C, *Transportation and Circulation*, Impact 4.C-2, p. 4.C-37. In addition, as required by Mitigation Measure 4.C-2b, a monitoring program would be established to regularly assess the success of the TDM program.

In accordance with the General Plan, the Draft EIR establishes the TDM program as the primary mitigation for reducing traffic impacts. General Plan Policy 4.4.2.f specifically requires that transportation mitigation should be designed to reduce the total amount of traffic generated by a project through TDM rather than widening roads, building new roads, or other physical improvements designed to accommodate more cars or allow them to operate at an improved level of service, but which would reduce the level of service for other modes of transportation, such as pedestrians, bicyclists, and transit riders (see page 4.C-16 of the Draft EIR).

TDM refers to a range of strategies, measures, and services that, individually or combined into a comprehensive program, will help create the envisioned transit-oriented development at Alameda Point; achieve the City of Alameda's General Plan goals to reduce automobile trips, and in particular, target the reduction of Single Occupant Vehicle (SOV) trips; and mitigate potential traffic impacts. TDM strategies are designed to change travel behavior (when, where, and by what means people travel) by using combinations of incentives, disincentives, and convenient services.

The Draft EIR requires that the City condition all development projects at Alameda Point to comply with the TDM program as a mitigation measure for all transportation impacts identified in the report. Beyond mitigating the potential traffic impacts of Alameda Point development, TDM contributes to meeting regional goals that include reducing traffic congestion on the Bay Area's routes of regional significance; reducing the primary source of mobile emissions; improving safety, and thus increasing mobility, for those who bicycle, walk or take public transit; conserving energy; and improving the health of the population by encouraging physically active forms of transportation.

To achieve the General Plan goals for trip reduction at Alameda Point, the TDM program will require that all owners of property at Alameda Point annually fund, comply with, and collaboratively manage, monitor and continuously improve upon a TDM program that reduces single occupancy vehicle trips and improves the quality of life for those who live and work at Alameda Point.

The TDM program will be developed by the City with the flexibility to:

- a) adapt to future phasing of Alameda Point land uses;
- b) implement transit services starting at the commencement of development and introduce larger and more comprehensive services as specific development thresholds are met; and
- c) use annual monitoring of performance as a mechanism for continuous improvement of individual employer TDM plans and services.

The property owners of Alameda Point will be required to pay a financing mechanism to fund, implement, and direct the management of the TDM program and be accountable for the TDM program's success. As stated above, every development at Alameda Point will be required to comply with, and provide an annual financial contribution to fund the management and implementation of the TDM Plan. The TDM services funded by the development at Alameda Point will include:

1. Shuttles, and buses, to supplement, compliment and expand AC Transit, BART and WETA services.
2. Car and Bicycle Share Programs
3. A Parking Program (pricing and management)

4. Annual monitoring and reporting (on- and off-site)
5. An enforcement program to ensure that the program is successful.

Mitigation Measure 4.C-2b requires a monitoring program to regularly assess the success of the TDM program. Depending on the success of the TDM program, the City would determine which of the physical intersection improvements identified in the EIR and incorporated into the Mitigation Monitoring and Report Program would be required to address residual transportation impacts based on the operation conditions of a particular intersection that can be attributed to vehicle traffic from Alameda Point.

The mitigation measures proposed in the Draft EIR are consistent with Objective 4.4.2 of the General Plan. The mitigations are specifically designed to ensure that TDM is the primary mitigation measure to reduce the vehicle trips and, therefore, further reduce or eliminate the potential transportation impacts. The recommended mitigations then require that the City monitor the impacted locations until buildout of project to help ensure that the TDM program has successfully reduced any project impact to a less-than-significant level. In the event, and only in the event, that the City monitoring shows that the TDM program is not avoiding or sufficiently reducing the potential transportation impacts, the “second level” mitigations, calling for physical improvements, would be implemented to mitigate the level of service impact at a particular location.

- 7-16 This is not a comment on the adequacy of the environmental analysis.
- 7-17 The City of Alameda has no jurisdictional authority to implement mitigation on Oakland or Caltrans facilities that would involve changes to the physical environment, updates to equipment and technologies in use (such as timing of signal systems), or other changes to City of Oakland/Caltrans property. However, in those locations where an impact to an Oakland signalized intersection has been found to be significant and unavoidable, the City of Oakland should consider potential improvements within its responsibility and jurisdiction, such as adjusting the signal timing with regard to the potential changes in traffic volumes, that are identified and recommended in the Draft EIR. As stated in the City of Oakland’s recently published Lake Merritt Station Area Plan EIR¹¹, absent implementation of the Lake Merritt Station Area Plan, over which the City of Oakland has jurisdiction to implement mitigation from specific applicants, no change to signal timing was assumed, an assumption that “reflects current City of Oakland practice that incorporates basic signal timing changes into routine maintenance of the traffic signal system. It is expected that retiming of signals in areas with the greatest need (e.g., major streets, areas with rapidly shifting traffic patterns) would be prioritized as part of the regular ongoing maintenance of signal equipment.”¹² It is further noted that that the Lake Merritt Station Area Plan EIR repeatedly states that retiming traffic signals to improve

¹¹ CEQA State Clearinghouse No. 2012033012.

¹² City of Oakland, *Lake Merritt Station Area Plan Draft Environmental Impact Report*, State Clearinghouse No. 2012032012; November 2013; p. 3.2-72. Available on the internet at: <http://www2.oaklandnet.com/Government/o/PBN/OAK043804>.

vehicle flow “would require greater wait time for pedestrians to cross intersections, and therefore be in conflict with City [of Oakland] policy concerning pedestrian safety and comfort.”¹³

Moreover, with specific application to the intersection of Sixth/Jackson Streets in Oakland, as stated on p. 4.C-38 of the Draft EIR, “An improvement identified as part of the Broadway-Jackson Interchange project to provide direct access to Sixth Street from the Posey Tube would reduce traffic through Oakland Chinatown. With the assistance of the ACTC, the cities of Alameda and Oakland are working to develop consensus on this improvement. To date, Oakland and Caltrans, which has jurisdiction over the freeway and its ramps, have not agreed upon a solution.” The City of Alameda has been, and will continue to be, an active participant in discussions and planning for potential improvements to this corridor, which includes the intersection of Sixth/Jackson Streets.

See response to Comment 7-1 and 7-4 regarding the conclusions of the Lake Merritt Station Area Plan EIR.

For the intersection of Jackson and Sixth Street, which is part of the Broadway-Jackson interchange, the City of Alameda is continuing to work with Alameda CTC and the City of Oakland to develop consensus on this improvement in order to bring an improvement to the LOS at those intersections. However, it should be noted that over the last 10 years and two separate efforts by the Alameda CTC to develop a “Broadway Jackson” improvement plan with Oakland, the City of Oakland has rejected every alternative development to-date.

7-18 Please see response to Comment 7-17.

7-19 Please see response to Comment 7-17.

7-20 The intersection volume-to-capacity (v/c) ratio reported in the EIR (for example, in Table 4.C-16, on page 4.C-51 of the Draft EIR) is the v/c ratio calculated using the methodology contained in the Transportation Research Board’s *Highway Capacity Manual 2000* (HCM 2000). This methodology presents a v/c ratio that is not a strict arithmetic ratio of overall intersection volume divided by overall capacity, but rather reflects the volume-to-capacity relationship for so-called “critical movements,” which are the traffic lanes that are most important to intersection performance. Generally, these are conflicting movements, such as a left-turn against oncoming traffic. In calculating the v/c ratio, HCM 2000 takes into account factors such as lane width and the presence of heavy vehicles. As with average intersection delay, it is possible for overall intersection volume to increase and v/c ratio to decrease if there is a relatively greater increase in traffic volume in lanes with greater remaining capacity than those with lesser capacity. For example, while the total intersection volumes would increase with the project at the intersection of Jackson and Sixth streets, the overall intersection v/c ratio would decrease

¹³ *Ibid*; see for example, Impact TRAN-7, p. 3.2-131.

because the proposed project results in lower volumes for a critical movement, such as the northbound left-turns.

7-21 Please see response to Comment 7-17.

7-22 Pedestrian safety in Oakland Chinatown is discussed on pages 4.C-83 through 4.C-87 of the Draft EIR. The Draft EIR identified a significant impact to pedestrians (Impact 4.C-9, page 4.C-83), and identified Mitigation Measure 4.C-9, page 4.C-87, “The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and shall continue to work with the City of Oakland, the Alameda CTC, and Caltrans, to evaluate and implement measures to reduce or divert the volume of traffic that travels through Oakland Chinatown to and from Alameda Point and other City of Alameda destinations.”

The City of Alameda has no jurisdictional authority to implement mitigation on Oakland facilities that would involve changes to the physical environment (such as construction of curb extensions), updates to technologies in use (such as timing of signal systems), or other changes to City of Oakland property. However, in those locations where an impact to Oakland intersections have been found to be significant and unavoidable, the City of Alameda is committed to minimizing the traffic through Oakland Chinatown through the TDM program, which the City of Alameda has the authority and jurisdiction to implement, as well as through other methods that may result from discussions between the City of Alameda and the City of Oakland, the Alameda CTC, and Caltrans. See response to Comment 7-4 regarding findings of the Lake Merritt Station Area Plan EIR.

7-23 Oakland and Alameda have different thresholds of significance, so it is predictable that the significance conclusions for Oakland intersections might be different from the significance conclusions for Alameda intersections. The Alameda Point EIR’s findings for Oakland intersections are substantially consistent with the City of Oakland’s findings in the recently released Lake Merritt Station Area Plan Draft EIR, however. As noted above, in the response to Comment 7-17, the Lake Merritt Station Area Plan EIR rejects as mitigation for intersection impact the retiming of traffic signals to improve vehicle flow because such changes would conflict with City of Oakland policy concerning pedestrians. The Lake Merritt Station Area Plan EIR similarly rejects as mitigation at a number of intersection the potential addition of additional travel lanes to improve traffic flow because such changes would require acquisition of right-of-way, and/or could result in loss of bicycle lanes, medians and/or on-street parking or narrowing of existing sidewalks. The City of Alameda would not propose improvements in Oakland that have been rejected in the City of Oakland’s own analyses and which would be outside the City of Alameda’s responsibility and jurisdiction. See also response to Comment 7-4.

7-24 Please see response to Comments 7-15 and 7-16 regarding the TDM program. The TDM program, Mitigation Measure 4.C-2a (see page 4.C-37 of the Draft EIR) is specifically designed to reduce automobile trips and automobile LOS impacts in both Alameda and in Oakland.

- 7-25 The City of Oakland's CEQA air quality thresholds, including those for TACs, are based on the thresholds adopted by the BAAQMD in June 2010. The analysis of impacts included in the Alameda Point Draft EIR, including the analysis of TACs along roadways in Oakland, are also based on the methodologies and thresholds adopted by the BAAQMD in June 2010. Thus, the Alameda Point Draft EIR conclusions regarding the significance of the impact of TACs conform to the standards established by the BAAQMD and also are consistent with Oakland's own approach and findings regarding TACs, including for much larger cumulative projects in Oakland in closer proximity to Chinatown such as the Lake Merritt Station Area Plan.
- 7-26 Please see response to Comment 7-3. As stated under Impact 4.I-6 on page 4.I-25 of the Draft EIR, the level of risk from a 100-year flood event to the proposed development would depend on the location and design of the site development and structures and the protection provided by the emergency response/preparedness planning for the public in the event of a flood. The project site would be developed in accordance with the FEMA criteria and with additional consideration for sea level rise. As discussed under Impact 4.I-9 in the Draft EIR (also described in the response to comment 7-3 above), implementation of the proposed project, together with past, present, and reasonably foreseeable future projects in the vicinity would not result in a significant impact related to exposing people and/or property to flooding from a 100-year event and sea level rise. The proposed project itself would involve structural measures designed to abate flooding from high tides in a 100-year storm event combined with sea level rise of up to 18 inches initially and a future increase of 55 inches and beyond with adaptive measures. The amount and timing of sea level rise are still much debated, and any increased flooding risks associated with sea level rise are expected to occur gradually with time. Regardless, the impending sea level rise is a global phenomenon and protection measures on the project site would have an insubstantial effect of displacement compared to the global rise in sea levels.
- 7-27 As described in Chapter 3, *Project Description* and Section 4.I, *Hydrology and Water Quality* (pages 4.I-25 and 4.I-26 of the Draft EIR), sea level rise and stormwater adaptation strategies, such as the proposed storm drain and flood protection measures and the internal drainage system, would be implemented onsite. As also described under Impact 4.I-8, the project would involve future adaptive measures such as expansion of the levees or floodwalls within the proposed corridors along the shorelines. As discussed under Mitigation Measure 4.I-8, the City would implement steps such as applying for membership in the National Flood Insurance Program (NFIP) Community Rating System and cooperating with FEMA in its efforts to comply with recent congressional mandates to incorporate predictions of sea level rise into its Flood Insurance Studies and Flood Insurance Rate Mapping. Please see response to Comment 7-3.

The BCDC policies (applicable to the proposed project or the project area) indicate that projects with a life beyond the mid-century shall have flood protection measures that can be adapted to address additional sea level rise that is projected to occur by the end of the

century.¹⁴ Consistent with BCDC policy, as discussed under Impact 4.I-8 in Section 4.I Hydrology and Water Quality, the flood protection measures would be designed initially to accommodate 18 inches of sea level rise with capability to adapt to 55 inches (~1.4 meters) and beyond of sea level rise by 2100. Future adaptive measures would involve expanding the levees or floodwalls within the proposed corridors along the shorelines consistent with BCDC guidelines and policies.

- 7-28 The commenter is mistaken. The proposed project is consistent with SB 375 (not AB 375). As stated in the Chapter 3, *Project Description*, on page 3-15, the proposed Alameda Point project is a Priority Development Area in the *Plan Bay Area* (i.e., ABAG/MTC Sustainable Communities Strategy or SCS). Success of the Alameda Point project will contribute to the success of the region's plan to reduce regional greenhouse gas emissions, address climate change, and reduce regional vehicle miles travelled.

The City of Alameda agrees with the statement that the Cities of Oakland and Alameda should be collaborating on climate change and regional development issues. The Cities of Alameda and Oakland need to be coordinating their efforts to focus regional resources to improving the regional transportation system, including transit systems, bicycle facilities, pedestrian improvements, and I-880 modifications to improve circulation in and around Chinatown. The City of Alameda has been working with the City of Oakland, the Alameda CTC, and Caltrans, for more than 10 years to help develop a solution to traffic and pedestrian issues in the Sixth/Jackson Streets corridor in Oakland and is committed to continuing the dialogue concerning potential enhancements at this location. However, the City of Oakland must ultimately approve a plan for these improvements in order for them to be considered feasible. To date, the City of Oakland has been unwilling to approve any such plan.

- 7-29 As stated in the response to Comment 7-7, above, the transportation analysis in the Draft EIR is relied upon the most current version of the Alameda Countywide Travel Demand Model ("the Model"), which is the recommended and industry standard tool for analysis of large, mixed use projects in Alameda County. The land use projections for Oakland are those that the City of Oakland provided to the Alameda CTC for the regional model, and include major projects in Oakland (such as those noted in the comment) and other communities. The other quantitative analyses in the Draft EIR—such as air quality, greenhouse gases, and noise—are based largely on the transportation analysis, and therefore also incorporate the referenced projects in Oakland. For other, non-quantifiable impacts that are generally more location-specific (e.g., aesthetics, geology, hydrology and water quality, biological resources, etc.), no substantial interaction between the proposed Alameda Point project and the Oakland projects noted in the comment would be anticipated because, for example, views affected by one project would not be substantially affected by another, substantially distant project. Likewise, site-specific soils and seismic conditions at the Alameda Point project site would not interact with those conditions at another, distant site. However, the Draft EIR does explicitly

¹⁴ CBG, Master Infrastructure Plan, October 31, 2013.

encompass broad geographic areas in its cumulative impacts analysis, where relevant (see, for example, Impact 4.E-7, which discusses cumulative biological resources impacts in “biologically linked areas sharing Central San Francisco Bay and its waters,” or Impact 4.I-0, which discusses cumulative hydrology and water quality impacts in “the Inner Harbor and the Bay”).

- 7-30 The comment does not address the adequacy of the environmental analysis. The City of Alameda is aware of its obligations and the City of Oakland’s obligations under the terms of the settlement agreement.
- 7-31 The comment does not address the adequacy of the environmental analysis.
- 7-32 The Draft EIR found that the Alameda Point project would contribute to significant and unavoidable transportation impacts at intersections in the City of Oakland, as disclosed in Section 4.C, *Transportation and Circulation*, of the Draft EIR. These impacts would occur because the intersections are already at capacity or will be at capacity with all of the development currently being proposed by the City of Oakland. The Draft EIR used the City of Oakland’s thresholds of significance and provided a level of detail and analysis that is comparable to the level of detail and analysis that Oakland provides for the public in its own EIRs.
- 7-33 For the reasons explained above and based on substantial evidence in the record, the City of Alameda strongly disagrees with the comment. The City of Oakland appears to have a double standard for environmental documents. The Alameda Point Draft EIR provides an extensive discussion and disclosure of potentially significant impacts in Oakland and Chinatown, including significant and unavoidable impacts (see response to Comment 7-32). Please refer, for example to Draft EIR Sections 4.C, *Transportation and Circulation*, 4.F, *Air Quality*, and 4.G, *Noise*. Specifically, see the traffic analysis that includes numerous Oakland intersections (Draft EIR Tables 4.C-8, 4.C-9, 4.C-15, and 4.C-16), using Oakland’s own significance criteria; the Oakland Chinatown pedestrian analysis on page 4.C-83 – 4.C-87 of the Draft EIR; the analysis of air quality impacts along streets in Chinatown on pages 4.F-39 – 4.F-40 of the Draft EIR; and the roadway noise analysis on pages 4.G-18 – 4.G-20 of the Draft (which also includes Oakland street segments). The analysis is equivalent in scope and detail to the scope and detail that the City of Oakland provides in its own environmental documents for projects in and around Oakland Chinatown.



October 17, 2013



Andrew Thomas, Planning Services Manager
City of Alameda Community Development Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Dear Mr. Thomas:

Re: Notice of Availability of a Draft Environmental Impact Report for the Alameda Point Project, Alameda

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Alameda Point Project (Project) located in the City of Alameda (City). EBMUD has the following comments.

GENERAL

Please make the following revisions to Chapter M (Utilities and Service Systems) related to wastewater conveyance and treatment:

- Throughout the Wastewater section, please replace "Pump Station No. 1" with "Pump Station R". As noted on page 4.M-3, this is an EBMUD owned facility. EBMUD identifies this facility as "Pump Station R."] 8-1
- On page 4.M-3 (third paragraph, third sentence) and on page 4.M-11 (first paragraph of Impact 4.M-2, fourth sentence) please delete "capacity" from the phrase "current average dry weather flow capacity of approximately 54 mgd".] 8-2
- On page 4.M-3 (last paragraph, last sentence) the document references the flow monitoring study required by EBMUD under its Stipulated Order and states that a draft report has been prepared. Please update this section to note that the final report was completed in March 2012 and approved by EPA in December of 2012.] 8-3
- Under Section M.3 Regulatory Setting, EBMUD suggests adding a description of the City of Alameda's NPDES Permit for its collection system and associated Stipulated Order. This permit regulates wastewater discharges from the City.] 8-4
- The last paragraph on page 4.M-10 states that the projected wastewater flow from the project is "up to 2.16 mgd" (first sentence), but later states, in the same paragraph, "At buildout, the project would generate increased wastewater treatment demand of"] 8-5

Andrew Thomas, Planning Services Manager
October 17, 2013
Page 2

approximately 0.23 mgd." (third sentence). Please clarify the difference between these two numbers and whether each is a dry weather or wet weather flow.

↑ 8-5
| cont.

- EBMUD would appreciate the incorporation of sewer collection system replacement and rehabilitation in the project design, as described under Impact 4.M-2 on page 4.M-11 (last paragraph, second sentence).

| 8-6

If you have any questions concerning this response, please contact David J. Rehnstrom, Senior Civil Engineer, at (510) 287-1365.

Sincerely,



FOR

William R. Kirkpatrick
Manager of Water Distribution Planning

WRK:JAM:sb
sb13_203.docx

Letter 8. East Bay Municipal Utility District (William R. Kirkpatrick, Manager of Water Distribution Planning)

- 8-1 In response to this comment, the term “Pump Station No. 1” is replaced with “Pump Station R” as a global edit throughout the Draft EIR, and specifically on the following pages of the Draft EIR:

The last sentence of the first paragraph under the heading “Wastewater” is revised as follows:

Wastewater from the project site is collected and conveyed to an existing pump station (Pump Station ~~No. 1~~R), located just west of the Main Gate at the northern edge of Alameda Point. As described below, wastewater collected at this pump station is transported via force main to the EBMUD Main Wastewater Treatment Plant (MWWTP) for treatment.

The last sentence under the section heading “Onsite Wastewater Collection System” and the first sentence under the heading “Offsite Wastewater Transmission Facilities” is revised as follows:

Recent flow monitoring conducted by the EBMUD just upstream of Pump Station ~~R~~No. 1 indicates the existing peak wet weather wastewater flow from Alameda Point is approximately 1.80 mgd.

Offsite Wastewater Transmission Facilities

The existing onsite wastewater collection system directs wastewater to Pump Station ~~R~~No. 1, described above. Since 2003, wastewater from this pump station gets directed eastward via an approximately 8,600-foot-long 20-inch force main to the Alameda Siphon facility near the Webster/Posey Tubes.

The second sentence of the second paragraph on page 4.M-3 is revised as follows:

The existing capacity of Pump Station ~~R~~No. 1 is approximately 7.5 mgd, and the 20-inch diameter force main has a capacity of 12.1 mgd. The Alameda Siphon has an existing peak wastewater flow of approximately 28 mgd.

The first incomplete sentence on page 4.M-12 is revised as follows:

... diameter) and five lift stations, and would connect to the existing Pump Station ~~R~~No. 1 located at the Main Gate.

- 8-2 In response to this comment, the third sentence of the first paragraph under the heading “Wastewater Treatment” is revised as follows:

The interceptor system then transports wastewater to EBMUD's MWWTP, which has a current average dry weather flow ~~capacity~~ of approximately 54 mgd.

The fourth sentence of the first paragraph under Impact 4.M-2 is also revised as follows:

With a current average dry weather flow ~~capacity~~ of approximately 54 mgd, EBMUD has adequate dry weather capacity at the MWWTP for the projected wastewater flows.

- 8-3 In response to this comment, the last sentence of the last paragraph on page 4.M-3 is revised as follows:

~~A draft of t~~This flow monitoring study was completed in March 2012 and approved by the EPA in December 2012~~has been prepared~~, and EBMUD is currently working with the EPA and various stakeholders to develop a long-term plan for region-wide reductions (EBMUD, 2013; CBG, 2013).

- 8-4 A description of the Stipulated Order that the City of Alameda and other Satellite Agencies entered into with the U.S. Environmental Protection Agency (EPA), State Water Resources Control Board, and the San Francisco Bay Regional Water Quality Control Board (RWQCB) is described on page 4.M-4 of the Draft EIR. In response to this comment, a description of the City of Alameda's NPDES permit for its collection system is inserted after the first paragraph on page 4.M-8 of the Draft EIR as follows:

City of Alameda NPDES Permit No. CA0038474

The proposed project would be subject to the requirements of the NPDES permit for the City of Alameda's sewer collection system and wastewater discharges (Permit No. CA0038474, Order No. R2-2009-0081) (RWQCB, 2009). This permit prohibits the discharge of untreated or partially treated wastewater to any surface water stream or to any drainage system intended to convey storm water runoff to surface waters. It also prohibits discharge of chlorine, or any other toxic substance used for disinfection and cleanup of wastewater spills, to any surface water body. Provisions of this permit include proper sewer system management and reporting, consistent with statewide requirements. The City is required to specifically control inflow and infiltration and report any noncompliance, except that the City does not need to report noncompliance with Prohibition III.D. This particular prohibition ensures the City properly operates and maintains its wastewater collection systems so as to not cause or contribute to violations of the Clean Water Act. However, because EBMUD's NPDES permit (CA0038440) requires EBMUD to report such discharges from its wet weather facilities, the City does not need to comply with Prohibition III.D. The NPDES permit also summarizes the 2009 Stipulated Order that EBMUD entered with the EPA, SWRCB, and RWQCB (see above for details).

The following reference is added after (Municode, 2013) on Draft EIR page 4.M-19:

Regional Water Quality Control Board (RWQCB), 2009. Waste Discharge Requirements for the City of Alameda Sanitary Collection System, Alameda County, Order No. R2-2009-0081, NPDES No. CA0038474, adopted on November 18, 2009.

- 8-5 Page 4.M-10 of the Draft EIR states, “At buildout, the project would generate increased wastewater treatment demand of approximately 0.23 mgd.” The 0.23 mgd value represents the increase in peak wet weather flow in comparison to existing peak flows at the EBMUD MWWTP. To correct this error, the second sentence of the last paragraph on page 4.M-10 of the Draft EIR is revised as follows:

At buildout, the project would generate an incremental increased of wastewater treatment demand peak wet weather flow by of approximately 0.23 mgd.

- 8-6 The proposed wastewater collection system improvements, including the replacement of the existing system, are described in Chapter 3, *Project Description* (Draft EIR pages 3-45 to 3-46). A schematic of the proposed ultimate sanitary sewer system is also shown in Figure 3-16 of the Draft EIR.

EBRPD

October 21, 2013

Andrew Thomas, AICP
City Planner
Planning and Building Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

E-mail: athomas@alamedaca.gov

RE: Comments on Draft Environmental Impact Report for Alameda Point General Plan and Zoning Amendments, Master Infrastructure Plan, and Town Center and Waterfront Plan

Dear Mr. Thomas:

The East Bay Regional Park District (the 'Park District') appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Alameda Point General Plan and Zoning Amendments, Master Infrastructure Plan, and Town Center and Waterfront Plan. As a follow up to the Park District's letter dated Feb. 28, 2013 and included in Appendix B of the DEIR, the Park District especially appreciates the acknowledgement of

- 1. The 147-acre Regional Park proposed in the Northwest Territory to be managed by the Park District as shown in Fig. 3-3, Fig. 3-6, Fig. 3-7 and elsewhere in the DEIR;
- 2. The Bay Trail (Class I 12-foot wide) provisions and the Bicycle Lane (Class II 10-foot wide) provisions as shown in Fig. 3-7 and elsewhere in the DEIR. The seasonal trail (10-foot wide) in the Nature Reserve will help protect the California Least Tern and other vital natural resources of the site.

9-1

As indicated in the previous letter, the Park District is concerned regarding the DEIR evaluation of environmental effect of the General Plan Amendment. In particular, the DEIR does not seem to adequately discuss the impacts on the current Open Space Element, the Open Space Action Program (per Government Code Section 65564 Implementation), and the Parks and Recreation Element.

9-2

As part of the action program to implement the Open Space Element, the Park District requests consideration of an implementation policy (similar to Implementation Policy 9.6j) to assure that there is an adequate long term funding for capital improvements, operations and maintenance of the Regional Park and Bay Trail components of the Alameda Point project.

The District appreciates the opportunity to provide these comments on the draft environmental document for the Alameda Point project. We look forward to working with the

City of Alameda and the various stakeholders in developing a vision that can be implemented on Alameda Point that will benefit the City and the region as a whole.

Please provide any future project materials to my attention. I can be reached at (510) 544-2621 or ltong@ebparks.org should you have any questions.

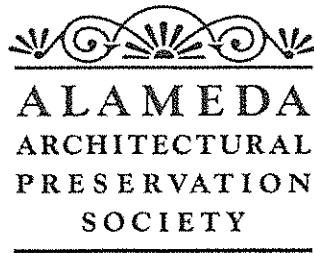
Sincerely,

Larry Tong
Interagency Planning Manager

Cc: Doug Siden – EBRPD Board of Directors
Robert E. Doyle – EBRPD General Manager
Bob Nisbet – EBRPD Assistant General Manager
Michael Anderson – EBRPD Assistant General Manager
Brian Holt – EBRPD Senior Planner

Letter 9. East Bay Regional Park District (Larry Tong, Interagency Planning Manager)

- 9-1 The comment does not pertain to the adequacy of the environmental review. While the proposed project includes several hundred acres of large scale public open spaces and trails that will be used by residents of not only Alameda, but also Oakland, Berkeley, San Leandro and other cities from throughout the region, the determination regarding which entity will manage open space proposed for the Northwest Territories is an administrative question for the City of Alameda and does not affect the adequacy of the EIR or to the environmental process. At this time no decision has been made by the City of Alameda on this point. Although the Park District may be chosen by the City of Alameda to manage the Northwest Territories, as explained no such determination has yet been made. Further, as described on page 3-21 of the Draft EIR, the Bay Trail is an important component of the proposed project, but is required by the United States Fish and Wildlife Service to operate seasonally to protect the California Least Tern and other vital natural resources of the area.
- 9-2 The proposed project changes the zoning on several hundred acres of land from Manufacturing to Open Space, consistent with the City of Alameda General Plan Open Space Element and the Alameda Point Element (adopted 2003). The 2003 General Plan amendment established and planned these areas for future open space in the General Plan. As explained in the Draft EIR, the proposed project is consistent with the City's General Plan Open Space and Conservation Element, Open Space Action Program prepared in accordance with Section 65564, and Parks and Recreation Element. Please see the discussion of recreation and open space on pages 4.A-16, 4.A-21 to 4.A-22, and 4.L-7, 4.L-11 and 4.L-12 of the Draft EIR.



October 21, 2013

(By Electronic Transmission)
Mr. Andrew Thomas
City of Alameda Community Development Department
2263 Santa Clara Avenue
Alameda, CA. 94501

Subject: Alameda Point Project Draft Environmental Impact Report (DEIR)

Dear Mr. Thomas:

The Alameda Architectural Preservation Society has the following comment on the DEIR.

1. **Chapter 2 Figure 2-3, page 2-6** shows a map of the 2 areas. The Reuse Area includes much of, but not all of the NAS Historic District. Then there are 4 subareas: Open space, Town Center and Waterfront Sub-area, Main Street Neighborhoods Sub-area, Adaptive Reuse Sub-area, and the Enterprise Sub-area. As with the Development vs. Reuse Areas, these sub areas do not line up with the boundaries of the Historic District. Much of the Historic District is located inside the Adaptive Reuse zone, but there are Historic District contributors throughout the other zones. The problem with all these maps of zones, areas, sub areas, etc is that NONE of them have the boundary of the Historic District shown including the district contributors.
2. **Chapter 3 Figure 3-4, page 3-13** – this map was originally published in the Cultural Landscape report. This map has an error; the Tower (Bldg 19) is shown as a non-contributor to the Historic District. This information is incorrect. The Tower was identified as a contributor to the Historic District.
3. **Chapter 3 Project Description-** The Main Street Neighborhoods SubArea states removal of the NCO houses but does not indicate where the replacement housing with be located.

10-1

10-2

10-3
Page 1

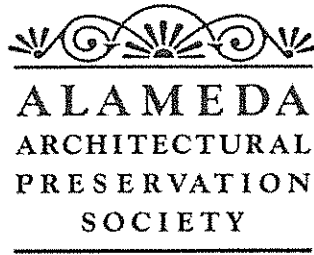


Fig 3-9 is not labeled with street names or building landmarks to identify the location. It is unclear if the Admiral House will be removed as the project description and Figure 3-9 is unclear.

↑
10-3
cont.

4. **Chapter 3 Project Description** – Adaptive Reuse Subarea needs to incorporate the use of the Design Guidelines included in the Cultural Landscape Report as well the use of the *Guide to Preserving the Character of the NAS Historic District*.

↑
10-4

5. **Chapter 3 Project Description** – Town Center/Waterfront Sub Area – the addition of new buildings along the Seaplane Taxi Way would be incompatible with the Design Guidelines in the Cultural Landscape Report (page 258), which would negatively impact the “Views and Vistas” along Tower Avenue and could possibly impact the SeaPlane Hangars. Since the addition of new buildings would be a significant impact; we request a mitigation of infill buildings be limited to 30’ -40’ and/or infill buildings to be significantly lower than historic resources or existing buildings.

↑
10-5

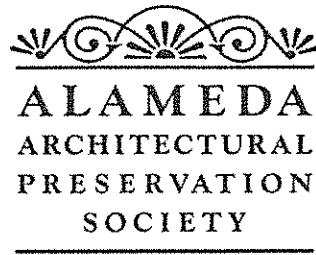
6. **Chapter 4 Impact 4.K-1: Development facilitated by the proposed project could potentially have an adverse effect on a scenic vista. (Significant)**

Views of the project area are not sensitive because it consists of buildings, piers, runways, hangars, and other structures with low scenic qualities. Although there are views of the project area from across the bay from Jack London Square, Alameda/Oakland ferry and other boats, I- 880, the Oakland Ferry Terminal, and from elevated heights in Oakland, there are no particularly scenic features or views of major interest.

↑
10-6

The area has already been deemed significant within the Views and Vistas of the Cultural Landscape report. This analysis is biased and does not take into considering previous adopted historic resource reports.

Page 2



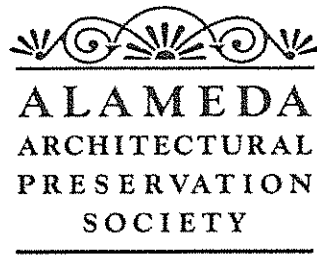
7. Chapter 5: Alternatives D.2 The Preservation/Less Development Alternative –

The Analysis is boilerplate and is not well defined, explained, examined or detailed. The analysis does not identify any specific historic resources that will be impacted, with the exception of the NCO houses. The mitigation is also boilerplate and does not really provide appropriate reparations for significantly impacting historic resources. Additionally:

- Historic district contributors are not identified
- Cumulative impact discussion is lacking a broader historical view: it ought to address the impact of the loss of integrity through modernization and modern development of other major historic military installation on San Francisco bay; Hunters point, Hamilton Field, the Naval Station on Yerba Buena Island & Treasure Island. The DEIR should acknowledge the cumulative impact of diminishing similar resources in the Bay Area.
- Inconsistency of historic names of buildings and landmarks.
- Removal of trees in the identified in the Cultural Landscape report is not addressed.
- Would the new “Supportive housing” to replace the NCO/CPO houses be located inside the HD? If so, would other contributing buildings have to be demolished to make room for them?

10-7

Please contact Karin Sidwell at (510) 459-3799 or karinsidwell@gmail.com if you have any questions.



Thank you,

A handwritten signature in cursive script, appearing to read "Karin Sidwell".

Karin Sidwell
Preservation Action Committee Chairmen
Alameda Architectural Preservation Society

Letter 10. Alameda Architectural Preservation Society (Karin Sidwell, Preservation Action Committee Chairmen)

- 10-1 The outline of the NAS Historic District is shown on page 4.D-24 of the Draft EIR in Figure 4.D-7 and is discussed in detail in Section 4.D, *Cultural and Paleontological Resources* of the Draft EIR (see pages 4.D-6 through 4D-29 of the Draft EIR). The comment is correct that the zoning maps and the Master Infrastructure Plan maps do not show the outline of the NAS Historic District. Both the proposed draft zoning ordinance and draft Master Infrastructure Plan include a number of provisions to ensure that the integrity of the entire NAS Alameda Historic District is considered in all zoning and all infrastructure improvement decisions. The Draft EIR concludes in Impact 4.D-1, notwithstanding the project features to protect historical resources and the mitigation measures identified in the Draft EIR, that it remains possible that one or more historical resources could be adversely affected by demolition or substantial alteration, and for this reason the Draft EIR concludes that this impact is significant and unavoidable.
- 10-2 The diagram referenced by the commenter was provided to the City by the U.S Navy. Although the diagram does not show Building 19 to be a contributing structure, the table on page 4.C-20 of the Draft EIR does list the building as a contributor. The map has been corrected in the Final EIR. This correction has no impact on the environmental analysis or the conclusions and findings in the Draft EIR regarding cultural resources. Neither the zoning, the Master Infrastructure Plan nor the Town Center and Waterfront Precise Plan proposes to remove or alter the Tower building (Building 19). Please see Chapter 5 of this Final EIR for a corrected map.
- 10-3 The Collaborative's proposal to consolidate and relocate their existing 200 housing units, which include the NCO houses, is shown in Figure 3-9 of the Project Description (see page 3-29 of Draft EIR).
- 10-4 The comment relates to the proposed draft zoning ordinance, not the adequacy of the environmental analysis. The October 18, 2013 draft of the Zoning Ordinance includes references to the Cultural Landscape Report and the *Guide to Preserving the Character of the NAS Alameda Historic District*.
- 10-5 The Draft EIR discloses that redevelopment and reuse of the properties within the NAS Alameda Historic District could result in significant unavoidable impacts to the contributing features, including the Seaplane Taxiway. The Draft EIR also includes Mitigation Measures 4.D-1a, 1b, and 1c which requires review of any new buildings proposed within the boundaries of the NAS Alameda Historic District to ensure that the new buildings are designed in a manner that is consistent with the character defining features of the Historic District (see page 4.D-36 of the Draft EIR). These mitigation measures are designed to ensure that the City of Alameda Historical Advisory Board reviews proposed new buildings and modifications to existing buildings and features on an

individual, and case-by-case basis to ensure that each proposal is compatible with the surrounding context. A “one-size-fits-all” approach, where all new buildings would need to be “significantly lower than historic resources” or limited to “30-40 feet” in height, is not recommended as part of the proposed project because the character defining features of existing structures varies dramatically within the Historic District. For example, a 30- to 40-foot high building may not be compatible with the 50-60 foot high hangars, and it may not be appropriate immediately adjacent to the one and two story residential buildings in the residential area.

- 10-6 The potentially significant impacts on the NAS Alameda Historic District are discussed and disclosed in Section 4.D, *Cultural and Paleontological Resources*, of the Draft EIR. In contrast, Impact 4.K-1 relates to scenic resources within a state scenic highway, and addresses significance criterion number two on Draft EIR page 4.K-10. The project site is not within a designated scenic highway; therefore, the project would have a less-than-significant impact on scenic highway vistas, as discussed on page 4.K-13 of the Draft EIR.
- 10-7 The purpose of the alternatives analysis in an EIR is to determine whether there is an alternative development scenario that would: 1) avoid or substantially lessen any of the significant environmental effects of the proposed project, and 2) meet most of the basic Project Objectives, pursuant to CEQA *Guidelines* §§ 15126.6(a) and 15126.6(c). The analysis in Chapter 5, *Alternatives*, of the Draft EIR finds that a preservation alternative would reduce or eliminate the cultural resource impacts associated with the proposed project, but that the preservation alternative would fail to meet many of the project objectives. In response to the specific issues raised by the comment:
1. The mitigation proposed for the impacts associated with the proposed project is specifically designed to allow the Historical Advisory Board and the general public the opportunity to review, evaluate and conditionally approve individual modification to existing contributing structures and new structure proposed within the NAS Alameda Historic District.
 2. The contributors to the Historic District are listed on pages 4.D-20 through 4.D-23 (Table 4.D-1) and are shown on Figure 4.D-7 on page 4.D-24 of the Draft EIR.
 3. The Draft EIR analyzes cumulative impacts to cultural resources in Cumulative Impact 4.D-5 (Draft EIR pages 4.D-40 to 4.D-41). Impact 4.D-5 discusses the combined impact on cultural resources in combination with the effects of other projects in the vicinity of the project site that may have related impacts.
 4. Table 4.D-1 on pages 4.D-20 through 4.D-23 is the list of names and building numbers from the National Register of Historic Places Nomination Form for the Naval Air Station Alameda. If a building or feature was referred to by a different name in the text of the analysis, (because many of the buildings are known by several names), it would not affect the findings or conclusions of the environmental analysis.

5. The project does not propose any tree removals. On the contrary, the project is designed to increase the number of trees at Alameda Point. As described in the Draft EIR, (page 4.D-36) if a tree or other landscape element identified in the Cultural Landscape report is proposed for removal to accommodate an infrastructure improvement or a proposal for a new building, then that proposal would be reviewed by the Historical Advisory Board at a public meeting to determine if there is a way to avoid the removal of the tree or landscape feature and/or minimize the impact of the proposed removal on the integrity of the NAS Alameda Historic District.

6. When and if the Alameda Point Collaborative proposes a plan to consolidate their existing 200 housing units of supportive housing, and if that plan includes either: 1) new construction in the NAS Alameda Historic District or 2) demolition of contributing structures such as the “NCO/CPO” units, then that proposal would be reviewed by the Historic Advisory Board at a noticed public hearing consistent with Mitigation Measures 4.D-1a, 1b, and 1c.



October 21, 2013

Andrew Thomas
City Planner
City of Alameda
Community Development Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Subject: Comments on Draft Environmental Impact Report for Alameda Point Project SCH No. 2013-12043

Dear Mr. Thomas,

Alameda Point Collaborative, Operation Dignity and Building Futures for Women and Children have reviewed and prepared the following comments on the Draft Environmental Impact Report (DEIR) for the proposed Alameda Point Project.

We are encouraged that many impacts of the proposed project can be mitigated to a level of insignificance. Nevertheless, our resident population has the following concerns:

PROJECT DESCRIPTION

1. Project Objective B.4 Economic Development and Employment Objectives (page 3-4)

The project objectives need to include reference to the McKinney-Vento Act homeless employment goals and the 1995 Standards of Reasonableness agreement with Alameda Point Collaborative. The agreement sets a first source-hiring goal of placing homeless and low-income residents in 15% of all new jobs at Alameda Point.

11-1

2. Figure 3-7 Alameda Point Circulation Framework (page 3-17)

Figure 3-7 needs to be revised to show Orion Street as a Local Residential Street north of West Midway Avenue, rather than an Island Collector, per our agreement with Jennifer Ott and Matt Naclerio. This local residential street can have traffic calming, bicycle lanes, traffic bulb-outs and changes in alignment to reduce traffic volume and speeds.

11-2

3. D. Project Description Sub Areas Description: Main Street Neighborhoods Sub-Area. "The existing Supportive Housing Units may be relocated into a new well-designed neighborhood center with multi-family housing, community spaces, supportive facilities and public gathering spaces." (page 3-28)

The project description needs to state: "The intentions of the Alameda Point Project are to ensure:

11-3

- o Early investment in infrastructure and public service improvements to enable the successful rebuilding and maintaining of long-term operations of supportive housing to meet the health, safety, welfare and job readiness needs of the formerly homeless at Alameda Point;

- o Priority to invest in replacement infrastructure to protect livability of existing supportive housing until replacement housing is built; and
- o Support to obtain early funding to rebuild replacement housing (federal and state tax credits, grants, private and other funding), including relocating in the Main Street Neighborhood closer to the Town Center to maximize tax credit allocation competitiveness.”

11-3
cont.

4. D. Project Description Development Program. “...development increments may be moved from one sub-area to another to optimize development opportunities, and address site specific conditions.” (page 3-32)

We are concerned this will be detrimental to rebuilding supportive housing. There needs to be a minimum number of residential units in the Main Street Neighborhood. While some flexibility to address site-specific conditions makes sense, this is too open ended. For example, depending on the number of housing units moved from the Main Street Neighborhood to the Town Center, there could be an insufficient amount of market rate housing to pay for infrastructure; funds to subsidize rebuilding supportive housing; funding public services per city’s fiscal neutrality policy; or insufficient density to qualify as a viable mixed-use transit-oriented neighborhood.

11-4

The City’s General Plan (Chapter 9, page 5, Table 2-7 Alameda Point Build Out 2000-2020) allocates 490 units for medium density residential and 50 low density residential for the “Big Whites” in the Main Street Neighborhoods. Medium density residential in this area will be approximately 5 du/ac, which is considerably less than the One Bay Area Plan, which designates Alameda Point as a moderate density town center, with residential densities from 20 – 70 dwelling units/net acre.

5 units per acre is already low to achieve the city’s goal to have: “a wide variety of residential building types including single family detached homes, and multi-family buildings such as attached town house and row houses.” Transferring units from this area to other areas will further reduce residential density building types to only large lot single family. These units will be larger than traditional Alameda neighborhoods, and inconsistent with the General Plan.

ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

1. A. Land Use Consistency and Compatibility: Local Plans, City of Alameda

The DEIR analysis needs to reference the 1995 ARRA adopted Standards of Reasonableness to guide the evaluation of land use impacts with the plan.

The Standards of Reasonableness provide a general commitment to the future reuse goals at Alameda Point that lead to the Legally Binding Agreement and Property Lease (LBA) for 200 units of supportive housing for a 59 year least term once the Navy conveyed the property to the Alameda Reuse and Redevelopment Authority. The DEIR finding needs to show that the Alameda Point Project is consistent with the Standard of Reasonableness.

11-5

2. **B. Population and Housing Impact 4.2 B-2: Development facilitated by the proposed could potentially displace a substantial number of people or housing. "The proposed project would not displace any people or existing housing, and the project would not necessitate construction of replacement housing." (page 4.B-9)**

We are concerned that the DEIR does not address mitigation of impacts to residents if there is no project, inadequate funding to implement project or there are long-term delays with implementing the project that could result in displacing existing residents.

The existing residents live with infrastructure that is way beyond its useful life. The Navy left active use of the base 20 years ago, and no investment in infrastructure has taken place.

The existing infrastructure continues to deteriorate and is increasingly unreliable. Storm water floods areas at the base. The sewer system has water infiltration during rains. The water system breaks, is costly to repair, and residents have been without water for days. Telephone service is unreliable, having been disrupted for days at a time. Natural gas is not provided to parts of the base. Sidewalks do not meet federal disability accessibility standards for the resident disabled population.

Existing infrastructure does not meet current codes and is completely inadequate to address the threat of sea level rise and climate change as anticipated during the 20-year build-out of the plan to 2035. Residents are rightfully concerned that of what could happen at a peak storm event.

Existing historic buildings are vacant, abandoned, vandalized and rapidly deteriorating, creating a district of "historic blight." These buildings are a health and safety hazard, and invite further vandalism. Supportive housing has deferred maintenance issues due to funders anticipating the rebuilding of supportive housing, and thereby not investing in long-term maintenance.

Disabled Veterans returning from Afghanistan and Iraq and their families, women and children surviving domestic violence, as well as formerly homeless and their families recovering from homelessness and striving for self-sufficiency, need adequate housing and infrastructure services.

The potential for displacement of these residents as a result of the city's not acting in time and with sufficient resources to ensure adequate infrastructure to protect and serve these communities needs to be addressed in the DEIR.

The DEIR needs to identify mitigations to address health and safety risks to existing residents with deteriorating infrastructure and buildings if rebuilding supportive housing is not accomplished in the first phase of the project or with the selection of a lesser environmental impact alternative.

11-6

- 3. **C. Transportation and Circulation Mitigation Measure 4. C-1: The City shall require that project applicant(s) and construction contractor(s) develop a construction management plan for review and approval by the Public Works Department prior to issuance of any permits. (page 4.C-35)**

Construction management plans need to have uniform criteria to mitigate the impact of truck trips and deliveries on existing supportive housing residents. APC needs to review the criteria for development of the plans to ensure this is adequately addressed.

11-7

- 4. **D. Cultural and Paleontological Resources Mitigation Measure 4.D-1c: "As condition of approval for demolition or removal of contributor to the Historic District, the City shall require that the project applicant..."**

Figure 3-11 Reuse vs. Development Areas (page 3-38) shows the extent of the area of new construction extends into the historic district, demolishing existing officer housing north of West Midway and East of Pan Am Way. Please clarify that this means that new construction in this area will be permitted to replace existing officer housing per meeting mitigation measures for this section.

11-8

- 5. **F. Air Quality and Greenhouse Gases: Impact 4.f-1: Development facilitated by proposed project could potentially result in air quality impacts due construction activities.**

Residents are concerned that even with the implementation of the BAAQMD Best Management Practices for construction activities, there is still a health risk with exposure to dust, construction exhaust, cancer causing toxic air contaminants and particulates. The DEIR states that supportive housing is downwind of the most intensive construction activity including grading. However the duration of construction from 2014 to 2035 will result in long-term exposure risks, including objectionable odors for almost 20 years. 50 percent of the residents at Alameda Point are children, which have much higher sensitivity to exposure to toxic air contaminants and particulates.

11-9

We request that the City fund working with an environmental justice organization to protect resident health. For example, Global Community Monitor (GMC) is an environmental justice organization that trains and supports communities in the use of environmental monitors tools to understand the impacts if industrial pollution on their health. This independent air testing program empowers residents to take scientifically credible samples using U.S environmental Protection agency approved methods and laboratories. This gives communities a way to "level the playing field" with indifferent regulators and polluters. The City can support these efforts through funding and inclusion into the project mitigation measures.

11-10

6. **G. Noise: Impact 4.G-1: Construction facilitated by the proposed project could potentially expose persons to or generate noise levels in excesses of City noise standards.**

Residents will experience noise from pile driving, generators, air compressors, truck traffic and other stationary and mobile sources, including ground borne vibration on an annual basis for 20 years with build out by 2035.

Mitigation of noise impacts will be essential for quality of life of residents, who occupy existing housing during daytime construction and do not have acoustical measures built into their housing. Rebuilding supportive housing in the first phase will mitigate noise with new construction meeting city's standards for indoor noise. Outdoor noise mitigation measures will need to be identified for areas that are used by children. Prior to construction of replacement housing, APC will need to review measures to respond and track complaints.

11-11

7. **J. Hazards and Hazardous Materials: Impact 4.J-1: Demolition of existing structures on Alameda Point which contain hazardous building materials such as lead based paint, asbestos and PCB's could potential expose workers, the public or the environment from the transport, use or disposal of these hazardous materials and waste.**

The supportive housing providers need to review the City's hazardous building material assessment, as well as review and comment on any proposed health and safety plans prepared by future applicants to address mitigations of hazardous materials. This includes review and comment on a site management plan and land use restriction tracking program to address any risks of exposure to previously contaminated soil or ground water including vapor intrusion into buildings and mitigation management of construction waste and recycling. These mitigation programs could be opportunities to train APC residents for monitoring jobs.

11-12

ALTERNATIVES ANALYSIS

We are concerned that the Alternatives Analysis does not evaluate how the project alternatives either advance the goal of rebuilding supportive housing, or articulate the impacts on existing residents to inform consideration of project alternatives. We recommend adding the following text:

11-13

D.1. **The No Project/No New Development Alternative.** This alternative will result in further deterioration of infrastructure services on residents resulting in increased displacement risks to residents due to lack of reliable infrastructure services and exposure to flood hazards. This alternative does not achieve the goal of rebuilding and maintaining long-term operations of supportive housing and is unlikely to achieve first source hiring goals.

11-14

D.2. **The Preservation/Less Development Alternative (1,000 units/6,000 jobs):** This alternative will attract limited investment and inadequate resources to rebuild housing and infrastructure. Residents will continue to be exposed to flood

11-15

Comment Letter 11

Collaborative Supportive Housing
DEIR Comments

hazards and deteriorating, unreliable infrastructure therefore increasing displacement risks for residents. This alternative does not achieve the goal of rebuilding and maintaining long-term operations of supportive housing.

11-15
cont.

- D.3. **The Existing General Plan Alternative: More Housing and Less Jobs Alternative** (1,928 units/2.3 million SF): This alternative is unlikely to achieve goals for job creation, economic development or re-use of historic buildings. Build out of a greater number of residential units in the Main Street Neighborhood is more likely to achieve rebuilding of supportive housing, but less likely to achieve first source hiring goals.

With limited commercial development, preservation and adaptive reuse of existing historic buildings will not be achieved, increasing "historic blight" and discouraging investment in residential development in the Main Street Neighborhoods. This alternative performs better at achieving the goal of rebuilding and long-term operations of supportive housing but is unlikely to achieve first source hiring goals.

11-16

- D.4. **The Multifamily Alternative** (1,425 units/5.5 million SF): This alternative will result in large land areas remaining undeveloped and less infrastructure investment without single-family residential uses. This alternative does not achieve the goal of rebuilding and long-term operations of supportive housing.

11-17

- D.5. **The Transit-Oriented Mixed-Use Alternative** (3,400 units/5.5 million SF): This alternative will provide higher levels of development and infrastructure investment, thus making it easier to achieve the goals of rebuilding and maintaining long-term operations of supportive housing and achieving first source hiring goals. This assumes that the real estate market can accomplish project goals even with the imposition of Navy fees for housing above the no cost conveyance limits of 1,425 units.

11-18

- D.6. **The High-Density Alternative** (4,841 units/3.4 million SF): This alternative will provide higher levels of development and infrastructure investment, thus making it easier to achieve the goals of rebuilding and maintaining long-term operations of supportive housing and achieving first source hiring goals. This assumes that the real estate market can accomplish project goals even with the imposition of Navy fees for housing above the no cost conveyance limits of 1,425 units.

11-19

Sincerely,



Doug Biggs
Executive Director
Alameda Point Collaborative

Letter 11. Alameda Point Collaborative (Doug Biggs, Executive Director)

- 11-1 The comment does not address the adequacy of the environmental analysis presented in the Draft EIR. The City acknowledges the agreement with the Alameda Point Collaborative (APC) and is committed to working with APC toward achieving the goals established by the agreement, as substantiated by in the final project objective on page 3-5 of the Draft EIR which reads:
- Facilitating the relocation and consolidation of existing supportive housing providers in new facilities at Alameda Point to help ensure a mix of incomes and populations are represented at the project site.
- 11-2 The General Plan Amendment to Chapter 4 (Transportation Element) shows Orion Street as a Local Residential Street north of West Midway Avenue.
- 11-3 The comment does not address the adequacy of the environmental analysis presented in the Draft EIR. The City acknowledges the goals of the APC and will continue working with the Supportive Housing Providers toward investment in infrastructure and public services improvements that serve the long-term needs of the residents in the Supportive Housing Units.
- 11-4 The comment does not address the adequacy of the environmental analysis presented in the Draft EIR. The City agrees that housing development in the Main Street Neighborhood will be crucial to financing infrastructure and other required public and community benefits planned for that area and elsewhere at Alameda Point. The details of exactly where, how much and what type of housing occurs in the Main Street Neighborhood will be determined in the Master Plan for this zoning sub-district as required by the proposed Zoning Ordinance Amendment.
- 11-5 The Standard of Reasonableness provide a general commitment to the future reuse goals of Alameda Point that led to the Legally Binding Agreement and Property Lease for 200 units of supportive housing for a 59-year lease term. The Standards of Reasonableness were reviewed in preparing this EIR.¹⁵ The proposed project would be consistent with those Standards. The Supportive Housing Units are described as part of the project on page 3-28 of the Project Description, on page 4.A-22 under consistency with the Housing Element, and on page 4.B-8 of Population and Housing related to inclusionary housing. The proposed project is consistent with the Standards of Reasonableness in that it will continue to provide housing opportunities for the homeless population. Although job placement under buildout of the proposed project is not discussed in the EIR because it is not related to a physical effect on the environment, the City is committed to working with APCs in achieving the 15 percent hiring goal.

¹⁵ Standards of Reasonableness for Homeless Uses at the Alameda Naval Air Station, as amended January 2, 2007.

11-6 As explained in the Draft EIR, page 5-1 CEQA requires all EIRs to analyze the “no project” alternative, which consists of “the existing conditions at the time the notice of preparation [NOP] is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” CEQA Guidelines § 15126.6(e)(2); Draft EIR, pages 5-1 and 5-2. The purpose of analyzing the no project alternative “is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” CEQA Guidelines § 15126.6(e)(1).

The NOP for this EIR was issued on January 10, 2013. Accordingly, the analysis of the No Project Alternative, which is described on pages 5-5 to 5-6 of the Draft EIR, addresses the conditions that would exist if the proposed project is not approved, which consists of a continuation of the existing uses on the project site, with no new construction, but ongoing use of and reinvestment in existing residential and commercial buildings. In addition, because the project site would continue to be occupied the site would continue to require some construction work to repair and maintain existing facilities, as noted on pages 5-19 to 5-20, 5-26 to 5-27, 5-28, 5-29 of the Draft EIR.

The Draft EIR assesses the environmental impacts of each of the alternatives, including the No Project Alternative, in Section F of Chapter 5 of the Draft EIR (on pages 5-11 to 5-29 of the Draft EIR). Thus, for example, the No Project Alternative would not correct ongoing and current deterioration of the cultural resources making up the NAS Alameda Historic District as described on pages 5-18 to 5-19 of the Draft EIR. In addition, because under the No Project Alternative the current substandard storm water systems and storm water runoff conditions would remain, they would likely continue to contribute to or even increase existing water quality issues (see page 5-29 of the Draft EIR).

A “significant effect on the environment” (significant impact) under CEQA consist of “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project.” CEQA *Guidelines* § 15382; Public Resources Code § 21068. Because the No Project Alternative would involve the City making no change in the status quo, there would be no project approval, and CEQA does not require the lead agency to evaluate and mitigate the impacts from the lead agency taking “no action.”

The Alameda Point Collaborative housing is an existing condition on the project site. The Alameda Point Collaborative site is above the existing 100-year flood elevation under existing conditions plus 18 inches of sea level rise. Draft EIR, p. 3-39, Figure 3-12, and pp. 4.I-3 through 4.I-7. As explained in the Draft EIR, the City has a Comprehensive Emergency Services Management Plan to protect the safety and welfare of residents, employees and visitors in Alameda in the event of an emergency such as a flood, tsunami or earthquake. Continuation of existing conditions is not a significant impact for purposes of CEQA, please see pages 4.I-16 to 4.I-17 of the Draft EIR.

As stated in the Draft EIR, the proposed project meets the project objective for reinvestment in infrastructure and deteriorating facilities (Objective B.1) better than the no project. The faster that the project is implemented the greater the potential for upgrade and replacement of infrastructure and other deteriorating conditions found at Alameda Point under the existing conditions, including the facilities used by the Supportive Housing Units. The City is committed to working with the Supportive Housing Providers to pursue financing mechanisms from numerous public and private sources to achieve new infrastructure and the relocation of the Supportive Housing Units into new facilities as soon as possible.

- 11-7 The request is noted and the City welcomes the review of such plans by the APC when they are developed.
- 11-8 Page 4.D-35 of the Draft EIR notes that the proposed project includes development of new residential development of the CPO housing area which could change the character of the district and/or require the removal of these or other contributing structures or features. This effect was identified as a potentially significant impact. Mitigation measures identified to reduce this and other impacts to the Historic District are listed on paged 4.D-36-37 of the Draft EIR. They include Measure 4.D-1a (City shall implement the requirements of the Historic Preservation Ordinance, which requires a certificate of approval by the HAB for modifications to contributors and resources within the Historic District), Mitigation Measure 4.D-1b (prior to approval of new buildings within the Historic District the City shall complete and adopt *Guidelines for New Infill Development within the Historic District*), and Mitigation Measure 4.D.1c (as a condition of approval for demolition or removal of a contributor to the Historic District, the City shall require that the project applicant to complete various documentation, public interpretation, and architectural salvage efforts prior to demolition). Page 4.D-37 of the Draft EIR concludes that these mitigation strategies would reduce, but not eliminate, potential significant adverse impacts to the NAS Alameda Historic District (including potential demolition of the CPO housing area). Therefore, even with implementation of the Mitigation Measure 4.D 1, demolition and/or substantial alteration of NAS Alameda Historic District contributors could result in significant and unavoidable impacts. New construction within this or other portions of the NAS Alameda Historic District would be subject to these same mitigation measures. Therefore, these measures would apply to both the potential removal of the CPOs and new replacement housing.
- 11-9 The health risk impacts associated with proposed project construction are conservatively analyzed in Impact 4.F-1 of the Draft EIR, which concludes that supportive housing would not be downwind of significant project construction and would not represent the maximally exposed receptors. In addition, no individual receptor would be exposed to maximum exhaust emissions over the total duration of the project development, because construction would occur in different areas and at distances from sensitive receptors for more limited periods of time during the overall buildout period. Finally, as indicated on page 4.F-34 of the Draft EIR, the health risk estimates incorporate updated age sensitivity

- factors and daily breathing rates that factor in the increased susceptibility of infants and children to carcinogens as compared to adults. Substantial emissions reductions would be achieved by implementing specified mitigation measures, which would in turn substantially reduce potential health risks of all sensitive receptors in the area, including the supportive housing residents. The localized TAC health risk impact was determined to be less than significant after mitigation.
- 11-10 The City welcomes discussions with the Alameda Point Collaborative regarding coordination with an environmental justice organization, such as the Global Community Monitor, to establish a community air quality monitoring program.
- 11-11 Construction noise impacts and proposed mitigation measures are described in Impact 4.G-1 of the Draft EIR. The analysis found that the mitigation measures specified would ensure that construction would comply with the City of Alameda Noise Ordinance and would reduce the construction noise levels from the proposed project to the extent feasible. However, for some infrastructure projects, activities could occur outside the allowable hours permitted under the noise ordinance and potentially result in short-term significant noise impacts. Although phasing of development is not known at this time, supportive housing residents would not be exposed to the maximum noise levels for the entire 20 year construction period, but rather when construction occurs in close proximity. Individual residents would be exposed to reduced noise as construction progressed at greater distances and intervening structures are built. The City welcomes the Alameda Point Collaborative in assisting in complaint review and tracking efforts as warranted.
- 11-12 Much of the process and performance standards in the Site Management Plan are guided by existing regulatory protocols and standards from public agencies including OSHA, BAAQMD, DTSC and RWQCB such that implementation of Mitigation Measures 4.Ja through e and 4.J-2 would be effective in reducing potential health risks from hazardous building materials or residual contamination to less than significant levels. Regardless, the City will coordinate with the Alameda Point Collaborative on abatement of any hazardous building materials that remain on the site for potential job opportunities for APC residents. The City will also include the Alameda Point Collaborative in the review process for the Site Management Plan and other City reports and programs, along with the regulatory agency review process to ensure that public safety is protected.
- 11-13 The request is noted and the following responses incorporate the requested analysis (responses to Comments 11-14 through 11-19).
- 11-14 In response to this comment, the following text is added under the No Project/No New Development Alternative on page 5-5 of the Draft EIR:

This alternative would result in further deterioration of infrastructure services on residents resulting in increased displacement risks to residents due to the lack of reliable infrastructure services and exposure to flood hazards. This alternative

would not achieve the goal of rebuilding and maintain long-term operations of supportive housing and is unlikely to achieve the first source hiring goals.

- 11-15 The following text is added under the Preservation/Less Development Alternative on page 5-6 of the Draft EIR:

This alternative would attract limited investment and inadequate resources to rebuild housing and infrastructure. Residents would continue to be exposed to flood hazards and deteriorating, unreliable infrastructure, thereby increasing displacement risks for residents. This alternative does not achieve the objective of rebuilding and maintaining long-term operation of supportive housing.

- 11-16 The following text is added under the Existing General Plan Alternative: More Housing and Less Jobs on page 5-8 of the Draft EIR:

This alternative is unlikely to achieve the project objectives of job creation, economic development and re-use of historic buildings. Buildout of a greater number of residential units in the Main Street Neighborhood is more likely to achieve rebuilding of supportive housing, but less likely to achieve first source hiring goals.

With limited commercial development, preservation and adaptive reuse of existing historic buildings will not be achieved, thereby limiting re-investment in the district. This alternative would perform better at achieving the project objective of rebuilding and long-term operations of supportive housing but is unlikely to achieve first source hiring goals.

- 11-17 The following text is added under the Multifamily Alternative on page 5-8 of the Draft EIR:

This alternative would result in land areas remaining undeveloped and less infrastructure investment because it would not include new single-family residential uses. This alternative may not achieve the project objective of rebuilding and long-term operation of supportive housing.

- 11-18 The following text is added under the Transit-Oriented Mixed-Use Alternative on page 5-9 of the Draft EIR:

This alternative would provide higher levels of development and infrastructure investment, thus making it easier to achieve the project objectives of rebuilding and maintaining long-term operation of supportive housing and achieving first source hiring goals. This alternative assumes that the real estate market can accomplish project objectives even with the imposition of Navy fees for housing above the no cost conveyance limits of 1,425 units.

11-19 The following text is added under the High-Density Alternative on page 5-10 of the Draft EIR:

This alternative would provide higher levels of development and infrastructure investment, thus making it easier to achieve the project objectives of rebuilding and maintaining long-term operation of supportive housing and achieving first source hiring goals. This alternative assumes that the real estate market can accomplish project goals even with the imposition of Navy fees for housing above the no cost conveyance limits of 1,425 units.

Comment Letter 12

Bayview Estates Homeowners Association

P.O. Box 1775
Alameda, CA 94501-1775

October 18, 2013

Mr. Andrew Thomas
City Planner
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501

Dear Andrew:

On October 9th a group of concerned neighbors and four of five Board Members of the Bayview Estates Homeowners Association met with you along Bayview Drive. We appreciate your time and clarifications. On behalf of the Board we are writing to express our concerns about the Draft Environmental Impact Report (EIR) which focuses on potential impacts of future Alameda Point development.

According to the Draft, Bayview Drive could be an alternative feeder/overflow route for Otis Drive and Bayfarm Bridge traffic. Due to the projected increase in traffic in the area, the EIR has proposed several mitigation concepts designed to accommodate an increase, one which proposes removing six parking spaces along Bayview Drive near the Ravens Cove development.

The Board position is, that despite the apparent infeasibility of this option (pages 62-63 Traffic), any increase in traffic is opposed by the neighborhood and the Board. Please note that we have worked closely with the City over the years to mitigate increasing cut-through traffic and speeding on Bayview Drive as evidenced by the installation of traffic calming devices. Specifically, we have worked with Public Works to:

- a) Install speed lumps on Bayview Drive to slow traffic and discourage cars from using our residential street as a cut-through route between the Bay Farm Bridge and South Shore Center; and
- b) Improved pedestrian access and the cross-walk at Court Street and Bayview Drive

12-1

Other elements that were initially called for but NOT installed, including Bulb-Outs at the Bayview/Broadway intersection and at the Court Street/Bayview intersection, a cross walk and caution sign installed mid-street at the Coastal Access easement mid-way along Bayview Drive, and stripping in the median of Bayview Drive to highlight visual cues to help reduce speeding. We would like to propose that all of these items now be considered for installation.

We urge the Planning Department to amend the draft EIR to reflect our desire to lower traffic levels on Bayview Drive, and mitigate traffic flows that are contrary to that goal. We would like to continue to work with the City to expand traffic calming, recognizing the inevitability of future development in Alameda.

Andrew, we look forward to working with you and other City departments to modify the draft EIR to more closely match our utilization goals for Bayview Drive.

Sincerely,

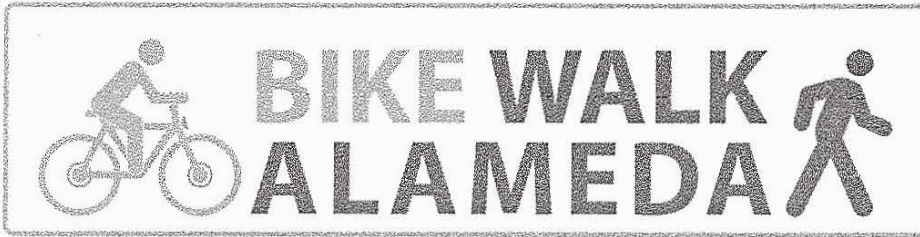
Michael Karp, President
Zachary Davis, Vice President
Olivia Rebanal, Treasurer
Susan Davis, Editor
Susie DeFranco, Secretary

Letter 12. Bayview Estates Homeowners Association (Michael Karp, President)

12-1 In response to the comments received, the City conducted an onsite re-evaluation of the conditions on Bayview Drive and a review of Mitigation Measure 4.C-5f. As a result of this re-evaluation, Mitigation Measure 4.C-5f is revised to read as follows:

“The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b, page 4.C-63 of the Draft EIR) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:

- ~~Add a northbound right turn lane on High Street to provide a shared through-left and right turn lane on the north bound approach,~~
- ~~Add an overlap phase for the northbound High Street right turn movement and prohibit the conflicting westbound Otis Drive U turn movement; and~~
- Optimize the signal timing at High and Otis for both peak hours, and
- Install traffic calming strategies on Bayview Drive to include improvements, such as: restriping Bayview Drive to create narrower driving lanes to reduce speeding, installing a cross walk and caution sign at the location of the public coastal access easement, and/or construction of sidewalk bulb-outs to improve pedestrian safety at the intersections of Bayview/Court Street and Bayview/Broadway.”



www.bikewalkalameda.org

(510)595-4690

PO BOX 2732

ALAMEDA, CA 94501

October 17, 2013

Andrew Thomas
City Planner
2363 Santa Clara Avenue
Alameda, CA 94501

re: Alameda Point EIR

Mr. Thomas,

Bike Walk Alameda has reviewed the EIR and would like you to consider the following biking and walking issues.

1. Development at Alameda Point, provides opportunities to follow through on the recommendations of the **Estuary Crossing Study**. Given that increased traffic congestion is the key issue around this development, every way to enhance alternative transit -- bicycle, pedestrian and transit networks -- between Alameda and Oakland should be explored. A few years ago, the city funded the Estuary Crossing Study to look at this very issue. There were three preferred recommendations -- short-term (Tube improvements), medium-term (water shuttle), and long-term (a bridge with transit lanes). The long-term recommendation was deemed too ambitious at that time. Now, however, seems like the perfect time to revisit it. Not only would a bridge address the "significant and unavoidable" impacts of this development, but it would serve as a lifeline corridor to the mainland in the event of a disaster.

13-1

One of the key issues around the bridge was the height it would have to be to accommodate the large Coast Guard cutters stationed at Coast Guard Island. Has the idea of mooring the Coast Guard cutters at Seaplane Lagoon been considered? Not only would that make the engineering of the bridge much simpler, but perhaps this location would be more convenient for the Coast Guard, which needs to be able to get their cutters to the Bay quickly when needed.

13-2

2. *Master Infrastructure Plan Part I, item IV/C./2./b. (page 68): Shuttle service will be for residents and employers at Alameda Point.*
All transportation services and programs should serve the broader public, as well as residents and employers? The AP shuttles should be coordinated with other programs in Alameda (Alameda Landing's TDM program, for example) to ensure it's addressing and meeting the island's traffic mitigation goals.
What are the standards, public input, and on-going public oversight of the TDM?

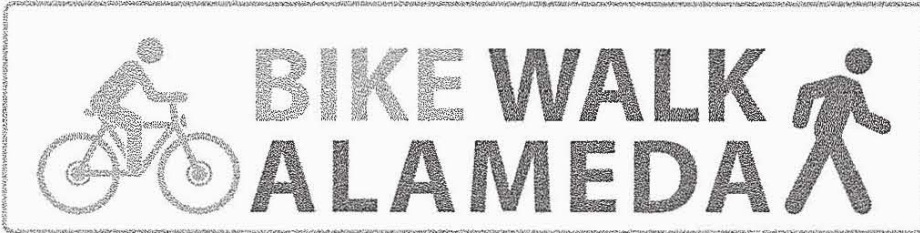
13-3

3. *Master Infrastructure Plan Part I, item IV/C./2./d. (page 71): There will only be one ferry terminal for Alameda Point -- either the existing one at Main Street or the one to be built at Seaplane Lagoon.*
We strongly support the enhancement of transit connections between Alameda and Oakland, not just between Alameda and San Francisco. Losing the only ferry terminal on the estuary would be unwise. We favor improving and increasing transportation options and networks. The existing ferry service is not designed with the Oakland-Alameda connection in mind, but can -- and should -- be modified as Alameda Point builds out.

13-4

A **water shuttle** service is the medium-term recommendation in the Estuary Crossing Study, and there is a water shuttle planned for Alameda Landing when a certain occupancy target is met. Alameda Point should contribute and support the AL water shuttle.

13-5



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4. The mitigations proposed need to analyze their impact on the thresholds of significance for each mode. Most of the auto mitigations are proposed on bike priority streets and little to no analysis is made for degradation in bicycle service, if the mitigation were made. Where there is analysis, the conclusion is wrong. The mitigation in some cases would preclude the city from acting on long term bicycle plans. 13-6

Mitigation issues:

Auto Analysis

The following auto mitigation are proposed for bike priority streets that have proposed bike infrastructure in the Bicycle Master Plan. We do not believe that the impacts to bicycle travel are 'less than Significant' as the EIR states. 13-7

Park and Clement 4.C-5a: Clement is a bike priority street and part of the Cross Alameda Trail. If travel lanes are added for the mitigation, how would they impact the proposed bike lanes on Clement? 13-8

Broadway/Otis 4.C-5c

Broadway and Otis at Broadway are bike priority streets. Adding a left turn lane impacts the LOS of bike travel on Broadway. What is the evidence that this mitigation is 'less than significant for bicycle travel'? 13-9

Tilden/Blanding/Fernside 4.C-5d All three of these streets are bike priority streets. Adding a left turn lane could impact the LOS of bike travel along Fernside and Blanding. 13-10

(Island Drive/Otis Drive and Doolittle Drive) 4.C-5g: Doolittle has bike lanes. Would the addition of a westbound turn lane impact LOS of bikes? 13-11

Mitigation Measure 4.C-5i (Park/Blanding). Blanding is a bike priority street with class II facilities planned. What is the impact of the proposed mitigations on the long term bike facility plans 13-12

Bicycle Analysis

Mitigation Measure 4.C-5ziv (Oak Street Bike): We would like to propose a stronger mitigation for the 'significant and unavoidable' impact on this main bike access to the Park Street Corridor. Park Street is a significant destination for all Alamedans with the civic corridor, entertainment, restaurants and high school. Oak Street is the only north/south bike way that serves the district. Significant mitigations should be proposed on this corridor. 13-13

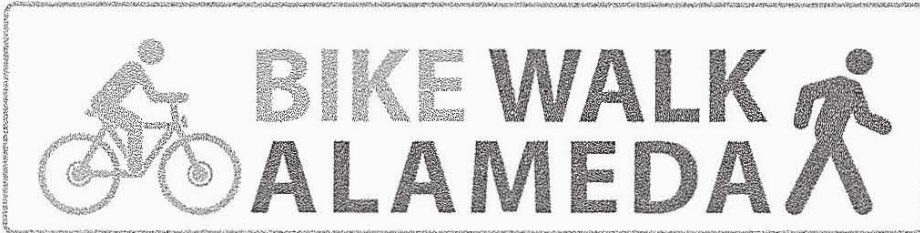
a. "... fund a fair share contribution to design standards for bicycle boulevard treatments in Alameda as described by the Bicycle Master Plan (BMP) and implement them on Oak Street.

The BMP defines a bicycle boulevard, but no standards have been created for Alameda. "treatments such as traffic calming and traffic reduction, signage and pavement markings, and intersection crossing treatments. Traffic calming features are utilized to facilitate bicycle travel while not encouraging additional motor vehicle traffic on the street." The completion of standards and implementation of treatments along Oak Street would be an appropriate level of mitigation.

b. Use the latest tools, including green paint, and bike signals to prioritize biking along the two lane corridor. 13-13

5. TDM program recommendations.

TDM coordination: There should be coordination between the Alameda Landing, Alameda Point and other TDM programs, so that there will not be duplication in the programs and wasted funds. 13-14



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Public Input: The public should have the opportunity through public meetings, such as the TC, planning board and city council to give regular input on TDM programs and changes that can be made.

Public Benefit: Are there clearly defined goals of who has access to the programs? In order to benefit all Alamedans, access to the transportation programs should have a benefit for everyone. For example, bike sharing or shuttles should be available for everyone. This is especially important since not all of the new employees and residents would be taking the transit, but all Alamedans will be affected by their traffic and should have access to the programs that might improve transportation choices.

↑
13-14
cont.

6. **Stargell to Alameda Point** should be a Class 2A bike facility leading to the proposed class 2A facility on Main Street.

13-15

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Lucy Gigli". The signature is written in a cursive style.

Lucy Gigli, President BikeAlameda

Letter 13. Bike Walk Alameda (Lucy Gigli, President)

- 13-1 The comment addresses the proposed development transportation strategy and not the adequacy of the environmental analysis. Numerous studies examining the feasibility of constructing a new bridge over or a new tunnel under the estuary have been completed over the 17 years since the Navy decommissioned the Naval Air Station. All of these studies, including the most recent *Estuary Crossing Study Feasibility Report* prepared in May 2009 by City of Alameda found that such crossings are not financially feasible.
- 13-2 The comment addresses the proposed development transportation strategy and not the adequacy of the environmental analysis. The comment is noted.
- 13-3 The comment addresses the proposed transportation strategy and not the adequacy of the environmental analysis. The TDM program is currently being prepared by the City and a number of hearings have already been held on the content of the TDM program before the Transportation Commission and Planning Board. There will continue to be public hearings about the TDM program for Alameda Point over the next several months. Decisions about public access to, and project funding of, transportation services to and from Alameda Point will be made during both the preparation and implementation of the TDM program.
- 13-4 The comment addresses the proposed development transportation strategy and not the adequacy of the environmental analysis. The proposed project does not require the removal of the existing ferry terminal if the service moves to the Seaplane Lagoon.
- 13-5 The comment addresses the proposed transportation strategy and not the adequacy of the environmental analysis. The TDM program may include water taxis to supplement, compliment and expand AC Transit, BART and WETA services. The proposed project does not preclude a water shuttle.
- 13-6 The transportation analysis included an evaluation of the proposed project on four modes of transportation: bicycle, pedestrian, transit, and automobile. The analysis was conducted in accordance with the thresholds of significance prepared and recommended by the City of Alameda Transportation Commission. The specific threshold for each mode of travel is described on page 4.C-17 under Significance Criteria.

The significance criteria used in this EIR were developed and recommended by the City of Alameda Transportation Commission on April 22, 2009 to implement General Plan Policy 4.4.2.d (see page 4.C-16 of the Draft EIR). General Plan Policy 4.4.2.d reads:

Policy 4.4.2.d: All EIRs must include analysis of the effects of the project on the city's transit, pedestrian and bicycling environment, including adjacent neighborhoods and the overall City network.

Accordingly, the analysis addresses impacts to all modes of travel. When mitigation is proposed to mitigate an impact to a specific mode, the analysis also considered the impact of the mitigation on the other modes of travel. If the analysis revealed that the mitigation resulted in a secondary impact to another mode of transportation, then the analysis considered which mode has the highest priority at the particular location. The determination of priorities was conducted pursuant to the guidelines prepared by the Transportation Commission and the classification of the transportation facility in the City of Alameda General Plan Transportation Element. If the mitigation resulted in an impact to a higher priority mode, then the mitigation was either modified to avoid the impact or the mitigation was not recommended.

After each impact disclosed in the Draft EIR, the Draft EIR identifies which mode will be impacted by the project or by the proposed mitigation. In some cases, it was necessary to adopt mitigation for a high priority mode, and the mitigation resulted in a significant and unavoidable impact to a lower priority mode. In other cases, it was necessary to disclose a significant and unavoidable impact to a mode caused by the project, because the mitigation would have resulted in an impact to a higher priority mode. In all cases, these primary and secondary impacts were described in the text and disclosed in the impact statements for each location.

Also, please also see response to Comment 34-1 revisions to text regarding revisions to certain mitigations for conformance with the General Plan.

- 13-7 The bicycle impacts and the “less than significant” impact conclusions were determined by applying the thresholds of significance and analysis methodologies established by the City of Alameda Transportation Commission. Specifically, for Bicycle LOS, the methodology applies a segment-based analysis that is based on the traffic volume, lane width, and speed of traffic. Where the analysis intersection included bike priority streets (with either existing or proposed marked bike lanes, “sharrows,” or signed bike routes), the bike facility was considered in the impact and mitigation discussion.
- 13-8 While travel lanes were considered on Clement Avenue approach as a possible mitigation, the consideration of impacts to pedestrians and consistency with the General Plan necessitated a lesser improvement that does not include adding travel lanes to Clement Avenue. Also see response to Comment 13-7.
- 13-9 See response to Comment 13-7. Also, see revised Mitigation Measure 4.C-5c, presented in response to Comment 34-1, which no longer includes adding turn lanes.
- 13-10 See response to Comment 13-7. Also, see revised Mitigation Measure 4.C-5d, presented in response to Comment 34-1, which no longer includes adding turn lanes.
- 13-11 See revised Mitigation Measure 4.C-5g, presented in response to Comment 34-1, which no longer includes adding turn lanes.

- 13-12 See response to Comment 13-7. Also, see revised Mitigation Measure 4.C-5i, presented in response to Comment 34-1, which no longer includes adding turn lanes.
- 13-13 As described in Mitigation Measure 4.C-5ziv, on page 4.C-81 of the Draft EIR, the project would be required to fund a fair share contribution to implement the completion of a bicycle boulevard with appropriate signage and striping along Oak Street from Blanding Avenue to Encinal Avenue to advise motorists and bicyclists to share the street. Design standards for bicycle boulevards would follow standard practices, such as those published by the Initiative for Bicycle and Pedestrian Innovation (IBPI) at Portland State University entitled the “Fundamentals of Bicycle Boulevard Planning & Design Guidebook.”¹⁶
- 13-14 The proposed TDM program would be funded, implemented, and directed by, the property owners, residents and tenants of Alameda Point. The management of the TDM program will be accountable for the TDM program’s success. As such, the coordination between the two TDM programs will be done at the discretion of the programs. See response to Comment 13-3 regarding public process and preparation of the TDM program.
- 13-15 The comment’s preference for a Class II bicycle lane over a Class I bicycle path, either of which would fulfill the requirements of Mitigation Measure 4.C-2m, is noted. The comment does not address the environmental adequacy of the Draft EIR.

¹⁶ Initiative for Bicycle and Pedestrian Innovation Center for Transportation Studies Center for Urban Studies
Portland State University, Portland, Oregon. July, 2009.

October 3, 2013

Andrew Thomas
City Planner, City of Alameda
2363 Santa Clara Avenue
Alameda, California 94501

Re: Comments on Draft CEQA Draft Environmental Impact Report (DEIR) for City of Alameda’s Alameda Point Reuse Plan: Seaplane Lagoon Setbacks and Adjacent Land Use

Dear Mr. Thomas:

Since 2010, the Center on Urban Environmental Law (CUEL) at Golden Gate University School of Law has undertaken independent research and analysis regarding open space, parkland, habitat and land use issues at the former Alameda Naval Air Station (NAS). The comments below pertain specifically to aspects of the Alameda Point Reuse Plan Draft CEQA EIR (DEIR) that relate to proposed land uses along Seaplane Lagoon.

In previous submissions to the City of Alameda, CUEL has noted the remarkable open space opportunities presented by the reuse of the Alameda NAS. In particular, in August 2011 CUEL published its *Flight Park Booklet* which presented full-color renditions (prepared by Professor Stephanie Landregan and her colleagues at the UCLA Landscape Architecture Department) of how to take full advantage of the scenic and habitat resources of Seaplane Lagoon, and how to integrate these resources into the open space and habitat and scenery on the adjacent portions of Alameda Point owned by the federal government. Full advantage in this context means preserving and highlighting the uniquely spectacular elements of the location to ensure that Alameda Point is a place that people want to live, visit and work (which is the key to the economic success of any reuse effort). A copy of the *Flight Park Booklet* is attached to this letter.

In evaluating the DEIR for the Alameda Point Reuse Plan against the open space, scenic and habitat opportunities identified in CUEL’s *Flight Park Booklet*, there

14-1
14-2

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PHIL STEVENS

are certain aspects of the DEIR’s Seaplane Lagoon proposals and analysis that merit praise yet other aspects in which the DEIR has fallen short of the mark.

↑ 14-2
| cont.

In terms of west shore of Seaplane Lagoon, the DEIR proposes what is referred to as “De-Pave Park” along this shore’s entire length. As depicted in the DEIR, De-Pave Park would involve removing the current pavement along about a 150-200 foot strip along the waterfront and replacing the pavement with some combination of grasses/plants and recreational trails. Although the specifics of this De-Pave Park remain unclear at this point, CUEL supports the DEIR’s proposal to create a new band of naturalistic greenspace to connect Seaplane Lagoon to the adjacent undeveloped federal lands (which would help establish the unimpaired viewsheds and contiguous habitat corridors recommended in the *Flight Park Booklet*).

| 14-3

In terms of the north shore of Seaplane Lagoon, the DEIR has proposed what is referred to as the “Waterfront Park & Promenade.” As depicted in the DEIR, it appears that Waterfront Park & Promenade will encompass an area 100-feet from the waterline, presumably to avoid conflict with BCDC (San Francisco Bay Conservation and Development Commission) requirements that new development provide public access to the “maximum extent feasible” within 100 feet of San Francisco Bay. The drawings in the DEIR suggest that the Waterfront Park & Promenade will involve some type of lawn and walking paths, but additional specifics about this area are not provided. CUEL has two comments in regard the proposed Waterfront Park & Promenade along the north shore of Seaplane Lagoon.

| 14-4

First, CUEL notes that the proposal for Waterfront Park & Promenade (which calls for some type of park/greenspace) is an improvement on many earlier land use proposals for Seaplane Lagoon’s north shore, which had suggested only a narrow paved area or waterfront boardwalk in this area. These earlier proposals suggested a de-naturalized and cramped waterfront public access akin to Fisherman’s Wharf in San Francisco and most of Jack London Square in Oakland, approaches fundamentally at odds with more progressive economic, ecological and scenic thinking discussed in the *Flight Park Booklet*.

| 14-5

Second, the *Flight Park Booklet* had suggested the benefits of using the area adjacent to Seaplane Lagoon’s north shore to create viewsheds and habitat corridors that linked to the naturalist federal Alameda Point lands to the west. More specifically, the *Flight Park Booklet* called for a broad swath of wild grasslands set 500-feet back from the lagoon, with discrete/minimal trails (see page 4 of the attached copy of the *Flight Park Booklet*). As currently depicted in the DEIR, it appears the Waterfront Park & Promenade will only extend 100 feet back from the Seaplane Lagoon, and will be more in the tradition of a manicured lawn park criss-crossed with paved walkways rather than a naturalist landscape. The narrowness of the setback will greatly reduce the viewshed/scenic benefits of this open space area, and the use of manicured lawns rather than wild grasslands

| 14-6
↓

will reduce both the beauty and habitat benefits of the area.

↑ 14-6
| cont.

In connection with the second point above, CUEL recommends that the EIR be revised to include consideration of an alternative configuration of Waterfront Park & Promenade that involves a more expansive setback from Seaplane Lagoon (e.g. 250-500 feet) and that calls for parkland that is focused on wild grasslands with minimal recreational access rather than manicured laws with extensive recreational access. Consideration of this alternative in the EIR would allow the public, environmental stakeholders and public officials to better appreciate the scenic and habitat benefits of what was proposed for Seaplane Lagoon’s north shore in the *Flight Park Booklet*, and how alternative land use approaches for this area could contribute to the type of spectacular “place-making” that will make the residential/commercials aspects of Alameda Point an economic success.

| 14-7

Thank you for your consideration of CUEL’s comments.

Yours,

Paul Stanton Kibel

Paul Stanton Kibel
Associate Professor and CUEL Co-Director

Attachments: August 2011 CUEL *Flight Park Booklet*

Cc: John Russo, City Manager, City of Alameda
Jennifer Ott, City of Alameda Planning Department
Jamie Michaels, SF Bay Conservation and Development Commission
John West, Regional Water Quality Control Board
Alameda Point Environmental Report
Golden Gate Audubon Society/Friends of the Alameda Wildlife Refuge



PAST



PRESENT

FLIGHT PARK AT ALAMEDA POINT

SEPTEMBER 1, 2011



NATURAL RESOURCE PLANNING AND DESIGN



SEPTEMBER 1, 2011

NATURAL RESOURCE PLANNING AND DESIGN
STEPHANIE V. LANDREGAN, FASLA PRINCIPAL

THE FOLLOWING INDIVIDUALS HAVE GENEROUSLY PROVIDED PERMISSION TO USE THEIR PHOTOS:
RICHARD BANGERT, LEORA FEENEY, STEPHANIE LANDREGAN.

AERIALS COMPILED FROM GOOGLE MAPS
BOOKLET DESIGN: JANET WOLSBORN
PLAN AND BIRDSEYE VIEW: ROXANNE SPEAR
VIGNETTES: ROXANNE SPEAR AND JANET WOLSBORN

THIS BOOK MAY BE REPRODUCED ONLY WITH PERMISSION OF GOLDEN GATE UNIVERSITY SCHOOL OF LAW AND STEPHANIE V. LANDREGAN, FASLA.



The Greenspace Opportunity at Alameda Point

There are sound reasons why Golden Gate University's Center on Urban Environmental Law (CUEL) selected Alameda Point as the initial focus of its greenspace program.

In one of the most urbanized locales in the nation, Alameda Point constitutes more than 500-acres of unbuilt land surrounded by San Francisco Bay waters. It contains extensive saltwater and freshwater wetlands, supports a colony of the threatened California Least Tern, and offers spectacular unimpacted views of the San Francisco skyline. Establishing a large-scale natural park at the core of a re-envisioned Alameda Point holds the prospect of improved property values on nearby lands, the availability of wetlands mitigation funds to fund the park, and the reduced long-term maintenance costs associated with a more naturally sustained landscape.

On both economic and environmental grounds, CUEL recognized Alameda Point as a once-in-a-generation urban greenspace opportunity. The realization of this opportunity, however, is complicated by the jurisdictional division that occurred when the Alameda Naval Air Station (NAS) located at Alameda Point closed in the 1990s. With this closure, the unbuilt portions of the Alameda Naval Air Station containing the jet fighter tarmac were retained by the Navy while the more built portions of the NAS were transferred to the City of Alameda. Since then, the federal and City of Alameda land use planning processes have proceeded on separate tracks.

For the federal portions of Alameda Point, the Navy is moving ahead with plans for toxic cleanup and wetlands restoration, the United States Fish and Wildlife Service has a long-standing proposal to create a national wildlife refuge, and in recent years the Veterans Administration has expressed interest in constructing new facilities. For the City of Alameda portions of Alameda Point, a public consultation and environmental impact assessment process is now underway (known as *Going Forward*) to determine the nature and location of development. While the *Going Forward* process is proceeding, Lawrence Berkeley Laboratory (associated with the University of California at Berkeley) has approached the City of Alameda with a proposal for a new Alameda Point research facility.

CUEL, in collaboration with the Professor Stephanie Landregan and her colleagues at the UCLA Landscape Architecture Department, is working to articulate a broader greenspace vision for Alameda Point and to identify the regulatory and financing solutions to make this vision a reality.

The Hannover Principles and Imagining Flight Park

The challenge ahead will be to integrate and align the federal and City of Alameda land use planning processes for Alameda Point. The Hannover Principles for Design in Sustainability (adopted in 2000 in conjunction with the World Fair held in Hannover, Germany) provide a template to meet this challenge.

The Hannover Principles call for open space/habitat designation and planning that "respects natural borders" more than the jurisdictional borders of particular agencies. For greenspace at Alameda Point, this means planning across federal and City of Alameda boundary lines to maximize habitat benefits and to preserve viewsheds. This also means siting any new structures at Alameda Point, such as the new Veterans Administration facility being considered, within or adjacent to existing development to avoid the vehicular traffic and fragmentation of scenic vistas and wildlife corridors that would result from locating such structures in the more open expanses.

The Hannover Principles also caution against "overplanning" greenspace such that ecosystems and habitats are not provided with sufficient latitude to balance themselves out over time. In a section titled *Humility in Design*, the Hannover Principles advocate that we "leave space for the design to evolve on its own." For greenspace at Alameda Point, this points to large swaths of contiguous open space (on both the federal and City of Alameda portions) with wildness and habitat the high priorities. In terms of those areas within the City of Alameda *Going Forward* planning process, envision a 500-foot wide bank of grasslands and dunes along the Seaplane Lagoon's north shore. Imagine a several hundred-acre expanse of interconnected wetlands as the centerpiece of the Northwest Territories (along the entrance to the Oakland-Alameda Estuary).

As shorthand for this notion of developing integrated greenspace along the lines suggested by the Hannover Principles, CUEL has employed the term *Flight Park*. This term evokes and honors the prior Navy uses of the site as an air station as well as the extensive bird and waterfowl on the site. In using the term *Flight Park* CUEL is not suggesting that there necessarily needs to be "one" park at Alameda Point under the jurisdiction of a "single" entity. Rather, the concept of *Flight Park* is employed as a device to allow everyone involved - City of Alameda staff, federal planning staff, adjacent communities, park agency staff, wildlife advocates - to think about the greenspace opportunities (both environmental and economic) at Alameda Point in a broader way. This broader perspective can help inform the planning process for both the City of Alameda and federal agencies.



Wetlands Make Flight Park Economically Feasible

When considering the critical question of how to fund the creation and maintenance of greenspace at Alameda Point, the most cost-effective way to address these fiscal concerns is to think big rather than small. That is, the establishment of a large-scale contiguous naturalist landscape (with wetlands throughout) at Alameda Point is a far more viable economic prospect than the establishment of a collection of several isolated small-scale non-naturalist manicured parks.

First, to the extent wetlands were a dominant element of the greenspace at Alameda Point, a Flight Park Wetlands Mitigation Bank could be established to secure investments for the construction and enhancement of these wetland resources. There are a variety of activities/projects in the Bay Area with adverse potential impacts on wetlands (both saltwater and freshwater), such as those frequently undertaken along the shoreline by the Port of Oakland. Those involved in undertaking and approving such activities/projects are often in search of wetlands enhancement and wetlands creation projects along or near San Francisco Bay which can be funded to mitigate/offset such impacts. As such, there is already a strong market for the type of wetlands focused greenspace proposed for Flight Park.

Second, in the case of a large acreage naturalist greenspace (such as envisioned for Flight Park), the East Bay Regional Park District (EBRPD) may be interested in adding portions of Alameda Point to its existing system of public parklands. In fact, the EBRPD has several million dollars in recent bond money allocated for Alameda Point, and representatives from the EBRPD have indicated that they would be interested in creating new parkland at Alameda Point "if" it is a large acreage naturalist park.

Third, as reflected in the *Humility in Design* concept set forth in the Haunover Principles, large-scale naturally balanced landscapes (such as Flight Park's proposal for wetlands hydrologically connected the Bay and expansive dune grasslands with native plants) tend to maintain themselves much more readily and at much less expense than the restrictive micro-designed landscapes generally associated with small isolated municipal parks.

Fourth and finally, large-scale naturalist greenspace (such as Flight Park) increases the desirability and value of adjacent and nearby properties, thereby contributing to municipal property tax revenues and the economic success of commercial development in close proximity to such greenspace. As Professor John Crompton noted in his article *The Impacts of Parks and Open Space on Property Values*, "a strategy of conserving parks and open space is not contrary to a community's economic health, but rather is an integral part of it."



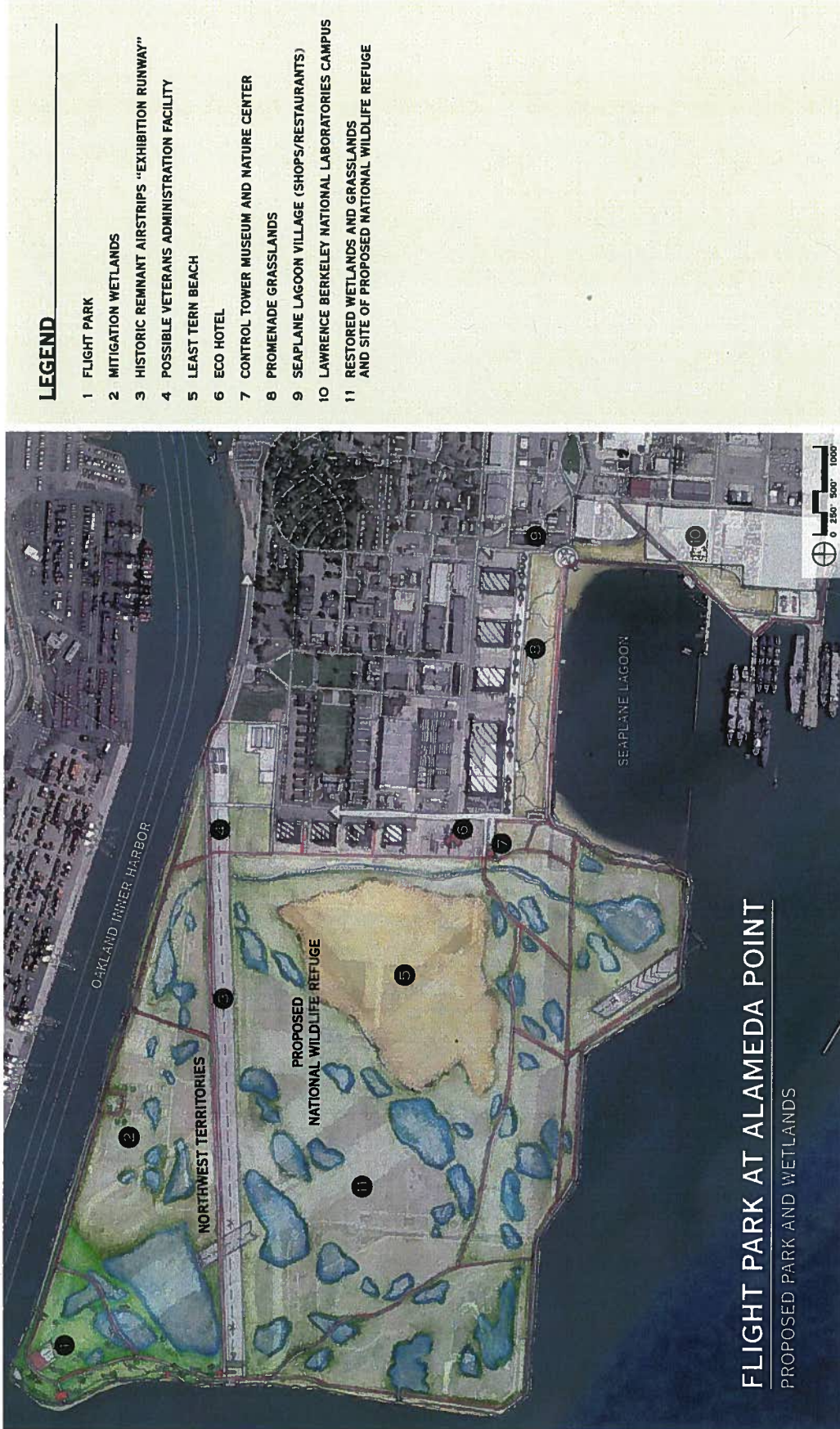
The National Park Service (NPS) reached the same conclusion as Crompton in its resource book *Economic Impacts of Protecting Rivers, Trails and Greenway Corridors*. The NPS book reported: "Rivers, trails and greenway corridors are traditionally recognized for their environmental protection, recreation values and aesthetic appearance. These corridors also have the potential to create jobs, enhance property values, expand local businesses, attract new or relocating businesses, increase local tax revenues, decrease local government expenditures and promote a local community." The NPS book went on to clarify, however, that "Many studies have found that the potential for increase in property value depends upon the characteristics of the open space and the orientation of the surrounding properties. Property values increases are likely to be highest near those greenways which highlight open space rather than highly developed facilities and which have limited vehicular access." The publication further noted that greenspace with highly developed facilities and extensive vehicular access (the type of parks initially proposed for the City of Alameda portions of Alameda Point) often led to a decrease in nearby property values, as such areas often become associated with "nuisance factors" (criminal/gang activity, drug usage and dealing, graffiti, etc).

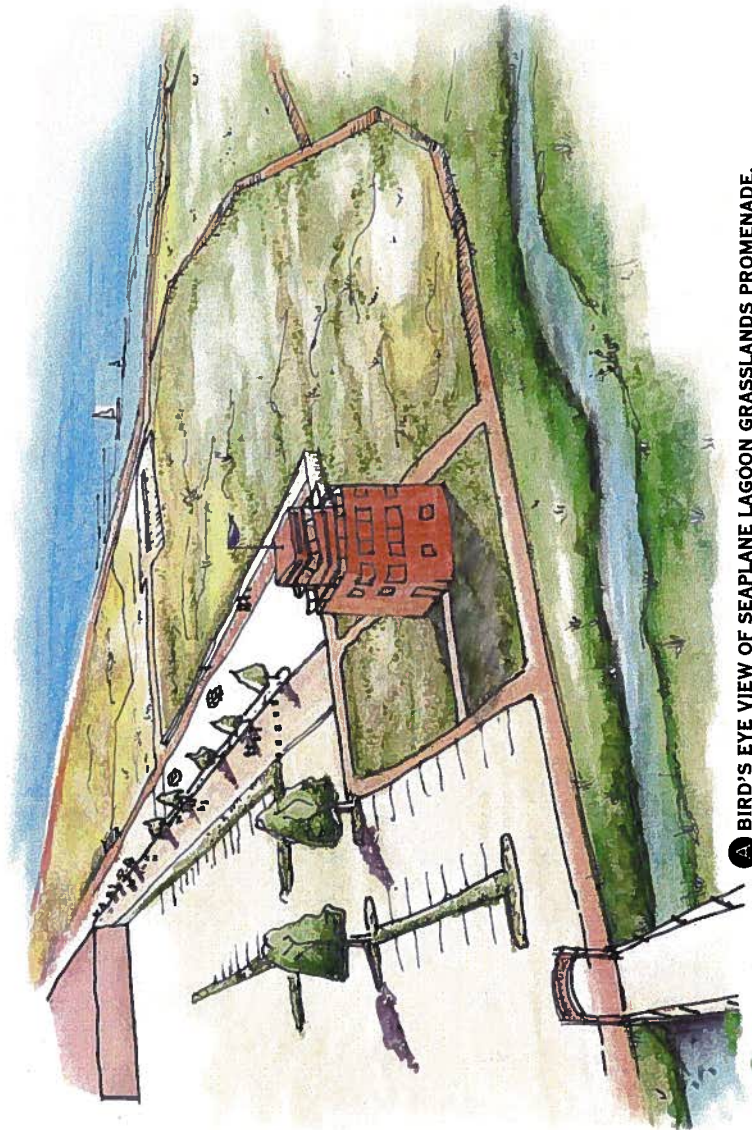
A report by the natural resource economics firm of Robert Hrubes & Associates titled *Overview of Potential Economic Benefits of the Proposed Alameda National Wildlife Refuge* made similar findings, noting that benefits of the proposed refuge "can be captured in higher land values due to the proximity to an open space area that, because it is undeveloped, provides attractive viewsheds of the bay waters and San Francisco skyline." This report also noted that "Businesses may be more willing to relocate to other portions of the present [Naval] air station because of the undisturbed views of the Bay and San Francisco skyline afforded by the refuge."

The observations in the Crompton article, NPS book and Hrubes & Associates report all bear directly on the City of Alameda *Going Forward* planning process. In the areas near the Seaplane Lagoon, there are now proposals under consideration for Lawrence Berkeley Laboratory to build a new facility and for the creation of a Seaplane Village of restaurants and shops. Flight Park's proposal for a 500-foot wide swath of dune grassland along Seaplane Lagoon's northern edge will create the grand vistas and spectacular natural landscapes that will make Lawrence Berkeley Laboratory a place people want to work at and Seaplane Village a place people want to visit. Flight Park also contains the particular parkland characteristics noted in the NPS book – an emphasis on open space rather than highly developed park facilities – that tend to increase rather than decrease surrounding property values.

With Flight Park, natural habitat becomes the core fiscal and economic strategy for Alameda Point.

Professor Paul Stanton Kibel
Co-Director, Center on Urban Environmental Law (CUEL)
Golden Gate University School of Law





A BIRD'S EYE VIEW OF SEAPLANE LAGOON GRASSLANDS PROMENADE.

VIGNETTE LOCATION

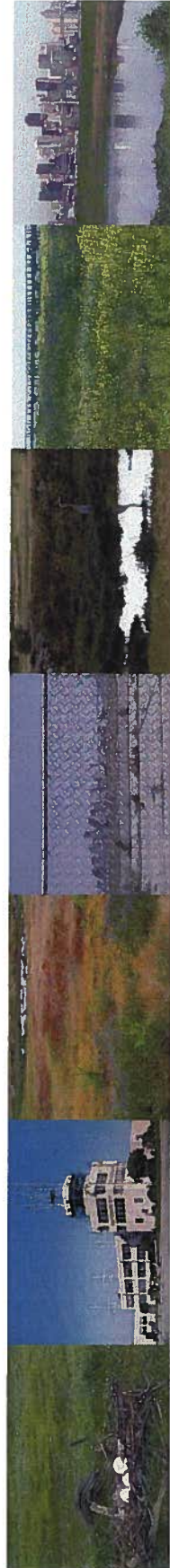


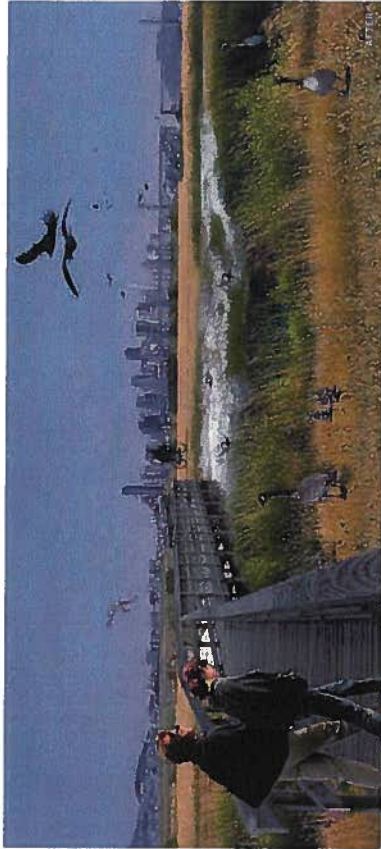


B VIEW ALONG SEAPLANE LAGOON BOARDWALK TOWARD LAWRENCE BERKELEY NATIONAL LABORATORY CAMPUS AND OF THE PROPOSED SEAPLANE VILLAGE (SHOPS/RESTAURANTS)

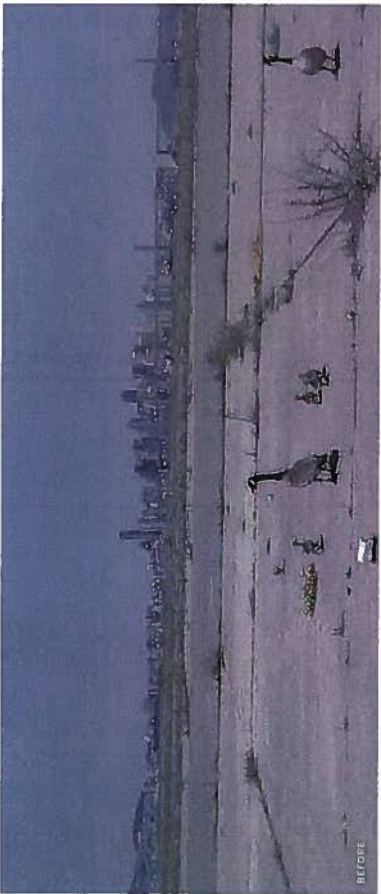


VIGNETTE LOCATION





ENTRY TO LEAST TERN WILDLIFE REFUGE



VIGNETTE LOCATION

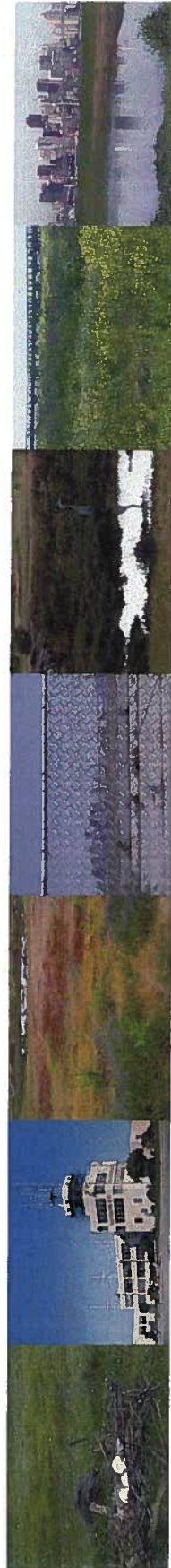




LEAST TERN BEACH VIEWING PLATFORM ACROSS THE BAY LOOKING SOUTHEAST TOWARD SAN FRANCISCO



VIGNETTE LOCATION





E VIEW ALONG SOUTHWEST PERIMETER BOARDWALK IN NATIONAL WILDLIFE REFUGE

VIGNETTE LOCATION



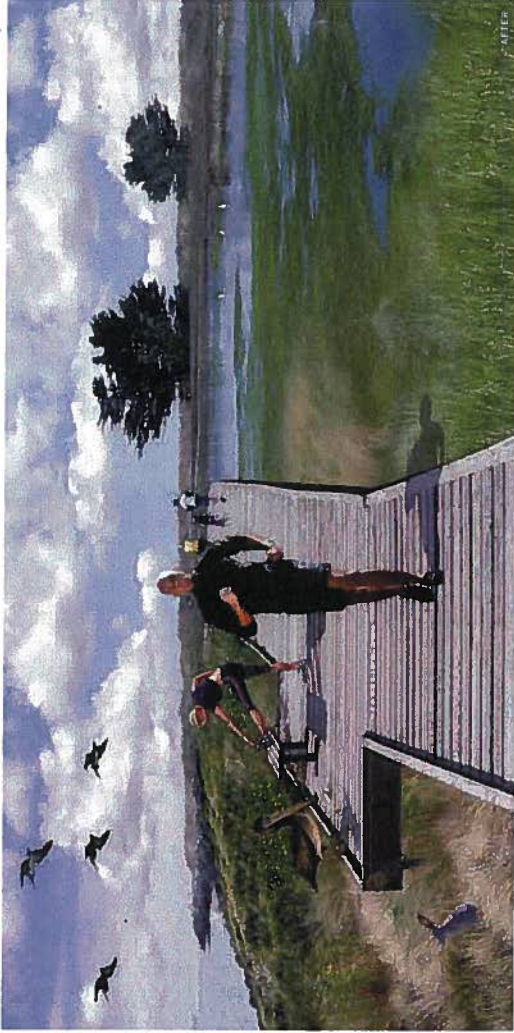


FIGURE 2 SOUTHERN PERIMETER BOARDWALK THROUGH FLIGHT PARK

VIGNETTE LOCATION



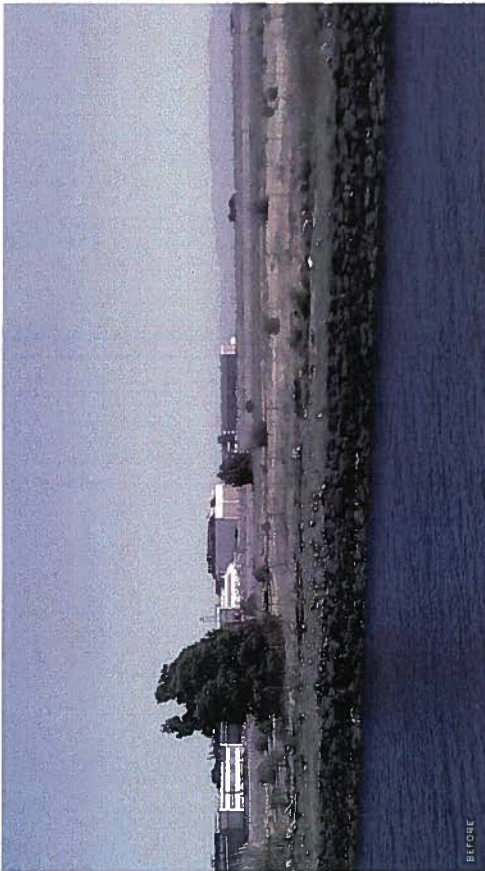


VIEW FROM FLIGHT PARK POINT TO TREASURE ISLAND



VIGNETTE LOCATION

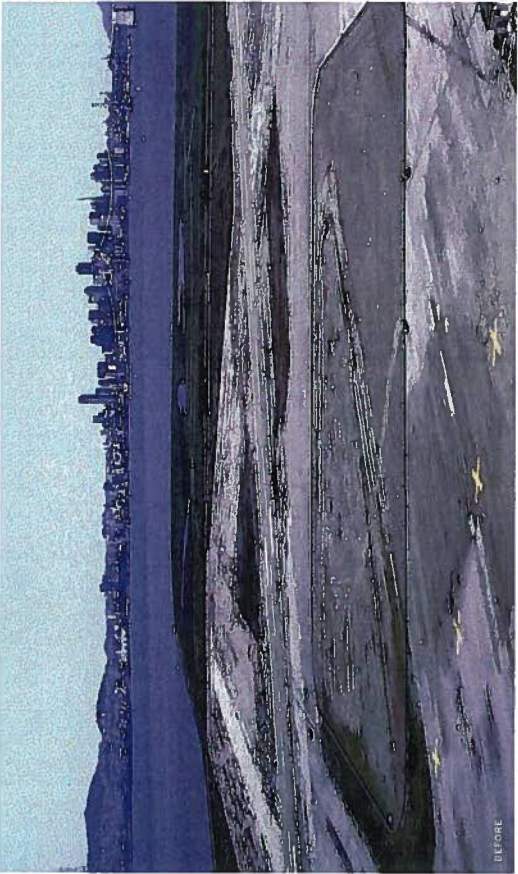
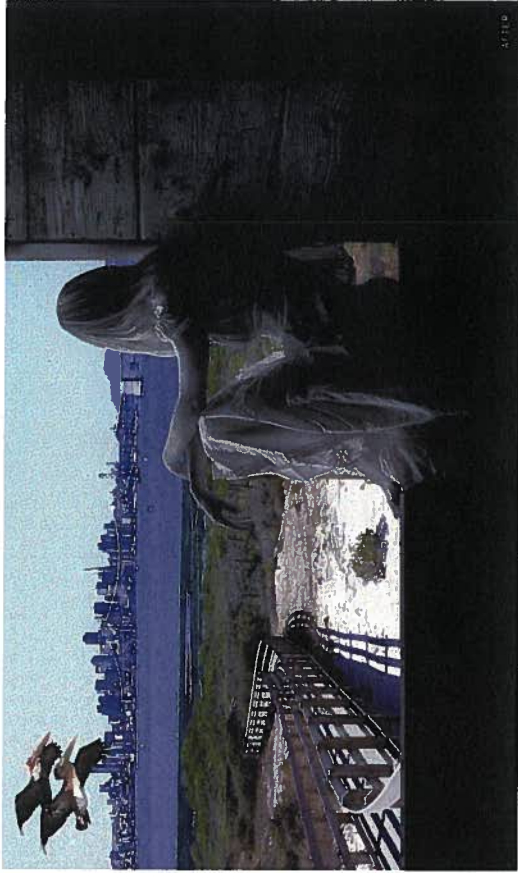




VIEW ACROSS OAKLAND INNER HARBOR TO NORTHWEST TERRITORIES FLIGHT PARK AT ALAMEDA POINT

VIGNETTE LOCATION





1 VIEW FROM ECO HOTEL TO SAN FRANCISCO ACROSS NATIONAL WILDLIFE REFUGE

VIGNETTE LOCATION





Letter 14. Center on Urban Environmental Law (Paul Stanton Kibel, Associate Professor and CUEL Co-Director)

- 14-1 The comment does not address the adequacy of the environmental analysis. The City acknowledges receipt of the *Flight Park Booklet* and is using it as a resource as it prepares the Town Center and Waterfront Precise Plan.
- 14-2 The comment does not address the adequacy of the environmental analysis. The City appreciates the positive comment on the plan.
- 14-3 Comment noted. The comment does not address the adequacy of the environmental analysis.
- 14-4 Comment noted. The comment does not address the adequacy of the environmental analysis.
- 14-5 As described on page 3-4 of the Draft EIR, one of the project objectives is to enhance views of water and public access to the waterfront in all development and creatively encourage the usage of the waterfront, by providing a waterfront promenade, public art, open space, and other public amenities.
- 14-6 Comment noted. The comment does not address the adequacy of the environmental analysis.
- 14-7 As explained on page 5-1 of Chapter 5, Alternatives, of the Draft EIR, the range of alternatives should include those that would avoid or substantially lessen any of the significant effects of the project (CEQA *Guidelines* Section 15126.6(a)-(c)). Because the Draft EIR concluded that the proposed project would have a less than significant impact related to views from the waterfront, no mitigation measure or alternative related to views from the waterfront is required. Although the comment does not cause the need for additional environmental analysis, the comment does raise planning, design, and cost issues relative to the design of the public open spaces that will need to be considered in the design of the future public open spaces. The City of Alameda appreciates the comments and suggestions provided.



October 21, 2013

Via Email and US Mail

Andrew Thomas, Planning Services Manager
City of Alameda
Community Development Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501
Email: athomas@ci.alameda.ca.us

RE: Comments for the City of Alameda's Alameda Point Project Draft Environmental Impact Report (SCH No. 2013012043).

Dear Mr. Thomas:

I am writing on behalf of the Golden Gate Audubon Society to provide comments for the City of Alameda's Draft Environmental Impact Report (DEIR) for Alameda Point. GGAS appreciates the effort put into the DEIR, but has concerns about its adequacy with regard to Biological Resources, especially cumulative impacts on wildlife when considered with the planned redevelopment and management of the lands that will remain under federal jurisdiction.

Since 1917, Golden Gate Audubon has worked to protect birds and their habitats in the Bay Area. We have been directly involved with research and protection of the endangered California Least Terns that nest at the former Alameda Naval Air Station (ANAS). Many of our members live in Alameda and many of our members use and enjoy Alameda's open space and natural resources. Therefore, we have great interest in the protection of the terns and other wildlife at Alameda Point.

15-1

Golden Gate Audubon appreciates the efforts of the City of Alameda to communicate with us and other stakeholders regarding development at Alameda Point. Overall, Golden Gate Audubon is supportive of redevelopment of the site. We continue to emphasize that redevelopment can and should be congruous with the conservation of the endangered tern colony and the maintenance of wildlife and open space values at Alameda Point, especially in Seaplane Lagoon, on the area known as the Alameda Wildlife Reserve (formerly the airstrip for ANAS), the Northwest Territories, and the surrounding waters.

15-2

The City of Alameda has long expressed support for the conservation of the California least terns at Alameda Point. (*See, e.g.*, City of Alameda General Plan, Policies 9.3kk and 9.3mm) We urge the City to continue to uphold this tradition of conservation leadership as it plans for and implements the next phases of redevelopment and growth at Alameda Point.

15-3

I. COMMENTS

A. The Maps in the Project Description Should Be Amended to Reflect that the Northwest Territories Will Be Managed as a Regional Park.

Golden Gate Audubon appreciates that the Project Description map (Figure 3-1) designates the former ANAS tarmac as a "nature reserve." This reinforces the intent that the portion of the area that will not be developed as part of the Dept. of Veterans Affairs (VA) facility will be managed as a natural area to the benefit of the endangered California Least Terns and other wildlife.

15-4

Golden Gate Audubon further appreciates that the portion of the Northwest Territories that will not be developed by the VA is designated as green space. However, the map is not explicit that the area will be kept for open space (it is colored green, but not labeled). (DEIR, at 3-2, Fig. 3-1) This is a similar omission from other maps. Figure 3-3 does identify the remaining NWT area as "Regional Park". (*Id.* at 3-11) We note that the NWT park land is more fully described in the section covering "Primary Open Space". (*Id.* at 3-19) GGAS requests that the map on Figures 3-1, 3-6, and 3-7 be amended to reflect that it will be formally designated as open and green space, preferably as a regional park.

15-5

GGAS believes that the designation on the color maps (e.g., Figs. 3-1, 3-6, 3-7) is important because it normalizes the expectation among the community and decision-makers that the NWT portion not developed by the VA will be a regional park. The development of the park, preferably a naturalistic, wetland-oriented park, is a major part of the US Fish & Wildlife Service's assessment in its 2012 Biological Opinion for the Navy-VA transfer and redevelopment. The DEIR should reflect that fact.

15-6

Finally, as has been previously expressed on a multiple occasions, GGAS strongly encourages the City of Alameda to resolve differences with the East Bay Regional Park District regarding the NWT and to invite the District to manager the park. The District has the resources and expertise to manage such a large park and to ensure it is managed in concert with the strictures of the Biological Opinion.

15-7

B. Impacts to Biological Resources Must Be Better Described and Further Reduced.

1. Impacts to and Mitigation Measures for Eelgrass Must Be Better Described.

The DEIR acknowledges that activities will have significant negative impacts on eelgrass. (DEIR, at 4.E-63, Impact 4.E-2) As the DEIR acknowledges, eelgrass is extremely important to several species of fish and other marine animals in San Francisco Bay, and it has been significantly reduced from its historic range. GGAS is particularly concerned about the state of eelgrass as a spawning ground for fish and, necessarily, as a provider of forage for birds.

15-8

While MM 4.E-2a appears to be well-founded, in at least as it depends on guidance from the National Marine Fisheries Services and established plans, GGAS is concerned about how the compliance process—particularly the requirement for compensatory mitigation—will be managed by the City. GGAS requests that, at a minimum, the Response-to-Comments provided with the FEIR detail how the City will ensure compliance with this Mitigation Measure.

15-9

MM 4-2b is a source of concern because while educating boaters is important, the education materials are ultimately of little use if there is not an enforcement mechanism to ensure that boaters behave appropriately and minimize impacts. Therefore, GGAS requests that MM 4.E-2b be amended to include some kind of enforcement mechanism (i.e. a commitment to patrol and issue citations), at least for a set amount time or during times of the year when eelgrass and other resources are most sensitive.

15-10

MM 4.E-2c is a good start for ensuring that the project applicant minimizes invasive taxa. However, the MM should be amended to require submission and approval of a budget that provides for a specific financial commitment for implementation of the invasive species control plan. Moreover, the City should set forth a more comprehensive long-term plan for invasive species control in its waters should project applicants fail to meet the requirements of this MM.

15-11

Finally, GGAS is not convinced that the three mitigation measures do render the impact "Less than Significant." Mitigating impacts to eelgrass, especially the kinds of direct impacts sought to be mitigated by MM 4.E-2a, are especially tricky. GGAS is not confident that even if a 3.01:1 mitigation ratio is implement, the impact will be mitigated to a less than significant level. GGAS believes that this will still likely be a Significant Impact and that a Statement of Overriding Considerations should be issued.

15-12

2. Impacts to Wetlands Should Be Mitigated for at a Higher Mitigation Ratio.

Mitigation Measure 4.E-3c states that where direct impacts to jurisdictional waters occur and other mitigation measures are deemed inadequate, compensation shall be provided at 1:1 ratio. (DEIR, at 4.E-70) Because of the uncertainty of compensatory mitigation (i.e., areas in a mitigation bank may be of lesser quality, restored areas may not be self-sustaining, etc.), a higher mitigation measure is more appropriate. (See Ambrose, R. 2004. *Wetland Mitigation in the United States: Assessing the Success of Mitigation Policies*. Wetland (Australia) 19: 1-27, at 23 (concluding that "higher mitigation ratios may be necessary in order to end up with no net loss of wetland functions in a region"), available at http://water.epa.gov/lawsregs/guidance/wetlands/upload/2004_10_28_wetlands_ambrose_wetlandmitigationinus.pdf)

15-13

3. Impact 4.E-4 Is a Significant Impact that Is Not Minimized to a Less than Significant Level.

Impact 4.E-4 acknowledges that the project will have a significant impact on native and migratory wildlife and the use of wildlife nursery sites. (DEIR, at 4.E-71) Disturbance from watercraft directly results in harm to birds and other wildlife, including disturbance during resting and foraging, stress and area-avoidance, and unnecessarily activity (swimming, diving, or flying), which can drain precious energy reserves, reducing the fitness of an animal or its young. The DEIR does a fairly good job of assessing these potential impacts. (See *id.* at 4.E-72)

15-14

Mitigation Measure 4.E-4a is inadequate because it fails to explain why the marina and ferry access corridor (500 foot) is appropriately-sized. If a narrower corridor could be implemented, GGAS urges the City to consider it (or at least to explain and substantiate reasons for rejecting it). Moreover, the MM should include enforcement provisions to ensure that boaters (1)

15-15

remain in the access corridor and (2) maintain a speed of no more than 10 mph. The DEIR does not provide any substantial evidence that MM 4.E-4a will be met without an enforcement mechanism.¹

↑ 15-15
| cont.

4. The City Should Adopt Standards for Bird-Safe Buildings and a "Lights Out for Birds" Policy to Reduce Impacts from Lights and Risks to Birds from Collisions with Buildings and Other Structures.

The DEIR provides a good description of the potential risks to birds due to lights and collision risks in urban environments. The build-out of the former NAS will increase the number and height of some buildings and likely result in a net increase in illumination (due to increased night-time activity and modernized lighting systems).

| 15-16

As part of its proposed Mitigation Measures, the City should adopt a set of Bird-Safe Building Guidelines similar to those adopted by the City of San Francisco in 2011 and the City of Oakland in 2012.^{2, 3} While MM 4.E-4b provides for some similar requirements, it lacks the comprehensive approach of similar bird-safe guidelines enacted in San Francisco and Oakland. Arguably, the mitigation measure does not mitigate the potential impact to the fullest feasible extent because it falls short of the benchmarks set by other, similar plans.

| 15-17

Likewise, the DEIR would be strengthened if it included a statement that the City of Alameda would participate in a *Lights Out for Birds* program similar to that in San Francisco.^{4, 5} A "Lights Out for Birds" program encourages business and home owners to turn off unnecessary lights during the bird migration periods (March-May and August-November). More information is available at <http://bird-friendly.audubon.org/lights-out-0>.

| 15-18

Finally, the DEIR relies heavily on mitigation measures set forth in the 2012 Biological Opinion covering the Navy-VA transfer and activities. GGAS reminds the City that the BO was intended only to cover the endangered Least Terns and provided mitigation measures intended to avoid a jeopardy finding (i.e., a finding that the VA proposal would jeopardize the continued survival of the California Least Tern species).

| 15-19

The standard for CEQA is much lower, as far as "significant impacts" are concerned. The DEIR seems to conflate the two standards. The DEIR needs to be amended to clearly articulate whether lighting (and other potential impacts) will result in significant negative impacts and whether specific mitigation measures—not just those required by the BO—will reduce those impacts to less than significant levels.

| 15-20

¹ The lack of enforcement begs a question similar to one legal academics pose about "international law": is a code or rule for behavior "law" if it cannot be enforced. (See D'Amato, A. 1985. *Is International Law Really "Law"?*, 79 NW. U. L. REV 1293, 1293)

² See San Francisco Planning Department, *Standards for Bird-safe Buildings*, available at <http://www.sf-planning.org/index.aspx?page=2506>.

³ See *Cities Adopt Bird-friendly Building Codes*, available at <http://www.theepochtimes.com/n3/219515-cities-adopt-bird-friendly-building-codes/?photo=2>.

⁴ *Lights Out in SF Buildings to Save Birds*, 2013, available at <http://www.nbcbayarea.com/news/local/Lights-Out-In-SF-Buildings-To-Save-Birds-221557251.html>

⁵ Kwong, J. 2013. *San Francisco Municipal Buildings Going Dark to Save Birds*, available at <http://www.sfoxaminer.com/sanfrancisco/san-francisco-municipal-buildings-going-dark-to-save-the-birds/Content?oid=2561251>

5. The DEIR Must Be Amended to Improve Protections for Nesting Birds.

Mitigation Measure 4.E-4c fails to include adequate terms to protect nesting birds and reduce potential impacts to less than significant levels. First, the MM requires surveys to be conducted no more than two weeks prior to construction—however, many species can initiate nesting and lay eggs within that window of time. The MM should be amended to reduce this risk by requiring surveys be conducted by a qualified biologist no more than one week (seven days) prior to the initiation of construction.

15-21

The Mitigation Measure also fails to identify a buffer zone to avoid disturbance to nesting birds. The DEIR should be amended to require a minimum of 100 meters around an existing nest, unless a qualified biologist can demonstrate that a less buffer is necessary. At a minimum, the DEIR should be amended to identify a minimum buffer zone and set forth evidence to support it.

15-22

GGAS also believes that the DEIR would be improved if it included a more comprehensive catalog of species that occur at Alameda Point. It is our understanding that such data were provided to the City by Leora Feeney, a long-time Alameda resident and expert ornithologist. Ms. Feeney and others have catalogued at least 185 bird species that occur at Alameda Point. At a minimum, such information should be considered in the environmental review process.

15-23

6. The DEIR Should Be Amended to Include a Pest Management Plan that Avoids the Use of Unnecessary and Highly Toxic Rodenticides.

Rodenticides are a major source of injury and mortality for raptors.⁶ Many of the rodenticides that harm raptors have also been found by the US EPA to pose an unreasonable risk to human health and the environment and the EPA is going through the regulatory process to ban or further regulate such poisons.⁷

15-24

At a minimum, the DEIR should include a Mitigation Measure that sets forth action items for reducing rodenticide exposure to raptors. GGAS recommends that the City consider the "Don't Take the Bait" campaign adopted by the City of San Francisco. (Available at <http://www.sfapproved.org/rodents>). The campaign urges a voluntary ban on the most toxic rodenticides and urges retailers and city residents to avoid their use. For serious pest management issues, professionals should be retained who can assure that the toxics are not unnecessarily spread into the environment. Similar programs have been adopted by several Bay Area cities. For a more comprehensive discussion on this topic and additional resources, please visit <http://www.raptorsarethesolution.org/>.

15-25

7. The DEIR Should Include a Mitigation Measure Banning the Maintenance of Feral Cat Colonies in the Project Area.

The DEIR mentions increased predation on nesting birds, but completely fails to mention outdoor cats. (See DEIR, at 4.E-87) Outdoor cats are the single-largest human-induced cause of

15-26

⁶ California Dept. of Fish & Wildlife. 2013. *Rodenticides Can Harm Wildlife*, available at <http://www.dfg.ca.gov/education/rodenticide/>

⁷ See <http://www.sfgate.com/homeandgarden/thedirt/article/Citizens-campaign-to-ban-baits-that-kill-wildlife-3569772.php>

mortality for birds in North America, killing upwards of 3.7 billion birds each year.⁸ The DEIR is silent as to the occurrence of outdoor cats in the project area. It is highly likely that residences will attract cat owners or people that feed feral cats. Moreover, employees of local businesses may also "adopt" feral cats and create "feeding stations" where food is dumped, ostensibly to feed cats. Such feeding stations not only subsidize feral cat populations, but also subsidize other non-native and human-tolerant species, including crows, ravens, raccoons, and Norway rats, all which may have significant negative impacts on birds and other wildlife.

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15-26
cont.

The DEIR should include a Mitigation Measure which ensures that impacts from outdoor cats are reduced to the greatest extent feasible. Specific provisions of the Mitigation Measure should include (1) a ban on feral cat feeding stations (or, preferably, the feeding of any wildlife), (2) a ban on Trap-Neuter-Return policies in the project area, which are likely to further subsidize the outdoor cat population, and (3) an education program to area homeowners encouraging them to keep their cats indoors, which lead to a longer, healthy life for cats and fewer impacts to local birds, small mammals, and other wildlife.^{9, 10}

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15-27

8. The DEIR's Analysis of Cumulative Impacts to Biological Resources Should Be Revised to Be More Comprehensive and Accurate.

GGAS points out that the DEIR erroneously states that the measures in the 2012 Biological Opinion were created to "ensure that the cumulative development of land now owned by the VA and the City would not result in impacts on the California least tern". (DEIR, at 4.E-93). That is simply not true.

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15-28

The purpose of the Biological Opinion was to reduce the likelihood of jeopardy to the continued existence of the California Least Tern as a species. Through communication with USFWS personnel, GGAS understands that some impacts to the California Least Terns are expected as a result of the VA project and, in all likelihood, the City's redevelopment activities.

Therefore, the entire Cumulative Impacts section needs to be rewritten. If the DEIR is going to assume that the measures set forth in the BO reduce cumulative impacts to less than significant levels, it needs to clearly articulate its reasoning and set forth supporting evidence. It cannot assume that mitigation measures (i.e., those in the BO), which were not drafted for CEQA purposes, meet the standard for compliance with CEQA.

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15-29

GGAS is particularly concerned with the increase in ambient light, ambient noise, and predator pressures at the tern colony. Even without the VA project and the City's redevelopment, predator control at the colony is a challenge each year. The 2012 tern breeding season was almost a complete failure due to predation pressures. While 2013 appears to have been an exceptionally good year, the successes of the colony continue to hinge on effective predator management and

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15-30
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⁸ See, e.g., Eilperin, J. 2013. *Outdoor Cats Kill Up to 3.7 Billion Birds a Year, Study Says*, available at http://articles.washingtonpost.com/2013-01-31/national/36650863_1_outdoor-cats-feral-cat-george-h-fenwick; original study available at

http://www.abcbirds.org/abcprograms/policy/cats/pdf/Loss_et_al_2013.pdf

⁹ American Bird Conservancy, *Cats Indoors*, available at <http://www.abcbirds.org/abcprograms/policy/cats/index.html>.

¹⁰ People for the Ethical Treatment of Animals (PETA), *Why All Cats Should Be Kept Indoors*, available at <http://www.peta.org/living/companion-animals/indoor-cats.aspx>

ensuring that other factors (food supply, disturbance, and pollution levels) are maintained at levels that promote the terns' survivability.

↑ 15-30
| cont.

The DEIR fails to address these impacts in any meaningful way when considered cumulatively with the impacts from the VA project. Again, the VA project has not undergone CEQA review (and it will not). It is up to the City to understand the impacts of the VA project through a CEQA lens in order to understand the cumulative impacts. The failure of the DEIR to do so is perhaps its most glaring deficiency.¹¹

| 15-31

II. CONCLUSION

Thank you for this opportunity to comment on the DEIR. GGAS appreciates the effort invested by the City in this document. However, we continue to have significant concerns about the adequacy of the environmental review, especially with regard to the impacts and mitigation measures identified above. We strongly encourage the City to consider these comments and others from the community and meaningfully incorporate them into a final EIR to ensure that this process is as credible and protective of the environment as possible.

| 15-32

If you would like to discuss these comments further, please contact me at (510) 843-9912 or mlynes@goldengateaudubon.org.

Respectfully submitted,



Michael Lynes
Executive Director

¹¹ GGAS notes that it raised this issue in its Scoping Comments, however the DEIR fails to address the issue at all.

Letter 15. Golden Gate Audubon Society (Michael Lynes, Executive Director)

- 15-1 The comment does not address the adequacy of the EIR analysis. The City shares the Society's interest in protecting terns and other wildlife at Alameda Point.
- 15-2 The comment is noted and the City concurs.
- 15-3 Comment noted. The City shares the Society's support for the conservation of California least terns at Alameda Point.
- 15-4 Comment noted. Additionally, in March 2013 the City Council adopted City of Alameda Resolution No. 14780 affirming the City's support for creation of a "Nature Reserve" at Alameda Point and confirming that the land will remain as federal land over which the City has no jurisdiction.
- 15-5 The comment does not pertain to the adequacy of the environmental review. The proposed action being considered is the application of an Open Space zoning district on the lands commonly referred to as the Northwest Territories. As described in the draft zoning ordinance being considered for adoption, the use of this land under the proposed zoning would be limited to those uses that support public open space uses and natural habitat. Every park in Alameda is zoned "open space."
- 15-6 See comment 15-5. The Northwest Territories was designated for open space uses in the General Plan in 2003. The proposed zoning designation is consistent with the existing General Plan designation and is consistent with USFWS' assessment in the 2012 Biological Opinion.
- 15-7 Comment noted. The comment does not address the adequacy of the analysis.
- 15-8 The City concurs with the Society's statements concerning the ecological importance of eelgrass. Please see response to Comment 4-4, which strengthens Mitigation Measure 4.E-2a related to eelgrass. Also see response to Comment 15-12, below.
- 15-9 The City will enforce compensatory mitigation requirements through the Mitigation Monitoring and Reporting Program (MMRP), conditions of approval for future uses and improvements, and through lease provisions. Through the MMRP, City staff will track compliance with the requirements of Mitigation Measure 4.E-2a, including verification that any required compensatory mitigation is performed adequately. Please see comment 4-2 for additional information.
- 15-10 Please refer to the response to Comment 4-2 regarding the mechanisms for enforcement of measures related to eelgrass beds.

- 15-11 Like all mitigation measures prescribed by the Draft EIR, Mitigation Measure 4.E-2c will be subject to compliance monitoring by the City under the MMRP. The City has the ability to condition entitlements and development permits and to include provisions in leases for marinas or ferry terminal proposals in order to ensure that the conditions of Mitigation Measure 4.E-2c are satisfied. Pursuant to its monitoring of compliance with all adopted mitigation measures and conditions of approval, the City will review the Marine Invasive Species Control Plan to ensure that it is appropriate and will enforce the implementation of the plan through the mechanisms described in the response to Comment 4-2.
- 15-12 The City disagrees that the impact to eelgrass will be significant and unavoidable. Based on surveys of eelgrass beds conducted in the project vicinity in the past (as summarized in maps in Boyer and Wyllie-Echeverria [2010]), it is likely that impacts to eelgrass will be low, if any such impacts occur at all, because eelgrass may not be present in any waters where activities such as marina or ferry terminal development occurs. The City understands that eelgrass transplantation and restoration is challenging, and it will require that any such compensatory mitigation be performed appropriately. Enforcement of the necessary mitigation measures will occur as described in the responses to Comments 4-2 and 15-9. Therefore, implementation of Mitigation Measures 4.E-2a to 4.E-2c will reduce any impacts to eelgrass to less-than-significant levels.
- 15-13 Mitigation Measure 4.E-3c requires “a minimum” 1:1 ratio. As indicated in Mitigation Measure 4.E-3c, the applicant will need to comply with the mitigation requirements of regulatory agencies as well, so this mitigation measure defines the minimum acceptable amount. Also, Mitigation Measure 4.E-3c requires development of a wetland mitigation and monitoring plan (unless mitigation is satisfied through the purchase of credits in a mitigation bank). The City will ensure that the mitigation approach is adequate, and to enforce remedial measures if monitoring of the wetland mitigation demonstrates that success criteria have not been achieved. Thus, the City will be able to ensure that compensatory mitigation for wetland impacts is adequate.
- 15-14 The comment is acknowledged.
- 15-15 The City disagrees that Mitigation Measure 4.E-4a is inadequate. The 500-foot width in Mitigation Measure 4.E-4a is based on the width of such a corridor envisioned by the Draft Comprehensive Conservation Plan for the previously proposed Alameda National Wildlife Refuge.¹⁷ That document, prepared by the U.S. Fish and Wildlife Service (USFWS), concluded that a 500-foot wide corridor was appropriate to allow for vehicles to pass each other while protecting wildlife on the shore and on Breakwater Island. It should be noted that such a 500-foot wide corridor was not required by the USFWS, in the most recent 2012 Biological Opinion (BO) for the Navy’s conveyance and the VA’s/City’s reuse of Alameda Point. It is the City’s opinion that a 500-foot wide corridor

¹⁷ Caffrey, C., 2005. *The California Least Tern source population at the proposed Alameda National Wildlife Refuge*, Golden Gate Audubon Society, Berkeley, CA.

is necessary to allow vehicles to pass each other safely; a narrower corridor may not allow large vessels to pass each other safely. Please refer to the response to Comment 4-2 for information regarding the mechanisms by which the 500-foot wide corridor and the limit on boat speed will be enforced by the City.

- 15-16 The comment is acknowledged.
- 15-17 Mitigation Measure 4.E-4b contains substantive measures for bird-safe building design from the San Francisco and Oakland design guidelines cited in this comment. The City does not need to adopt a set of bird-safe building guidelines in order to reduce impacts of the Alameda Point Project on birds to less-than-significant levels. Mitigation Measure 4.E-4b will reduce the impacts of buildings on birds to a less-than-significant level.
- 15-18 Participation in a “Lights Out for Birds” program is not necessary to reduce impacts of the Alameda Point Project on birds to a less-than-significant level and mitigation Measure 4.E-4b contains the substantive lighting-related measures for bird-safe building design from the San Francisco and Oakland design guidelines. In addition, development within the project area is subject to the restrictions on increases in lighting described in the 2012 BO and the subsequent design guidelines (the Memorandum of Agreement)¹⁸ that the City formulated to ensure compliance with the BO’s requirements. As a result, Mitigation Measure 4.E-4b will reduce the impacts of buildings on birds to a less-than-significant level.
- 15-19 The City recognizes that the 2012 Biological Opinion provided a no-jeopardy opinion for the California least tern.¹⁹ However, it should be noted that the conservation measures and conditions of the BO that provide for the conservation of the least tern are also applicable to and will be protective of numerous other wildlife species in the project area. The City does not agree that the sole purpose of the conservation measures and conditions in the BO are to avoid a jeopardy finding, because many of the BO’s conservation measures provide protection to the least terns at Alameda Point beyond what is necessary to avoid jeopardy and therefore, benefits other species as well. The comment seems to imply that because the standard of the USFWS’s section 7 consultation was to determine whether or not the proposed project would jeopardize the continued existence of the California least tern, the standards for CEQA compliance (mitigation of impacts to less-than-significant levels) necessitate more stringent mitigation measures. The applicable conservation measures and conditions included in the BO were conservation measures incorporated into the Project Description. While one of CEQA’s mandatory findings of significance for determining whether to prepare an EIR is whether the project will “cause a fish or wildlife species population to drop below self-sustaining levels” (CEQA *Guidelines* § 15065(a)(1)), the Significance Criteria used to analyze the impacts of the proposed project on biological

¹⁸ MOA, 2012. *Memorandum of Agreement By and Between The United States of America, Acting By and Through the Department of Veterans Affairs and The City of Alameda*. August 29, 2012.

¹⁹ The 2010 BO also found that the conveyance and reuse of NAS Alameda, which includes both the Alameda Point project site and the VA project site, “may affect, but is not likely to adversely affect the snowy plover.” USFWS August 29, 2012 cover letter to 2012 BO.

resources in Section 4.E of the Draft EIR (see page 4.E-45), are based on CEQA *Guidelines* Appendix G and cover a broader range of potential impacts, all of which are analyzed in the EIR and for which mitigation measures are identified. As a result, the analysis in the EIR goes well beyond simply avoiding a jeopardy determination, and the protection that will be provided by the mitigation measures identified in the EIR goes far beyond simply avoiding jeopardy of the California least tern. Moreover, many of the mitigation measures presented in Section 4.E, *Biological Resources*, have been expanded beyond the BO conservation measures and conditions. For example, the 500-foot wide corridor for boating and the implementation of a no-wake zone outside the least tern breeding season were not required by the BO, but rather have been identified by the City to reduce impacts to other wildlife species to less-than-significant levels, as described on page 4.E-74 of the Draft EIR, Mitigation Measure 4.E-4a. Please see response to Comment 15-28.

15-20 Please refer to the response to Comment 15-19. The City is confident that the mitigation measures prescribed by the Draft EIR, with the minor refinements made in response to public comments, are adequate to mitigate impacts to biological resources to less-than-significant levels. Further, these mitigation measures are in addition to the BO requirements. For example, implementation of Mitigation Measure 4.E-4b, presented on page 4.E-77 of the Draft EIR, would further avoid and minimize potential impacts of night lighting and increased avian collisions on resident and migratory birds by requiring design features such as patterned or fritted glass and decreasing reflectivity of surfaces would make buildings appear less transparent. The measure also calls for limiting night lighting, which would reduce the potential for disorientation. Similarly, implementation of Mitigation Measure 4.K-4, presented on page 4.K-20 of the Draft EIR, would reduce potential impacts related to new sources of substantial light or glare which could potentially adversely affect day or nighttime views in the project area to a less than significant level.

15-21 In response to this comment, the second bullet under Mitigation Measure 4.E-4c has been revised as follows to provide greater assurance that new nests will not become established near Project construction areas between the timing of the pre-construction survey and commencement of construction:

- To avoid and minimize potential impacts on nesting raptors and other birds, preconstruction surveys shall be performed not more than ~~two weeks~~ one week prior to initiating vegetation removal and/or construction activities during the breeding season (i.e., February 1 through August 31).

15-22 The Draft EIR provides guidance regarding the typical minimum buffer zones to be implemented around active bird nests. The third bullet under Mitigation Measure 4.E-4c describes these buffers as 250 feet for raptors and 50 feet for other birds. However, site-specific conditions, including the level and type of existing disturbance (as compared to the level and type of disturbance proposed by the reuse activity), the sensitivity of the species in question, the height of the nest, the presence or absence of screening vegetation or structures, and other variables may affect the size of the buffer that is necessary to

prevent nest abandonment as a result of project activities. Accordingly, Mitigation Measure 4.E-4c appropriately indicates typical buffer zones, and indicates that the actual buffer zone around a given nest will be determined by a qualified biologist in cooperation with the USFWS and/or CDFW.

- 15-23 The City appreciates the information regarding the large number of bird species recorded at Alameda Point by Ms. Feeney. The City was aware of this information and considered the site's importance to birds in the preparation of the Draft EIR. Inclusion of the list of bird species in the Draft EIR is not necessary, however, and it would not change the analyses or conclusions of the Draft EIR.
- 15-24 Comment noted. The City understands the potential risks to wildlife posed by rodenticides.
- 15-25 The City disagrees that including a mitigation measure to reduce rodenticide exposure to raptors is necessary. There is no evidence that rodenticide use on the proposed project site will result in significant impacts, as the City employs best management practices and follows federal, state, and local regulations related to the application, storage, and disposal of products and well as training for those who handle the products. In addition, the EPA has ongoing regulatory actions to cancel and remove from the market mouse and rat poison bait products that fail to comply with EPA safety standards as found in the Federal Insecticide, Fungicide, Rodenticide Act (FIFRA) that should help in reducing the potential future impact to raptors and other animals. In its current form, FIFRA mandates that EPA regulate the use and sale of pesticides to protect human health and preserve the environment. Further, the City of Alameda has an integrated pest management policy which would apply to the project area.²⁰
- 15-26 Feral cats are discussed on page 4.E-6 as an "urban wildlife species" and on page 4.E-7 which states that they are often found in developed/landscaped areas. The Draft EIR also discusses the City's funding of the preparation and implementation of a predator management plan (on page 4.E-87 of the Draft EIR) in the project area west of Main Street, as required by the 2012 BO.²¹ The predator management plan includes measures to trap feral cats and to report observations of feral cats being fed by the public to the City. As required by the BO, the City will prohibit feral cat feeding stations and feral cat colonies on all lands conveyed by the Navy, and the City will install educational signage describing that prohibition. These measures are incorporated into the proposed project.
- 15-27 Please refer to the response to Comment 15-26. In addition, the City will include measures in the zoning for the project site banning not only feral cat feeding stations, but also the release of any cats in the project area. Such zoning restrictions will preclude Trap-Neuter-Release programs from operating legally within the project area. These measures are incorporated into the proposed project.

²⁰ City of Alameda Integrated Pest Management policy. Adopted by City Council Resolution June 15, 2010.

²¹ City of Alameda, 2012. *Alameda Point Predator Management Plan for Lands West of Main Street*, Project # 3333-03 prepared by H.T. Harvey & Associates for City of Alameda, December 5, 2012.

15-28 Please refer to the response to Comment 15-19. The conservation measures and conditions of the BO that provide for the conservation of the least tern are also applicable to and will be protective of numerous other wildlife species in the project area. The City does not agree that the sole purpose of the conservation measures and conditions in the BO are to avoid a jeopardy finding, as many of the BO's conservation measures provide protection to the least terns at Alameda Point beyond what is necessary to avoid jeopardy and therefore benefit other species as well. Taking into account the measures incorporated into the project in compliance with the BO and the mitigation measures identified in the Draft EIR, no additional measures are necessary to reduce impacts to least terns to a less-than-significant level. The Draft EIR found that even with implementation of these measures, development of the proposed project could have an effect, albeit a less-than-significant effect, on the least tern. For the sake of accuracy, the statement referred to in this comment on page 4.E-93 of the Draft EIR is revised as follows:

As described above, the proposed project includes all of the applicable measures from the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BO), as embodied in the Navy's Declaration of Restrictions, that were developed to ensure that the cumulative development of land now owned by the VA and the City would not result in significant impacts on the California least tern (see the Regulatory Framework section above for details on each measure).

The VA project is one of the cumulative projects analyzed in the EIR, and thus the combined effect of the VA project and the Alameda Point project have been analyzed. The 2012 BO was issued for both projects, and thus addresses the effects of both projects and the conservation measures appropriate for implementation by both projects for the conservation of least terns at Alameda Point. The City reviewed the EA for the VA project in preparing the cumulative impacts analysis to ensure that the VA project's impacts were adequately considered in conjunction with those of the Alameda Point project.

15-29 As described on page 4.E-93 of the Draft EIR, the proposed project includes all of the applicable measures from the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BO), as embodied in the Navy's Declaration of Restrictions, that were developed to ensure that the cumulative development of land now owned by the VA and the City does not have potential impacts on the least tern colony. Accordingly, the cumulative impacts assessment in the Draft EIR takes into account the impacts from, and the adopted BO conservation measures and conditions pertaining to, both the Alameda Point and VA projects. As described in the response to Comment 15-19, the BO conservation measures and conditions, which apply to both projects at Alameda Point, provide conservation value beyond simply avoiding jeopardy to the California least tern's continued existence.

The comment implies that the entire cumulative impacts assessment relies solely on the implementation of BO conservation measures and conditions to avoid significant cumulative impacts, but that is not the case. As described on page 4.E-93 of the Draft EIR, the cumulative impact assessment clearly refers to the mitigation measures addressing both projects. As described in Impact 4.E-7, with implementation of the BO's conservation measures for both the VA and Alameda Point projects in the BO, in conjunction with the mitigation measures identified in the Draft EIR for the Alameda Point project, the cumulative impact of these projects on the California least tern is less than significant.

- 15-30 Please refer to the responses to comments 15-28 and 15-29 regarding the Draft EIR's consideration of both the VA and Alameda Point projects in the cumulative impact analysis. As discussed in the Draft EIR on page 4.E-87, the City's funding of the preparation and implementation of a predator management plan in the project area west of Main Street is required by the BO. The City has already prepared that plan and has funded the plan's implementation. In addition, the City hired a lighting consultant to develop a set of lighting guidelines for projects in the redevelopment area to ensure against an increase in ambient light levels beyond those allowed by the BO. The VA and the City have agreed upon the implementation of those guidelines to ensure that any increase in lighting levels from redevelopment activities at Alameda Point do not exceed the thresholds outlined in the BO. The Draft EIR includes an extensive analysis of the effects of construction noise and boating noise and identifies Mitigation Measures 4.E-1a to 4.E-1c to address construction-phase noise impacts for in-water activities and Mitigation Measure 4.E-4a to limit boating noise by providing a speed limit for boats. Implementation of these measures will reduce project impacts on the California least tern to less-than-significant levels.
- 15-31 Please refer to the responses to Comments 15-19, 15-28, 15-29, and 15-30. The VA Project is one of the cumulative projects analyzed in the EIR, hence the combined effect of the VA Project and the Alameda Point Project have been analyzed. The 2012 BO was issued for both projects, and thus addresses the effects of both projects and the conservation measures required to be implemented by both projects for the conservation of least terns at Alameda Point. The VA project was the subject of environmental review under the National Environmental Policy Act (NEPA), the City reviewed the VA's Environmental Assessment and, as described on page 4.E-92 of the Draft EIR, the cumulative analysis included the VA project. The conservation measures and conditions of the BO applying to the VA, coupled with those applying to the City's Alameda Point Project and the mitigation measures described in the Draft EIR, are adequate to reduce impacts (both on a project-specific and cumulative level) on the California least tern colony to less-than-significant levels.
- 15-32 Comment noted. The City appreciates these comments and has considered the Society's comments carefully.

*Housing Opportunities Make Economic Sense
(H.O.M.E.S)*

October 21, 2013

Andrew Thomas, City Planner
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501

Re: Draft EIR for Alameda Point

Dear Andrew Thomas:

There are several fundamental questions that I feel need clarity, so the community knows what the possibilities of change are in analyzing the "project" and the "alternatives". It may be understood what the relationship is beyond the fact the requirement that the EIR examines alternatives.

16-1

The overarching comment is that if the alternatives are truly that, and one can pick and chose one of the scenarios then it is clearly no choice. The Transit Oriented Alternative is the only one that provides even close to a balance of uses. It also is the one that will provide adequate housing to support the proposed retail (unless this area is to build on the notion of more big box store districts.) Nor will it support the traffic mitigation proposals. There simply must be an adequate population to make those ideas work.

16-2

The question is from our viewpoint - the "project" is not very feasible and can the City choose instead to make one of the Alternatives into a project to build? Could we two months later say we are actually going to build this analyzed alternative? Achieving a mixture of uses including the public amenities, such as a post office, library, religious buildings, schools, neighborhood retail require a certain amount of shoppers, which are not likely to draw from other parts of the City.

16-3

Further flaws in all of the plans is the statement that grid streets will link into the adjacent Alameda neighborhoods, yet the drawings do not illustrate these connections and the few that exit Alameda Point nearly all end at Main St. Realistically, does proposing up to 9,000 jobs with a "balance" of essentially 1,200 new homes work? Suggest a re-examination of the traffic impact premise. There are approximately 60 properties in all of Alameda currently for sale and so unlikely the rest of the island could absorb the number of workers who hopefully would desire to live here.

16-4

The following attachment will reflect other concerns and comments for consideration.

Sincerely,

Helen L. Sause
President
H.O.M.E.S.

cc: Planning board
City manager

*Housing Opportunities Make Economic Sense
(H.O.M.E.S)*

ALAMEDA POINT DRAFT EIR COMMENTARY

EIR Chapter 1 Project Overview

Comments:

- 1. Does not address the diversity to absorb amount of land available in a reasonable amount of time. The absorption of retail, business park type uses in Alameda does not reflect that the absorption of the amount of square footage proposed is achievable without some more realistic component of housing. 16-5
- 2. Analyze more carefully the number of jobs an island community can absorb without additional expansion of the housing resources. The Housing Element Sites to date do not come even close to achieving their development potential. So there must be a more realistic evaluation of this aspect of the EIR. 16-6
- 3. The transit objectives and retail absorption are unlikely to succeed with 1,200 new units. 16-7
- 4. Major concern is whether the infrastructure plan locks Alameda into a housing development decision to only 1,200 new units. If not, how is the system planned to be capable of adjustment to say more units and/or different mix of retail and/or light industrial? 16-8

Chapter 3 Transportation and Circulation

This section needed lots of analysis and fortunately Alameda has defined many policies to act as a framework. This analysis required a multi-modal and cumulative projects analysis. The mitigation measures needed to include Transportation Demand Management (TDM) plan. 16-9

Comments:

- 1. A TDM along with the Monitoring and Improvement Program are mitigation measures for almost all of the Potential Impacts. The EIR states on page 4 – 23 “The transportation modeling assumes that the share of trips made using transit will be consistent with existing transit ridership patterns in Alameda, and does not assume reduction in automobile trip generation rates to account for the potential future benefits of Transportation Demand Management (TDM) at the project site.” 16-10
 - a. Although the TDM is required, it seems that some calculation could be made on the projected outcome of the program. Please explain why the future benefits of the TDM cannot be calculated.

ALAMEDA POINT DRAFT EIR – H.O.M.E.S. COMMENTARY

- 2. The analysis uses the project description and objectives (see Chapter 3) and the street design and transit infrastructure from the draft Master Infrastructure Plan.
 - a. Page 2 -3 has a list of housing units per subarea for a total of 1,425. The Disposition Strategy has now suggested more of these units should be concentrated at the Town Center. And many of these would be multi-family. We would expect fewer cars, greater transit and bike usage. This should impact some of the calculations. 16-11
 - b. An inter-transit center and better ferry service (more frequent, a new ferry facility at the Sea Plane Lagoon) are in the project. Why are these not mentioned in the EIR? Evaluating what they would contribute to the decrease of auto traffic is important. 16-12

- 3. Summary of Impacts and Mitigation Measures (Table 2-2)
 - a. There are 44 mitigation measures and 29 (or 65%) include at least one “significant and unavoidable” outcome for transit, bike, pedestrian or auto. 16-13
 - b. Most of these impact auto travel
 - c. Eleven or 25% are for intersections or roads outside of Alameda, and therefore under these counts are disturbing. Some of the reasons are provided in the details of Chapter 4. For example:
 - Existing policies prohibited some of the proposed mitigations. There is a policy on street width; many discarded cases were due to the modal preference (ranking of auto, transit, bike and pedestrian).
 - Shouldn’t variances on the policy be considered? For example, at the Webster, Atlantic, Willie Stargell intersections transit overrides and therefore pedestrians and bikes are negatively impacted.
 - Not feasible or unlikely – some analysis noted that a certain proposal was not feasible or unlikely for reasons such as the purchase of a “right away”. I don’t understand why this is considered not feasible. 16-14
 - Jurisdiction – many of the intersections posing problems (e.g. LOS above E) are in Oakland. Alameda does not have the authority to implement the proposed measure. Other jurisdictions such as the CalTrans and the Alameda County Transportation Commission are involved. This will require Alameda to work with these agencies on the proposed measures. In many cases only a brief statement as to the status is provided. There should be consistency in the detail. A more expansive description of the status, likely outcome and schedule should be provided. The success of Alameda Point will depend on the completion of some of these mitigation measures outside the local jurisdiction.

ALAMEDA POINT DRAFT EIR – H.O.M.E.S. COMMENTARY

- 4. Phasing – implementation of these mitigation measures is dependent upon a carefully planned phasing strategy. The EIR does not fully address this. In chapter 2 it states, “It is anticipated that development within the Development Areas would occur in cohesive areas and would be implemented in orderly phases.” A TDM discusses the triggers. The EIR should expand on phasing impacts. 16-15

- 5. “Limits of the methodology to calculate bicycle LOS for this study do not include Class I bicycle paths.” This is a statement from the EIR. What will be done to address this? 16-16

- 6. The EIR discusses the challenges in finding a solution for safe biking on Wille Stargell, Appezatto and Main. Actually no good measure is recommended, and point 5 above applies here. The TDM and other plans will encourage biking. More work is needed to provide an adequate solution. 16-17

Chapter 4 Land Use and Compatibility

Comments:

- 1. The EIR paints a very broad stroke for much of the proposed land use at AP (Alameda Point); however, at the same time, the uses outlined, particularly in the land use map provided in the EIR, do not appear to allow for flexibility for the designated uses.
 - a. For example, the “Employment (AP-E)” zoning implies that no type of housing would be allowed or considered in that AP-E area. This specific example brings into question one of the principles of the EIR in regards to integrating AP in to the surrounding neighborhoods. The West End of Alameda is predominately residential. An employment park, as suggested by the EIR, does not appear to be compatible with the surrounding uses. If the AP-E were to be modified to allow for some style of housing mixed in (either horizontally or vertically) with the employment use, then the surrounding neighborhood and the new AP fabric may be better integrated. 16-18

- 2. The “Alameda Landing Retail Strategy” prepared for Catellus Development Corporation by ALH-ECON in Sept 2012 shows that approximately 680,000 square feet represent the retail leakage from Alameda, not including the Alameda Landing development. Upon completion of the Alameda Landing and AP housing a retail need may be in the range of 750,000 square feet. The EIR is calling for approximately 800,000 square feet of retail for the “Project” based on table 2-7 on page 3-33 and one million square feet of retail in the “Alternatives” section (in the Transit INFRASTRUCTURE I, OPEN SPACE: p. 78 Figure 31.) 16-19

ALAMEDA POINT DRAFT EIR – H.O.M.E.S. COMMENTARY

- 3. The EIR notes 3 areas of open space: Nature Reserve, Primary, and Secondary spaces. Shown on the map are 2 small parks abutting each other in the Main Street neighborhood and 2 small parks abutting each other in the Enterprise Area next to Enterprise Park. None are shown in the historic district or central core. The text states that smaller neighborhood serving parks will be located even though they are not shown on the map; it continues to state what the spaces will include in the 3 types of areas; however, the need for neighborhood parks is not restated, apparently assuming that somehow they will appear.

 - a. It is imperative that locations/delineations of parks of different types--e.g. tennis courts, recreation fields, picnic areas, etc.-- throughout several residential areas be clearly outlined so that developers will know that they must be provided. Perhaps "x" number of parks within "x" blocks of each neighborhood, some with tennis courts, some with picnic areas, and so forth.

16-20

- 4. SCHOOLS: 4.L, P.10, Figure 4.L-4. There is a projected increase in total school enrollment of 427 students spread over grades K-12. The EIR concludes that there is less than significant impact, as the school district has the ability to generate fees from developers to build new schools. This seems like the City is throwing a potential problem to the school district.

 - a. Over the years projections of student increases have been woefully inadequate-- note the portable buildings on all schools, which serve Alameda Point, excepting Ruby Bridges, which is very new. AUSD reports that each school (Paden, Ruby Bridges, Wood and Encinal High "have all long exceeded their true capacities").
 - b. In addition to lack of space, location is a major factor. Location of these schools is quite a ways away from the planned Alameda Point residential neighborhoods. Because of the distances, it is presumed that parents will drive their children to school; for an area geared toward lack of dependence on automobiles, this does not represent thoughtful planning. It is imperative that schools be planned near residential areas, in coordination with AUSD, so potential buyers are assured that their children can go to neighborhood schools, usually a major factor when a family looks to purchase a home.
 - c. Thought should be given also to use of school buildings. Use of playing equipment, fields, auditoriums, and community rooms should be available to the public when not in school use to efficiently use the space and facilities to maximum advantage.

16-21

16-22

16-23

- 5. Oriented Mix only. In the other alternatives the amount of retail is not specific but for this review purpose the assumption is made that the same one million is the same for the other alternatives).

 - a. The delta between what is proposed for the alternatives vs. what is suggested by the retail study is 250,000 square feet. Does this difference need more research and does this number need to be more carefully understood regarding the real retail need and allocation? The danger for AP would be to designate too much retail above and beyond what could reasonably be supported. 250,000 square

16-24

ALAMEDA POINT DRAFT EIR – H.O.M.E.S. COMMENTARY

feet is the equivalent of more than two structures the size of the Bladium Athletic Club. Is it realistic to move forward on the assumption that the additional 250,000 square feet will be eventually filled or could that amount of space be better allocated throughout the site?

↑
16-24
cont.

b. Additionally, with 2.3 million square feet of existing built space at AP currently vacant and another 1.4m square feet proposed, how does the 750,000 work with the total 3.7m square feet of non-residential use? Or put in a simplified way, with a total of 5m square feet existing at AP currently and 5m square feet identified in Table 2-7 how are the existing and new, or replaced, structures allocated across the site and does this support the density needed to meet the project objectives?

16-25

Chapter 5 Alternatives

Comments:

1. Table 5-6 on page 5-31 comprises a type of score card that provides a comparison of the suggested alternatives for AP. Items that should be addressed are as follows:

16-26

a. The Economic Development and Employment Objectives category scores a +1 for both the "EGP" ("Existing General Plan") and "Multi Family" options yet scores a 0 for "TOM" ("Transit Oriented Mix") and "High Density." If the "Project" plan scores a base line 0 in this category why does the "EGP" and the "Multi Family" score a +1 while providing less non-residential square feet compared to the "Project"? More job creation, as proposed in the "TOM" and "High Density" plans, would seem to create more economic development with a better balance of residential and non-residential.

b. Based on the overall square miles of the 94501 zip code, minus AP (a total of 6.65) and the number of housing units in that zip code (27,000 according to internet real estate sources) this amounts to approximately 6.2 units per acre spread over the entirety of the 94501 area. This includes all park and open space, roads, shopping areas, R&D parks, etc. The "High Density" alternative is calling for an equivalent density of 5.5 units per acre. This disparity should be addressed or the "High Density" category should be renamed to "Not as dense as the rest of Alameda."

16-27

2. These comments point to the possible need to create a finer grained plan that allocates the spaces as outlined in the various alternatives. The general assignment for an EIR is to address the impacts of a proposed plan and this document is able to achieve that in a very broad way, allowing for a great deal of flexibility for interested developers to approach the project. However, the danger of too broad an approach may be that the space allocations hoped for are not properly apportioned throughout the site, leading to "lop-sided" development that does not, in the end, meet the originally intended objectives. At the very least the amount of square feet per use should be shown on the plan, per alternative, to illustrate a proportional sense of land use and allocation.

16-28

ALAMEDA POINT DRAFT EIR – H.O.M.E.S. COMMENTARY

3. In addition it would be helpful to note examples of other developments with similar constraints and opportunities to AP, not just locally but internationally. Solutions to those projects may provide insights to the challenges at AP.

16-29

Letter 16. Housing Opportunities Make Economic Sense (Helen L. Sause, President)

- 16-1 The Draft EIR included an evaluation of several alternatives. As discussed on page 5-1 of the Draft EIR, CEQA requires that an EIR describe and evaluate a range of reasonable alternatives to the proposed project, or to the location of the proposed project, and evaluate the comparative merits of the alternatives (*CEQA Guidelines* §15126.6(a), (d)). The purpose of the alternatives analysis is to identify ways to mitigate or avoid the significant environmental effects of the proposed project. (*CEQA Guidelines* §15126.6(b)). Therefore, the discussion of alternatives should focus on alternatives that are capable of avoiding or substantially lessening any of the significant effects of the project. (*Id.*) In compliance with CEQA, Chapter 5 of the Draft EIR describes six alternatives to the proposed project, including their ability to avoid or substantially lessen any significant impact of the proposed project, and evaluates their comparative environmental impacts and ability to meet the project objectives, all for consideration by the decision makers.
- 16-2 The comment is not a comment on the adequacy of the EIR analysis. As described in the Chapter 5, *Alternatives*, each of the various alternatives included some advantages and some environmental impacts.
- 16-3 The City disagrees that the proposed project is not feasible. The City Council may adopt any of the alternatives analyzed in the EIR if it finds that the alternative is feasible. If the City chooses to adopt an alternative that was not analyzed in the EIR, additional study would be performed to determine if that decision would result in additional environmental impact.
- 16-4 As shown in Figure 3-7, the streets within Alameda Point would connect with Island Arterials and Collectors. As stated on page 4.B-2 of the Draft EIR, the City of Alameda currently has more employed residents than jobs. It is estimated that the City has approximately 26,970 jobs and 37,799 employed persons, which indicates that many of Alameda's employed residents commute to work outside of the City. The ratio of jobs to employed residents within the City of Alameda is 0.71. Therefore, a proposed project at Alameda Point with a large amount of jobs and less housing would improve the City of Alameda's overall jobs/housing balance and potentially reduce off-island commute traffic.
- 16-5 The comment does not address the adequacy of the environmental analysis. The Draft EIR assumed that the build out of the proposed project would take at least 20 to 30 years. The EIR also included an analysis of two alternatives that included more housing than the proposed project. The City Council may adopt any of the alternatives analyzed in the EIR if it finds that the alternative is feasible. If the City chooses to adopt an alternative that

- was not analyzed in the EIR, additional study would be performed to determine if that would result in additional impacts.
- 16-6 Please see responses to Comments 16-4 and 16-5.
- 16-7 The comment does not address the adequacy of the environmental analysis presented in the Draft EIR. Please see responses to Comments 16-4 and 16-5, above regarding an improved Citywide jobs-housing balance with the proposed project.
- 16-8 The Draft Master Infrastructure Plan is designed to provide flexibility for the City of Alameda in the event that the City chooses to change the composition of the land uses at Alameda Point to address changing market conditions or community priorities.
- 16-9 Mitigation Measure 4.C-2a on page 4.C-37 of the Draft EIR requires a Transportation Demand Management program to reduce automobile trips.
- 16-10 In accordance with the City of Alameda General Plan, the TDM program is designed to reduce residential trips by 10 percent and non-residential trips by 30 percent. As described on pages 4.C-23 and 4.C-37 of the Draft EIR, the TDM program is the primary mitigation to reduce transportation impacts in accordance with the General Plan. The additional analysis requested by the comment would not have changed the conclusion of the Draft EIR. The analysis would have simply confirmed that the potential impacts will still occur without the TDM program and that TDM mitigation is required to reduce or eliminate those impacts as required by the General Plan.
- 16-11 The City agrees with the comment. As discussed in Chapter 5, *Alternatives*, the Multifamily Alternative would generate about 10 percent fewer peak-hour trips than the project. Because the Multifamily Alternative would have the same development program as the proposed project except that all housing would be multi-family dwellings, the comment's supposition regarding reduced trip generation for multi-family dwellings is confirmed in the Draft EIR.
- 16-12 The ferry terminal is described in the EIR in Chapter 3, *Project Description*, on page 3-22 of the Draft EIR. The City agrees with the comment. Ferry service to the Seaplane Lagoon is an important component of the TDM program and will help achieve the City's goals for a transit oriented development at Alameda Point and a 10 percent reduction in residential trips and a 30 percent reduction in non-residential trips.
- 16-13 The Draft EIR identified a number of impacts to a variety of travel modes, including automobiles, transit, bicycle and pedestrian.
- 16-14 Mitigation measures are not considered feasible if they are prohibited by currently adopted plans and policies, or are outside the jurisdiction of the lead agency for this EIR, which is the City of Alameda. In order for the City of Alameda, as CEQA lead agency, to demonstrate that the mitigation measures will be effective in reducing significant impacts to

a less-than-significant level, they must be feasible and within the responsibility and jurisdiction of the City. See Public Resources Code § 21081(a)(1)-(3).

The General Plan policy against widening streets is consistent with its other City policies to create a transit oriented development at Alameda Point and maintain and improve the quality of the citywide transportation infrastructure for alternative modes of transportation. Widening streets to accommodate more automobiles is a mitigation that is specifically designed to allow more automobiles to use city streets. The City policy is to reduce the number of automobiles on City streets by utilizing TDM strategies that make other modes of travel more attractive and effective. TDM strategies are specifically designed to reduce the amount of cars on the roads. In addition, widening streets to accommodate more automobiles can have a negative effect on pedestrians and bicyclists, which in turn may cause those pedestrians and bicyclists to use automobiles for more of their trips. Regarding the impacts on Oakland, the City agrees that the two cities need to be working together to solve regional transportation issues.

- 16-15 With respect to phasing and implementation, the Draft EIR provides an analysis of the impacts of full buildout of the proposed development and recommends mitigation measures to lessen or avoid the impacts of the proposed development. Those measures are all designed to be implemented and monitored throughout the implementation of the proposed project, to ensure that any impacts associated with the project are mitigated when they occur during the 20 to 30 year buildout period. This approach provides maximum protection for the environment and ensures that no interim impacts occur prior to implementation of mitigation measures.
- 16-16 The Draft EIR used the thresholds recommended by the City of Alameda Transportation Commission. As described on page 4.C-24 of the Draft EIR, the Florida DOT method for bicycle LOS, which has been adopted by the City of Alameda, is based on bicyclists' perceptions of their level of comfort along a roadway segment, including vehicles speeds, lane width, and vehicle volumes, which are not a concern on separated and protected paths not shared by vehicles.
- 16-17 As presented on pages 4.C-45 through 4.C-47 of the Draft EIR, the proposed project would require, as part of Mitigation Measures 4.C-2m, 4.C-2n, and 4.C-2o the construction of a Class I or Class II bicycle facility on Willie Stargell between Main and Webster streets on Main Street from Apezatto Parkway to Pacific Avenue, and on Central Avenue from Main Street-Pacific Street to Lincoln Avenue. Additionally, 14.8 miles of onsite protected bikeways are being proposed in the MIP to further promote a safe and efficient biking environment.
- 16-18 The comment addresses the proposed project and not the adequacy of the environmental analysis. The Planning Board has been having a series of public meetings on the draft zoning and has discussed these issues specifically. The Planning Board's current draft of the zoning includes a number of new provisions to improve the interface between the Enterprise Sub-district and the adjacent neighborhoods.

- 16-19 The comment does not address the adequacy of the Draft EIR. It should be noted that the 812,000 sqft of commercial identified in Table 2-7 includes both retail and services. The alternative excludes services, and would include one million square feet of retail. It is also important to note that “sales tax leakage” is a metric designed to measure how much retail shopping is being done by Alameda shoppers in other cities. It is not necessarily a “cap” on how much retail sales might occur in a jurisdiction. For examples, some cities, such as Emeryville do not have any “sales tax leakage,” but in fact, have a ‘sales tax surplus” because residents from other cities are shopping in Emeryville.
- 16-20 As presented on page 3-4 of the Draft EIR, one of the key project objectives is creating an open space network that incorporates preservation, restoration and enhancement of wetlands and other natural habitats and provides for both passive and active recreational uses. The Open Space Framework is illustrated in Figure 3-6 of the Draft EIR, and it identifies open space within all sub-areas of the project site. The City agrees with the comment. Implementation of the open space network will require careful coordination during implementation of the development process.
- 16-21 Section 4.L, *Public Services and Recreation*, acknowledges that AUSD has exceeded their capacities (page 4.L-10 of the Draft EIR). However, as further described in Section 4.L, AUSD levies development fees for residential and commercial development. Under Senate Bill (SB) 50 (described on Draft EIR pages 4.L-5 to 4.L-6), school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. For the purposes of CEQA and pursuant to SB 50, payment of the development fees for schools is considered full mitigation of the impacts of a development project on school facilities. Therefore, the Draft EIR appropriately concluded that project impacts on schools would be less than significant. In addition, as described in response to Comment 6-1, the City will continue to work cooperatively with AUSD to identify potential sources, physical resources, and partnerships to improve AUSD’s ability to provide education facilities and services for Alameda’s youth.
- 16-22 The comment does not address the environmental adequacy of the Draft EIR. In the event that an adopted school facility needs analysis concludes that new school facilities are needed as a result of the project, the City and the AUSD would jointly evaluate whether and where new school facilities should be built. As described in responses to Comments 6-1 and 16-21, the City is committed to working with the State of California, AUSD, and/or other parties to identify additional, legally appropriate ways to alleviate costs of construction beyond the requirements of SB 50.
- 16-23 This comment does not address the content or adequacy of the Draft EIR. However, it should be noted that the use of school facilities is within the responsibility and jurisdiction of the AUSD.
- 16-24 The comment does not address the adequacy of the environmental analysis presented in the Draft EIR. Please see response to Comment 16-19.

- 16-25 The proposed land use sub-areas are discussed starting on page 3-25 of the Draft EIR, and the density and intensity of development that potentially would be accommodated in each sub-area is shown in Table 3-1 on page 3-32 of the Draft EIR. Pending the receipt and review by the City of actual development proposals, it cannot be stated at this time with certainty with regard to all existing buildings on the project site which structures would be retained and which would be replaced.
- 16-26 The tables in Chapter 5, Alternatives, are specifically designed to help decision makers and the public evaluate the potential benefits and potential environmental impacts of different alternatives. Different readers may disagree with the individual rankings. Ultimately, the City Council must decide which alternative or variations in the proposed project represent the best balance between achieving City objectives and minimizing environmental impacts.
- 16-27 The names for the alternatives were chosen to distinguish the differences between the alternatives and the project. The comment is correct though in that given the large areas of open space in the plan, even the highest density alternative is relatively low density when compared to other areas of Alameda.
- 16-28 The City agrees that successful development of Alameda Point will require careful and thoughtful decision making throughout the 20 to 30 year build out of the project site to ensure that all of the hoped for community benefits are achieved.
- 16-29 The comment does not address the adequacy of the environmental analysis presented in the Draft EIR. Reuse of many former military bases throughout California has presented challenges, some of which have been more easily overcome than others. The experiences of various such facilities (see, for example, Treasure Island, Hunters Point, Moffett Field, Hamilton Air Force Base, Fort Ord in Monterey County, and the like) have been varied, although each may offer learning opportunities for Alameda decision-makers as they move forward with Alameda Point.

OAKLAND CHINATOWN COALITION

October 21, 2013

TO: Andrew Thomas
City Planner
2263 Santa Clara Avenue
Alameda, CA 94501

FROM: Oakland Chinatown Coalition

SUBJECT: Comments on the Draft Environmental Impact Report for Alameda Point Project

Dear Mr. Thomas:

Thank you for providing the opportunity to comment on this document. We appreciate the City of Alameda's willingness to work with Oakland Chinatown Coalition members during the development of this Draft EIR. We are a coalition of nonprofit organizations, churches, businesses, and residents of Oakland Chinatown who are deeply affected by new development on the west end of Alameda. As organizations dedicated to preserving the health, safety, and vitality of Oakland Chinatown residents, merchants, workers, employers, and visitors, we have paid particularly close attention to traffic issues that will affect us. The impact of traffic on Oakland Chinatown is obvious to any casual observer who stands on any of the intersections at 7th and Harrison, 7th and Webster, or 7th and Broadway on any day of the week during peak travel hours. Cumulatively, hundreds of cars line up and idle for hours each day in Oakland Chinatown, either coming out of the tube or waiting to enter the tube. While the impacts on pedestrian safety are important, and are discussed in the DEIR, equally important are the measurable negative impacts on air quality within our neighborhood.

17-1

The Chinatown Community's key concern about the proposed project is the additional negative traffic impact it will have on our community. Traffic congestion, reduced air quality, and pedestrian safety problems are real issues we face each day. In our opinion, the proposed project will add to those problems and diminish the quality of life in our neighborhood. Therefore, we expect that the EIR will explore all possible alternatives to route traffic away from using the Posey and Webster Street Tubes. In that regard, the EIR fails to evaluate an alternative whereby project traffic is channeled to other routes providing access to/from Alameda lying to the south. The EIR as presently written seems to assume that traffic will seek other routes when congestion and delay in the tubes become so bad that drivers will be forced to use the other routes. That premise is not acceptable to the Chinatown community.

17-2

We are particularly concerned with the inconsistencies, missing data, and errors in the traffic methodology in this draft EIR that render it difficult to assess whether the impacts to Oakland Chinatown have been adequately analyzed and appropriate mitigation measures developed, in compliance with the California Environmental Quality Act (CEQA).

17-3

COMMENTS ON DEIR
FOR THE
ALAMEDA POINT PROJECT

Our analysis indicates there are inconsistencies in the traffic model that was used to project future vehicle trips in the AM and PM Peak Period. The finding that only 1 vehicle trip per hour in the AM Peak Period at the 6th & Jackson intersection that is a direct result of the project leaves one to question the validity of the model. Furthermore, the back-up analysis has no indication of the traffic distribution from the Project, nor from where traffic is coming that is headed to the Project.

17-4

Additional inconsistencies that were identified include:

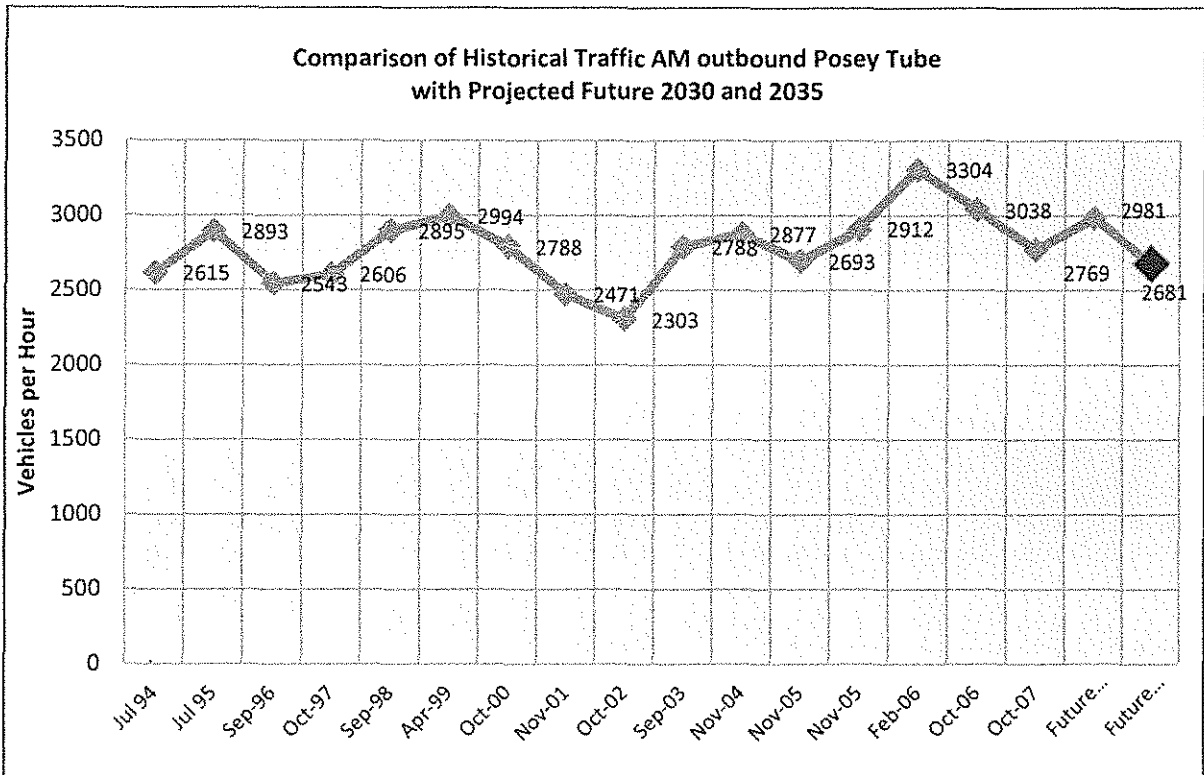
- **Minuscule or no** increases in exiting traffic at the other four island gateways in the AM peak hour due to the project. The DEIR traffic analysis does not accurately show traffic volumes exiting the Posey Tube in the AM peak hour in stating that the project would only generate one car outbound through the Posey Tube, as seen in the table below, and minimal traffic increases at the other four island gateways. This does not seem accurate, and the analysis for this should be checked. It is "unimaginable" that the traffic in the AM peak hour would be one car per hour for the "Existing with Project" condition and then only eight cars per hour for "Cumulative with Project" condition from the Alameda Point Project. For the PM peak hour, the project volume into the Posey Tube and into the Webster Tube at only 102 vph and 104 vph, respectively, for the cumulative plus project is also unimaginable.

Traffic Volume Summary at Island Gateways for Existing and Cumulative Peak Hour Conditions without and with Project
Vehicles Per Hour

AM Peak Hour (vph)							
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Posey Tube	Outbound	2588	2589	1	2673	2681	8
Park St Bridge	Outbound	1937	2004	67	2150	2147	-3
Miller Sweeney Bridge	Outbound	814	878	64	1573	1561	-12
High St Bridge	Outbound	783	802	19	1212	1210	-2
Bay Farm bridge	Outbound	1738	1725	-13	3158	3168	10
Total of all Island Gateways	Outbound	7860	7998	138	10766	10767	1
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-2B & G-2C	Figures G-4B& G-4C		Figures G-6B& G-6C	Figures G-8B& G-8C	

17-5

- Future traffic in the Posey tube is less than historical peak hour traffic in the AM, as indicated in the below graph.



17-6

The Historical am peak hour volumes were provided by the Public Works Directors in his Oct 8th 2008 Traffic Capacity Management Report to City Council. The Caltrans count data shows similar results and this is available upon request.

The 2030 forecasts were provided in the DEIR for the Transportation element (FEIR certified in Jan 2009). The 2035 forecasts were provided in the 2013 Alameda Point DEIR Appendix G).

- The development program that the Alameda Point DEIR studies calls for construction of new public space, an additional 5.5 million square feet of commercial development, and rehabilitation and new construction of 1,425 residential units. While much of the commercial square footage to be developed will replace existing square footage located in hangars, the employment projections indicate an increase of almost 8,900 jobs. It is impossible for us to conceive how anyone driving or riding transit to this project area who is not coming from Alameda will arrive here without coming or leaving through the Webster Tube.

17-7

Traffic growth due to the project is related to the commercial portion of the project and not the 1,425 homes. For cumulative plus project conditions, however, the project traffic drops significantly. An example of this is when the outbound PM at the all-island crossing drops from a project traffic generation of 1228vph in the PM peak hour in the existing plus project condition to 481 vph in the cumulative plus project condition. Inbound in the morning also drops for the project in future years. No explanation is provided in the DEIR, and the resulting impacts become minor at most intersections. The below tables illustrate this significant drop in project volume after the implementation of the project.

17-8

AM Peak Hour							
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Webster Tube	Inbound	1905	2561	656	2929	3073	144
Park St Bridge	Inbound	864	1058	194	1896	2177	281
Miller Sweeney Bridge	Inbound	777	1075	298	1395	1479	84
High St Bridge	Inbound	656	759	103	942	1074	132
Bay Farm bridge	Inbound	2292	2442	150	2436	2637	201
Total of all Island Gateways	Inbound	6494	7895	1401	9598	10440	842
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-2B & G-2C	Figures G-4B & G-4C		Figures G-6B & G-6C	Figures G-8B & G-8C	

PM Peak Hour							
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Posey Tube	Outbound	2125	2737	612	3331	3433	102
Park St Bridge	Outbound	1437	1487	50	2228	2307	79
Miller Sweeney Bridge	Outbound	641	930	289	1375	1487	112
High St Bridge	Outbound	550	686	136	919	1030	111
Bay Farm bridge	Outbound	1987	2128	141	1899	1976	77
Total of all Island Gateways	Outbound	6740	7968	1228	9752	10233	481
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-3B & G-3C	Figures G-5B & G-5C		Figures G-7B & G-7C	Figures G-9B & G-9C	

17-8 cont.

PM Peak Hour							
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Aia Point	Project Volume
Webster Tube	Inbound	3392	3488	96	3882	3986	104
Park St Bridge	Inbound	1451	1566	115	2027	2167	140
Miller Sweeney Bridge	Inbound	1103	1228	125	1559	1639	80
High St Bridge	Inbound	715	847	132	883	1103	220
Bay Farm bridge	Inbound	1783	1887	104	2849	2819	-30
Total of all Island Gateways	Inbound	8444	9016	572	11200	11714	514
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-3B & G-3C	Figures G-5B & G-5C		Figures G-7B& G-7C	Figures G-9B& G-9C	

17-8 cont.

- Intersection Impact Analysis: The effects of downstream constraints were not considered in the intersection analysis in the DEIR and should be. For example, the freeway weave and ramp merge at the 6th Street northbound on-ramp to I-880 and I-980 today causes backup all the way to the 7th and Harrison intersection, but the intersection analysis states the southbound right turn at the intersection of 6th Street and Jackson Street movement has only 1.3 seconds of delay (Level of Service A) for the future plus project conditions. (Appendix G, Sychro Analysis, 2035 AM with Project).

17-9

This is illogical considering the problems at the I-880 ramp and weave today. All intersections should be re-evaluated if downstream constraints affect the intersections. This constraint currently overwhelms the current roadway system and will only become rapidly more significant with any growth in traffic.

- The DEIR states that there will be **no** impacts in west Alameda and approaching the tubes (see levels of service tables in the DEIR).
- The DEIR mentions on 4.C-25 that only “the segment of I-980 and the segment of I-580 west of I-980 were carried forward for analysis in the EIR” based on a review of volume difference plots from the travel demand model stating that only those sections were shown to result in meaningful increase in traffic volumes. However, neither the methodology nor the calculations from this traffic model were provided for these volume differences in the DEIR. The travel time data from this traffic model was also omitted. We would need this critical data in order to accurately assess traffic and resulting air pollution impacts since it illustrates major congestion when approaching the tubes and along other corridors.

17-10

17-11

- In July of 2013, Coalition members conducted an Environmental Protection Agency funded community air pollution assessment of twelve hotspots located throughout Oakland Chinatown. Initial findings indicate that consistently higher rates of black carbon were observed on Harrison Street right off the mouth of the Posey tube between 6th Street and 7th Street where a local daycare center with young children is

17-12

located. Black carbon rates in this area averaged at 2.65µg/m³ and hit a peak of 20.01µg/m³. For comparison, the action level threshold of the nearby city of San Francisco is 0.2 ug/m³, meaning new residential construction must take affirmative actions to reduce exposure. Another peak region was on 8th Street between Harrison and Webster, which showed an average black carbon level of 3.27 µg/m³. The high rates of black carbon emitted in this area are of great concern due to the high number of pedestrians who are seniors and children, and the concentration of churches, schools, community-based organizations, and shops in the area that are patronized by thousands of residents, shoppers, and visitors on a regular basis. With a residential population of roughly 5,000, we estimate that Chinatown residents experience 40 days per year of respiratory symptoms, 28 days with work limitations, and 144 days of minor activity limitations. These estimates are for a normalized adult population and do not take into account Chinatown’s high senior population.

17-12
cont.

- The DEIR states that there will be **no** Congestion Management Network impacts. (Year 2035 PM peak hour project traffic is 50vph inbound and 100vph outbound in the Webster and Posey Tubes as per Appendix G.) This minuscule cumulative 50 and 100 vph (inbound and outbound at the tubes) when distributed over the Chinatown intersections is within the error of the methodology of the intersection Levels of service calculations. It is recommended that Table 2-2 be checked for each intersection.

17-13

- Background traffic causes the congestion in Alameda and Oakland but no information is provided which project causes what traffic problems. The Draft EIR should provide the traffic technical report and traffic modeling documentation so that the traffic analysis can be better understood. This information is needed to understand how the background traffic growth has such a large contribution to the future traffic conditions while the Alameda Point project has little effect. More information can help to verify which project causes what traffic problems.

17-14

- The proposed Broadway-Jackson interchange is not included in the analysis. This is likely due to the lack of funding at this time, and because this interchange project or any other form of Chinatown mitigation introduces major changes in travel patterns in Chinatown as well as to and from the Alameda Point Project in and around Chinatown. However, mitigation measures can be implemented: it is reasonably foreseeable that the new County Transportation Sales Tax Measure will pass in the next year because this Measure in the last election failed with such a small percentage. Reasonably foreseeable events should be considered in an EIR, and an assessment of the traffic impacts with and without Broadway Jackson Interchange or other mitigations acceptable to Chinatown should be done.

17-15

- An analysis of seismic conditions of the island bridges and tubes was not addressed in the DEIR. According to Caltrans letters dated from Caltrans to the City of Alameda in 2002, the tubes have a seismic rating of minimum performance level. A professional engineering report “Retrofit Strategy Report” for the Alameda Tubes dated September 30, 1996 prepared by Parsons Brinckerhoff Quade and Douglas Inc. and approved and adopted by Caltrans states that minimum performance levels in Table 10-2 would result in “delays to motorists due to tube closure requiring long term (more than a year) diversion of traffic to the bridge crossings between Oakland and Alameda.”

17-16

As major seismic events are no different than the Rising Sea Levels, the earthquake event is reasonably foreseeable and should be evaluated in this DEIR. With almost 70,000 vehicles per day using the tubes, traffic impacts and mitigations need to be assessed for the without and with project conditions.

17-17

Furthermore, this Seismic Strategy Report mentioned the steel re-enforcement was corroded and the field test indicated this condition to be a problem. The report is unclear if this was planned to be fixed. Per the report the primary damage to the tubes (retrofitted to minimum performance levels) is expected to be cracks and significant leakage; the tubes may be flooded within a day and that no loss of life would be expected. The report also indicates that repairs may not be possible, thus requiring replacement of the tube(s).

17-18

At a minimum, it would be appropriate to construct protective traffic devices similar to railroad crossings so vehicles do not continue to enter the tubes immediately after an earthquake. This measure and other measures should be considered for safety of the public and be evaluated for both without and with project conditions.

The seismic and inaccessibility uncertainties are likely to be major impediments for any major employers at Alameda Point, but not for individual home buyers. Therefore the DEIR should also evaluate the scenario where only a small fraction of the projected employment growth occurs. The project would then become overwhelmingly residential and result in future changes for a project with more houses. This is a growth inducement concern and should be addressed in the DEIR.

17-19

➤ The Draft EIR should state whether or not any aspect of this project will involve federal funding. Are any federal funds needed for the affordable housing, on- and off-site transportation facilities, or other mitigation measures? Should that be the case, then this project will require an EIS.

17-20

➤ Additional crossings from the island to West Oakland should be considered. With such significant new development proposed for Alameda, why is no additional crossing from the island to West Oakland considered? This would benefit Oakland Chinatown, Alameda and West Oakland in several distinct ways. For Oakland Chinatown, it would reduce traffic in a highly impacted area. For Alameda, it would develop an alternative exit entrance from the island for all the new drivers and transit users. For West Oakland, there would be an increase auto traffic. Increased auto traffic through West Oakland west of Brush Street would provide some potential economic development opportunities, as this area would become an additional gateway between Alameda and Oakland. The disproportionately negative air quality impacts in West Oakland are currently the result of Port related shipping and trucking, while general auto traffic is minimal.

17-21

An alternative mitigation factor to study is the development of a cross-town boulevard that allows Alameda Point traffic to use the Fruitvale crossing.

17-22

Additionally, as Oakland residents, we find the significant but unavoidable conclusions about the following intersections unacceptable, especially the bolded intersections, which are in and around Oakland Chinatown:

- **Jackson/Sixth (Oakland)**
- **Webster/Eighth (Oakland)**
- **Broadway/Fifth (Oakland)**
- Brush/12th (Oakland)
- High/Oakport (Oakland)
- High/Coliseum (Oakland)
- 29th/Ford (Oakland)
- 23rd/7th (Oakland)

17-23

The DEIR states that the high volume of traffic on 7th, 8th, 9th, 10th, Franklin, Webster, and Harrison streets make the area not conducive to walking. If you spend any time in the neighborhood, you know that thousands of people are walking within our neighborhood in spite of the traffic. The DEIR's Mitigation Measure 4.C-9 is vague and ineffectual.

17-24

The redevelopment of Alameda Point is important to all of us in the Bay Area. However, it should not proceed at the expense of Chinatown. We look forward to your response to our comments in the Final EIR.

Sincerely,
Oakland Chinatown Coalition

Enc: Comments
Cc: Alameda Mayor and City Council, Oakland Mayor and City Council

Letter 17. Oakland Chinatown Coalition (Oakland Chinatown Coalition)

17-1 The City of Alameda acknowledges the concerns raised in the comment. The Draft EIR includes an evaluation of the potential transportation, air quality, and noise impacts of project related automobile traffic in Chinatown. The existing conditions in Chinatown are described starting on page 4.C-6; the traffic impacts are described starting on page 4.C-38 for Existing plus Project conditions, and starting on page 4.C-38 for Cumulative plus Project conditions. The traffic analysis also includes an Oakland Chinatown pedestrian analysis (Draft EIR pages 4.C-83 – 4.C-87); an analysis of air quality impacts along streets in Chinatown (Draft EIR pages 4.F-39 – 4.F.40).

17-2 Please see responses to Comments 17-1 and 7-9. The Draft EIR finds that the Webster and Posey Tubes have a limited capacity and that when that capacity is reached, automobiles will divert to other crossings. For these reasons, the Draft EIR found a large number of traffic impacts at locations throughout Alameda in the vicinity of the other Estuary crossings (Park Street Bridge, High Street Bridge, etc.). The City has evaluated the potential effectiveness of trying to divert traffic to other crossings through signs and has determined that automobile drivers will ignore such signs if the signs force a more circuitous route. The City also found that diverting traffic from the Webster Posey Tubes would simply increase traffic flow in other Oakland neighborhoods such as those in the Fruitvale District. For these reasons, the Draft EIR and the City of Alameda General Plan require mitigation measures designed to reduce the amount of automobiles (TDM strategies) rather than mitigation measures that are designed to divert automobiles to other Oakland neighborhoods or increase roadway capacity for more automobiles. The EIR also recommends Mitigation Measure 4.C-9 which calls for the City of Alameda to continue to work cooperatively with the City of Oakland, the Alameda County Transportation Commission, and Caltrans “to evaluate and implement measures to reduce or divert the volume of traffic that travels through Oakland Chinatown to and from Alameda Point and other City of Alameda destinations.” This mitigation is intended to support the ongoing efforts to find a regional solution to the existing “Broadway Jackson” interchange deficiencies and find regional solutions to divert traffic around Chinatown, instead of through Chinatown, but not divert traffic into other Oakland neighborhoods.

The primary means by which the proposed project will reduce traffic impacts and associated air quality impacts in Oakland Chinatown are by implementing a TDM program that will reduce vehicular trips, and improve Alameda’s housing/jobs balance. The Draft EIR describes a TDM program as part of the proposed project starting on page 3-22, under the Circulation Framework. Mitigation Measure 4.C-2a requires implementation of the TDM program, as described in Chapter 4.C, *Transportation and Circulation* under Impact 4.C-2. As further explained in response to Comment 7-15, the TDM program is specifically designed to reduce peak-hour residential trips by 10 percent and non-

- residential trips by 30 percent. By reducing automobile traffic and commute trips through project design and transportation demand management, the Alameda Point project provides a program with specific goals and funding to reduce automobile generated emissions in both Alameda and Oakland. The Draft EIR did analyze localized air quality impacts in Oakland Chinatown (see Impact 4.F-3 on page 4.F-39), and found that the effects of project traffic would be less than significant. Please see also response to Comment 7-25, which pertains to the air quality TAC impact analysis. As stated on page 4.B-2 of the Draft EIR, the City of Alameda currently has more employed residents than jobs. It is estimated that the City has approximately 26,970 jobs and 37,799 employed persons, which indicates that many of Alameda's employed residents commute to work outside of the City. The ratio of jobs to employed residents within the City of Alameda is 0.71. Alameda Point project land use mix is specifically designed to improve the City of Alameda Jobs Housing Balance and reduce commute trips through Oakland.
- 17-3 The Draft EIR utilized the City of Oakland thresholds of significance, the same regional traffic model used by the City of Oakland, and the analysis provided a similar level of detail as is typical in the City of Oakland's EIRs. For these reasons, the findings in the Draft EIR regarding traffic impacts, noise impacts, and air quality impacts are very similar and consistent, if not identical, to the findings in City of Oakland EIRs in Chinatown. Please see responses to Comments 7-1 and 17-4 through 17-24.
- 17-4 The Draft EIR identifies that the proposed project will have significant transportation impacts in Oakland. This would not be the case if the project were only generating one (1) single automobile through the Posey Tube. It should be noted that the City of Oakland thresholds of significance require that the analysis examine peak hour conditions, and the Webster and Posey Tubes have a limited capacity to accept additional traffic during the peak hours. As documented in the EIR for the Alameda Point General Plan Amendment in 2003, the Alameda Landing Supplemental EIR in 2006, and a variety of other City of Alameda traffic studies over the last 10 years, the capacity of the Webster and Posey Tubes is fixed to a specific number of automobiles that can cross between the two cities during the AM or PM peak commute periods. The City of Alameda conducts an annual count of automobiles using the tubes in the AM and PM periods and reports those counts annually. It is well documented that the existing tubes have been at or near capacity for the last six to seven years. Therefore, the Draft EIR found that regional growth and other development that is planned in Alameda over the next 20 to 30 years will exceed the capacity of the Webster and Posey Tubes. The Draft EIR finds that the limited capacity of the tube causes many automobile trips to divert to other crossings during the AM and PM peak periods. In addition to diversion of commute hour traffic, it should be expected that the peak hours of congestion will "spread" as more commuters choose to leave earlier or delay their commute to later in the morning to avoid the peak hours of congestion. Also see response to Comment 30-7. Model output plot showing the assignment of project trips on the roadway network are available at the city offices for review. Also please see responses to Comments 2-1 and Comment 7-7 related to the regional transportation model.

- 17-5 The change in traffic volumes between the ‘no project’ and ‘with project’ during the AM and PM peak hours at the Alameda island gateways reflect both the traffic generated by the project as well as diversion to existing and future non-project traffic due to the capacity constraint in the peak direction. That is, that although the Webster and Posey Tubes are the closest automobile access points to the regional transportation network and I-880 from the project site, because the Tubes are currently operating near capacity and do not have additional capacity to accept significantly more automobile trips during the peak commute periods, the Model assigned many project trips that would use the Tubes, if capacity were available, to other routes. (It is noted that the Tubes would still be the route of choice during non-peak periods, when capacity exists; however, the analysis in the EIR focuses on the peak periods of commute traffic, as is common and appropriate in CEQA analysis.) Thus, the Model projects that many of the additional trips will be diverted to the other Estuary crossings at the Park Street Bridge, the Fruitvale Bridge, the High Street Bridge and the Bay Farm Bridge.

To clarify, for the volume shown in the table, the column labeled “Project Volume” represents this change in volume due to the proposed project, not just project related traffic. As noted in the comment, this constraint is particularly evident in the outbound Posey Tube in the AM, where the change in volume with the project is 1 car under existing conditions and 8 cars under cumulative conditions. Under the Existing Plus Project Conditions scenario, the total change in outbound traffic is represented at other Estuary crossings, which represents traffic diverted from the Tubes. Under cumulative conditions, other growth in Alameda would result in a better jobs-housing balance thereby reducing the total outbound at island gateways during the AM peak hour. For more details on the travel demand model used for the analysis, see responses to Comments 2-1 and 7-7.

- 17-6 As illustrated in the figure in Comment 17-6, historical traffic counts range between a low of 2,300 to a high of 3,304. Recent counts from 2012 for the Posey tubes in the AM range from 2,368 to 2,888 for the mid-week (Tuesday through Thursday) workday. These volumes for the AM peak hour are fairly consistent despite the changes in activity at an active Alameda Point since its height of activity as the naval air station. Also see responses to Comments 2-1 and 30-2.
- 17-7 As projected in the Regional Travel Model, and as is evident during periods of traffic congestion, drivers will often choose alternative routes to avoid congestion. During the a.m. and p.m. peak hour commute periods it is expected that drivers would choose to avoid the Webster and Posey Tubes and find alternative routes. Also see response to Comment 2-1 regarding the projected volumes from the project at the Posey Tube.
- 17-8 The comment is not correct. Traffic growth occurs from both residential and non-residential land uses. The change in traffic volumes between the ‘no project’ and ‘with project’ during the PM peak hour at the island gateways reflect both the traffic generated by the project as well as diversion in existing and future non-project traffic due

- to the capacity constraint in the peak direction. See response to Comment 17-5 which explains the increase in traffic at other Estuary crossings during the peak hour- these increase represent traffic diverted from the Tubes. Also see response to Comment 2-1 regarding the projected volumes from the project at the Posey Tube.
- 17-9 The intersection analysis is consistent with the methodology and approach applied by the City of Oakland in its own impact analysis for environmental documents, which does not consider the effects of downstream constraints. The Draft EIR included analysis of “down-stream” Oakland intersections. See responses to Comments 2-1 and 30-2 regarding the capacity constraint the affects the projected peak hour volumes at the Posey Tube as well as on the freeways.
- 17-10 The comment is not correct. The Draft EIR identifies significant transportation impacts to bicycles, pedestrians, and transit in west Alameda as the result of increased automobile trips associated with the proposed project. See Section 4.C, *Transportation and Circulation*, specifically Impacts 4.C-2 (Existing plus Project Conditions) and 4.C-5 (Cumulative plus Project Conditions).
- 17-11 As discussed on page 4.C-22 of the Draft EIR, the Alameda Countywide Model was used to forecast future traffic volumes. Page 4.C-26 states that “the 2000 *Highway Capacity Manual* (HCM) procedures, as applied by Highway Capacity Software (HCS+), were used to calculate average peak hour capacities for each freeway mainline segment. The LOS was determined using ‘density,’ which is measured as passenger cars per mile per lane (pc/mi/ln) given an estimated free-flow speed.” Based on the thresholds of significance, travel time was not used to determine traffic impacts consistent with Caltrans practices and procedures. The peak hour traffic volumes at analysis intersections were used to assess air quality impacts. Please see the technical memorandum entitled *Freeways and Ramps Analysis – Impacts and Mitigations*, to City Staff dated June 30, 2013, which documents the freeway analysis, presented in **Appendix A** of this Final EIR.
- 17-12 Although unclear from the information provided by the commenter, it appears that the assessment referenced by the commenter examined short-term measurements of black carbon. If so, the comparison to the City of San Francisco “action level” of 0.2 micrograms per cubic meter is misplaced, because the San Francisco standard is an *annual* average concentration. As explained in the response to Comment 17-1, the Draft EIR analyzed localized air quality impacts in Oakland Chinatown (see Impact 4.F-3 on page 4.F-39), and found that the effects of project traffic on local air quality would be less than significant. Please see also responses to Comments 7-25 and 17-1.
- 17-13 For the purpose of the Congestion Management Program, the impacts to roadway segments on the Metropolitan Transportation System (MTS) were assessed. The City of Alameda coordinated with the City of Oakland to identify key Oakland intersections for analysis of traffic impacts. Twenty-four (24) existing intersections were analyzed, including several intersections located within Chinatown. The discussion of impacts to

those intersections can be found in section C.4 Impacts and Mitigation Measures, starting on page 4.C-17 of the Draft EIR.

- 17-14 Please see response to Comment 7-29. The background traffic is based on the growth projections from *ABAG Projections 2009* as assumed in the countywide model. The Model allows for the capture of interactions between a mix of uses (in this case, the proposed residential, commercial, manufacturing, recreational, and service uses) both internal to the project site as well as externally in the rest of Alameda, Oakland and the surrounding cities. Using the model for cumulative conditions rather than the list of projects approach is considered standard practice for transportation analysis and is required by the Alameda CTC for the CMP analysis. Also see responses to Comments 2-1 and 7-7 for additional details of the travel model.
- 17-15 The City of Alameda disagrees with the comment. It would not be appropriate for the Draft EIR to expect a regional transportation sales tax measure to pass after a similar measure recently failed. Furthermore, after 12 years of efforts by Alameda CTC and City of Alameda to identify improvements for the Broadway Jackson Interchanges, the Chinatown community and the City of Oakland have been unwilling to agree to any proposed improvement plan. For these two reasons, it would not be appropriate for the Draft EIR to state that these improvements are “reasonably foreseeable.” Additionally, they are neither programmed nor funded. Furthermore, if the Draft EIR had assumed that the sales tax measure had passed and the improvements were constructed, the Draft EIR would have also concluded that the impacts in Chinatown would be lessened and the Draft EIR would have understated the impacts of the project.

As stated on page 4.C-22 of the Draft EIR, “for consistency with recent model forecasts for other studies in Alameda, the recently updated Alameda Countywide travel demand model, which is based on *ABAG Projections ‘09* and includes network changes and regional improvements outside the City of Alameda, was used. The zonal detail, street network and land use from the City of Alameda travel model developed as part of the Transportation Element were merged into the Alameda Countywide travel model. The updated 2035 street network includes improvements such as the improvements at the 23rd Avenue/29th Avenue interchanges on I-880.” Proposed street network projects that have received limited to zero funding or that are yet to receive substantive community and municipal support were not included in the model.

- 7-16 The proposed project will not affect the seismic stability of this existing, operating regional infrastructure. Seismic hazards, including the potential for a significant earthquake to occur in the future within the Bay Area, are discussed in the Draft EIR beginning on page 4.H-7 and again on page 4.H-18, which relies on the most comprehensive studies of earthquake probabilities for the area from the United States Geological Survey and California Geological Survey under the Working Group on California Earthquake Probabilities.

Under the California Environmental Quality Act (CEQA) the City of Alameda is not required to evaluate the potential environmental impacts of an earthquake on the existing regional transportation system and State Route 260. Originally constructed in 1928, the Posey tube is the older of the two subterranean roadways, with the Webster Street tube completed much later in 1963. Both had similar designs and were later found to be vulnerable to earthquakes largely due to the presence of potentially liquefiable materials immediately surrounding the tubes. Beginning in April 2000, Caltrans performed major seismic upgrades through jet grouting methods to stabilize and strengthen surrounding soils by injecting a cement slurry mixture into the subsurface materials around the tubes. Work was completed on October 31, 2003, and is now considered by Caltrans in a 2011 report to meet current seismic standards.²² Nevertheless, the potential for the tubes to incur some level of damage following a substantial earthquake cannot be fully ruled out and that could require temporary closure of one or both tubes. If such circumstances occur, traffic would likely be routed to one of the other bridges that provide access to the island and expanded ferry service would be provided by the Water Emergency Transit Authority as mandated by Senate Bills 976 and 1093. However, considering the more recent seismic upgrades that the tubes have received, catastrophic failure of the tubes is not considered likely.

- 17-17 CEQA does not require that the EIR analyze the impacts to the regional transportation system or the conditions in Chinatown in the event of a major earthquake or other natural or man-made disaster.

Seismic hazards, including the potential for a significant earthquake to occur in the future within the Bay Area, are discussed in the Draft EIR beginning on page 4.H-7 and again on page 4.H-18, which relies on the most comprehensive studies of earthquake probabilities for the area from the United States Geological Survey and California Geological Survey under the Working Group on California Earthquake Probabilities.

The potential effects of sea level rise was considered in preparing the proposed project plans, and would be incorporated into further project planning as discussed in the Draft EIR on page 3-52. The potential impacts of sea level rise are also analyzed on page 4.I-29 under Impact 4.I-8.

The purpose of the traffic analysis found in the Draft EIR in Section 4.C *Transportation and Circulation* is to determine the potential impacts of the proposed project compared to existing conditions (i.e., without the proposed project). In this way, the Draft EIR does compare conditions with and without the project.

- 17-18 As explained above in response to Comment 17-16, CEQA does not require that the EIR analyze the impacts to the regional transportation system or the conditions in Chinatown in the event of a major earthquake or other nature or man-made disaster.

²² Caltrans, State Route 260 Transportation Concept Report, http://www.dot.ca.gov/dist4/systemplanning/docs/tcr/sr_260_tcr_final.pdf, June 2011.

- 17-19 Seismic issues are addressed in Section 4.H, *Geology and Seismicity*. See Impact 4.H-1 on page 4.H-18 of the Draft EIR. Regarding growth inducing impacts, the Draft EIR presented a discussion on starting on page 6-1 of the Draft EIR. Alternatives to the proposed project are presented in Chapter 5, *Alternatives*, and three of the six alternative analyzed included more housing than the proposed project. Any future change to the project, similar to those suggested in the comment to add more housing, would be subject to a future environmental review to evaluate whether the additional homes would result in new or more severe impacts.
- 17-20 As stated on page 1-1 of the Draft EIR, the City of Alameda is proposing the project and is Lead Agency, pursuant to CEQA. As further discussed in Table 3-3 on pages 3-63 to 3-64, future approvals by responsible and federal agencies may be needed to implement portions of the project. Each of those agencies would be responsible for ensuring compliance with CEQA or NEPA, as applicable.
- 17-21 The comment addresses the proposed transportation strategy and not the adequacy of the environmental analysis. Numerous studies examining the feasibility of constructing a new bridge over or a new tunnel under the estuary have been completed over the 17 years since the Navy decommissioned the Naval Air Station. All of these studies, including the most recent *Estuary Crossing Study Feasibility Report* prepared in May 2009 by City of Alameda found that such crossings are not financially feasible.
- 17-22 The Alameda street network provides multiple routes for east-west travel of the city, providing access between Alameda Point and the Fruitvale Bridge. The City of Alameda General Plan includes a policy to extend Clement Street from Tilden Avenue and the Fruitvale Bridge to Atlantic Avenue.
- 17-23 The Draft EIR findings regarding the significant and unavoidable impacts at the listed intersections are a reflection of similar findings about these same locations made by the City of Oakland. As determined by Oakland's own EIRs, if Oakland does not believe mitigation is available, then Alameda cannot impose a physical change in Oakland. The City of Alameda lacks the jurisdictional authority to make operational or design changes to intersections in the City of Oakland in order to mitigate impacts of changes in traffic volumes due to proposed project-related traffic. However, the City of Alameda has identified Mitigation Measure 4.C-2a (TDM Program) and Mitigation Measure 4.C-2b (Monitoring and Improvement Program) in order to decrease the number of personal vehicle trips that would be generated by the proposed project. As stated on page 4.C-69 of the Draft EIR, implementation of Mitigation Measures 4.C-2a (TDM Program) and 4.C-2b (Monitoring) could improve intersection LOS by reducing vehicle trips, although it would be speculative to quantify the potential improvement.

Further, the comment appears to be referring to Impact 4.C-9 (Pedestrian Hazards) on pages 4.C-83 – 4.C-87 of the Draft EIR. As stated on page 4.C-87 of the Draft EIR, the EIR conservatively considered the potential effect on pedestrian safety in Oakland Chinatown to be significant and unavoidable, because “the City of Alameda has no

jurisdiction over mitigation other than implementation of the project TDM program and Monitoring.” The EIR identifies Mitigation Measure 4.C-9 pursuant to which the City of Alameda would work cooperatively with the City of Oakland, Alameda CTC, and Caltrans “to evaluate and implement measures to reduce or divert the volume of traffic that travels through Oakland Chinatown to and from Alameda Point and other City of Alameda destinations.” Concerning the comment’s suggested mitigation in the form of countdown signals and curb extensions, the Draft EIR notes, on page 4.C-6, that signals at many Chinatown intersections already include countdown signal heads for pedestrians, and that bulbouts have been added (and other improvements made, including implementation of a pedestrian “scramble” phase) by the City of Oakland at four heavily used intersections in Chinatown—Eighth/Webster, Eighth/Franklin, Ninth/Webster, and Ninth/Franklin Streets, which are the key Chinatown intersections in the travel path to and from the Webster and Posey Tubes.

Finally, several of the intersections listed in the comment, or other nearby intersections not listed, have been analyzed by the City of Oakland in the Central Estuary Implementation Guide Supplemental EIR and the Draft EIR for the Lake Merritt Station Area Plan. In these reports, the City of Oakland found several intersections in the vicinity of Chinatown to experience significant and unavoidable impacts. For example, on page 3.2-153 of the Draft EIR for Lake Merritt Station Area Plan, the discussion of the impact of that project upon the intersection at 6th and Jackson streets states, “No feasible mitigation measures are available that would mitigate the impacts at this intersection. The Level of Service can be improved by providing additional automobile travel lanes on the affected roadway segments. However, additional travel lanes would require additional right-of-way, and/or loss of bicycle lanes, medians and/or on-street parking or narrowing of existing sidewalks, and are considered to be infeasible. Signal timing changes would not improve the traffic and load capacity of this intersection. Therefore, the impact would remain significant and unavoidable.”

- 17-24 The City of Alameda is committed to working with the Chinatown community, the City of Oakland, and Alameda CTC to identify solutions to the Broadway Jackson Interchange intersections that would provide a more direct route to I-880 for project traffic and reduce the number of automobiles within the most pedestrian areas of Chinatown. Mitigation Measure 4.C-9 restates the City of Alameda’s intention to continue to work with the City of Oakland, Alameda CTC, and Caltrans, to evaluate and implement measures to reduce or divert the volume of traffic that travels through Oakland Chinatown to and from Alameda Point and other City of Alameda destinations.

Regarding “the thousands of people walking”, it is noted in the Draft EIR (see Impact 4.C-5 and 4.C-9) that there are pedestrians utilizing intersections; however the presence of pedestrians does not alter the fact that that multiple traffic lanes and high volumes are not conducive to the walking environment.

Andrew THOMAS - Sierra Club Comments on the Alameda Point DEIR SCH #201312043

From: "Norman La Force" <n.laforce@comcast.net>
To: <athomas@alamedaca.gov>
Date: 10/20/2013 8:37 PM
Subject: Sierra Club Comments on the Alameda Point DEIR SCH #201312043

Dear Mr. Thomas,

The Sierra Club makes the following comments on the Draft EIR on Alameda Point.

The Sierra Club is very concerned about impacts of development on the Least Tern habitat and future wildlife area or refuge. Development too close to the habitat area will have a negative impact on the least tern habitat.

18-1

Sincerely yours,

Norman La Force,
Chair, Legal Committee for the Sierra Club San Francisco Bay Chapter

Letter 18. Sierra Club (Norman La Force, Legal Committee for the Sierra Club San Francisco Bay Area Chapter)

- 18-1 As described on pages 4.E-1 through 4.E-97, of the Draft EIR, the proposed project is specifically designed to limit future development, activities, noise, and light in proximity to the habitat area for the least tern. The Draft EIR also identifies mitigation measures (see Mitigation Measures 4.E.1d, 1e, 2a, 2b, 2c, 3a, 3c, 4a, 4b, 4c, 4d, 4e, and 4f) to ensure that the least terns and their habitat will be protected in perpetuity. Please see, in particular, pages 4.E-46 through page 4.E-97 of the Draft EIR. Together with the avoidance and minimization measures and the terms and conditions of the 2012 BO, the mitigation measures described in the Draft EIR will reduce impacts to wildlife, including the California least tern, to less-than-significant levels.

Comments on Draft Environmental Impact Report for Alameda Point
Submitted by Richard Bangert, Alameda Point Environmental Report
October 21, 2013

Comment #1 – Mitigating Impacts to Air Quality and Greenhouse Gas Emissions by implementing landscape proposal for western Seaplane Lagoon – According to the draft environmental impact report (DEIR), the development facilitated by this project will have significant and unavoidable impacts on air quality and greenhouse gas emissions, even after mitigation measures are implemented. According to the DEIR, construction activities for the project could produce significant and unavoidable impacts to air quality and greenhouse gas emissions, even after mitigation measures are implemented.

The impacts to air quality and greenhouse gas emissions can be further mitigated through implementation of the precise plan (Appendix E) for the western shoreline of the Seaplane Lagoon.¹

The precise plan calls for removing pavement and establishing a naturalized landscape that includes wetlands on the existing land as well as floating offshore wetlands. Removing pavement and the shoreline retaining wall boulders will have a positive environmental impact by removing heat-capturing materials and exposing the natural soil. The introduction of vegetation – grasses and wetland vegetation – will have a positive environmental impact by capturing and reducing the greenhouse gas carbon dioxide.

Proposed action/addition to EIR - Identify a new and additional mitigation measure: Establish the Precise Plan’s Seaplane Lagoon western shoreline naturalized landscape and off-shore floating wetlands as a mitigation measure for the individual and cumulative impacts to air quality and greenhouse gas emissions associated with this project. In addition to the vehicle impacts associated with this project, the report should note the impacts from marine traffic to the proposed Seaplane Lagoon marina and ferry terminal, which will also be partially mitigated by the above shoreline mitigation measure.

The proposed action/addition to the EIR is supported by the following text from the DEIR –

“4F 4. Environmental Setting, Impacts, and Mitigation Measures
F. Air Quality and Greenhouse Gases guidance on measures to mitigate GHG emissions, when such emissions are found to be significant: Measures to mitigate the significant effects of greenhouse gas emissions may include, among others: (4) **Measures that sequester greenhouse gases**” (Emphasis added.)

19-1

19-2

“Impact 4.F-1: Development facilitated by proposed project could potentially result in air quality impacts due to construction activities. (Significant) Even after mitigation measures, the impacts could be significant and unavoidable.”

“Impact 4.F-2: Development facilitated by the proposed project could potentially generate operational emissions that would result in a considerable net increase of criteria pollutants and precursors for which the air basin is in nonattainment under an applicable federal or state ambient air quality standard. (Significant) Significance after Mitigation: Significant and Unavoidable.”

19-2
cont.

Comment #2 - Mitigating Impacts to Air Quality and Greenhouse Gas Emissions by implementing Master Infrastructure Plan stormwater basin feature – As stated in Comment #1 above, impacts to air quality and greenhouse gas emissions from this project will be significant and unavoidable. The impacts could be further mitigated by indentifying the proposed stormwater basins in the master infrastructure plan (MIP) as serving a mitigating role for air quality and greenhouse gas impacts through removal of pavement and adding vegetation.

The basins will be shallow relatively flat depression of only a few feet, which will remain dry for the foreseeable future. Recreational activities are a possible use for the stormwater basins. There are four proposed basins in the MIP. One of the proposed basins will not be immediately necessary for flood control or sea level rise mitigation and is not proposed for construction until later phases of the project. The “Future Basin” identified in the MIP for a later phase is located where the asphalt parking lot is at the eastern end of West Hornet Avenue, next to the recreation building and campground. This southeast Future Basin is 2.8 acres.

19-3

Removing the asphalt from this southeast site (as well as at the other three proposed basin sites) will provide an immediate benefit to the environment by eliminating the heat-capturing black pavement. Introduction of vegetation to this site (and the other basin sites), regardless of whether the basin is constructed, will have even more beneficial effects on air quality and greenhouse gas emissions.

A natural landscape at the southeast site, and others, will provide numerous benefits to the environment and should not be left to the distant future to depave. The southeast parking-lot-turned-natural-basin would also become a de facto addition to the adjacent Enterprise Park, as well as enhancing the overall aesthetics of the adjacent Enterprise Zone. Establishment of the other three stormwater basins will have a mitigating effect on the significant and unavoidable impacts to air quality and greenhouse gas emissions associated with this project.

Proposed action/addition to EIR – Identify the MIP stormwater basins as a mitigating measure for the individual and cumulative impacts of the project on air quality and greenhouse gas emissions.

Excerpts from the draft Master Infrastructure Plan – Appendix C:

“The basins will be designed to have two tiers, allowing for public use of the upper tier, potentially including active recreation including sports fields. The lower tier will occupy roughly one quarter of the basin area and will be subject to more frequent inundation than the upper tier area, the latter can be managed such that it is flooded only in the largest storm events. The multi-purpose basins are intended to be landscaped and under-drained to create a usable amenity for the community.”

↑
19-3
cont.

¹ The Town Center and Waterfront Precise Plan (Appendix E – Precise Plan Framework), page 35, identifies two areas on the western side of the Seaplane Lagoon: Area #6 is categorized as a “Park” and described as “Wildlife Habitat/Passive Recreation/Limited Access;” and Area #7 is categorized as “Water” and described as “Constructed Wetlands.” Page 58 of the Precise Plan describes the western shoreline with four images of a naturalized landscape and the words “Nature,” “Wildlife,” “Trails,” “Docks,” “Camping,” “Art,” and “Wetlands.” Page 62 of the Precise Plan provides a Landscape Plan for the perimeter of the Seaplane Lagoon, with the western shoreline being labeled “Depave Park,” and the adjacent water as “Adaptive Floating Wetland Park.”

Letter 19. Individual (Richard Bangert)

19-1 The comment does not address the adequacy of the environmental analysis presented in the Draft EIR. The Draft EIR found significant and unavoidable impacts to air quality, but not greenhouse gas emissions. Revisions to the MIP assume that the western shoreline of the Seaplane Lagoon is not protected for sea-level rise and the current draft plans of the Precise Plan assume it is “de-paved.”

19-2 As described in Impact 4.F-10 of the Draft EIR, greenhouse gases associated with proposed project construction and operations were determined to be less than significant without mitigation.

As described in Impact 4.F-1 of the Draft EIR, the air quality impacts associated with construction would be reduced below the BAAQMD thresholds for the reasonable conservative development scenario, however, because construction schedule and phasing have not been determined and development may overlap, there is the potential for project construction emissions to exceed the BAAQMD thresholds, so the impact was considered significant and unavoidable. Construction emissions are related to the use of heavy-duty construction equipment, from vehicle trips hauling materials, from construction workers traveling to and from the project site, paving operations and the application of asphalt, architectural coatings (i.e., paints) and other building materials. The de-paving of the runways would not mitigate these types of air emissions. Further, the proposed improvements and the ‘de-pave’ park are part of the project, and not mitigation. Furthermore, the de-pave park would not directly reduce the air quality impacts associated with construction of the project or automobile traffic generated by the project.

19-3 The City of Alameda agrees with the comment that the storm water retention ponds proposed as part of the project have environmental benefits, but the City does not agree that they should be mitigation measures for the air quality impacts identified in the Draft EIR. As described in Impact 4.F-10 of the Draft EIR, greenhouse gases associated with proposed project construction and operations were determined to be less than significant without mitigation; thus, the stormwater basins are not needed as mitigation to reduce project specific impacts. Further, as described in response to Comment 19-2, air emissions related to construction would not be directly mitigated through retention ponds.

Finally, logistically the phased approach of the improvements in the existing stormwater infrastructure is consistent with the phased approach of development and due to sizing requirements and local stormwater management requirements, the stormwater improvements would need to be sized according to the site specific requirements of the development. Therefore, phasing in these improvements allows for appropriate sizing and overall adequate stormwater management.

Comment Letter 20

DEBBIE SOVEL
2917 Bayview Drive
Alameda, CA 94501
dasovel@gmail.com



October 15, 2013

City of Alameda Planning Department
Attention: Andrew Thomas
c/o Alameda Point EIR Comments
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
Proposed Traffic Changes - EIR

Dear Mr. Thomas:

I am a homeowner on Bayview Drive and I am writing to express my concerns regarding the City's mitigation plan, as it relates to Bayview.

I am against the removal of any parking spaces on Bayview as proposed in the EIR. We have had significant traffic problems for years, and any diversion of traffic due to Alameda Point development would have a negative impact and be detrimental to our neighborhood. 20-1

Our community has worked with the City in the past on traffic calming issues - speed bumps were installed - but the balance of the plan has yet to be implemented. We want to reduce and calm traffic, not increase it. 20-2

I urge the Planning board to amend the "Bayview Plan" and move forward to find an alternative solution. Please help us keep our street and our children safe.

Thank you for your consideration.

Sincerely,

Comment Letter 20

October 15, 2013



Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
Proposed Traffic Changes – EIR

Dear Mr. Thomas:

As a homeowner on Bayview Drive, we are writing to express our concerns regarding the City's mitigation plan as it relates to Bayview.

We are against the removal of any parking spaces on Bayview as proposed in the EIR. We have had significant traffic problems for years, and any diversion of traffic due to Alameda Point development would have a negative impact and be detrimental to our neighborhood.

Our community has worked with the City in the past on traffic calming issues – speed lumps were installed – but the balance of the plan has yet to be implemented. We want to calm traffic, not increase it.

We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

ELENA PODDA [name]

2914 BAYVIEW DR. [address]

ALAMEDA CA 94501

Comment Letter 20

October 15, 2013



Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

Kevin Sikora [name]

2914 Bayview Dr. [address]

Alameda, CA 94501

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

KAREN EIKELAND [name]
2608 BAYVIEW DR. [address]
ALAMEDA, CA 94501



Comment Letter 20

October 15, 2013



Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

David C. Turner [name]
DAVID C. TURNER
2619 Bayview Dr. [address]
Alameda CA 94501 6343
510 522 4404

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
Proposed Traffic Changes – EIR

Dear Mr. Thomas:

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We urge the Planning Board to amend the “Bayview Plan” and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

Steven Mason [name] STEVEN MASON

2718 BAYVIEW DR [address]
ALAMEDA, CA 94501

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
Proposed Traffic Changes – EIR

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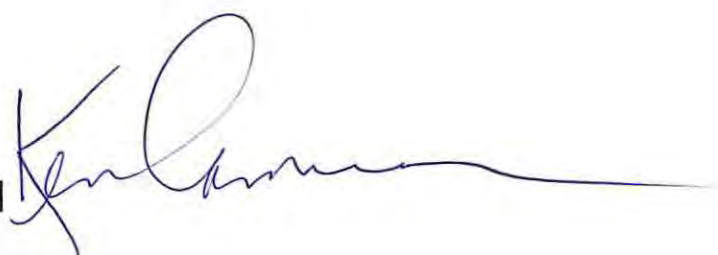
We urge the Planning Board to amend the “Bayview Plan” and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,



[name]



2716 Bayview Drive [address]
Alameda 94501

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

_____ [name]

_____ [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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Thank you for your consideration.

Sincerely,

_____ [name]

_____ [address]

Hello,

For those who could not attend the Planning Board meeting on October 14th, there is another way to voice your concern about the proposed traffic changes on Bayview Dr.

Attached is a sample letter to the Planning Board for your convenience. We have until the 21st to submit our letters.

Please take a moment to print out, sign, and mail this attached letter to the Planning Department. You can also write your own of course.

From what I understand, Andrew Thomas, at the Planning Department, just needs to get enough letters from people voicing their concern to drop this idea of routing more traffic down Bayview Dr.

Regards,
Elena Podda
2914 Bayview Dr.

Hello,

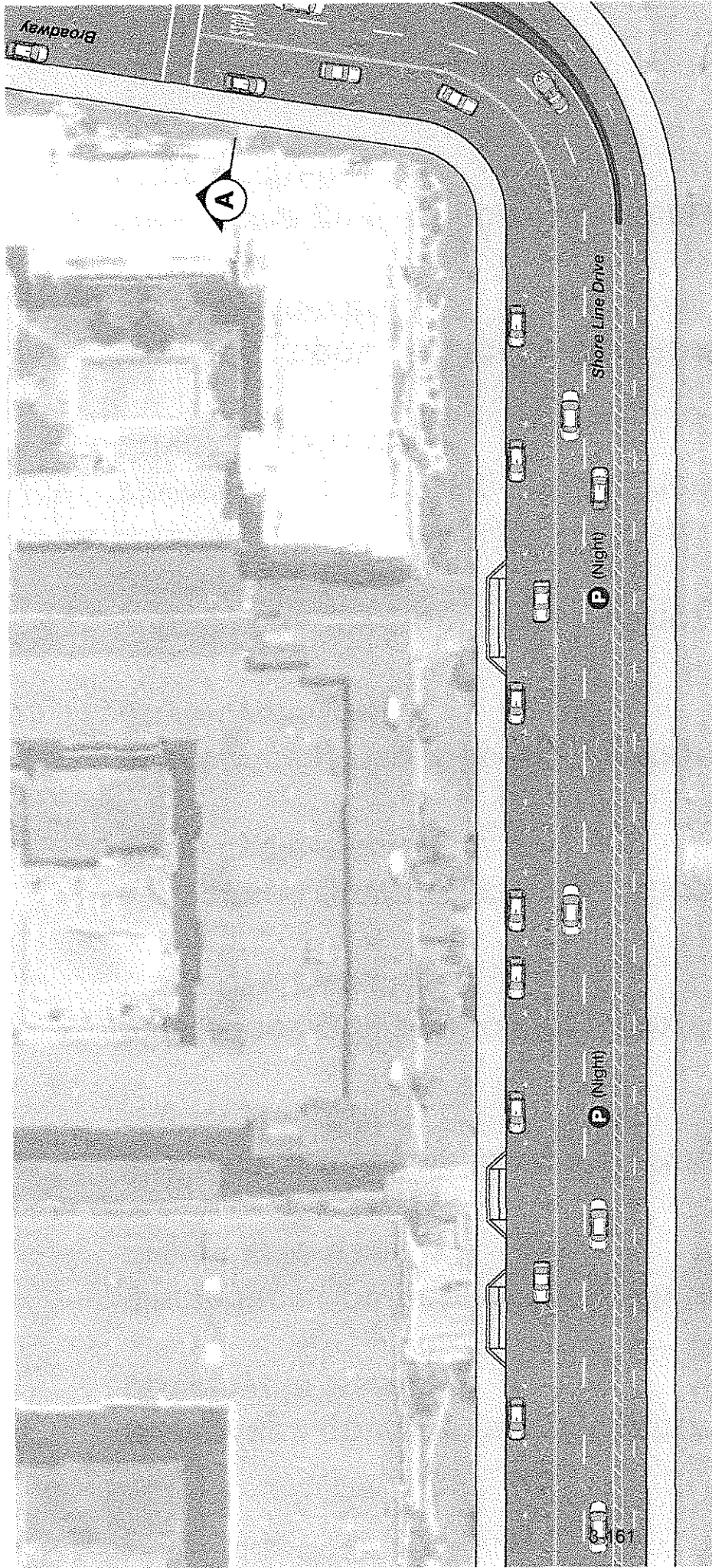
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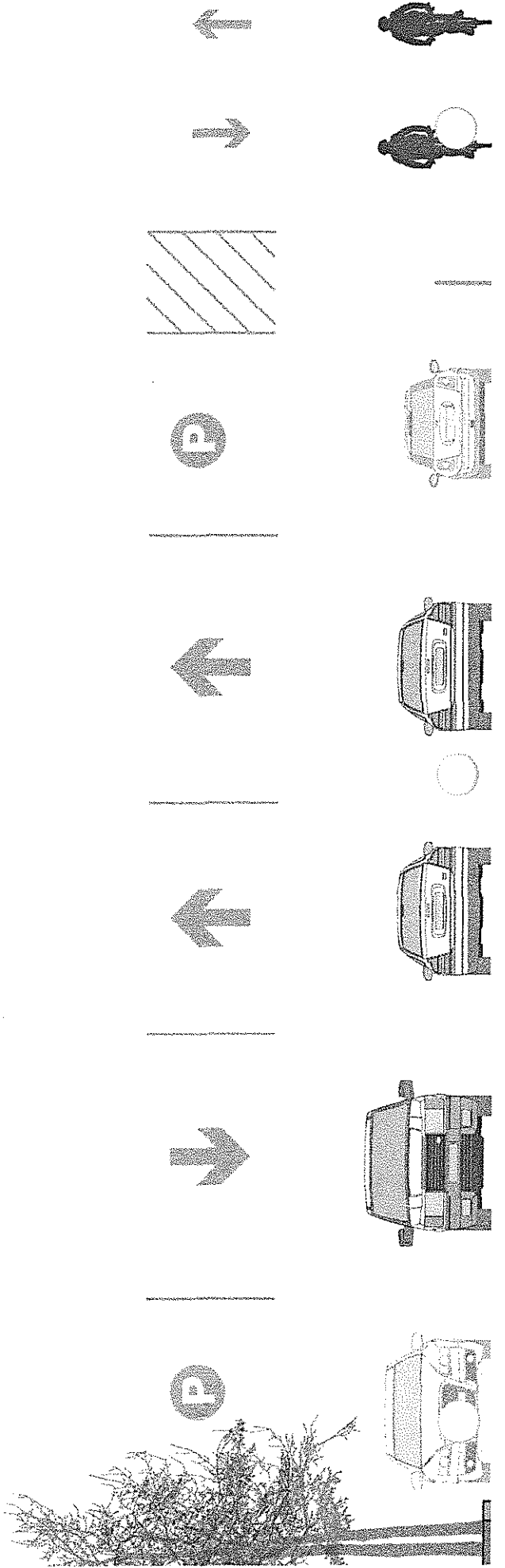
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Regards,
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2914 Bayview Dr.



Comment Letter 20



October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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We urge the Planning Board to amend the “Bayview Plan” and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely, 

Vincent P. Phillips [name]

2619 Bayview Dr. [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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Dear Mr. Thomas:

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Thank you for your consideration.

Sincerely,

Suzette Barnache [name] Suzette Barnache

2701 Bayview Dr 94501 [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
Proposed Traffic Changes – EIR

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Thank you for your consideration.

Sincerely,



STEWART LEVINE [name]

2702 Bayview Dr. [address]

Alameda 94501

Comment Letter 20

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

Ross Ojeda [name]

2824 BAYVIEW DR [address]

Ross Ojeda

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

FLAVIA KRASILCHIK [name] 
824 BAYVIEW DR [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

John Seiberling [name]
305 Laguna Vista [address]
John Seiberling

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Marina X Africa [name]

2702 BAYVIEW DR [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Chi Ho [name]

2919 Bayview Dr. [address]

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

Carol Anpaci [name]
343 Laguna Vista [address]
Alameda, CA, 94501

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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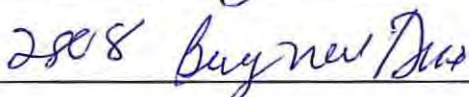
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_____[name]


_____[address]

October 15, 2013

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Alameda, CA 94501

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Sincerely,


Roger Schwenke [name]
2907 Bayview Dr. [address]

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution. *Already people use Court St. for a shortcut, make a rolling stop, and speed down Bayview*
Thank you for your consideration.

Sincerely,

Raymond Waldster [name]

2911 Bayview Dr. [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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Thank you for your consideration.

Sincerely,

Dennis G. Lombetta [name]

2509 Bayview [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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Thank you for your consideration.

Sincerely,

L. PICETTI
L. Picetti Denise Picetti [name]

3009 BAYVIEW DR. [address]

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Jimmy Ng [name]

2801 Bayview Dr. [address]
Alameda, CA 94501

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Jim Ferris (Jim Ferris) [name]

321 Laguna Vista [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Ann Moore / Am [name]

321 LABUN VISTA [address]

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Gordon B. White [name]
307 Laguna Vista Ave. [address]

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Renate & John Witt [name]
2602 BAYVIEW [address]
ALAMEDA, CA 94501

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Meliton Aparici [name]

343 Laguna Vista [address]
Alameda CA 94501

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

Marlis White [name]

307 Laguna Vista [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
Proposed Traffic Changes – EIR

Dear Mr. Thomas:

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Thank you for your consideration.

Sincerely,

Wendell Hunter [name]

3010 Bayview Drive [address]
Alameda, CA 94501

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Desiree Olson [name] Desiree Olson
2715 Bayview Dr. [address]
Alameda CA

Comment Letter 20

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
Proposed Traffic Changes – EIR

Dear Mr. Thomas:

As a homeowner on Bayview Drive, we are writing to express our concerns regarding the City's mitigation plan as it relates to Bayview.

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Thank you for your consideration.

Sincerely,

Jalena Bingham [name]
2800 Bayview Dr. [address]
Alameda, CA 94501

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Mark Burnette [name]

2612 Bayview Dr [address]



October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

Kimberly Burnett [name]
2612 Bayview Dr [address]
Alameda CA 94501

Comment Letter 20

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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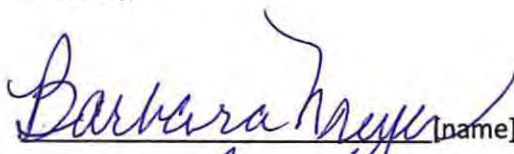
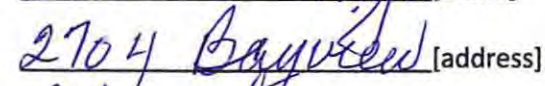

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Sincerely,


[name]

[address]

[address]

October 15, 2013

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Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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We urge the Planning Board to amend the “Bayview Plan” and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

ZACHARY DAVIS [name]

2810 BAYVIEW TR [address]
ALAMEDA CA 94501

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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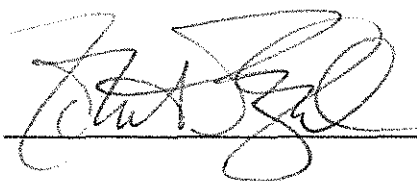
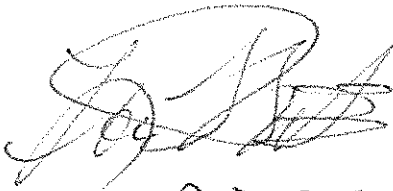
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We urge the Planning Board to amend the “Bayview Plan” and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

 
[name] ROBERT RIGEL / LORI FUJIMOTO
301 LAGUNA VISTA, [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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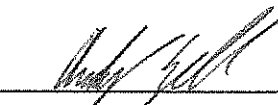
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Thank you for your consideration.

Sincerely,



Andy Zell [name]

2622 Bayview Drive [address]

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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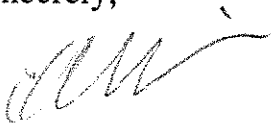
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Thank you for your consideration.

Sincerely,



_____ [name]

2915 Bayview Dr. _____ [address]
Alameda CA 94501

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Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Edward G. Thomas [name]

2624 Bayview Dr [address]

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Thank you for your consideration.

Sincerely,

Milany Gutman [name]

2629 Bayview Dr [address]
Alameda, 94501

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

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Sincerely,

HILDE FISHER [name]
309 ALBEN & VIS [address]
ALAMEDA, CA 94501

October 15, 2013

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Planning Department
2263 Santa Clara Avenue
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Thank you for your consideration.

Sincerely,

 [name] *PHOEBE GRAY*
319 Laguna Vista [address]
Alameda CA 94501

October 15, 2013

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City of Alameda
Planning Department
2263 Santa Clara Avenue
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Sincerely,


[name]

337 Laguna Vista [address]

Alameda 94501

October 15, 2013

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Planning Department
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Alameda, CA 94501

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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

Elena Ball [name]
232 McDannel Rd. [address]
Alameda, CA 94502

October 15, 2013

Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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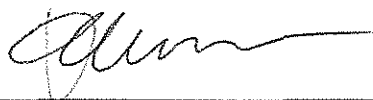
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We urge the Planning Board to amend the “Bayview Plan” and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,



[name]

Ken Chow

2718 Bayview Drive [address]

Alameda, CA

94501

Comment Letter 20

October 15, 2013



Andrew Thomas
City of Alameda
Planning Department
2263 Santa Clara Avenue
Alameda, CA 94501

RE: Bayview Drive
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We urge the Planning Board to amend the "Bayview Plan" and move forward to find an alternative solution.

Thank you for your consideration.

Sincerely,

ELENA PODDA [name]

2914 BAYVIEW DR. [address]

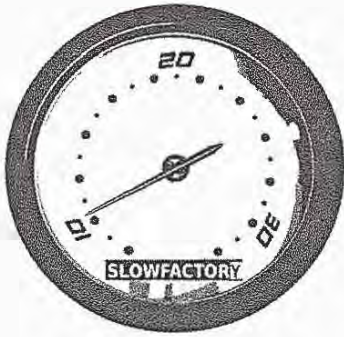
ALAMEDA CA 94501

Letter 20. Bayview Homeowners

20-1 Please also see response to Comment 12-1.

In response to the comments received, the City conducted an onsite re-evaluation of the conditions on Bayview Drive and a review of Mitigation Measure 4.C-5f. As a result of this re-evaluation, Mitigation Measure 4.C-5f is revised as presented in response to Comment 12-1:

- ~~Add a northbound right turn lane on High Street to provide a shared through-left and right turn lane on the north bound approach,~~
- ~~Add an overlap phase for the northbound High Street right turn movement and prohibit the conflicting westbound Otis Drive U-turn movement; and~~
- Optimize the signal timing at High and Otis for both peak hours, and
- Install traffic calming strategies on Bayview Drive to include improvements, such as: restriping Bayview Drive to create narrower driving lanes to reduce speeding, installing a cross walk and caution sign at the location of the public coastal access easement, and/or construction of sidewalk bulb-outs to improve pedestrian safety at the intersections of Bayview/Court Street and Bayview/Broadway.



Slow Factory

Todd Edelman, Director
1409 Caroline St.
Alameda, CA 94501
edelman@greenidea.eu
415.867.9843
www.greenidea.eu
Skype: Toddedelman

October 21, 2013

Comments on the Draft Environmental Impact Report (EIR) for Alameda Point

to: Andrew Thomas
City Planner
City of Alameda
2363 Santa Clara Ave.
Alameda, CA 94501
athomas@alamedaca.gov

Dear Mr. Thomas,

Regarding the following comments I am not aware of a standard or typical format for public comments on EIR's in California or in Alameda, so I will simply address points (chapters, paragraphs, etc.) in the EIR itself with **a)** General discussion and **b)** Actual recommendations (indented). (Also 1a and 1b, in the following sections). While texts under b) are my specific comments and should be treated as verbatim, the text under a) should assist you in understanding the text under b). I assume you have your own efficient process of incorporating public comments; in the future it might be useful to provide a suggested template in order to make things simpler for all parties, in particular those with no professional experience in urban or transport planning.

21-1

- Todd Edelman

Contents (section of the EIR commented on)

- B 2, Environmental Protection and Sustainability Objectives, page 3-3
- 4 C, Transit System, page 3-15
- 4 C – Transportation and Circulation
 - 4 C 15
 - 4 C 18-19
- Other General Discussions and Specific Recommendation

B.2, Environmental Protection and Sustainability Objectives, page 3-3

a) The amount of energy sourced from photo-volatic installations (solar power) is increasing rapidly internationally, nationally, and locally. This is, no doubt, encouraged by the ever-decreasing price of panels even as they become more efficient. Some municipalities, for example the city of Lancaster, California, mandate the installation of photo-voltaic equipment on all new residential buildings, a sign of the trust that solar is and will be in the future a great tool for helping communities and individuals meet their mandated and programmatic renewable energy goals.

Alameda and Alameda Point in particular are in an excellent position to benefit from solar power. Alameda has clear days 72% of the year, though photo-voltaic equipment can produce some energy in all light levels. All the new buildings at Alameda Point, and some with already-necessary renovations to their roofs, can be aligned whole or in part so that secure installations of photo-voltaic equipment are most efficient.

21-2

Self-reliance in terms of energy will have a significant impact on “ownership” of Alameda Point by its residents; this will have an even greater impact on children who grow up there. A solar Alameda will be their (new) normal.

The text for the fourth bullet point on the page should be amended as follows (suggested new text in bold):

b) Applying sustainability principles in the design and development of open spaces, recreation facilities, buildings, and infrastructure, including wastewater, storm water, electrical and transportation systems, including promotion of alternative modes of transportation through preparation and implementation of a Transportation Demand Management (TDM) Program, and alternative energy generation through installation of photo-voltaic (solar energy) systems to both new and – when possible - existing buildings, distribution of this energy to all buildings in Alameda Point and to feed any excess energy into the electrical grid.

C.3, Transit System, page 3-15

a) The Amtrak Station Oakland – Jack London Square (“OKJ” is the official Amtrak designation) is a stop on three Amtrak routes with a total of 20 trains visiting the station on a weekday. In 2012 an average of 1,142 persons boarded or detrained at OKJ every day. The routes of the services stopping at the station are being lengthened – it is likely that possibly even before the completion of the California High Speed Rail Project between the Bay Area and the Los Angeles in 2029 that the the Capitol Corridor service will be a main connection to it to and from its stop in San Jose. It is the tenth busiest of 74 stations in California run by Amtrak and the railway services that visit the station. Capitol Corridor is the 4th busiest Amtrak route in the entire country.

21-3

Despite all this, there is no mention of “Amtrak” in Chapter 3 (this chapter) and, in Chapter 4, OKJ and the services which use it are only described once. However BART, AC Transit and the WETA ferries are all mentioned by name in this chapter and in detail, as part of various plans, etc, in Chapter 4.

Moreover, the possibility of Amtrak services being of benefit to Alameda and Alameda Point are not mentioned and “Amtrak” is not mentioned at all in documents including the Alameda Point Preliminary Development Concept (2006) and the Alameda Point Transportation Strategy (2005). “Amtrak” appears once in the Estuary Crossing Study (2009) but OKJ is not mentioned further in regards to, for example, reasons why Alameda residents may want to cross the Estuary by bicycle or foot.

Why is this?

- OKJ is relatively new – it was opened in 1995 to replace the 16th St. Station in Oakland that was damaged in the Loma Prieta Earthquake in 1989. The *Capitol Corridor* service only started in 1991 (it stopped at 16th St. until 1994). It does not appear in the Alameda General Plan (1991). It has little historical use in families or other peer groups, including for the military personnel based or living on the island. A station nearby (1st and Broadway) operated by Southern Pacific closed in 1960.
- There is no direct connection by existing AC Transit buses to OKJ, and perhaps there never was (?).
- Though the station is actually visible from Alameda and would be a minute away by bike from a water taxi docking at Jack London Square, there is still no shore-to-shore crossing of the Estuary, and still no concrete plan to do so.
- The station name itself has no mention of Alameda its name despite being closer to all of Alameda than it is to most of Oakland.
- Connections from the west end of Alameda by automobile via either the tubes or the various bridges are circuitous, and especially for the tubes the travel time is not always predictable.
- As recently as February of this year, the planning manager of *Capitol Corridor* was completely unaware of any development plans at Alameda Point (or Alameda Landing) including the possible water taxi that would dock within a few hundred yards of OKJ.

In sum, it may be a bit of a chicken and an egg situation, though it is not possible to claim that services accessible at OKJ can approach both automobiles and transit networks in terms of capacity. Nevertheless, it is clearly a neglected part of TDM mitigation for Alameda Point, and an important element in developing both the *genius loci* of the general area and a clear amenity for anyone living in, visiting or commuting to Alameda Point.

The text for the second paragraph on the page should be amended as follows (suggested new text in bold):

b) Transit System

AC Transit’s Line 31 provides daily bus service through the central portions of Alameda Point. The destinations of this bus route include the MacArthur and Oakland City Center 12th Street BART Stations. The Alameda Ferry Terminal is located on the north side of Main Street adjacent to the northeastern portion of the project site. WETA operates daily commuter and excursion ferry service from this terminal to the San Francisco Ferry Building and Pier 41. Limited commuter service to South San Francisco is also provided. **Amtrak operates three services from the Oakland – Jack London Station located at Alice and 3rd St in Oakland – this is accessible by transfer from AC Transit Line 31 to other AC Transit lines that stop directly at the station.**

21-3
cont.

Chapter 4 C – Transportation and Circulation

a) The 25 mph speed limit in Alameda for all streets is laudable and responsible in part for the high degree of objective and subjective road safety in the city. It also decreases noise and pollution compared to more typical urban 35 mph streets in the Bay Area and beyond.

Nevertheless cycling has a low modal share in Alameda and pedestrians have a difficult time crossing many arterial streets due to their excessive width in many areas.

Though the creation of narrow streets in Alameda Point and possibly the reduction of many to the same is a significant goal within the area also as part of a Complete Streets policy, a 25 mph speed limit is simply too fast for local streets in Alameda Point. It cannot be overstated that improvements are exponential: a 25 mph limit is well more than 30% safer than a 35 mph limit and a 15 mph speed limit is well more than 40% safer than a 25 mph limit.

There are many cities throughout the USA and Europe which have recognized that safe and sustainable neighborhoods and school zones require streets with speeds in many cases considerably slower than 25mph.

Examples:

- NYC is developing 20 mph “Slow Zones”.
- Since 2011 San Francisco has been implementing 15 mph school zones.
- In the UK over 12 million people live cities which are adopting or have adopted 20 mph zones for neighborhood streets (following the slogan “Twenty is Plenty”).
- In many cities in mostly western Continental Europe there are extensive networks of 30 kph (roughly 18 mph) streets, including all the residential areas of Graz, Austria (it has a population three times higher than Alameda) and in many cities in the Netherlands among many others, 80% of the streets in Berlin are 18 mph streets.
- In the Netherlands: 30Km is more or less the standard for streets with no separated (the equivalent of Class I) cycling facilities. This contributes significantly to the cycling modal share in the flat Netherlands is on average more than 10 times higher than equally flat but much more sunny Alameda. In one town in the Netherlands, Groningen, about 60% of journeys in the center are made by bike.

For automobile drivers, there is no significant increase to duration of journeys on streets with 18 mph speed limits compared to those with 25 or 30 mph limits, in part because the time spent on streets with the slower limits represents a minority of total length of journey by distance.

Finally, a change in speed limit also complemented by concrete measures such as the aforementioned narrowed streets and e.g. raised crosswalks indicates to drivers the need to slow down (or that it is possible to speed up when exiting these zones.).15 mph zones should generally not require painted bike lanes – not painting or re-painting these will to some degree balance the cost of raised crosswalks. This design also fulfills the pedestrian-to automobile hierarchy for local streets on 4 C-19 of the EIR.

The text for the indicated pages and location should be amended as follows (suggested new text in bold):

4 C-15

21-4

b) Policy 4.4.2.c

Speed limits on Alameda’s new **arterial** roads should be consistent with existing roadways and be designed and implemented as 25 mph roadways. **Alameda's new local roads should be designed and implemented as 15 mph roadways.**

4 C-18-19 (et. al.)

b) As a means to not conflate the various type of automobile uses and place a higher value on non-private car use in relation to private car use, “automobile” as part of the transportation hierarchy in this EIR should be sub-divided into, and with the follow (sub-) hierarchy, as:

- taxis (or carshare)
- carshare (or taxis)
- private automobile

21-4
cont.

Other General Discussions and Specific Recommendations

(These reference many sections of Chapter 4, in particular to whole LOS and TDM/TSM set of problems and solutions – I appreciate and defer to your expertise and familiarity with the EIR in order to insert etc. these comments in the appropriate locations if they are acceptable or useful.)

1a) Nearly Carfree Alameda Point: The core or critical part of the EIR seems to be that TDM and complementary measures will come close to cancelling out the LOS negatives for the built Alameda Point, both in the medium- and longer-term. As I understand it the goals for TDM are that 30% of commercial visitors (shopping and also to the workplace) and 10% of residents will not use private automobiles to access Alameda Point.

The 10% residential goal is inadequate, especially as it not really enforceable. Once people have a car and claim a place to store it off-street (or one of several places informally near their home on-street), they will not want to give it up. Most people who will live in Alameda Point are either not born yet, or do not have a car in Alameda. A carfree Alameda Point will not result in cars being taken away from anyone – it is their choice to live there. Currently at least 30% of households in San Francisco have no car and also 20% in Oakland.

21-5

Demand for housing in the Bay Area - especially so relatively close to San Francisco - is so incredibly high it is certain AP could be totally filled with people who at the maximum only want their own car at the periphery of the area, and are content using car share, collective public transport, taxis, bike sharing, their own bikes, walking, or even boats to friends in future housing at e.g. Treasure Island or Brooklyn Basin. Certain people do need a vehicle for their work but most of them do not need a vehicle within a few steps of their home. There will have to be exemptions for certain disabled persons; housing that is accessed from arterial routes nearer to the periphery of Alameda Point can have limited off-street parking. Though not ideal, it may be possible to drive cars in only to unload or load passengers, but with no internal parking. Even this will do much for ambiance as well as encouraging use of bicycles or other alternatives.

There are different ways to make a place carfree, but for legalistic reasons methods such as requiring people to not have a car registered in their name might be very difficult. The main justification for

requiring off-street parking in new residential projects (and commercial ones, too) is so that existing on-street parking is not reduced. So - to jump ahead - a solution for AP is have restricted parking in all of AP and other neighborhoods within walking distance at least. This is something that the City of Alameda should be able to create on their own.

Since Alameda Point residents will still be permitted to own cars, some will choose this option. They should be provided with options to park their cars either off the island or at the very least on an artery on the periphery of Alameda Point or one closer to the tubes.

Not building off-street parking will present a tremendous cost savings in construction which will, among other things, help or totally offset the cost of installation of solar power equipment (see above).

Commercial visitors including employees to various zones outside the Town Center/Seaplane Lagoon must be required to travel on routes which completely avoid local streets. Parking for employees should not be free, both on-street and off-street, and whether for company or private cars. Off-street long-term parking should not be permitted and short-term parking will be possible for visitors. Employees will not of course pay for parking on private parking lots; they will pay a permit to access Alameda Point itself.

The specific measures to be taken for a Carfree Alameda Point for residents are as follows with key elements only in bold:

1b)

Parking (and some movement)

- **No housing of any sort on local streets should have its own off-street or on-street parking with exceptions for existing residents and certain disabled persons** (but these parking places should be where local streets meet arterials).
- **Housing accessed by arterial streets can have parking** following TOD standards or regulations. These spaces can be a combination of on- and off-street, but in aggregate they should not exclude the TOD standards/requirements for adjacent housing. This parking can be used by any registered residents of Alameda Point, whether owners or renters. The provision of an adequate number of carshare spaces should be included under this measure.
- **The entire area of Alameda Point, all areas of Alameda west of Webster St. should have restricted parking facilitated by a neighborhood parking permit system** similar to others in the Bay Area. This is to prevent Alameda Point residents and commercial visitors from using their cars and thus canceling out TDM measures or worse. There can be a system to permit visitors to existing housing in Alameda Point and other areas to enable convenient parking by visitors who do not have permits on their vehicles. Areas close to existing commercial zones (e.g. Webster St.) should have expanded implementation of paid, short-term on-street parking.
- **Commercial areas such as the Town Square next to the Seaplane Lagoon should have all visitor parking accessible only from an arterial street.** This will be likely to include underground parking. Spaces for disabled persons will be located as close as possible to the edge of the Town Square in comparison to other vehicles.
- **Parking for any short-term visitors should never be free via a validation** from commercial

21-5
cont.

tenants, even with minimum purchase.

- The City of Alameda on behalf of the developers of Alameda Point or the developers themselves should purchase, lease or arrange the purchase of **long-term parking space for Alameda Point residents that is both 1) As far as away from Alameda Point as possible, and 2) As close to an access point to the I-880 as possible.** This must also be served directly by bus or future BRT etc or other collective transport from Alameda without affecting or by minimizing the effect on residents of Oakland.

21-5
cont.

Housing Design

- All housing will have **street level bicycle parking** in a convenient location between the actual units and the street, i.e. in a more or less direct route for walking. This should be based on or exceed similar criteria (e.g. ratio per resident and size) for bicycle parking in San Francisco or other areas. It should make it possible to have cargo bicycles, tandems and other bicycles inside.
- Spaces for private cars and carshare cars should have **charging facilities for electric cars** or plug-in hybrids in an adequate amount, also taking into account future trends (i.e. an electric car should never be without a plug and a private car should never park in a plug-in space.)

21-6

Public Transportation and Cycling

- At an appropriate junction in development of Alameda Point, for example the move in of a certain number of residences or the opening of most of the shops at the Town Square etc., the opening of a **1) Pedestrian-bicycle bridge** from near the northeast corner of Alameda Landing to Oakland and a **2) watercraft** (water taxi, water bus, etc.) from at or near the Main St. Ferry Terminal to the area of the existing Schnitzer Salvage in Oakland on West Embarcadero St., which is apparently currently in the process of being vacated. In advance of this date it may be necessary to secure the use of this land via a fixed-term sublet which would terminate when a dock had to be built.
- **If for any reason operation of the bridge is not possible at this date, a new watercraft route should be set up from the same location** in Alameda Point to a dock at Jack London Square. In the event that Catellus is already operating a watercraft on this route due to obligations with the City of Alameda, the service should be increased if warranted, extended to other parts of Alameda etc.
- At a similar type to the above or other important juncture, and connected with development of express or BRT buses to Oakland, there should be a **new AC Transit route or modification of an existing route to create a new direction connection from Alameda Point to OKJ.** This would not necessarily duplicate or be similar r to the watercraft route as it will most likely travel from Alameda Point to the Tubes via xxxx St.

21-7

21-8

21-9

In conjunction with the Alameda Point connects to near OKJ by boat and/or direct bus, **the station should be renamed to include "Alameda"** (this is a decision of the Port of Oakland rather than Amtrak or Union Pacific. The name could be, for example, "Oakland – Jack

21-10

London – Alameda”.

↑ 21-10
| cont.

- As part of TDM measures, **residents of Alameda Point and employees working there should travel fare-free on any public transport within the approximate borders of Alameda Point.** Within the technical limits of the Clipper Card system – if still in operation – these persons would swipe a Alameda Point Card as anyone else using the system, but if they plan to leave the Alameda Point Fare Free Zone they would need to pay the fare with a separate Clipper Card. Guests of these persons will have the opportunity to travel fare-free, too.
- The EIR lists many cases in which, though they are not analyzed per se, it is strongly implied in the EIR that at many locations only a Class I facility will provide conditions for cycling as if Alameda Point was not built, i.e. they are only the effective method of mitigation. **Therefore all arterials or other main routes both within Alameda Point and connecting to the Estuary crossing points, and other main routes such as the path on Shoreline which will exist by the time AP construction is underway, must be solved with a Class I facility.**

| 21-11

| 21-12

Letter 21. Slow Factory (Todd Edelman, Director)

- 21-1 Comment noted. The comment is not on the adequacy of the environmental analysis. The comment will be forwarded to the Planning Board and City Council for consideration.
- 21-2 It is a policy decision as to whether requirements for photovoltaics and similar alternative energy sources should be mandatory. The comment is a comment on the proposed plan for Alameda Point and not on the adequacy of the environmental analysis. The comment will be forwarded to the Planning Board and City Council for consideration
- 21-3 The comment is a comment on the proposed plan for Alameda Point and not on the adequacy of the environmental analysis. The comment will be forwarded to the Planning Board and City Council for consideration. Connections to the Amtrak station may be included in the TDM program if it is expected that it would reduce a significant amount of automobile trips.
- 21-4 The comment is a comment on the proposed plan for Alameda Point and not on the adequacy of the environmental analysis. The comment will be forwarded to the Planning Board and City Council for consideration. It is a policy decision as to whether to make local roads 15 miles per hour speed limits. The existing citywide speed limit is 25 miles per hour.
- 21-5 The recommendations contained in this comment will be forwarded to the Planning Board and City Council for consideration.
- 21-6 The proposed project includes a Transportation Demand Management (TDM) program that will encourage reduced vehicle trips by providing facilities for alternative modes of transportation for visitors, residents, and employees, including charging stations and bicycle parking facilities. The recommendations contained in this comment will be forwarded to the Planning Board and City Council for consideration.
- 21-7 The comment addresses the proposed transportation strategy and not the adequacy of the environmental analysis. Numerous studies examining the feasibility of constructing a new bridge over or a new tunnel under the estuary have been completed over the 17 years since the Navy decommissioned the Naval Air Station. All of these studies, including the most recent *Estuary Crossing Study Feasibility Report* prepared in May 2009 by City of Alameda found that such crossings are not financially feasible.
- 21-8 The feasibility of implementing watercraft service is being evaluated as funding sources are identified, including as part of the TDM programs related to Alameda Landing and the implementation of the TDM program for the proposed project.

- 21-9 The proposed project includes a TDM program that will encourage reduced vehicle trips by providing facilities for visitors, residents, and employees, which will include significant coordination with AC Transit.
- 21-10 Comment noted.
- 21-11 The TDM program includes a dedicated funding mechanism from Alameda Point property owners for certain transit services and is specifically designed to allow the flexibility for the users of the program to adjust the programs and services to provide the most cost effective services to reduce automobile trips and provide alternative modes of transportation.
- 21-12 The Master Infrastructure Plan includes the proposed circulation and cross-sections for the street network for the proposed project. As present on Figure 4.C-3, the proposed bicycle network includes Class I facilities along the perimeter of Alameda Point and Class II facilities on the interior street network. These have been updated to include 14.8 miles of “cycle tracks” or protected bikeways as well.

Comment Letter 22

1817 Nason Street
Alameda, CA 94501
October 1, 2003

City Council and Planning Board
2263 Santa Clara Avenue
Alameda, CA 94501

Dear members of the Alameda City Council and Planning Board:

I have been encouraged by recent statements by BART Director Bob Rayburn that there is serious consideration of a BART station in Alameda. The proposed station would be across from Jack London Square and could accommodate bike and pedestrian traffic as well as trains.

22-1

Your policy 4.1.6.d in the draft EIR deals with connection to Oakland, including "Water Taxis, shuttles, and a Bicycle Pedestrian Bridge..." all of them either impractical or inadequate. I have heard descriptions of the design for a bridge that would be high enough for Coast Guard ships to pass beneath. I believe there are only two ways to provide a good crossing to East Bay destinations from the West End: a tunnel or moving the Coast Guard.

22-2

I am in accord with the goals of SB 175 to improve air quality, reduce greenhouse gasses, and shorten commute times. But for Alameda to play our part in housing, we should insist on significant improvement in transportation. With traffic problems both current and expected as a result of new development on Alameda Point and elsewhere in Alameda, the City should actively work to improve West End circulation. The most significant and effective project to achieve this is a BART station under the Estuary.

22-3

By making available a convenient passage by bicycle, foot, and trains, but not by cars, we would attract residents who prefer not to drive, to Alameda Point, Alameda Landing, and much of the rest of Alameda west of the bridges, thus improving the quality of life, or at least of travel, for a significant part of our population, including those who still drive, who would benefit from less competition in the Posey and Webster Tubes.

22-4

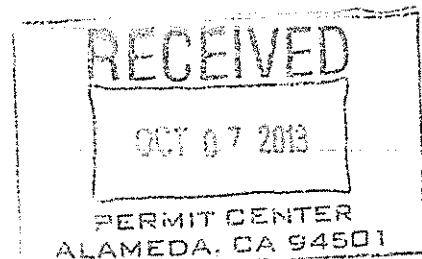
I urge that a BART tunnel/station be included in your policy.

22-5

Sincerely,



Selina Faulhaber



Letter 22. Individual (Selina Faulhaber)

- 22-1 Comment noted.
- 22-2 The comment addresses the proposed development transportation strategy and not the adequacy of the environmental analysis. Numerous studies examining the feasibility of constructing a new bridge over or a new tunnel under the estuary have been completed over the 17 years since the Navy decommissioned the Naval Air Station. All of these studies, including the most recent *Estuary Crossing Study Feasibility Report* prepared in May 2009 by City of Alameda found that such crossings are not financially feasible.
- 22-3 As discussed in Chapter 6 of the Draft EIR, page 6-3, the proposed project is consistent with SB 375 and the *Plan Bay Area*. Constructing a BART line under the Estuary is not part of the proposed project. The project would, however, adhere to a TDM program to reduce vehicle trips associated with the project. The City of Alameda will continue to work with BART to develop plans for direct BART connections to Alameda.
- 22-4 As presented in the Project Objectives on page 3-3 of the Draft EIR, the proposed project would promote alternative modes of transportation through preparation and implementation of a Transportation Demand Management (TDM) program. The project would adhere to a TDM program to reduce vehicle trips associated with the project. Please see response to Comment 7-15 related to the TDM program.
- 22-5 Comment noted.

Comment Letter 23

>>> David Gaskin <dgaskin@planetaria.net> 9/25/2013 4:36 PM >>>

Dear Jennifer Ott,

We are residents of Alameda and live on Tarryton Isle off Otis.
Our primary egress/ingress to and from the island is through the tubes.

We would love to see Alameda Point developed but we wonder why there has not been any consideration of a fly-over from the point to join up with I-80/I-880 somewhere near the East end of the port?

This could easily handle the new residents at the point and also eliminate any traffic jams through the tubes.

23-1

Worth some consideration?

Sincerely,

David Gaskin and Phil McPherson
657 Tarryton Isle
Alameda, CA 94501-5645

Letter 23. Individuals

(David Gaskin and Phil McPherson)

- 23-1 The City of Alameda has studied the question of how to build another bridge or tunnel over the estuary extensively. These studies have shown that a new automobile crossing is not feasible, either financially or physically. For these reasons, the transportation strategy is designed to increase the use of alternative modes of transportation as a means of increasing mobility for new residents and businesses at Alameda Point. Also see response to Comment 22-2.

Lesley Lowe

From: Jennifer Ott <jott@alamedaca.gov>
Sent: Thursday, September 19, 2013 9:08 PM
To: Andrew THOMAS; Karl Heisler; Lesley Lowe
Subject: Fwd: Alameda Point Inquiry

Fyi - Comment on EIR

Sent from my iPhone

Begin forwarded message:

From: "Dorothy Kakimoto <dkalameda@gmail.com>" <dkalameda@gmail.com>
Date: September 19, 2013, 6:26:24 PM PDT
To: "Jennifer Ott" <JOtt@alamedaca.gov>
Subject: Re: Alameda Point Inquiry

Yes.

On Thu, Sep 19, 2013 at 5:13 PM, Jennifer Ott <JOtt@alamedaca.gov> wrote:

Hello Dorothy:

I want to make sure I understand how to get you the information you need. Are you asking how Alameda Point development may impact traffic on your street (Bayview)?

Thanks,
Jennifer

Jennifer Ott
Chief Operating Officer - Alameda Point
City of Alameda
2263 Santa Clara Avenue, Room 120
Alameda, California 94501

(510) 747-4747 (o)
(510) 867-8237 (m)

>>> Dorothy Kakimoto <dkalameda@gmail.com> 9/17/2013 7:10 PM >>>

Bayview had a terrible traffic problem and the lumps helped somewhat. There are still speeders but not as much as before.

On Tue, Sep 17, 2013 at 5:06 PM, Jennifer Ott <JOtt@alamedaca.gov> wrote:

Hello Dorothy:

What terrible situation and resulting calming effect are you referring to so I can be sure to address your question and concern? I look forward to your clarification.

Thanks,
Jennifer

Jennifer Ott

24-1

Comment Letter 24

Chief Operating Officer - Alameda Point
City of Alameda
2263 Santa Clara Avenue, Room 120
Alameda, California 94501

(510) 747-4747 (o)

(510) 867-8237 (m)

>>> Dorothy Kakimoto <dkalameda@gmail.com> 9/16/2013 8:11 PM >>>

Does this plan impact traffic on Bayview Drive? We had a terrible situation, and then has a "Calming" effect. Is that now going to change?

↑ 24-1
| cont.

Letter 24. Individual (D. Kakimoto)

24-1 Please see responses to Comments 12-1 and Comment 20-1.

In response to the comments received, the City conducted an onsite re-evaluation of the conditions on Bayview Drive and a review of Mitigation Measure 4.C-5f. As a result of this re-evaluation, Mitigation Measure 4.C-5f is revised as presented in response to Comment 12-1.

Andrew THOMAS - Public Comment to the Draft EIR

From: "Craig" <craig@khyberinvestments.com>
To: <athomas@alamedaca.gov>
Date: 10/21/2013 5:01 PM
Subject: Public Comment to the Draft EIR
CC: "Craig" <craig@khyberinvestments.com>

Andrew Thomas,
City Planner
2263 Santa Clara Avenue
Alameda, CA 94501

Re: Public Comments on Draft EIR

Dear Andrew,

Thanks again for all the hard work that you put into the Draft EIR. It looks great so far, with a few exceptions.

I am not in support of demolishing the Chief Petty Officer Housing located in the National Registered NAS Alameda Historic District nor of putting infill housing between the "Big Whites". This area played an important role in the US Navy's operation in the Pacific theater. Borrowing from the criteria set by the World Heritage Organization to identify sites of exceptional value, the NAS Alameda Historic District embodies the following important characteristics which I believe deems them worthy of retention without infill development or demolition. A few important characteristics supporting its preservation as it is are as follows:

1. The area is representative of a masterpiece of human creative genius (placing the commission and noncommissioned officers in close proximity to the work area to accomplish their mission of exceptional aircraft production during the WWII);
2. It is demonstrative of an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;
3. It bears a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;
4. The area is an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history; and
5. The area is an outstanding example of a traditional human settlement, land-use, and sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change.

I hope that the protection, management, authenticity and integrity of properties will be held to the highest levels possible.

Craig Miott, MBA
Managing Partner

Khyber Investments LLC
Tel: 650.444.2220
Fax: 510.373.6666
craig@khyberinvestments.com

PROUD MEMBER OF
STANFORD PROFESSIONALS IN REAL ESTATE **SPARE**

Letter 25. Khyber Investments (Craig Miott, MBA)

- 25-1 Any decision to build new homes in the NAS Alameda Historic District or demolish existing contributing structures such as the Chief Petty Officer Housing (CPO) will require careful consideration and a public hearing before the City of Alameda Historical Advisory Board and the City of Alameda Planning Board. In the event that a decision is made in the future to remove these buildings, the potential demolition of the CPO housing was identified as a significant impact on page 4.D-36 of the Draft EIR, and the EIR identifies mitigation measures to reduce this impact on pages 4.D-36-37. These mitigation strategies would reduce, but not eliminate, potential significant adverse impacts to the NAS Alameda Historic District (including demolition of the CPO housing area). Therefore, even with implementation of the Mitigation Measure 4.D 1, demolition and/or substantial alteration of the NAS Alameda Historic District contributors could result in significant and unavoidable impacts. Please also see response to Comment 11-8.
- 25-2 The City agrees that the NAS Alameda Historic District is an important cultural resource that should be preserved. The NAS Alameda Historic District is listed on the National Register and as an official City of Alameda Monument. Please also see responses to Comments 25-1 and 11-8.

Andrew THOMAS - Comments re Alameda Point DEIR

From: Darcy DLM <darcydlm@hotmail.com>
To: "athomas@alamedaca.gov" <athomas@alamedaca.gov>
Date: 10/21/2013 10:25 AM
Subject: Comments re Alameda Point DEIR
CC: "darcydlm@hotmail.com" <darcydlm@hotmail.com>

I have the following comments regarding the Alameda Point DEIR:

I recognize that a tremendous amount of effort and expertise has gone into the planning process for Alameda Point, and I try to keep that in mind.

In general, though, I think the pressure for development overrides a truly realistic assessment of local conditions: We are on a low lying island with very limited access, in close proximity to a major fault zone. Nothing can be done to sufficiently overcome the risks associated with that, even with the herculean efforts proposed to make this site "safe" for development.

26-1

What is more, the formal planning process precludes a realistic assessment of the conditions because it limits the discussion. A realistic assessment should include the viability of the tubes, for example, and the potential loss of access. Regardless of where they're located or who's responsible for maintaining them, we'll all be just as trapped if the tubes should suffer earthquake damage.

26-2

Times change. In this case, both the likelihood of earthquakes and the risk of rising seas will increase dramatically in the coming years and development cannot proceed as if we were still in the '50's or the '80's.

26-3

I have the following specific comments to make:

- 1) Alameda is at risk of natural disaster on two fronts: seismic activity and sea level rise. The DEIR addresses potential mitigation for each risk factor alone, but not for the interaction between the two. It stands to reason that the ground water level will rise along with sea level, and that in turn should inform all of the infrastructure planning with regard to liquefaction, soil stability and drainage, and the long term viability of the project as a whole.

26-4

See the attached link to an MTC study of sea level rise entitled "Adapting to Rising Tides: Transportation Vulnerability and Risk Assessment Pilot Project", Chapter 3:

http://www.mtc.ca.gov/planning/climate/RisingTides-TechnicalReport/Chapter_3_Seismic_Vulnerability_Assessment.pdf

From page 1:

"In a sea level rise (SLR) scenario, rising groundwater levels could lead to an increased likelihood of liquefaction and lateral spreading, magnifying the impact of an earthquake."

From page 3-6:

3.2.4 GROUNDWATER

"Groundwater and soil saturation play a significant role in seismic vulnerability due to their role in

establishing conditions that lead to liquefaction caused by earthquake shaking. Relatively high groundwater levels exist in the relatively flat terrain along the bay margins and within the SLR area. This condition in itself presents special circumstances that must be compensated for in the engineering and construction of certain structures. A recent USGS study of the hydrogeology of aquifers beneath the San Leandro and San Lorenzo areas in the central portion of the project area shows groundwater essentially at sea level close to the bay and rising inland, toward the east (Izbicki et al. 2003). The study also acknowledges that groundwater levels near the bay also respond to tidal fluctuation, with associated pressure changes (Izbicki et al. 2003). For the scenario of end of century SLR considered by the pilot project, it would seem that already high groundwater levels near the bay would rise over the long term essentially in line with the magnitude of the SLR expected."

26-4
cont.

The proposed corrective geotechnical measures should be re-evaluated in light of a rising ground water scenario. The geotechnical measures are designed with a fixed water table in mind and that is not realistical. The potential for flooding caused by rising ground water in the adaptive reuse area must also be considered. The proposed levees cannot "mitigate" this type of flooding.

26-5

2) The DEIR says little about soil stability under the proposed levees. The shoreline in the vicinity of the Main St. ferry terminal will be reinforced which I'm assuming will help to stabilize any nearby levees as well, but the remainder of the levees will not be stabilized, and there's nothing to prevent the ground from failing beneath them. Damage to the levees could be costly to repair, and of course, could lead to catastrophic damage if major flooding ensued.

26-6

3) Main Street is at a very low elevation north of Atlantic Ave, and any practical plan will have to make provisions to raise it significantly along this entire length, not just at its lowest point, at the North Gate as the DEIR indicates. (For that matter, any practical plan should envision Alameda Point as an island with a causeway leading to it.) Please see the link below to a sea level rise map on the ABAG site.

<http://gis.abag.ca.gov/Website/SeaLevelRise/index.html>

26-7

The route of Main Street stands out clearly on this map as an "area vulnerable to an approximate 16" sea level rise", and by that I mean Main Street north of Atlantic Ave and the area surrounding it. The DEIR makes references to the low elevation and drainage issues on Main Street but doesn't address the need to elevate it substantially throughout this lowlying area.

In closing: Again, I recognize all the work that has gone into this planning process, but I continue to believe that this site is too much at risk from earthquake damage and sea level rise to be considered viable for development, and this tends to be true for all of Alameda's available waterfront sites.

26-8

I appreciate your efforts to engage the public.

Thank you.

Darcy Morrison

Letter 26. Individual (Darcy Morrison)

- 26-1 After extensive study, the City of Alameda does believe that Alameda Point can be redeveloped and reused despite the risks of seismic events and sea level rise. Page 4.I-25 of the Draft EIR begins the discussion of potential flooding from the 100-year storm event and the existing grades and areas that would be raised above existing flood zone elevations in addition to protection from eventual sea level rise. The potential impacts of sea level rise are also specifically analyzed on page 4.I-29 under impact 4.I-8.

As described in response to Comment 17-17, seismic hazards including the potential for a significant earthquake to occur in the future within the Bay Area is discussed beginning on page 4.H-7 of the Draft EIR and again on page 4.H-18. With incorporation of the latest in seismic design criteria as required by building code requirements, the proposed project improvements would be constructed to withstand the maximum credible earthquake anticipated at the project site, taking into account all of the regional active faults that are found in the Bay Area. By incorporating seismic design measures such as use of engineered fill and deep foundation systems, as appropriate, proposed improvements would be able to avoid catastrophic failure and protect human health such that potential impacts would be less than significant.

- 26-2 Under the California Environmental Quality Act (CEQA) the City of Alameda is not required to evaluate the potential environmental impacts of an earthquake on the existing regional transportation system and State Route 260. Originally constructed in 1928, the Posey tube is the older of the two subterranean roadways, with the Webster Street tube completed much later in 1963. Both incorporated similar designs and were later found to be vulnerable to earthquakes largely due to the presence of potentially liquefiable materials immediately surrounding the tubes. Beginning in April 2000, Caltrans performed major seismic upgrades through jet grouting methods to stabilize and strengthen surrounding soils by injecting a cement slurry mixture into the subsurface materials around the tubes. Work was completed on October 31, 2003, and is now considered by Caltrans in a 2011 report to meet current seismic standards.²³ Nevertheless, the potential for the tubes to incur some level of damage following a substantial earthquake cannot be fully ruled out and that could require temporary closure of one or both tubes. If such circumstances occur, traffic would likely be routed to one of the other bridges that provide access to the island and expanded ferry service would be provided by the Water Emergency Transit Authority as mandated by Senate Bills 976 and 1093. However, considering the more recent seismic upgrades that the tubes have received, catastrophic failure of the tubes is not considered likely.

²³ Caltrans, State Route 260 Transportation Concept Report, http://www.dot.ca.gov/dist4/systemplanning/docs/tcr/sr_260_tcr_final.pdf, June 2011.

- 26-3 Please see response to Comment 26-1. Building code requirements have evolved along with the advancements in construction methods and response to groundshaking such that current standards are much more stringent than the previous time periods referenced by the comment. As stated on pages 4.I-3 through 4.I-7 of the Draft EIR, the project site lies in an area that is subject to different flood conditions including high tide levels from storm surges, high waves from a tsunami, and sea level rise from global climate change. The flood impact analysis in the Draft EIR is based on site-specific information used to determine the risks associated with flooding that the public and the structures would be exposed to due to the project, and identification of measures to minimize these risks is based on recent science on the potential of sea level rise. Refer to the Impacts 4.I-6 through 4.I-8 from pages 4.I-25 through 4.I-29 of the Draft EIR and the references on Page 4.I-31 which includes a list of recent reports and studies used for the impact analyses for the proposed project.
- 26-4 The City of Alameda prepared a Master Infrastructure Plan which documents the improvements required by development to minimize risks from sea level rise and seismic events. As stated on page 4.H-19 of the Draft EIR, the entire project site is located in an area that is already considered to have a high potential for liquefaction. In fact, the project site is located within an area identified by the California Geological Survey to be in a liquefaction hazard zone where any new development or redevelopment must meet the requirements of Special Publication 117A to demonstrate adequate mitigation of any identified liquefaction hazards. The report referenced in the comment describes an increased risk of liquefaction for existing structures in areas where a rising groundwater level from sea level rise might begin to saturate currently dry sandy soils. However, for improvements associated with the proposed project, groundwater levels are already relatively shallow and preliminary geotechnical evaluations of the site have identified liquefaction hazards that would require substantive measures such as deep dynamic compaction of soils, vibratory compaction of soils, and soil/cement mixing such that a rising groundwater table would not reduce the stability of these improvements.
- 26-5 Please see response to Comment 26-4. The potential impacts of sea level rise are specifically analyzed on page 4.I-29 of the Draft EIR under impact 4.I-8 for the entire project site, including the Reuse area, which would receive a flood protection system of levees under the proposed project as discussed on page 3-38.
- 26-6 The levees that would be constructed as part of the proposed project would be required to meet FEMA, USACE, and seismic design requirements to maintain flood protection and seismic stability in the event of a substantial earthquake.
- 26-7 The Draft EIR acknowledges that there is an area of Main Street which is relatively low and lies within the 100-year flood zone. However, as stated on page 4.I-25, “the project site would be developed in accordance with FEMA criteria and with additional consideration to sea level rise.” In addition, improvements to stormwater management could also help alleviate flooding potential in this location. Therefore, the proposed

improvements to ensure flood protection in addition to future sea level rise and the Adaptive Management Plan that is part of the proposed project to address sea level rise beyond 18 inches would protect all areas of the site including the currently low-lying area of Main Street.

26-8 Please see responses to Comments 26-1 through 26-7.

Comment Letter 27

>>> <deerobyn@sbcglobal.net> 10/20/2013 11:48 PM >>>

Hello,

I am a citizen of Oakland, but have cause to venture into Alameda on occasion and I just wanted to comment on your draft EIR.

After looking over Section 4 Environmental Setting, Impacts, and Mitigation Measures the City of Alameda should shrink the development by taking development out of the 100 year storm and predicted sea level zones, as stated in 4.I-6. This would limit any liability to the City, but potential loss to developers/owners of businesses. Setting the whole development back would also have an impact on the sea wall needed to protect that development. Either way, it is an expensive project.

27-1

Earthquakes and liquefaction: new construction will undoubtedly be built to new stringent codes, but the upgrade to the historic buildings may be cost prohibitive, especially when including infrastructure improvements expected like sewer, water, and power.

27-2

Traffic will increase no matter what, but with an additional new community I don't see how the getting on and off the island will get any easier. Maybe we can get Cal-Trans to build a pedestrian bicycle tube next to the Posey! (We can dream, right?) The congestion on both sides of the Posey is very evident especially in Chinatown and especially at commute times; another point for a smaller development.

27-3

I attended the presentations to the HAB and the Planning Board where members of the Alameda Preservation Society made a case for the heights of any buildings be subordinate to the historic hangars which they say is 50 feet, rather than 60 feet as stated in the plans. Preserving the view shed around the historic buildings should be a priority and enhance the ability to attract vendors or developers.

27-4

I also heard proponents of a Cultural Landscaping Plan say that elements of an agreement with the Navy should be part of the new plan and I agree. It would be in keeping with preserving the look and feel of the Naval heritage. I'm not sure if Alameda has the infrastructure, but ideally all landscaping should use gray or filtered black water or use captured rainwater. We just had the driest year in a long time and it might not be over.

27-5

I'm concerned about the dredging and stirring up that toxic soup, but I don't have an alternative unless there is some new filtering technology and where are they going to dump it?

27-6

It's a grand plan, but you have some big elephants to move.

Thank you for allowing comment.

Dee Rosario

Letter 27. Individual (Dee Rosario)

- 27-1 As described under Impact 4.I-6 in the Draft EIR, the level of risk from a 100-year flood event that the proposed development would be subject to would depend on the location and design of the site development and structures and the protection provided by the emergency response/preparedness planning for the public in the event of a flood. Areas lower than flood protection elevations would be raised higher than 100-year flood levels plus 18 inches of sea level rise. The storm drainage system would also provide protection for 100-year flood events. Further, as required by Mitigation Measure 4.I-8 on Page 4.I-29 of the Draft EIR, the City would implement climate adaptation strategies such as avoidance/ planned retreat and setback levees to accommodate habitat transition zones, buffer zones and beaches. Please see response to Comment 7-3, which explains that the flood protection system for the proposed project, would make approximately one-half of the entire land mass at the form NAS Alameda (the Northwest Territories and the federal Nature Reserve areas), approximately 655 acres, available as open space areas (i.e., undeveloped) and would allow these areas to inundate in a high tide event or higher sea levels. These open space areas could also be potentially designed as seasonal wetlands. There is no evidence that the flood protection system would result in the flooding of low-lying areas in Oakland.
- 27-2 In accordance with the purpose of CEQA, the Draft EIR analyzes the potentially significant physical environmental impacts of the proposed project and does not address the costs of development. The Draft EIR does describe the existing regulatory requirements that would be necessary for any proposed development such as improvements to the existing utility infrastructure. The impacts of the proposed project on structures in the Historic District are discussed in Section 4.D, *Cultural Resources* of the Draft EIR. As described on page 5-18 of the Draft EIR, the historic building will continue to deteriorate under the No Project condition and investment in the site under the proposed project could help supplement the cost of retrofits.
- 27-3 The comment addresses the proposed development transportation strategy and not the adequacy of the environmental analysis. Numerous studies examining the feasibility of constructing a new bridge over or a new tunnel under the estuary have been completed over the 17 years since the Navy decommissioned the Naval Air Station. All of these studies, including the most recent *Estuary Crossing Study Feasibility Report* prepared in May 2009 by City of Alameda found that such crossings are not financially feasible.
- 27-4 Pages 4.D-34 through 4.D-35 of the Draft EIR state that the proposed project may introduce new structures which are considered visually or architecturally incompatible with the Historic District, thereby affecting the overall character of the Historic District, or adversely impact a contributor to the NAS Alameda Historic District. Page 4.D-35 of the Draft EIR, specifically, states that the project would include new buildings, roads, and parks on the 33 acres of taxiways between the Seaplane Hangars and the Seaplane

Lagoon, which could substantially change the character of this area. The Draft EIR also states that new buildings, streets, and trees could alter east-west views along this currently open area, and could also change southerly vistas of the Bay along Lexington and Saratoga Avenues. Because these open vistas are character-defining features of the historic landscape, obstruction by new construction could have a significant adverse effect on the integrity of the NAS Alameda Historic District.

Mitigation measures to reduce these and other impacts to the Historic District are identified on pages 4.D-36-37 of the Draft EIR. On page 4.D-37 the EIR concludes that these mitigation strategies would reduce, but not eliminate, potential significant adverse impacts to the NAS Alameda Historic District, including new construction on the taxiways. Therefore, even with implementation of the Mitigation Measure 4.D 1, demolition and/or substantial alteration of NAS Alameda Historic District contributors and could result in significant and unavoidable impacts. Please also see responses to Comments 11-8 and 25-1.

Mitigation Measure 4.D-1a requires a certificate of approval by the City of Alameda Historical Advisory Board (HAB) for changes within the NAS Alameda Historic District. This mitigation measure is designed to ensure that the HAB will review these proposals on an individual and case-by-case basis to ensure that each proposal is compatible with the surrounding context. All new infill construction, including new construction adjacent to the Seaplane Hangars, would be subject to this HAB certificate of approval process. Please also see response to Comment 10-5.

- 27-5 The comment is correct that as a result of the Memorandum of Agreement between the Navy and the Advisory Council on Historic Preservation regarding the reuse of NAS Alameda, a Cultural Landscape Report was prepared by JRP in 2012 (NAS Alameda Cultural Landscape Report). This agreement and the resulting report are described on page 4.D-17-18 of the Draft EIR. Mitigation Measure 4.D-1a(b) on page 4.D-36 of the Draft EIR states that an analysis of the project's conformity with general management and design guidelines contained within the NAS Alameda Cultural Landscape Report is required, including application of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. These include special treatments organized by functional area for such topics as spatial organization, topography, vegetation, views and vistas, circulation, as well as structures, furnishings and objects. Even with implementation of the Mitigation Measure 4.D 1a(b), demolition and/or substantial alteration of NAS Alameda Historic District contributors, including contributors to the historic landscape, could result in significant and unavoidable impacts to historic resources. Please also see responses to Comments 11-8 and 25-1. Comments supporting this plan, as well as comments requesting that all landscaping should use gray or filtered black water or use captured rainwater are noted. Water supply issues, including use of recycled water are discussed in Section 4.M of the Draft EIR, specifically Impact 4.M-4.

27-6 As stated under Impact 4.I-1, as part of the dredging (in-water construction) activities, removal and disposal of potentially contaminated sediment could result in turbidity and re-suspension of sediments affecting water quality. As stated in the Draft EIR on pages 4.I-9 and 10 and on pages 4.I-11 and 12, the proposed construction-related and maintenance dredging activities would be subject to the requirements of Section 404 and 401 of the Clean Water Act, which would include water quality control measures during the dredging activities. As discussed under Impacts 4.I-1 and 4.I-5, prior to dredging, a future project applicant would be required to submit an application and obtain from the Dredged Materials Management Office (DMMO) which is comprised of USEPA-Region 9, U.S. Army Corps of Engineers-San Francisco, San Francisco Bay RWQCB, BCDC, and the State Lands Commission. The project would incorporate rip-rap, geotextile fabrics, planting or a combination of such measures to protect the site from erosion. The rock slope protection would be designed to maintain a stable configuration (CBG, 2013a) for erosion and sedimentation control. In order to minimize impacts on water quality, the project applicant would implement BMPs, such as turbidity monitoring, use of floating debris booms/silt curtains to contain turbidity and suspended sediments in shallow waters, and use of clamshell bucket types that minimize turbidity. Silt curtains and gunnerbooms would be used as appropriate to minimize the area of increased suspended sediment, and mechanical or hydraulic dredge operational controls would be used to reduce the flow volume of fine materials and to allow removal of disturbed sediment with the hydraulic flow (USACE, 2001). Through compliance with the existing dredging requirements stipulated by the DMMO and permits from the San Francisco Bay RWQCB and BCDC, standard construction specifications incorporated as part of the project, and compliance with the local stormwater control requirements, the potential water quality impacts associated with project construction activities would be less than significant.

Reply to: William Smith
2822 Bayview Drive
Alameda, CA 94501-6348

October 21, 2013

Mr. Andrew Thomas
Planning Services Manager
City of Alameda
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Re: Comments of William Smith on Draft Environmental Impact Report (EIR) for Alameda Point Project (General Plan and Zoning Amendments, Master Infrastructure Plan and Town Center and Waterfront Plan) SCH No. 2013012043

Dear Mr. Thomas:

The redevelopment of Alameda Point between 2014 and 2035 provides one of the last opportunities to build a new community on hundreds of acres in the heart of the San Francisco Bay Area. We can achieve our community's many goals for Alameda Point, which include preserving plant and animal species, preserving open space and broadening our economic base, by attracting to Alameda Point thousands of new residents who otherwise may move to less sustainable developments on the urban fringe.

28-1

I appreciate that many Alameda citizens in their comments on the Scope of the Draft EIR (Environmental Impact Report) recognize that the Alameda Point Project is an opportunity to create an environmentally sustainable and just community next to a nature preserve with affordable homes, rewarding jobs and energy efficient transportation systems. To my disappointment, though, the Draft EIR makes clear that the City of Alameda's preferred alternative lacks both the innovative planning and the financing required to both achieve these goals and to mitigate negative cumulative impacts on 1) transportation at local intersections, 2) historic architectural resources, 3) regional air quality, and 4) noise.

28-2

The City described two environmentally superior alternatives, the Transit Oriented Mixed Use Alternative and the High Density Alternative, but failed to choose either as the preferred alternative. The Draft EIR acknowledges that these superior alternatives better fulfill both the intent and the criteria of *Plan Bay Area*. The Draft EIR also acknowledges that these alternatives would provide more assurance that the Project would strengthen and diversify the economic base of the

28-3

Comment Letter 28

Comments of William Smith on Draft EIR for Alameda Point Project

community than the alternative the City selected. Either of the environmentally superior alternatives would potentially make more funds available to better mitigate the negative cumulative impacts of the project alternative preferred by the City. I request that the City base the Project in the Final EIR on either the Transit Oriented Mixed Use alternative or the High Density alternative to better manage the transportation bottlenecks inherent in our island geography and to generate the financing required for a more sustainable development.

28-3
cont.

While the City of Alameda did respond to many of my comments on the scope of the EIR, dated February 22, 2013, and in my succeeding memo dated February 23, 2013, no explanation was given for why other comments were not addressed. Unfortunately the Draft EIR is incomplete as it included only the first four of my 15 pages of comments in Appendix B. The Final EIR must include all 15 pages of my comments and the attached appendix, which I have attached to this letter as I did to my transmittal letter of February 22nd.

28-4

I thank the City for, as I requested, providing a series of tables to compare the impacts of all alternative projects included in the EIR on affordable housing construction and supply, transportation demand, remediation programs and health risks, sea level rise, and historic and cultural resources. Still, several of my concerns were not adequately addressed in the DRAFT EIR and I request that they be better addressed in the Final EIR. These concerns include:

28-5

1) the feasibility of the different alternatives given the limits on multi-family development imposed by the ban in the City Charter on multi-family housing and the limited exceptions allowed by State Housing Law, such as the multi-family overlays used by the City to gain State approval of its housing element for the first time in decades, especially the feasibility of complying with the requirement in the Settlement Agreement with Renewed Hope Housing Advocates, Arc Ecology and others that 25% of the residential housing be affordable,

28-6

2) an analysis of the potential of the Navy's value recapture charge to influence the mix of housing for each alternative to be built at Alameda Point, and

28-7

3) an analysis of the relative costs per client per year of subsidized home ownership versus subsidized rental housing and the relative advantages and disadvantages of home ownership subsidies versus rental subsidies on the quality of service provided to the entire spectrum of very low to moderate income citizens.

28-8

See my original comments of February 22, 2013, for a description of the above concerns.

28-9

The Draft EIR is inconsistent in its application of the objectives and requirements of *Plan Bay Area* to the Project. The Draft EIR uses the *Plan Bay Area* as the baseline for existing conditions to claim in Table 2-2 that Impact 4.B-1, "Development facilitated by the proposed project could potentially induce substantial population or housing growth both directly and indirectly" is less than significant. Yet it also assesses that this less than significant "population and housing growth," will have several unmitigable adverse impacts, many regional, including:

28-10

Impact 4.C-5: Cumulative development, including the proposed project, would potentially

result in transportation impacts at local study intersections under Cumulative plus project conditions.

Impact 4.F-2: Development facilitated by the proposed project could potentially generate operational emissions that would result in a considerable net increase of criteria pollutants and precursors for which the air basin is in nonattainment under an applicable federal or state ambient air quality standard.

Impact 4.F-8: Development facilitated by the proposed, when combined with past, present and other reasonably foreseeable development in the vicinity, could potentially result in cumulative criteria air pollutant air quality impacts.

Impact 4.G-1: Construction facilitated by the proposed project could potentially expose persons to or generate noise levels in excess of the City noise standards.

Impact 4.G-3: Transportation-related operations facilitated by the proposed project could potentially result in a substantial permanent increase in ambient noise levels in the vicinity or above levels existing without the project.

Impact 4.G-6: Increases in traffic from development facilitated by the proposed project in combination with other development could potentially result in cumulatively considerable noise increases.

The City must use current conditions as the baseline for assessing impacts on population and housing rather than, as it does now, the future projections in the *Plan Bay Area*. The City must acknowledge that this large project will have significant impacts on regional population and housing growth (otherwise the project would not contribute to the unmitigable cumulative regional impacts listed above). The City must explain how the project will contribute to regional programs to improve transportation networks, including better transit access to destinations other than downtown San Francisco and Oakland, especially destinations south of Alameda in Silicon Valley where an increasing number of Alamedans work. Similarly, the City should describe mitigation measures for regional problems it contributes to, such as Project contributions to regional programs to improve air quality, reduce temporary construction noise and permanent noise associated with the development, especially traffic noise. The City should extend the mostly excellent analysis it has provided of local impacts to include regional problems.

As I requested in my scoping note, the Final EIR should include a discussion of the impediments to multi-family housing development presented by the EDC (Economic Development Conveyance) MOA (Memorandum of Agreement) negotiated by the City with the Navy. The cursory discussion of impacts in the Draft EIR fails to explain that the adverse impacts result in the City's land costs per residential acre increasing proportional to the number of units built, rather than, as is normal in a commercial transaction, decreasing proportional to the number of units built on an acre. The EDC MOA distorts the phasing and build out by providing the City and developers with powerful incentives to build up to 1400 units of multi-family housing first and then only single family residential. This distortion will increase adverse environmental impacts during both construction and occupation of the new developments by discouraging a mix of single and multi-family residential during the different construction phases. Nor did the City discuss options for restructuring the land transfer agreement with the Navy to remove this quirky impediment to highly desirable multi-family housing. The agreement could be restructured so that

↑
28-10
cont.

28-11

28-12

28-13
↓

although the Navy might make less money per unit, it would still make more money overall by enabling more units to be built than would be feasible under the current agreement.

↑ 28-13
cont.

Toxic Hazards

The City’s assessment that land use controls reported with the deed will be effective in limiting exposure as long as required by regulatory agencies is inadequate. The City must also include a description of its enforcement program for deed restrictions and their projected effectiveness. Many city enforcement programs related to health and safety have proven ineffective. These enforcement programs are often only effective if citizens can observe and report violations. After the site is subdivided into dozens, even hundreds of parcels, the regulatory agencies will be unable to monitor each parcel and citizens will not be able to detect exposure to toxics and thus motivated to report violations of deed restrictions by their neighbors to the City. Thus the City of Alameda needs to explain how it plans to monitor compliance with deed restrictions.

28-14

I agree with the City’s exclusion of nonresidential alternatives, namely that “a project that focuses exclusively on non-residential land uses which would exclude residential development would not achieve the mixed use and residential objectives of the proposed project, or the intent and obligations of the 2001 Settlement Agreement between the City and Renewed Hope Housing Advocates and its co-plaintiffs. Therefore, these alternatives were rejected from further analysis in the EIR because they do not meet the objectives, nor do they fulfill legal requirements.”

28-15

I also agree with the City’s analysis that the Transit Oriented Mixed Use Alternative and the High Density Alternative are superior to the proposed alternative in many respects, including that:

1. Alameda Point represents an important urban infill site for the region. From a regional perspective, prohibiting development of the property would cause future development to locate further from the urban centers, which will result in longer Bay Area commutes and increased greenhouse emissions (Sec. E5.D.1),

2. from a regional environmental perspective, as explained in the analysis of Air Quality and Greenhouse Gases below, this alternative [Transit Oriented Mixed Use Alternative] would perform better than the project when considering the major environmental issues of global climate change and regional greenhouse gas emissions, with lower GHG emissions per service population. By allowing for more development at Alameda Point and within the inner Bay Area, this alternative would perform better related when considering project objectives related to climate change and greenhouse gas emissions,

28-16

3. from a regional environmental perspective, this alternative [High Density] will perform better than both the project and the Transit Oriented Mixed Use Alternative when considering the major environmental issues of global climate change and regional greenhouse gas emissions. By allowing far more development at Alameda Point and within the inner Bay Area, this alternative would perform better when considering project objectives related to climate change and greenhouse gas emissions. From a local perspective, the increased traffic from this alternative would cause increased local traffic and associated air quality and noise impacts, but from a regional and global perspective, these local impacts would be off-set by a corresponding decrease in regional vehicular miles traveled (from shorter commutes) and the associated reductions in air quality and noise impacts associated with regional traffic, and

4. further, because the project site is included in Plan Bay Area as the NAS Alameda PDA, from a regional standpoint the project is part of a coordinated strategy for managing land use patterns and transportation investments to accommodate projected population growth while also reducing emissions of greenhouse gases, consistent with the direction in SB 375. As Plan Bay Area’s transportation projects are tied to the proposed land use development pattern and the region’s population projections, they are inherently designed to focus growth primarily in PDAs, as opposed to other locations in the region. That is, the transportation projects in Plan Bay Area were selected to complement a certain type of land development (balanced and compact) and discourage imbalanced, sprawling, and greenfields development. As such, by specifically being included in the Plan Bay Area, the proposed project is promoting focused infill growth rather than growth beyond targeted areas. By accommodating growth in a targeted urban area, the proposed project would regionally contribute to reduced vehicle miles traveled and greenhouse gas emissions, as required by SB 375 (see Section 4.A, Land Use, for further discussion of SB 375 and Plan Bay Area).

28-16
cont.

In selecting the Project alternative, the City should give priority to the environmental advantages identified in *Plan Bay Area*. Instead, the City discounts these advantages and primarily considers “local impact, not regional Plan Bay Area” criteria in selecting the superior alternative. CEQA, the California Environmental Quality Act, does not direct the City to give more weight to local impact.

28-17

Properly weighting the environmental advantages would lead the City to select as the preferred alternative either the Transit Oriented Mixed Use Alternative or the High Density Alternative. The environmental criteria in Plan Bay Area override considerations of local impact unless the City can make a strong case that the local impacts would make the superior alternative infeasible. The City acknowledges in the Draft EIR the many overriding goals of Plan Bay Area. “Plan Bay Area, which is the regional plan for reduction of greenhouse gases recently approved this year by the Metropolitan Transportation Commission and the Association of Bay Area Governments argues that the best way to reduce greenhouse gases regionally, improve air quality regionally, and reduce traffic regionally, is to focus development within the Planned Development Areas within the in the Bay Area. Plan Bay Area argues that increasing density and the number of jobs and housing in locations like Alameda Point will decrease pressures to develop in the outer Bay Area communities, reduce vehicle miles traveled, and generally improve air quality and reduce greenhouse gases.”

28-18

Biological Resources

Although the draft EIR identifies many of the biological and ecological resources in the project area, its analysis of the potential impacts to these resources from the proposed project and proposed mitigations for those impacts and identification of those impacts that are inmitigable is deficient. Piece-meal, rather than cumulative, analysis of developments planned for Alameda Point is the principal reason that the analysis is deficient.

28-19

Without an adequate cumulative analysis, the City cannot identify all impacts to wildlife, plant and fish habitats on any lands designated “Federal Facilities,” not just the portion of the Federal Facilities designated as Alameda Point, since those habitats sustain wildlife species that then utilize habitats under direct consideration of this project, e.g. upland avian species that utilize grasslands, waterbird species that utilize adjacent waters such as the proposed Marina. These habitats include, approximately 20 acres of seasonal wetland and tidal marshland that exist on the Northwest Territories area along the Oakland Estuary, a California least tern nesting colony and extensive grasslands. Other area habitats outside of the immediate project area for which the analysis of cumulative impacts was inadequate include the sheltered marine habitats including Alameda Point Channel, Seaplane Lagoon and Inner Harbor as well as the long breakwater, all wetlands, beaches, and lagoons.

28-20

Comment Letter 28

Comments of William Smith on Draft EIR for Alameda Point Project

The EIR fails to adequately evaluate the City's implementation of, and the potential impacts of failure of, measures to protect the Breakwater from human impacts such as the landing of dogs (this has occurred in the past) on the site as well as the impacts of boating on the open channel waterway because the waterway is used as a feeding ground for the least terns. The US Fish and Wildlife Service 2012 Biological Opinion for the VA project includes "Watercraft Exclusion Zones" around the Breakwater (§10.e and f., pg. 21, 22).

28-21

I appreciate that the City addressed many of the concerns the Sierra Club raised in its letter of February 15, 2013. Still, as highlighted above, many of the concerns raised in that letter were not addressed in the Draft EIR and remain to be addressed in the Final EIR.

28-22

Sincerely,

William J. Smith, Ph.D.,P.E.
California Registered Professional Engineer

Attachment: Comments on Notice of Preparation of Scope for an environmental impact report submitted February 22, 2013 by William J. Smith

Cc (via e-mail):

Marie Gilmore, Mayor of Alameda
Tony Daysog, Vice-Mayor of Alameda
Lena Tam, Councilmember
Marilyn Ashcraft, Councilmember
Stewart Chen, Councilmember
John Russo, City of Alameda Manager
Jennifer Ott, Alameda Point Development Manager
Debbie Potter, Alameda Housing Authority
Michael Lynes, Golden Gate Audubon Society
Laura Thomas, Renewed Hope Housing Advocates
Helen Sause, HOMES
Doug Biggs, Alameda Point Collaborative
Dennis Eloe, President, Alameda Chamber of Commerce
Sally Han, President, Alameda Association of Realtors
Brad Shook, President, West Alameda Business Association
Bruce Reeves, President, Park Street Business Association
Tony Kuttner, President, Greater Alameda Business Association

Sierra Club

Michael Brune, National Executive Director and Alameda resident
Arthur Feinstein, Chair San Francisco Bay Chapter
Kent Lewandowski, Chair Northern Alameda County Group
Norman LaForce, East Bay Public Lands
Matt Williams, Chapter Transportation
John Holtclaw, San Francisco Group Land Use / Sprawl and Transportation
David McCoard, Energy
Pat Piras, Environmental Justice
Joe Wallace, Environmental Justice
Sonia Diermayer, Water
Wildlife, Terry Preston
David Haskell, Zero Waste
Ruth Abbe, Alameda Recycling
John Rizzo, Chapter Political Committee

**Comments on the Proposed Scope
of the
Environmental Impact Report
for the
Alameda Point Project**

Submitted by
William Smith
Ph.D.,P.E.
WJASmith@aol.com

February 22, 2013

Summary of Comments

Comparison Criteria

Which Alternative is Best for

1. **Open Space:** requires the least land per housing unit, thus leaving more land available per housing unit for commercial use, for open space and to serve as protective transition zones between open space and incompatible uses, such as those that discourage desirable bird species, including residences with cats, bright lights that disturb birds, and tall structures that provide perches for raptors?
2. **Mobility:** enables the highest percentage of trips to be made via walking, bicycling, transit and ferries, which place fewer demands per resident on the capacity of streets and roads?
3. **Economy:** will generate the largest revenue base to finance preservation of historic and cultural resources, remediate toxics, and construct dikes and other measures to protect the Island from sea level rise? Will result in more moderately priced housing in walkable full-service neighborhoods to better enable Alameda and the East Bay to retain existing, and attract new, businesses and workers to generate a large revenue base more quickly?
4. **Toxics:** has the most potential to quickly minimize possible exposures to residual toxic contaminants at Alameda Point in the following order of preference: 1) by enabling complete remediation of toxics at sites where the Navy leaves residual toxics behind; 2) prohibits building on sites where mobile contamination is expected to persist for more than a decade, and 3) restricts building on sites where permanent construction would complicate or preclude future remediation should regulatory requirements tighten or community resources enable?
5. **Natural Resources:** promotes development that, for each resident, will use smaller amounts of building materials for construction, and thereafter less energy and less water annually?
6. **Historical and Cultural Resource Protection:** has the most potential to refurbish and thereafter maintain historical buildings, such as the Big Whites, and cultural resources, such as the art deco auditorium?
7. **Sea Level Rise Protection:** has the potential to provide the greatest protection from sea level rise by building dikes and implementing restrictions on ground floor development to protect against storm surges that may increasingly endanger structures at Alameda Point, especially in the last decades of the 21st Century?

Comments

A. Adaptive Alternative Description

The Adaptive Alternative provides an alternative to the City’s project alternative, the Baseline Alternative. I request that the City include the Adaptive Alternative in the EIR to assess whether, as intended, this alternative better protects the environment for people, flora and fauna and conserves natural resources and historic landmarks while providing for more open space, more housing units, and more commercial space than the Baseline Alternative.

For the Baseline Alternative the City limited the number of new housing units to comply with federal government regulations that govern no-cost economic development conveyances. Limits based on either site capacity or local market demand for housing and commercial space would be considerably higher. As there is a housing shortage in the East Bay, by the end of the project period in 2035 the demand for new housing at Alameda Point will far exceed the 1,225 new units proposed in the Baseline Alternative. This demand is evidenced by the environmentally sensitive development plan developed by Peter Calthorpe and SunCal for Alameda Point in 2009. As shown in Table 1, the Calthorpe Plan provided for 4,346 new housing units. Major features of the Baseline Alternative, the Adaptive Alternative, and the Calthorpe Plan are listed in this table.

**Table 1
Comparison of Project Alternatives for the Development of Alameda Point**

	2013 <i>Baseline Alternative</i>	2013 <i>Adaptive Alternative</i>	2009 <i>Calthorpe Reuse Plan</i>
Total upland area (acres)	878	878	> 878
Open space (acres)	258	290	145
Total housing (units)	1,425	4,500	4,841
New housing (units)	1,225	4,240	4,346
Existing/rehabilitated housing (units)	60	60	309
Existing low cost housing (units)	200	200	186
Commercial area (sq. feet)	5,500,000	6,600,000	3,182,000
Civic use (sq. feet)			260,000
Boat slips (count)			600

The Adaptive Alternative includes 4,500 housing units, which is similar to the number proposed in the Calthorpe Plan. The basis for this number includes, in addition to the Calthorpe Plan, a lawsuit filed in November of 2012 by the East Bay Municipal Utility District that seeks to correct errors and omissions in

the preparation of Alameda's current housing element. Should that lawsuit result in the temporary invalidation of the City's housing element, the number of new housing units the City would be required to allow between 2014 and 2021 could increase from the current provisional 1,700 to over 4,000. By fully analyzing the Adaptive Alternative in the EIR, the City could use the EIR to support the rezoning of Alameda Point for any additional units required by the outcome of the lawsuit.

If the City does not fully analyze an alternative, like the Adaptive Alternative that includes more housing, it may eventually have to modify the scope of the resulting EIR, which would delay final project approval, and hence the project. Even if the City does include an alternative with 4,500 units in the EIR, the market demand for housing is such that if environmental impacts from these additional units are satisfactorily mitigated and all planned housing is built, as happened for the Harbor Bay development, all planned housing for Alameda Point will likely be constructed before the end of the project period in 2035. The City would then need to initiate a new EIR should it desire, or be mandated by the State, to provide additional housing to meet projected regional demand.

With both the Baseline and Adaptive alternatives planning over 5,000,000 square feet of commercial space, the State will likely mandate that Alameda build more than the 1,225 new homes included in the Baseline Project. The State housing mandate will require Alameda to build sufficient new homes to insure that development of Alameda Point brings more homes closer to jobs rather than making the shortage of homes and commutes in the East Bay worse.

The demand for additional homes at Alameda Point is further evidenced by the City of Alameda's multi-decade build out of Harbor Bay where housing development has proceeded much faster than commercial development. The planned housing developments for Harbor Bay are now essentially built out, while there remains considerable land available for commercial development. Single and multi-family homes built there from the 1960s through and beyond 2000 paid for the basic infrastructure needed to attract the businesses that have been slowly trickling into the business park.

A.1 Advantages of the Adaptive Alternative

By including the Adaptive Alternative, or a similar alternative, the City will be able to evaluate the potential for more multi-family housing to mitigate the many constraints on sustainable development besides available financing and land area. These additional constraints are overwhelmingly environmental constraints and include the endangered California Least Tern, transportation, residual toxics in soil and groundwater, and rising sea levels. By using multi-family housing to minimize the land devoted to residential uses, the number of acres devoted to open space and to commerce can be increased, even as the number of residential units increases.

The Adaptive Alternative assumes that recent trends in Alameda that are increasing local support for the construction of multi-family housing will continue and result, before the end of the project in 2035, in the complete exemption of Alameda Point from limits placed on multi-family housing by the City's charter. In contrast, the Baseline Alternative assumes that current housing restrictions in the charter remain in place with the number of new multi-family housing units built throughout all of Alameda, not just

Comment Letter 28

Attachment to Letter of October 21st Commenting on the Draft EIR for Alameda Point Project

Alameda Point, limited to the number mandated by regional housing needs allocation (RHNA) as periodically determined by the Association of Bay Area Governments (ABAG).

At Alameda Point, the number of residential units, and allowable commercial space, will be limited by transportation constraints. Which alternative will enable employment of the best transportation demand management measures, including convenient and frequent public transit service, to mitigate transportation constraints? The transportation demand per unit of multi-family housing, especially with an upper limit of one or less parking space per new housing unit available for an annual fee from a common parking pool, can be considerably less than the demand per single family residence with a 3-car garage.

Toxic constraints will also limit development at Alameda Point. Which alternative will allow development that best adapts to these constraints without placing people or the environment at risk? The Navy, the City, and the regulatory agencies all recognize that a few mobile and volatile plumes of hazardous chemicals in soil and groundwater will take decades to fully remediate. They also recognize that the cost of remediating the hazardous Marsh Crust underlying large areas of Alameda Point makes full remediation of the Marsh Crust unlikely - even decades from now. Which alternative can best facilitate safe residential developments on such sites? Institutional controls prohibiting residential and office use on the ground floor coupled with high ventilation of that floor can protect some sites for up to a decade while mobile hazards decline. For which alternative is enforcement of such institutional controls on digging and excavations most effective? Digging and excavation can result in exposure to non-mobile hazards in the Marsh Crust.

As many of the buildings constructed as part of this project will still be in service at the turn of the Century in 2100, rising sea levels, and hence higher storm surges, also constrain development. Institutional controls that restrict uses permitted on ground floors of all buildings, both residential and commercial minimize flood damage from future storms. As for residual toxic hazards, for which alternative are such residential controls most effective? With the exception of walk-in retail districts, such controls would permit parking, warehouse, and other non-intensive uses on ground floors, and restrict living and office space to higher floors.

Sustainable development also reduces the demand on natural resources, especially construction materials and energy required to control the interior climate. Which alternative leads to the most sustainable development, by housing more people on less land and minimizing energy use for interior climate control and transportation? Which alternative has the most potential for the community to invest in restoring and maintaining cultural and historic resources, such as the former officer's housing (Big Whites), chapel, the auditorium and the largest collection of Streamline Moderne buildings on the West Coast?

In summary, which alternative has the most potential to adapt to

- 1) market demand that supports, and regulatory actions that may require, more sustainable housing as well as more sustainable commercial space,
- 2) limited funding from governmental and private sources to make more attractive housing available with fewer or no subsidies to more lower and middle class families,
- 3) limited funding to allow more development per dollar invested in transportation systems,
- 4) residual and persistent contamination in soil and groundwater by providing more reliable long term protection from residual toxics,
- 5) higher storm surges as sea levels rise,
- 6) declining natural resources, including energy resources, and
- 7) limited state and federal funding for protection and restoration of cultural and historic resources?

A.2 Key Features of the Adaptive Alternative

Except for about 30 acres more of open space, as shown in Table 1, and a corresponding 30 acres less of residential housing, the allocation of land between various uses at Alameda Point will be similar for the Baseline Project and for the Adaptive Alternative. The average housing density on the multi-family residential parcels will be three to four times higher for the Adaptive Alternative, averaging 60 to 80 units per acre, rather than the 15-25 units per acre expected for the Baseline Project. The Adaptive Alternative could still have more units of single family housing than the Baseline Project, especially if the average densities for the multi-family housing developments in the Adaptive Alternative are at the higher end of the range.

With triple the number of residents, the Adaptive Alternative will potentially have more neighborhood serving retail than the Baseline Alternative. As the Lawrence Berkeley National Laboratory Second Campus request for proposal (RFP) noted, such neighborhood serving retail, to include convenience stores, restaurants and dry cleaners, will also make Alameda Point more attractive to companies. The competitive LBNL Second Campus site selection process demonstrated that companies do consider such amenities when deciding on either expanding their existing operations at Alameda Point or relocating to Alameda Point from elsewhere.

The increased protection from toxics provided by the Adaptive Alternative will put more constraints on phasing the build out of this alternative. The Adaptive Alternative will build on clean sites first, sites with deeply buried and immobile contaminants next, and on sites with long lasting mobile contamination last, if at all before the mobile contamination is remediated. The Adaptive Alternative, if it relies for protection from mobile contaminants on institutional controls, such as restrictions on residential and office space on ground floors, will rely on such controls only temporarily, for periods of less than a decade. The Adaptive Alternative restricts the use of sites with mobile contamination expected to persist for more than a decade to open space, parks, parking lots, and, conditionally, warehouses without ground floor office space.

Comment Letter 28

Attachment to Letter of October 21st Commenting on the Draft EIR for Alameda Point Project

Even with the additional constraints placed on phasing development for the Adaptive Alternative, build out may still be completed sooner than for the Baseline Alternative. With approximately three times the number of more easily financed residential units, the Adaptive Alternative will provide the resources to manage the increased complexity and catalyze the build out of the commercial and civic areas.

B. Information Required to Compare Environmental Impacts of Project Alternatives

I request that the City include several criteria described here among those used to compare project alternatives. These criteria help the community assess many development issues, including preservation and enhancement of wildlife and open space, protection from residual toxics, impact on housing availability, impact on regional and Alameda transportation systems, and preservation of cultural and historical resources. These criteria are listed in Table 2 and described in this section.

**Table 2
Comparing Alternatives for Developing Alameda Point**

Item No.	Criteria, Tables and Analyses
1	<i>Potential for future exposure to residual toxics</i>
1.1	Table titled "Remedial Goals and Present and Future Contamination at Sites"
1.2	Table titled "Compatibility of Permitted Land Uses with Future Remedial Actions"
2	<i>Impact on the Availability of Housing in Alameda and the San Francisco Bay</i>
2.1	Analysis of the impact of Navy's value recapture charge on the mix of housing
2.2	Analysis of impact of alternative community demographics on long-term enforcement of institutional controls and housing safety codes
2.3	Table titled "Comparison of Construction Costs for Different Types of Affordable Housing"
2.4	Analysis comparing service quality and costs of providing affordable housing as ownership or rental units
3	<i>Impact on regional transportation systems</i>
3.1	Table titled "Comparison of Travel Times for Alternative Transportation Modes" that includes, at a minimum, the following 6 modes: walking, cycling, bus, BART, ferry and automobile
3.2	Supporting criteria for assessing impacts on individual transportation modes
4.	<i>Preservation of natural, cultural and historic resources</i>
4.1	Table titled "Comparison of Natural Resource Consumption by Alternatives"
4.2	Table titled "Comparison of Costs of Preserving Cultural and Historic Resources Relative to Value of and Revenue Generated by Alternatives"

B.1 Potential for Future Exposure to Residual Toxics

For each project alternative, provide a table, perhaps titled "Remedial Goals and Present and Future Contamination at Sites," that describes current contamination at each of the CERCLA sites at Alameda Point as well as those sites in the State of California's remedial program for petroleum hydrocarbons. The table should also list the proposed new zoning for the site, the land uses to be permitted which would place people, flora and fauna most at risk of exposure to the residual contamination, the projected year when the Navy will cease active remediation at the site, and the nature of residual contamination, if any, projected to remain after active remediation ceases.

For those sites for which residual contamination will remain after active remediation has ceased, note in the table whether any of the expected residual contamination is potentially mobile, that is could move

Comment Letter 28

Attachment to Letter of October 21st Commenting on the Draft EIR for Alameda Point Project

as a gaseous vapor or as a liquid, or dissolved in a liquid, through soil, irrespective of any natural or man-made barriers to movement that may exist in the soil strata. Such barriers can be breached by natural events, such as an earthquake, or by uncontrolled drilling or excavation when institutional controls fail. Also provide the year when nature is projected to remove all contamination above background or indicate that residual contamination, without more active remediation than planned, is expected to persist indefinitely, that is for more than a few decades.

Information on projected remedial goals will be readily available from the Record of Decision (ROD) for a CERCLA site or closeout documentation for a site that has been in the State's petroleum program. For those sites without a ROD or closeout documentation, information on expected residual contamination and projected time course of contamination concentrations may be available in remedial engineering or feasibility studies.

In a separate table, perhaps titled "Compatibility of Permitted Land Uses with Future Remedial Actions," provide for each site where residual contamination is expected to persist indefinitely, whether or not institutional controls are expected, the following information:

- 1) permitted land uses,
- 2) options for remediation to background levels, or to acceptable risk levels, whichever is lower,
- 3) identification of those land uses that will pose no more than minor obstacles for all remedial options (e.g. a parking lot),
- 4) identification of those land uses that will pose major obstacles for one or more remedial options (e.g. multi-story buildings built above widespread subsurface radiological contamination that requires excavation) and the obstacles they pose for each such remedial option.

B.2 Impact on the Availability of Housing in Alameda and the San Francisco Bay Area

The project alternatives with millions of square feet of commercial space may have an adverse impact on housing availability. Compare the number of jobs generated with the number of housing units to be built and discuss the balance between the number of jobs and housing units planned for each alternative.

The amount of housing included in the Baseline Alternative was determined by Federal regulations that provide a large subsidy for commercial development, but not for residential development. The subsidy is in the form of a no cost conveyance of the Naval Air Station property to the City that assumes that the City will profit substantially from any housing units built in excess of the 1,225 proposed in the Baseline Alternative. Should more housing be permitted or constructed, the City must pay the Navy a value recapture fee of \$50,000 per unit. Although affordable housing units will be exempted from this value recapture charge, the charge could encourage the construction of more expensive market rate housing and less market rate housing affordable to those with modest incomes that are, none-the-less, too large to qualify for subsidized housing. I request that the City provide an analysis of the Navy's value recapture charge on the mix of housing to be built at Alameda Point.

If the revenue recapture charge, as expected, is predicted to discourage the construction of modestly priced market rate homes, then compare the impact of alternative methods for the Navy to recapture

value that may result in a more modestly priced mix of housing. One alternative would be for the Navy to base the recapture charge on the area of land developed for residential use, which would provide a financial incentive to build more units, not less, on each acre designated for residential use. Another alternative basis for the revenue recapture charge may insert less arbitrary bias and better allow market demand to determine the mix of luxury and modest market rate homes. This basis would be to base the recapture charge on the actual value of the properties as determined by initial sales prices.

If any of these alternative bases for the revenue recapture charge promise a more affordable housing mix, then the City may be able to renegotiate the basis with the Navy. By changing the basis to encourage a larger number of multi-family housing units, the City could offer the Navy substantially increased revenue from land value recapture.

The Adaptive Alternative also includes 10-50 acres for single-family and small multiplex residential housing. 10 acres is the assumed minimum required for a neighborhood to attract a community of about 100 higher income residents, who will add their voice to others on the West End to better insure that institutional controls, traffic mitigations, and other environmental mitigations agreed to are enforced. If demographic analysis (which I request be included in the EIR) determines that more single family housing and small multiplexes would produce a more stable community, up to an additional 40 acres of commercially zoned property would be eligible for conversion to single and small unit residential neighborhoods. The EIR should include a discussion of how West End demographics will influence the enforcement of housing safety codes and environmental mitigations, especially institutional controls on sites with residual contamination and traffic mitigations. The City's failure to enforce housing safety codes at the old Harbor Isle apartments (now Summer House apartments) was a significant contributor to the abrupt eviction from their homes of about 300 lower income West End families in the mid-2000s.

Funding to subsidize affordable housing units has always been in short supply, and is in especially short supply now with the demise of redevelopment districts. Therefore, increasingly, funding agencies are looking to fund only those affordable housing projects that provide more quality housing per dollar. Therefore, include a table, perhaps titled "Comparison of Construction Costs for Different Types of Affordable Housing," that provides a basis for comparing the average cost of affordable housing between alternatives. This table will provide the data needed to validate for Alameda the common assumption that affordable housing costs are less for larger multi-family units than for duplex and small multiplex homes, the most common type of affordable housing constructed recently in Alameda.

Among Alamedans, a common but, according to many affordable housing experts, erroneous assumption is that affordable housing should be dispersed among for-market rate units in developments. Affordable housing experts agree that such dispersion may be reasonable for more capable citizens who qualify for subsidized homeownership, but may be both more expensive and less supportive of less capable citizens who live in subsidized rental units. Include an analysis of the relative costs per client per year of subsidized home ownership versus subsidized rental housing and the relative advantages and disadvantages of home ownership subsidies versus rental subsidies on the quality of service provided to the entire spectrum of very low to moderate income citizens. These costs should

include, among others, amortized planning and construction costs, financing costs, maintenance costs, and the costs of providing counseling and other supportive services.

B.3 Impact on transportation systems

The limited capacity of existing transportation systems could be a significant, many would argue the most significant, restraint on build-out of both the housing units and commercial space included in the various alternatives. The commuting public, the majority of whom travel to or through Oakland to get to work every day, is most sensitive to additional residential housing, many of whose occupants could have similar commuting patterns that, if improperly managed, could increase commute times on and off of the Island by an unacceptable 30 minutes or more. Traffic impacts of workers commuting to jobs on the Island will be less apparent to Alameda residents, but may be a significant consideration in the decision of a company to expand in or relocate to Alameda.

The EIR should assess whether clustering housing on less land, e.g. less than 100 acres for the Adaptive Alternative, would minimize average trip times by facilitating closer shopping, schools, and services as well as alternative transportation planning, including not only transit, but also ferry, bicycling and walking. For example, the Adaptive Alternative could facilitate neighborhood retail and effective transit, as a single transit stop with shops in the center of 60 acres could be within one-third mile, or a brisk and healthy five minute walk, of approximately 10,000 residents in 4,000 new homes. More likely, the up to 100 acres of multi-family residential will consist of several smaller clusters throughout Alameda Point, each efficiently served by transit.

As the access route to the Main Island closest to Alameda Point runs through Oakland's Chinatown, impacts on traffic created by the Project on Oakland's Chinatown must be considered as well as impacts within Alameda. Thorough and reliable analysis of projected transportation impacts and possible mitigations will be essential for comparing alternatives. With up to 4,500 new housing units and over 6,000,000 square feet of office and commercial space proposed in at least one alternative at full build out, analysis of the mitigation potential of innovative transportation networks and demand management will be essential for a realistic assessment of the potential for each alternative to keep people and goods moving throughout the more than 20 year project period, not just on the West End of the Island, but throughout the Island and, especially, through Oakland's Chinatown. Existing transportation systems must be enhanced as the project progresses. Scheduled check points to insure that transportation improvements are working must be included in phasing plans and further construction conditioned upon a satisfactory transportation check.

Accepting these comments on transportation will insure that the EIR presents the necessary information for the community to create traffic criteria for the development of transportation check points. As the entire West End uses routes through Oakland's Chinatown, the traffic impacts of planned development outside of Alameda Point on the West End must also be considered in the Alameda Point EIR. Consideration of neighborhoods outside of the West End provides opportunities to mitigate new traffic generated by the Project. Each vehicle trip originating from a West End neighborhood that is eliminated

by an innovative traffic management plan for Alameda Point, which includes all West End neighborhoods, will free up capacity for development at Alameda Point.

One of the most significant developments planned for the West End, the Veteran's Administration out-patient clinic and columbarium, can only be reached through the Alameda Point area. Therefore I request that the scope of this State of California Environmental Impact Report be expanded to include the VA project and be prepared jointly with the VA. Refer to Appendix A, an opinion piece by Irene Dieter published in an Alameda newspaper, for more on why environmental documents prepared jointly by the City and the VA are required. The VA just released their draft Environmental Assessment in late February, so their final environmental assessment could be merged with the City's.

With the adoption in July of 2012 of enabling zoning for the housing element, zoning that allows new construction on the West End is well documented. This zoning would allow the construction of about 2,400 new homes, which is about double the 1,200 homes proposed in the Baseline Alternative for all of Alameda Point. The East Bay Regional Park District's lawsuit against the City may result in the City studying, in greater depth, the traffic impacts of new housing planned for the West End outside of Alameda Point. Even so, the proposed EIR for the Alameda Point project must consider the housing on the West End allowed by the zoning required by the housing element. The cumulative impacts of all development that shares a constrained transportation resource, such as the streets of Oakland's Chinatown, must be addressed in the EIR for Alameda Point.

B.3.1 Functional Criteria for Transportation Checkpoints

Functional criteria focus on the bottom-line for Alameda Point and neighboring commuters and residents, which is "Will the proposed development decrease or increase the time it takes me to travel from home to work, shops, or other destinations?" With more homes located within walking and cycling distance of shopping, schools and other services and by supporting increased frequency of transit service, multi-family neighborhoods may reduce travel times for all transportation modes except the private automobile. In the transportation analysis, use the travel time between the same origin and destination as primary functional criteria for comparing alternatives. The following table pairs origins and destinations that would be suitable for comparing the impact of project alternatives on traffic in both Alameda's West End and in Oakland's Chinatown. At a minimum, the EIR should compare travel times for each project and each mode both in 2013 and at full project build out. Comparison of travel times after distinct phases are completed may also be informative, especially as full transit service may not be supported until build out is complete.

Comment Letter 28

Attachment to Letter of October 21st Commenting on the Draft EIR for Alameda Point Project

At a minimum include the following transportation modes in the transportation analysis, either singly or in combination, in the comparison of travel times for the various trips described in Table 3:

1. Walking for up to 2 miles
2. Cycling for up to 10 miles
3. Bus
4. BART
5. Ferry (Oakland and San Francisco only)
6. Automobile

B.3.1 Supporting Criteria for Transportation Checkpoints

Supporting criteria include the more traditional criteria, which focus on characterizing impacts on a single transportation mode, such as level of service at an intersection (e.g. number of stoplight cycles required to pass through), average travel speeds, and, for pedestrians, wait time to cross a street. Travel times discussed above are more useful for comparing different transportation modes than the traditional supporting criteria.

Table 3
Trips for Comparison of Travel Times for Alternative Transportation Modes (1)

No.	Origin	Destination	Reverse?	Comment
1	Big Whites	Downtown Oakland	Yes	Also serves to estimate time required to reach BART for all transportation modes
2	Seaplane Lagoon Town Center	Downtown Oakland	Yes	"
3	Ballena Bay	Downtown Oakland	Yes	"
4	Del Monte Historic Building	Downtown Oakland	Yes	"
5	Big Whites	Downtown SF	Yes	Via BART from downtown Oakland for all modes except auto
6	Seaplane Lagoon Town Center	Downtown SF	Yes	"
7	Ballena Bay	Downtown SF	Yes	"
8	Del Monte Historic Building	Downtown SF	Yes	"
9	Big Whites	Webster St.	Yes	-
10	Seaplane Lagoon Town Center	Webster St.	Yes	-
11	Ballena Bay	Webster St.	Yes	-
12	Del Monte Historic Building	Webster St.	Yes	-
13	Big Whites	Elementary School		Nearest
14	Seaplane Lagoon Town Center	Elementary School		"
15	Ballena Bay	Elementary School		"
16	Del Monte Historic Building	Elementary School		"

(1) For all automobile trips, except to elementary school, include time to find parking and to walk to final destination (e.g. 5 minutes Webster Street, 10 minutes downtown Oakland, 15 minutes San Francisco). For automobile trips to BART, also include time to park and walk to platform.

B.4 Preservation of natural, cultural and historic resources

For the residential housing associated with each alternative, provide a table, perhaps titled "Comparison of Natural Resource Consumption by Alternatives" that provides two comparisons of natural resource consumption, one based on the average residential unit and the other per resident, of

1. land area required for housing (including streets and parking but excluding sidewalks and associated open space [e.g.yards]),
2. relative masses of construction materials required,
3. annual energy required for heating and cooling,
4. liquid fuels required for transportation (or green house gases generated),
5. water required for personal use, and
6. water required for maintenance of residential grounds and associated open space.

To evaluate the potential for each alternative to fund the preservation of cultural and historic resources, estimate the cost of preserving and enhancing these resources as a percentage of both the expected total value of an alternative after complete build out and of the annual revenue generated by property, sales and business taxes. Present these costs and the corresponding percentages in a table, perhaps titled "Comparison of Costs of Preserving Cultural and Historic Resources Relative to Value of and Revenue Generated by Alternatives."

To evaluate how well each alternative conforms to the characteristics, such as deep setbacks and sense of openness, that led to the addition of NAS Alameda to the National Register for historic district. I am especially concerned by the proposed front and side setbacks and building separation distances for the Adaptive Reuse and Maritime-Visitors sub-districts listed in Table A (page 6) of the proposed amendment to the zoning ordinance. These setbacks are not suitable for new infill construction within the historic district, because the Navy's Cultural Landscape Report/Design Guidelines clearly state that the deep setbacks, the sense of openness and large areas between the buildings of lawn in the administrative core of the district, the seaplane operations area, as well as the shops area, are character-defining features of the district. The deep setbacks also allow for significant views and vistas that are integral to the setting and site planning, one of the reasons the NAS Alameda is a National Register historic district. Interspersing new buildings between existing historic buildings can create problems such as at Hamilton Field, where the historic buildings tend to be islands without historic context.

Attachment A

**Opinion Piece by Irene Dieter
Published in Alameda Sun on
Thursday, Feb. 14th, 2013**

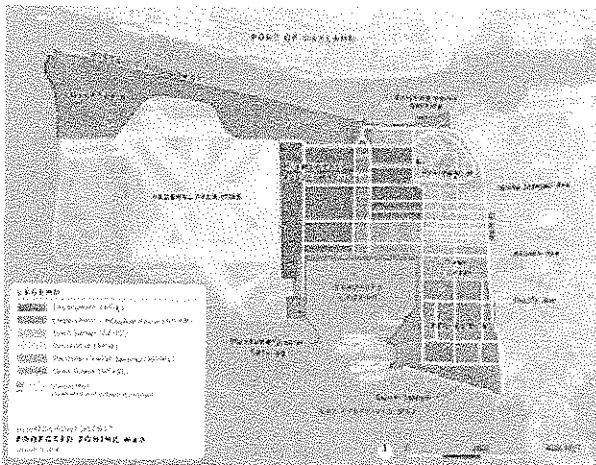
City, VA Must Act Together on Point

Published in Alameda Sun on Thursday, Feb. 14th, 2013

Posted on [February 15, 2013](#) by [Irene](#)

The clock is ticking. March 1 is the deadline for the public to identify the environmental questions that should be answered and the alternatives that should be analyzed in the environmental impact report for Alameda Point. I have a question.

How can we get an accurate picture of the environmental impacts of future development at the Point when the city's review will not include the \$200 million federal project — a veterans' clinic, columbarium and offices — planned to be built there?



While the federal Veterans Administration (VA) will perform its own environmental assessment, the city's and VA's planned developments are interrelated, and all roads lead to Webster Street.

For purposes of environmental review, we must analyze the cumulative effects of both developments on the surrounding area.

As we transition to the future, about 40 percent of Alameda Point is going to the VA and 60 percent is going to the city.

The federal project will produce about 1,500 vehicular trips per day. The street leading to the VA project runs alongside the city's Northwest Territories where a proposed regional park is expected to have 800 parking spaces. Even the US Fish and Wildlife Service, when analyzing the impacts on the endangered least terns, said both projects are interdependent. It is feckless to piecemeal the scope of environmental review.

Comment Letter 28

Attachment to Letter of October 21st Commenting on the Draft EIR for Alameda Point Project

Let's take the responsible, prudent and efficient approach. The VA and the city should conduct a joint environmental assessment as the law allows and encourages, reducing the duplication of resources. In fact, the California Environmental Quality Act authorizes federal agencies to cooperate with state and local agencies on the preparation of joint documents to satisfy the requirements of both federal and state environmental impact assessments.

The city is working with the VA to help facilitate building their project. We should also work with them to help analyze it. The combined larger, integrated project definitely has environmental impacts on the city's open space, wildlife and habitat, recreation, scenic/visual value, and traffic and noise.

Alameda Point is one place. Segmenting the two environmental review efforts could result in the environment getting the short end of the stick. With artificially reduced impacts, fewer mitigation measures may be required than if both projects were evaluated together.

Comments on the scope of the EIR can be provided in writing to Planning Services Manager Andrew Thomas in the Community Development Department at Alameda City Hall, 2263 Santa Clara Avenue, Room 190, Alameda 94501, or email athomas@ci.alameda.ca.us.

Originally published in *Alameda Sun*.

Thursday, Feb. 14th, 2013

By Irene Dieter

Letter 28. Individual (William Smith)

- 28-1 As discussed on page 3-12 of the Draft EIR, NAS Alameda is designated by ABAG and MTC as a regional Priority Development Area (PDA) in *Plan Bay Area*. PDAs are intended to provide lands for regional employment and housing growth in proximity to regional transportation systems to reduce greenhouse gas emission and combat climate change.
- 28-2 As required by CEQA, the Draft EIR provided an analysis of alternatives to the proposed project. Per CEQA, the Draft EIR does not choose a preferred alternative; it simply evaluates the alternatives. It's the City Council who chooses the preferred alternative or to reject the preferred project.
- 28-3 Please see response to Comment 28-2. As stated on page 5-30 of the Draft EIR, the environmental superior alternative is the Preservation Alternative, because it would avoid or lessen environmental impacts related to Cultural Resources, Traffic, Air Quality, and Noise that are associated with the proposed project.
- 28-4 The full set of comments submitted by the commenter are reproduced in the Final EIR as part of this letter (see Comment Letter 28).
- 28-5 Please see responses to Comments 28-6 through 28-8.
- 28-6 Pursuant to Municipal Code 30-17, Density Bonus for Affordable Housing, which contains provisions for density bonuses and other incentives for developments that include affordable housing, the City of Alameda does believe that it is feasible and appropriate to develop multifamily housing at Alameda Point.
- 28-7 The existing Economic Development Conveyance Memorandum of Agreement (EDC MOA) between the City and the Navy establishes a financial penalty for any market rate unit constructed after 1,425 units are constructed at Alameda Point. This pre-condition on the property conveyance has a uniform financial impact on any alternative with more than 1,425 units. The Navy's conveyance of the property, including the EDC MOA, has already occurred and is not part of the proposed project.
- 28-8 As explained on page 1-2 of the Draft EIR, CEQA requires the evaluation of the significant physical environmental impacts of the proposed project, in this case the Alameda Point project. The comment requests information pertaining to housing subsidies, which is an economic issue that would not alter the environmental analysis of the EIR. The affordable housing component of the proposed project is described on pages 3-15 and 4.B-7 of the Draft EIR.
- 28-9 The comment is noted. Please see responses to Comments 28-6 through 28-8.

- 28-10 The baseline for population and housing is described on page 4.B-1 under the *Environmental Setting*. The baseline consists of the existing physical environmental conditions at the time the Notice of Preparation was issued. *Plan Bay Area* is acknowledged as a currently applicable document that will affect planning for the proposed project. As described in the Approach to Analysis, the environmental analysis, proposed project was evaluated based on the potential effects on Alameda's housing, population and employment. The *Plan Bay Area* was referenced in the analysis to help assess whether the proposed project is within an area anticipated for future growth within both the City and the region. As described starting on page 6-1 of the Draft EIR, under *Growth Inducing Effects*, the project site's location near Interstate 880 and regional alternative transportation systems could result in less impact on regional transportation systems and air quality than would comparable development in a more outlying "greenfields" area, or an area with a lower concentration of population within the County. However, as found in the Draft EIR, reducing regional impacts does not necessarily mean that local impacts are less than significant, based upon City of Alameda and CEQA thresholds of significance which focus on local impact.
- 28-11 Please see response to Comment 28-10.
- 28-12 Mitigation measures related to cumulative impacts (i.e., regional and long-term), including air quality, construction noise, and traffic noise, are described throughout Chapter 4 of the Draft EIR and are summarized on page 6-4 of the Draft EIR.
- 28-13 Please see response to Comment 28-7.
- 28-14 The City's Land-Use Tracking Program and Site Management Plan (City Program) is described in detail beginning on page 4.J-28 of the Draft EIR. The City Program will address both closed sites where no further action is required, because investigations have determined no or minimal threats to human health and the environment, and open petroleum sites where additional investigation and/or cleanup work is necessary. To enforce restrictions on future uses of these properties, for opens sites a notification is and will be included in the deed of property to inform transferees that, at least until the site is closed, sensitive land uses such as residential, health care, day care or schools are restricted, and work involving soil excavation, trenching, or groundwater contact must comply with a site management plan that is acceptable to the responsible agency (U.S. EPA, DTSC, and/or Water Board). For closed sites, the same notifications will apply to the extent that the closure involved engineering measures to allow some level of hazardous materials to remain in place.

As stated on page 4.J-30 of the Draft EIR, the land-use restrictions for affected property will be identified in the automated permit-tracking system that the City uses for its permitting activities such that review of the City Program will be incorporated into the permitting process to ensure review of any potential restrictions prior to issuance of excavation, grading and building permits as well as other development approvals. Other restrictions, such as prohibitions of the use of underlying groundwater, are not likely to

affect future residents because the natural brackish conditions of the groundwater combined with the available high quality water supply service should preclude any reasonable desire to access site groundwater.

The U.S. EPA, Water Board and DTSC have been using deed restrictions and institutional controls throughout the Bay Area on many different sites with varying conditions as effective remedies to protect human health for many years. Considering the additional measures the City administers to track these controls (which are recorded directly on the property deeds) through the City's permit system would ensure the effectiveness of these controls.

- 28-15 Comment agreeing with alternatives approach is noted.
- 28-16 Comment agreeing with alternatives approach is noted.
- 28-17 CEQA requires that the alternatives section provide "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." It is reasonable to compare alternatives based on local impacts as opposed to the regional analysis of the Plan Bay Area and within the requirements of CEQA.
- 28-18 As noted above, the Alternatives analysis is consistent with CEQA requirements and is also consistent with Plan Bay Area which identifies the proposed project area as a priority development area. The approach to the Alternatives analysis in Chapter 5 of the Draft EIR was comparable to that taken in Plan Bay Area however, Plan Bay Area covered a much wider region which was analyzed at a program level and the proposed project was analyzed at a local level consistent with CEQA requirements.
- 28-19 The purpose of the Draft EIR is to evaluate the impacts of all future development in the project area as a whole. The "project-specific" impact assessment in the Draft EIR is a comprehensive evaluation of the impacts of all future reuse activities on the project site. As described in the Section 4.E, *Biological Resources*, of the Draft EIR, all impacts to biological resources would be reduced to less-than-significant levels with implementation of mitigation measures identified in the Draft EIR. In addition, the Draft EIR includes an extensive analysis of cumulative impacts (Impact 4.E-7) taking into account other projects in the Alameda Point vicinity.
- 28-20 The comment's suggestion that the cumulative impacts analysis has not considered the VA's lands; seasonal wetland and tidal marshland on the Northwest Territories; marine habitats in the Alameda Point Channel, Seaplane Lagoon, and Inner Harbor; and the breakwater, wetlands, beaches, and lagoons is incorrect. Impact 4.E-7 adequately assesses cumulative impacts of proposed projects in all these areas and habitats within the vicinity of Alameda Point, as well as impacts of other projects within San Francisco Bay that are further removed from the project site. Impact 4.E-7 discusses these impacts and concludes that, with the implementation of the mitigation measures prescribed by the Draft EIR, the project will not contribute to significant cumulative impacts to biological resources.

28-21 The City will comply with the avoidance and minimization measures and terms and conditions of the 2012 Biological Opinion (BO) related to watercraft exclusion zones and no-wake zones to minimize impacts of boaters on least tern foraging and roosting areas. In addition, the Draft EIR includes Mitigation Measure 4.E-4a, which expands on the BO's conservation measures by narrowing the corridor through which boats can travel between Breakwater Island and the shoreline (thereby expanding the watercraft exclusion zone) and limiting the speed limit of boats to 10 mph on the harbor side of Breakwater Island. Mitigation Measure 4.E-4a requires implementation of these measures year-round (as opposed to only being required during the least tern breeding season as specified in the BO) to reduce disturbance of wildlife using Breakwater Island. The watercraft exclusion zone around Breakwater Island will also prevent boats from landing humans or dogs on the breakwater. Please also refer to the response to Comment 4-2 regarding the enforcement mechanisms for this measure.

28-22 Please see responses to Comments 28-1 through 28-21.

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2013 ALAMEDA POINT DRAFT ENVIRONMENTAL REPORT—COMMENTS

These written comments address the City of Alameda’s Draft Environmental Impact Report (DEIR) for Alameda Point (AP), an area that has been studied many times and had many plans developed for it since 1996. They are my personal comments, made without endorsement by or connection with any group or organization.

I support, in whole or in part, the DEIR comments and input of the following organizations and their representatives made at public hearings and in writing: HOMES, Renewed Hope, Sierra Club, Center for Urban Environmental Law, Audubon Society, Friends of the Alameda Wildlife Refuge, and Alameda Architectural Preservation Society. I also support, in whole or in part, the public comments and written input submitted by these individuals: Richard Bangert, Irene Dieter, Carol Gottstein, Dale Smith, John Knox White, William J. Smith, Helen Sause, Doug Biggs, and Diane Lichtenstein.

29-1

RECOMMENDATIONS

Transit Oriented Mixed Use Alternative with Multifamily Density Throughout

The **Transit Oriented, Mixed Use Alternative**—combined with aspects of the **Multifamily Alternative**, as detailed below—offers the lowest-density opportunity to minimize traffic congestion in the Posey and Webster Tubes and their access roads, as well as presenting maximum economic return for the City of Alameda over the next 50-100 years of build-out. This AP development alternative would eventually:

29-2

- 1) add more residential units for a total of 3,400 units, and
- 2) maintain the total number of square feet of non-residential uses, but increase the relative amount of retail use on the site from 300,000 square feet to 1 million. (DEIR, p. 2-9)

Building only 1425 housing units at AP will not generate the transit trips needed to support offering competitive-with-autos transit service, such as Alameda now enjoys on the AC Transit District Line 51A. Housing and commercial densities must be able to support transit headways (service intervals) of 8-10 minutes for most hours of the day and night to make it easy for workers and residents to leave their cars at home, which is Alameda’s only hope for avoiding

29-3

gridlock in and around the tubes and other island access points. (See “Missing from the Draft EIR” below for additional considerations.)

↑ 29-3
cont.

3400 to 4800 Housing Units Possible—IF Viable Transportation Options Are Provided

If a robust, sustainable transit infrastructure is fully funded and implemented, AP could sustain as many as 4500 multifamily housing units, as recommended by HOMES. *The key to reducing local traffic congestion—with or without AP redevelopment at varying levels—is to implement a multi-pronged strategy that makes leaving a car at home easy and convenient for Alameda’s workers and residents.* (The need to provide an adequate island-wide and regional transportation infrastructure to replace single-occupancy vehicles is neglected in this DEIR.)

29-4

Build 1425 Multifamily, High Density Housing Units First:

Combining the Multifamily Alternative and the Transit Oriented Mixed Use Alternative

I support making at least the first 1425 new housing units at Alameda Point—as agreed to by the US Navy—multifamily housing. Those higher-density units should all be placed in the “Town Center” area in and around Seaplane Lagoon and along the Appezzato Parkway-Atlantic Avenue transit corridor. As the **Multifamily Alternative** recommends, the first 1425 housing units should “...be limited to multifamily housing. Existing single family housing units and the “Big Whites” would remain, but no new single family housing would be constructed.” (DEIR, 2-9)

29-5

The Multifamily Alternative offers a “project-wide reduction in trips (of) 10 percent” compared to the proposed project. (DEIR, 5-25) Since the trip generation from the would be comparable, “the mitigation measures required for this alternative would be the same as required by the proposed project...” (DEIR, p. 5-26)

29-6

There is another advantage, too: building 1425 multifamily units first in the higher-density transportation corridor and “Town Center” core allows us to develop new transportation options and find other ways to minimize traffic congestion. These would keep the Transit Oriented Mixed Use and High Density Alternatives available as future options beyond the build-out of the currently allowable 1425 housing units during the first 10-25 years.

29-7

Once the 1425 multifamily housing units—the maximum number allowed without penalty under

↓ 29-8

Alameda’s current agreement with the US Navy—are constructed and occupied, the City of Alameda can renegotiate a lower incremental cost per additional housing unit with the Navy, making additional housing units affordable for the city, developers, and buyers. (The current “surcharge” is \$50,000 per housing unit above 1425 units. Renegotiation could reduce this by more than half and lead to the construction of up to 3400 additional housing units. This would meet the economic concern that the multifamily alternative “would likely generate less financial return to support and fund reinvestment in the site wide infrastructure.” (DEIR, 5-8, 5-9, 5-32)

↑
29-8
cont.

The next 10-20 years—the period probably needed to build the initial infrastructure and the first 1425 housing units—are also likely to bring new transportation developments as well as further social and behavioral changes that will satisfy regional needs to reduce congestion and greenhouse gas production. This would permit additional development at AP.

29-9

The Sustainability-based Calthorpe Plan (High Density Alternative)

The community plan developed by Peter Calthorpe for Suncal remains the most sustainable, environmentally sound, and carbon-emission-reducing plan ever developed for Alameda Point. Calthorpe’s plan, originally developed for Suncal, deserves particular attention as we implement the city’s carbon emissions reduction plan: its energy production, energy conservation, and resource conservation elements—including the housing types and densities—represent levels of sustainability never achieved in any other plan for AP or any other part of Alameda.

29-10

The companion transportation plan developed for AP by Jim Daisa for Suncal was also the most comprehensive and “greenest” transportation plan developed for AP to date, and I am glad that he is now working on AP transportation planning for the City of Alameda. Both of these Suncal-funded plans—including the housing types, densities, and ranges of housing units proposed in them—deserve particular attention as we implement the city’s carbon emissions reduction plan and face global climate change and sea level rise, probably and current scientific projections and ABAG requirements/expectations. There is precious little discussion in the DEIR about energy efficiency and resource conservation standards (zero net energy and water use, gray water recycling, installing a smart grid and integral on-site renewable energy installations, implementing the highest levels of LEED standards, etc.).

29-11
29-12

Regardless of the densities and types of uses selected, AP redevelopment should be implemented using the highest and best sustainability practices available worldwide, with the highest LEED standards set for every phase, from demolition, infrastructure, housing, transportation, energy use and distribution, to resource conservation, and commercial development. (The DEIR does not adequately emphasize this imperative. nor does it address how to ensure that sustainability will be ensured throughout the entire redevelopment process.)

29-13

It goes without saying that utilizing higher-density housing at Alameda Point and implementing the sustainability characteristics of the Peter Calthorpe plan do not require having any further relationship with Suncal or any other master developer. But implementing an attractive, truly sustainable Alameda Point does require vision, courage, and an understanding that past development and building practices have been wholly inadequate for the health of our citizens and our planet.

29-14

With rates of global climate change and disruptions as well as sea level rise projected to increase beyond current scientific projections, Alameda must implement the highest possible sustainability standards community-wide today to meet our future needs.

29-15

MISSING FROM THE DRAFT EIR

As I read the DEIR, I found several areas that it did not address at all or did not address sufficiently. They are:

1) How the redevelopment process will ensure leading-edge sustainability in all areas, including: housing and commercial building standards and design; energy self-sufficiency, local power generation, and distribution grids; green transportation alternatives; and resource conservation (water recycling, mandating 100% reuse of materials from demolition, etc.).

29-16

2) How will an adequate island- and region-wide transit and alternative transportation system serving AP and all of Alameda will be planned, funded, and built? This is the only foreseeable option to reduce single-vehicle trips and the “significant and unavoidable” traffic congestion envisioned throughout Alameda in the DEIR, *even with the “No Project” option.* The final AP EIR should include plans for a robust transit and alternatives-based transportation system and address the funding of adequate alternatives (bus rapid transit, a second transbay

29-17

BART tube under Alameda, the provision of electric vehicle charging stations, etc.) that can achieve significant congestion reduction over the forecasts in the DEIR.

↑ 29-17
cont.

3) Discuss options for reducing congestion island-wide (compared to the transportation projections in the DEIR) by building additional transit-oriented higher-density housing as well as providing superior transit service as an alternative to driving. In its GreenTrip program, Transform has documented local housing projects that have achieved significant reductions in auto trip generation rates over the trip-generation projections in the DEIR by building higher-density and transit-oriented housing projects (<http://www.transformca.org/GreenTRIP>). Similar densities are envisioned in the AP project alternatives, but the potential savings in auto trip generation may have been significantly underestimated in the DEIR based on the findings of the GreenTrip program.

29-18

4) Evaluate alternatives over longer terms of 100-150 years, not just 50 years.

All DEIR discussions should forecast the effects for 100-150 years, since many Alameda buildings were built that long ago. What are the true long-term costs, benefits, and effects of various redevelopment strategies over long periods? How sustainable are various options? (Rising sea levels beyond 2100 as well as the effects on achieving AB32 goals come to mind here.)

29-19

5) Renegotiating the terms of the conveyance should be addressed in the DEIR.

Renegotiating the terms of the current conveyance agreement with the Navy is not discussed very much in the DEIR, even as a future possibility in 10, 15, or 20 years. It should be at least mentioned, given that the current terms impose an unusually high and unjustified financial penalty of \$50,000 per housing unit above the 1425-unit cap, limiting future housing availability and cost for Alameda and the regional urban core. Renegotiation should be examined as the realistic alternative it is.

29-20

6) Suggested Categories for Measuring Sustainability Impacts

I suggested in my comments on the EIR scoping that the DEIR include some of the following costs and impacts. (My goal was to comprehensively evaluate the neighborhood, citywide, and regional impacts over 100-150 years of the various options available to Alameda in

29-21
↓

redeveloping AP.) What would be the impacts of the housing, employment, and transportation energy used by AP and Alameda workers, such as those who would be living:

- 1) at AP (within walking, transit, and/or bicycling distance of their potential future employment at AP or elsewhere in Alameda)
- 2) in Alameda (within walking, transit, and/or bicycling distance of their potential future employment at AP)
- 3) outside of Alameda (within walking, transit, and/or bicycling distance of their potential future employment at AP)
- 4) outside of Alameda (not walking, taking transit, and/or bicycling to their potential future employment at AP)

↑
29-21
cont.

How do the lengths and transportation modes used by those commuting to or from AP or to jobs elsewhere in Alameda affect overall (AP, city, regional) energy consumption, the production of greenhouse gases (carbon, methane, etc.)? What are the environmental and social costs of various lengths of and modes used in commutes? How much time is lost or gained during various types and lengths of commutes, such as the time lost while stuck in traffic if all workers at new AP businesses are commuting 10-40 miles one way from off-island by auto in single-occupancy vehicle (SOV) trips? What are the effects over 100-150 years of providing or not providing various numbers of multifamily housing units (0-4500) at AP in relation to commercial development?

↑
29-22

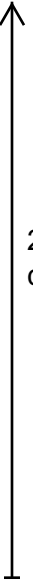
Similarly, I did not see much discussion of the following in the DEIR.

1. How will each variable in the various AP housing and commercial development options affect the individual and collective work, home, and transportation energy consumption patterns of:

- a) each AP resident?
- b) each Alameda resident?
- c) each East Bay resident?
- d) each Bay Area region resident?
- e) each AP household?
- f) each Alameda household?
- g) each East Bay household?
- h) each Bay Area region household?

↑
29-23
↓

- i) each AP worker?
- j) each Alameda worker?
- k) each East Bay worker?
- l) each Bay Area region worker?
- m) each AP business?
- n) each Alameda business?
- o) each East Bay business?
- p) each Bay Area region business?
- q) the city overall?
- r) the East Bay region?
- s) the Bay Area region overall?
- t) the state of California overall?



29-23
cont.

2. How would various housing types and overall densities implemented at AP affect transit use by:

- a) each AP resident?
- b) each Alameda resident?
- c) each East Bay resident?
- d) each Bay Area region resident?
- e) each AP household?
- f) each Alameda household?
- g) each East Bay household?
- h) each Bay Area region household?
- i) each AP worker?
- j) each Alameda worker?
- k) each East Bay worker?
- l) each Bay Area region worker?
- m) each AP business?
- n) each Alameda business?
- o) each East Bay business?
- p) each Bay Area region business?
- q) residents, households, workers, and businesses in the city overall?
- r) residents, households, workers, and businesses in the East Bay region?



29-24

- s) residents, households, workers, and businesses in the Bay Area region overall?
- t) residents, households, workers, and businesses in the state of California overall?

↑ 29-24
cont.

3. How would various housing types and overall densities affect the number of auto (vehicle), transit, bicycle, and pedestrian miles traveled by:

- a) each AP resident?
- b) each Alameda resident?
- c) each East Bay resident?
- d) each Bay Area region resident?
- e) each AP household?
- f) each Alameda household?
- g) each East Bay household?
- h) each Bay Area region household?
- i) each AP worker?
- j) each Alameda worker?
- k) each East Bay worker?
- l) each Bay Area region worker?
- m) each AP business?
- n) each Alameda business?
- o) each East Bay business?
- p) each Bay Area region business?
- q) the city overall?
- r) residents, households, workers, and businesses in the East Bay region?
- s) residents, households, workers, and businesses in the Bay Area region overall?
- t) residents, households, workers, and businesses in the state of California overall?

29-25

4. How would the various housing and employment options in various AP development schemes affect Alameda's overall jobs-housing balance for the next 100-150 years? (See above categories a-t for additional possible metrics.)

29-26

5. How would the various housing and employment options in various AP development schemes affect the East Bay's regional jobs-housing balance over 100-150 years? (See above categories a-t for additional possible metrics.)

29-27

6. How well does each planning option support regional housing goals and sustainability objectives such as redeveloping urban infill areas first rather than extending suburban and exurban sprawl? (See above categories a-t for additional possible metrics.)

29-28

7. How would employing various levels of energy efficiency and resource conservation standards (zero net energy and water use, gray water recycling, smart grid and integral on-site renewable energy installations, LEED standards implemented at various levels, etc.) in business and residential construction as well as various density levels and housing types affect local, regional, and state global warming, energy and resource conservation, and net energy consumption goals, etc.? (See above categories a-t for additional possible metrics.)

29-29

8. What will the energy and resource costs be of the various housing and commercial development alternatives? How will each commercial and housing density option or alternative affect the number of vehicle-miles traveled (per day, per month, per transportation mode, per worker, per business, and other metrics suggested in categories a-t above)? How will water, energy, and other resources be affected?

29-30

Respectfully submitted,

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Great Access, Deep Affordability

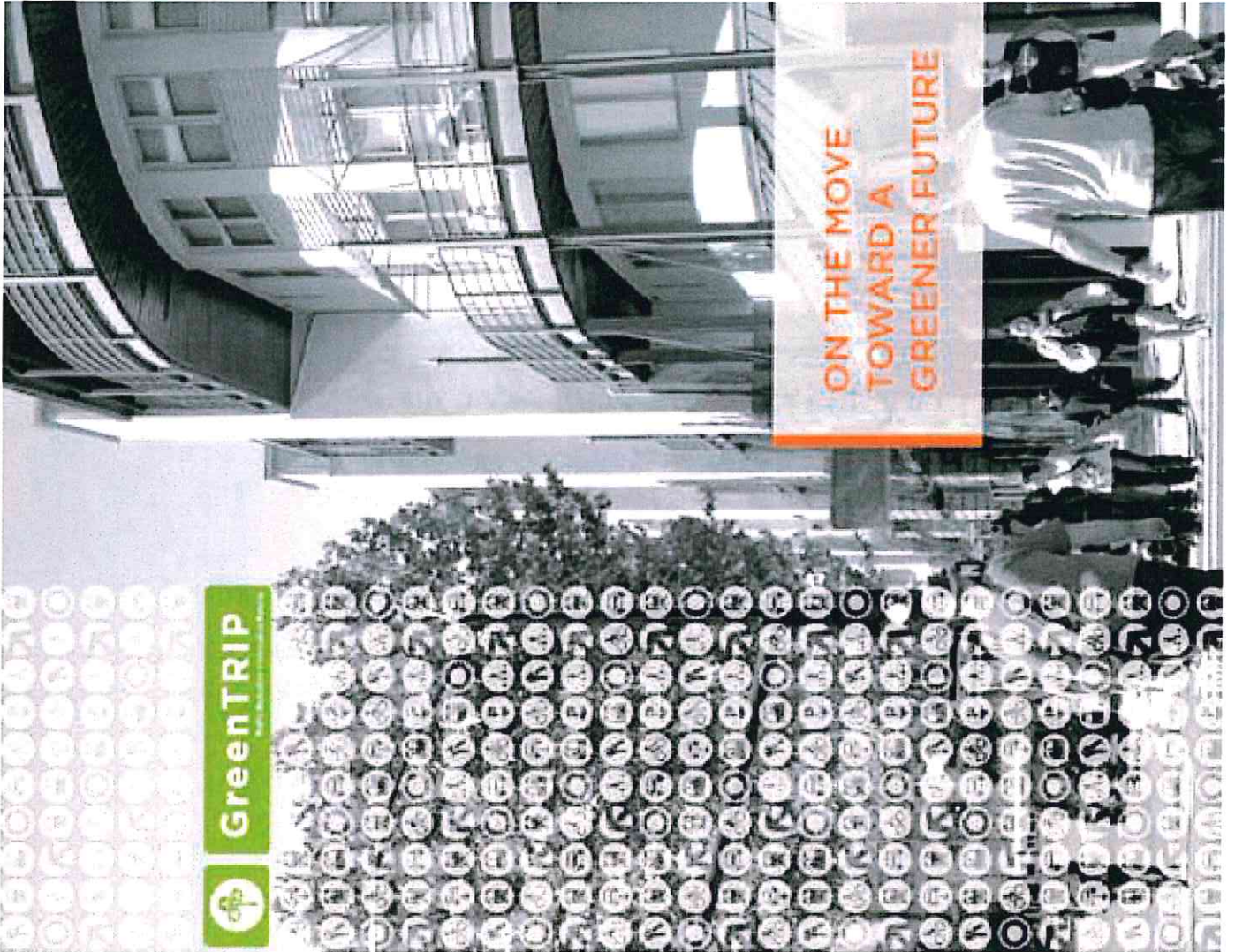
Switzer Foundation
Fellows Webinar

January 11, 2012

Stuart Cohen, Executive Director
&
Ann Cheng, Program Director

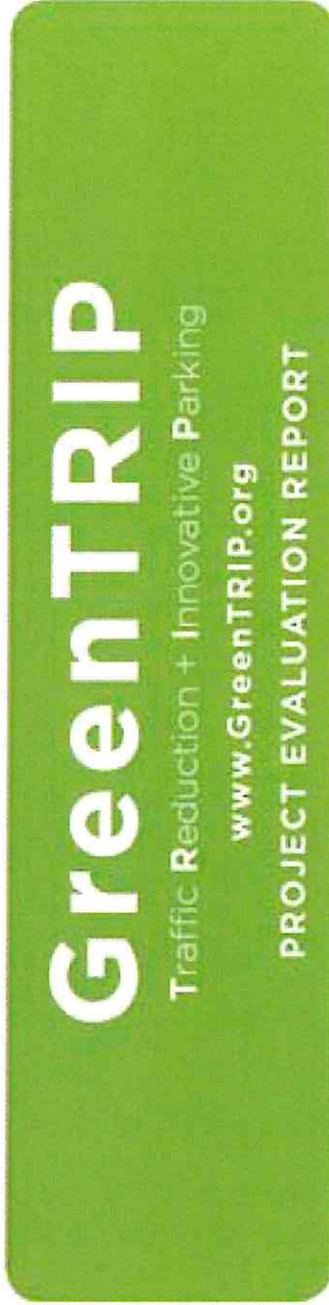
www.GreenTRIP.org

Webinar sponsored by the Robert and
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<http://www.switzernetwork.org>



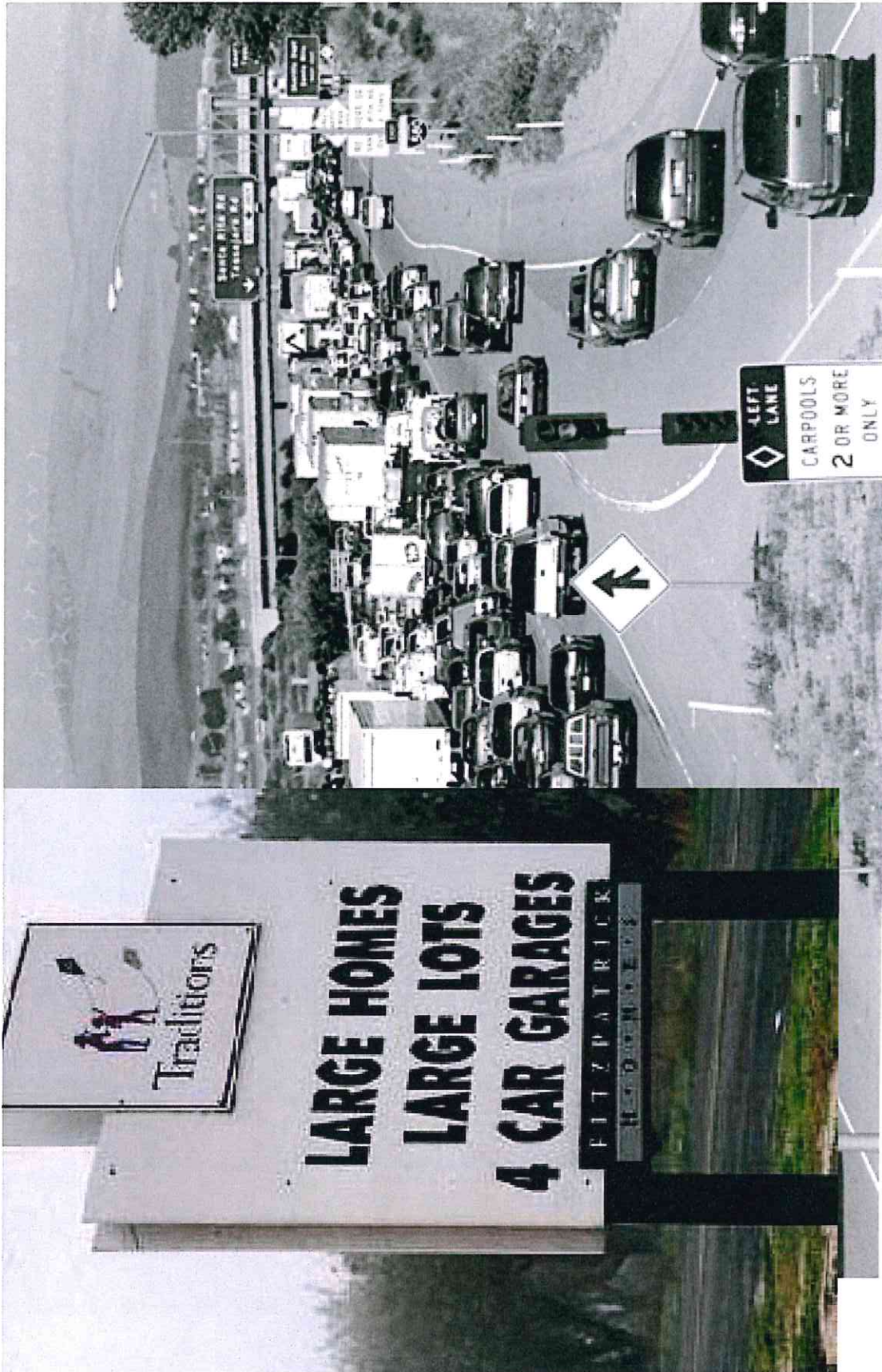
Live Webinar Housekeeping

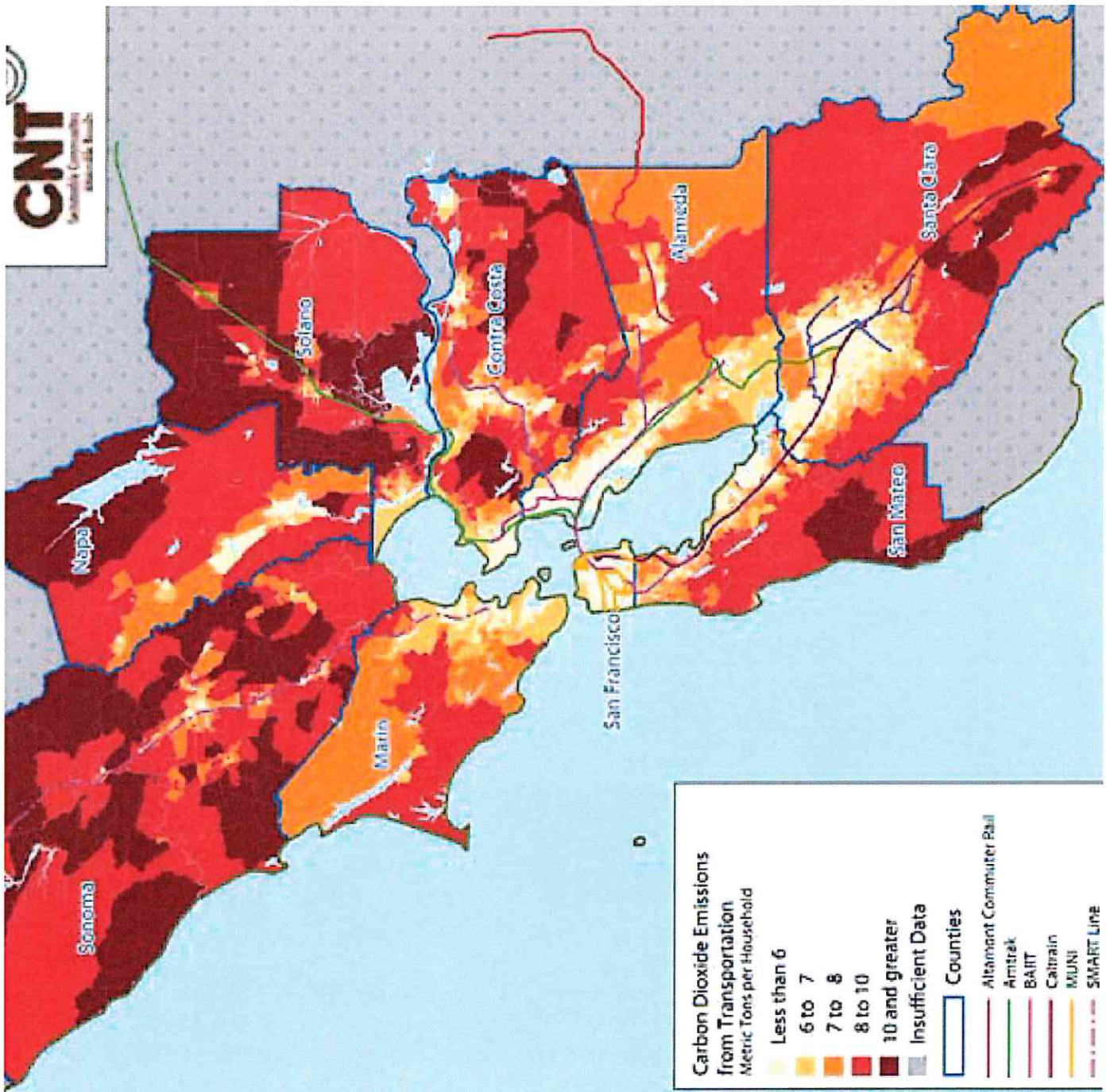
- Slides and a recording of the entire webinar will be available on the Switzer website blog (<http://www.switzernetwork.org/blog>) within 24 hours of the webinar broadcast.
- All microphones are muted for now, so please use the Questions box to ask questions during the webinar. You'll also have a chance to ask questions at the end of the webinar.
- Switzer staff will be monitoring Questions during the webinar to solve technical issues and pass content questions along to our presenters.



- 1) Problem
- 2) GreenTRIP Certification
- 3) Challenges
- 4) GreenTRIP 2.0

Self-fulfilling Prophecy of Sprawl





The New California Dream

**Preference:
walkable,
smaller,
convenient,
short
commutes**

VS.

**larger homes +
longer
commutes**

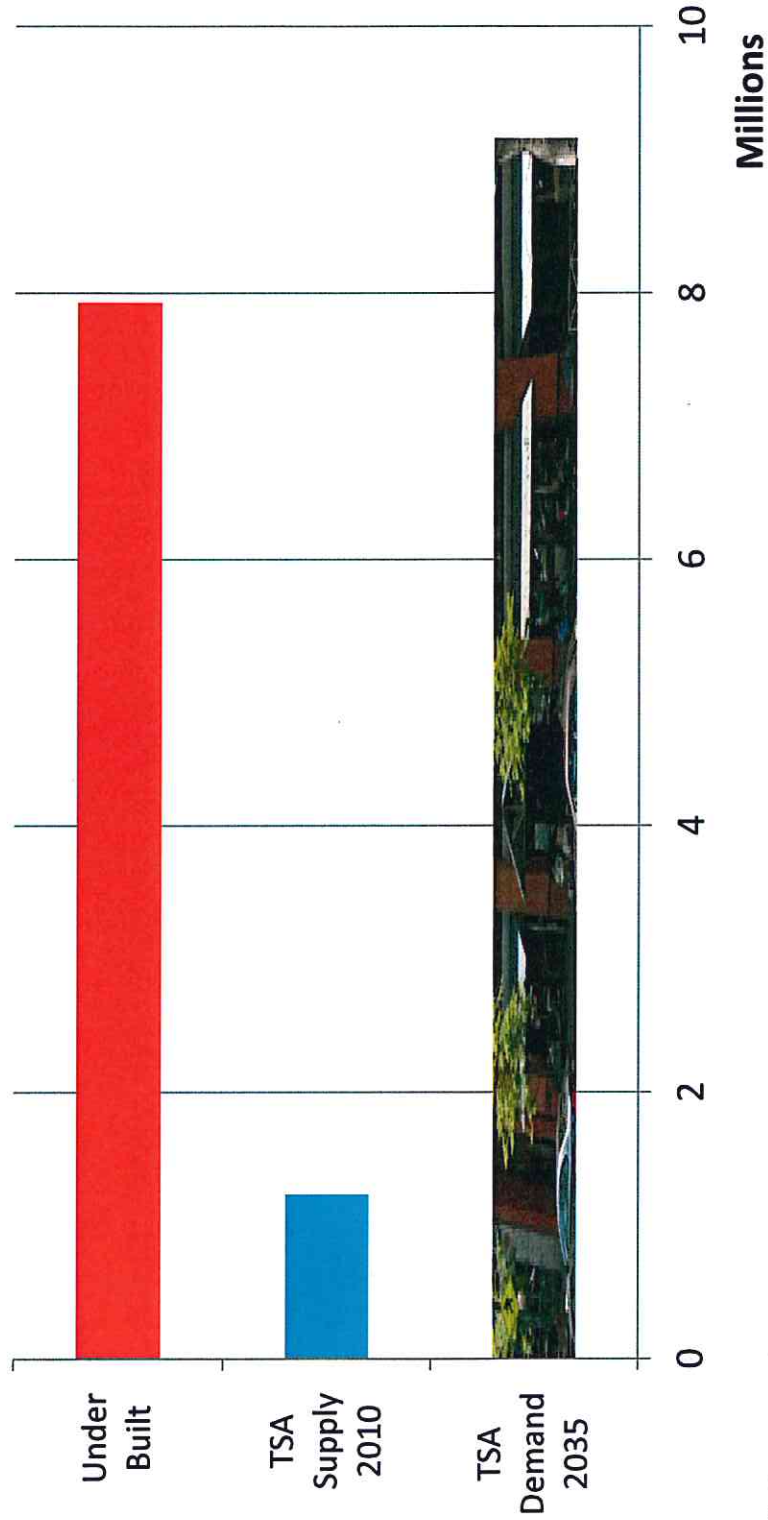


Demand for 8 Million More Homes near Transit

2035 Demand Vs. Supply Homes in Transit Rich Neighborhoods

Millions of Units

TSA: Transit Station Area



In CA's Largest 4
Metropolitan Areas:
MTC, SCAG, SANDAG,
SACOG



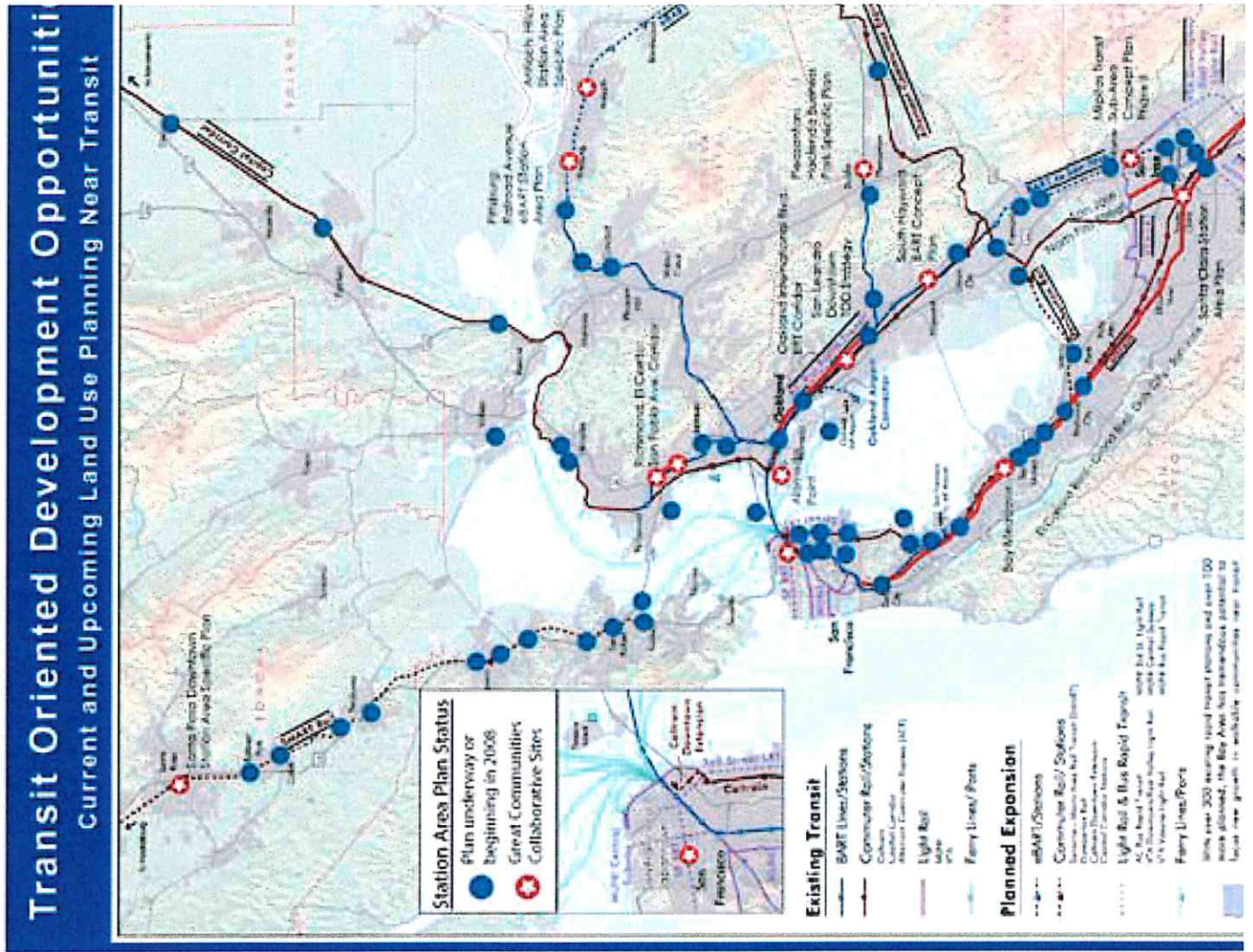
The New California Dream:

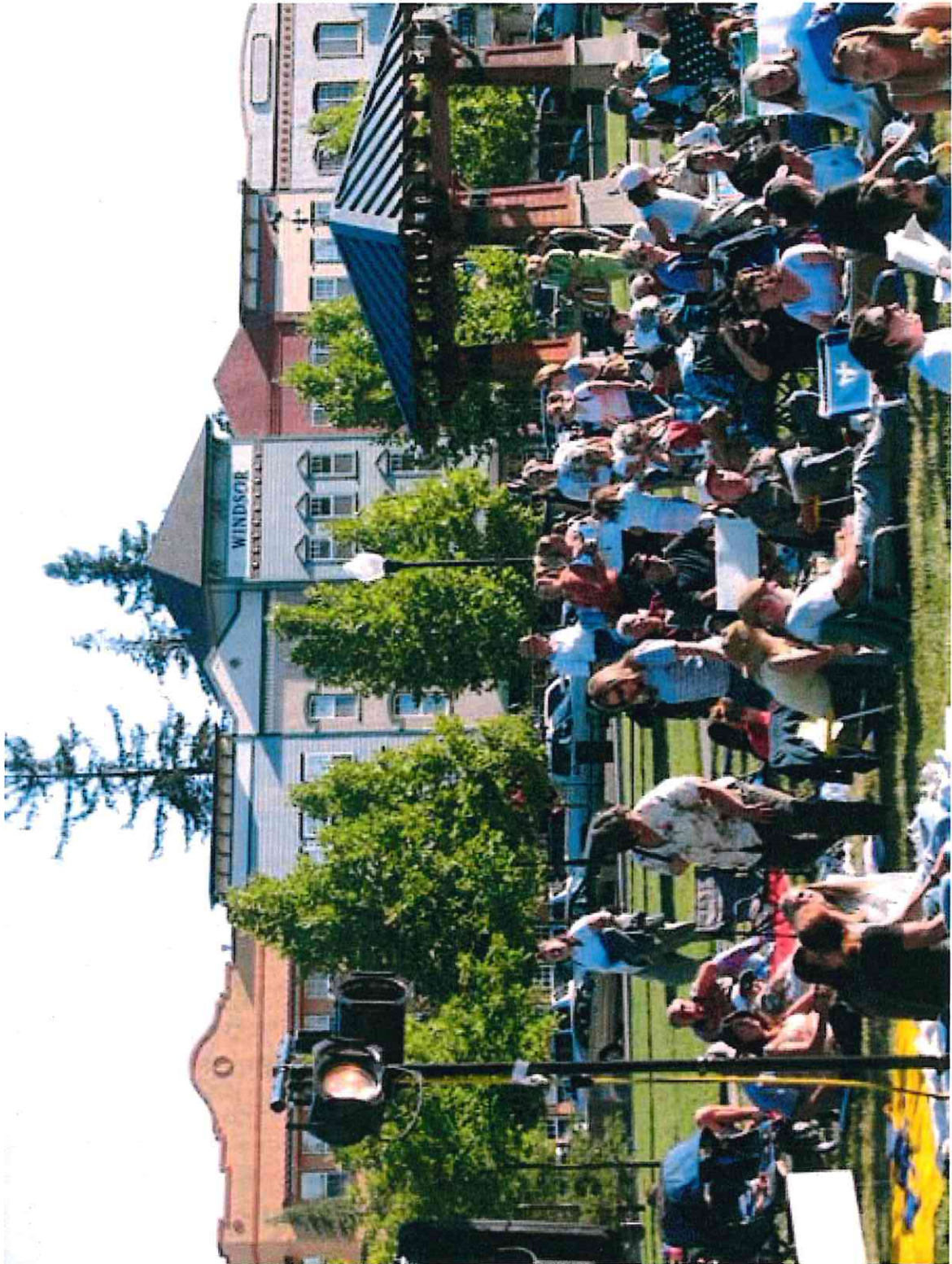
How Demographic and Economic Changes May Shape the Housing Market

Ideal equitable, sustainable TOD:



Great Communities Collaborative & Regional Policy

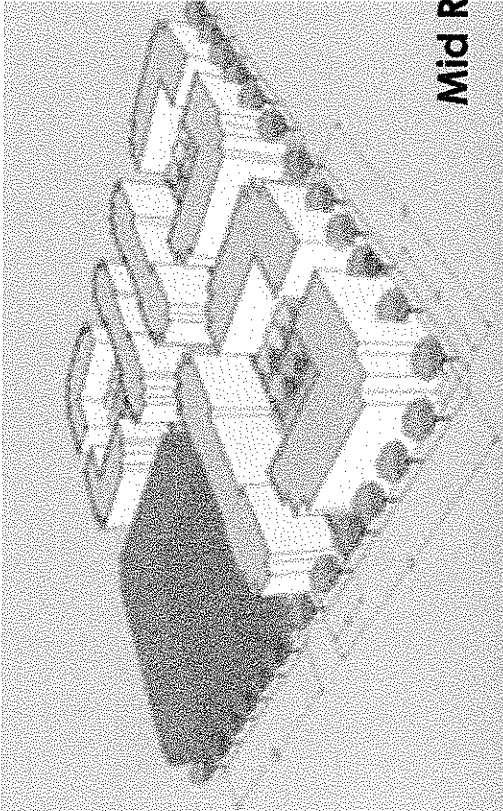




SmartTOD Infill good in theory, but.....



2.2 Parking Spaces per Unit



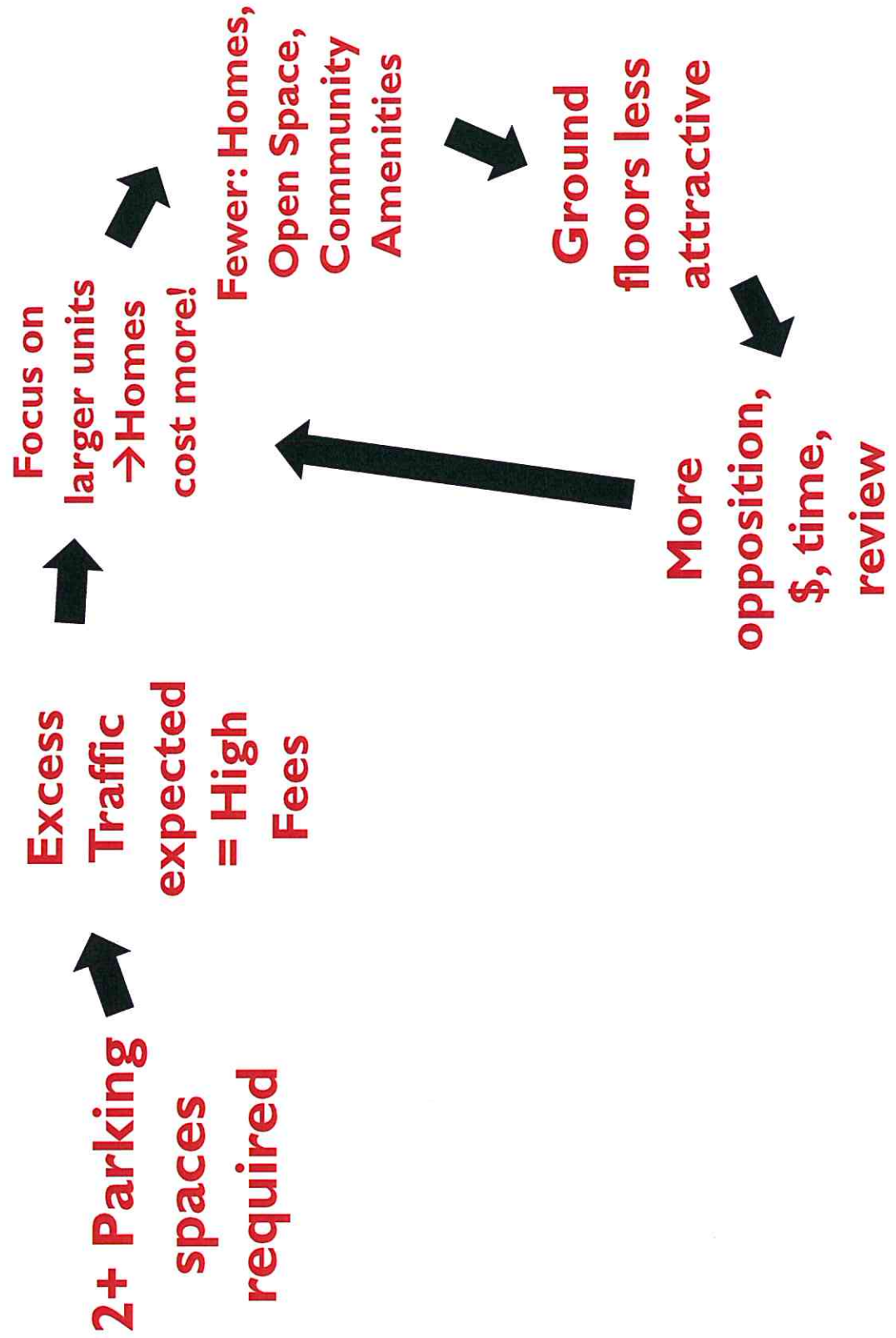
Mid Rise TOD

	Change	2.2
Acres		8
Units		801
Parking Spaces		1,800
Parking Cost		\$33.3 m
New Transit Riders		
New Transit Revenue		

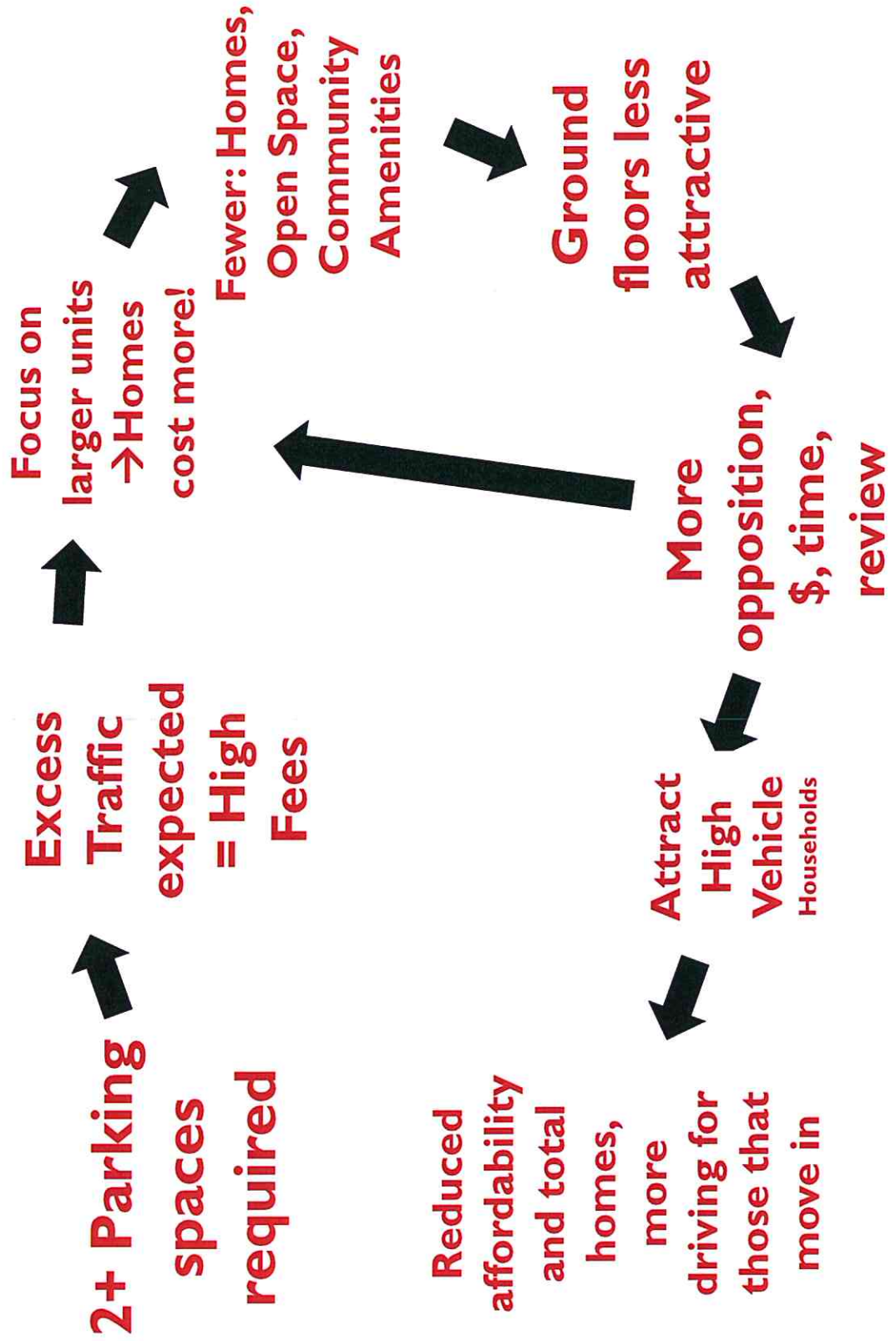
High Parking Creates Negative Feedback Loop



High Parking Creates Negative Feedback Loop



High Parking Creates Negative Feedback Loop



Dukakis Center 2010 Report

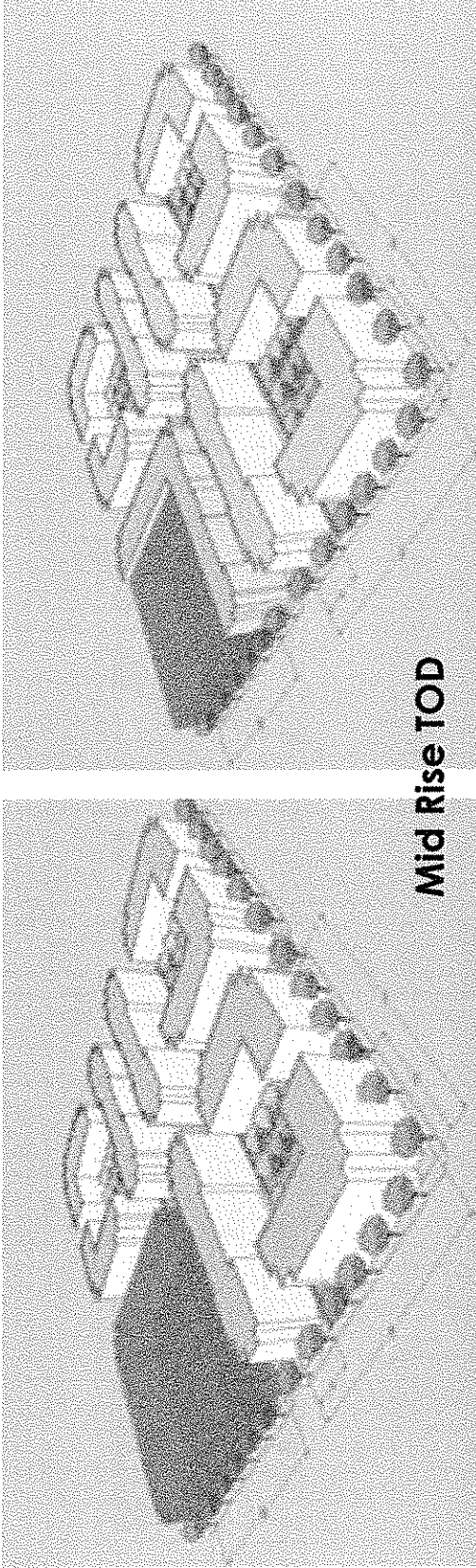
Maintaining Diversity In America's Transit-Rich Neighborhoods:

Tools for Equitable Neighborhood Change

TODs are destined to gentrify,
bringing higher incomes,
declining diversity, resulting in
higher vehicle ownership AND
ultimately reduced transit
ridership!



2.2 Parking Spaces per Unit vs. 1.1

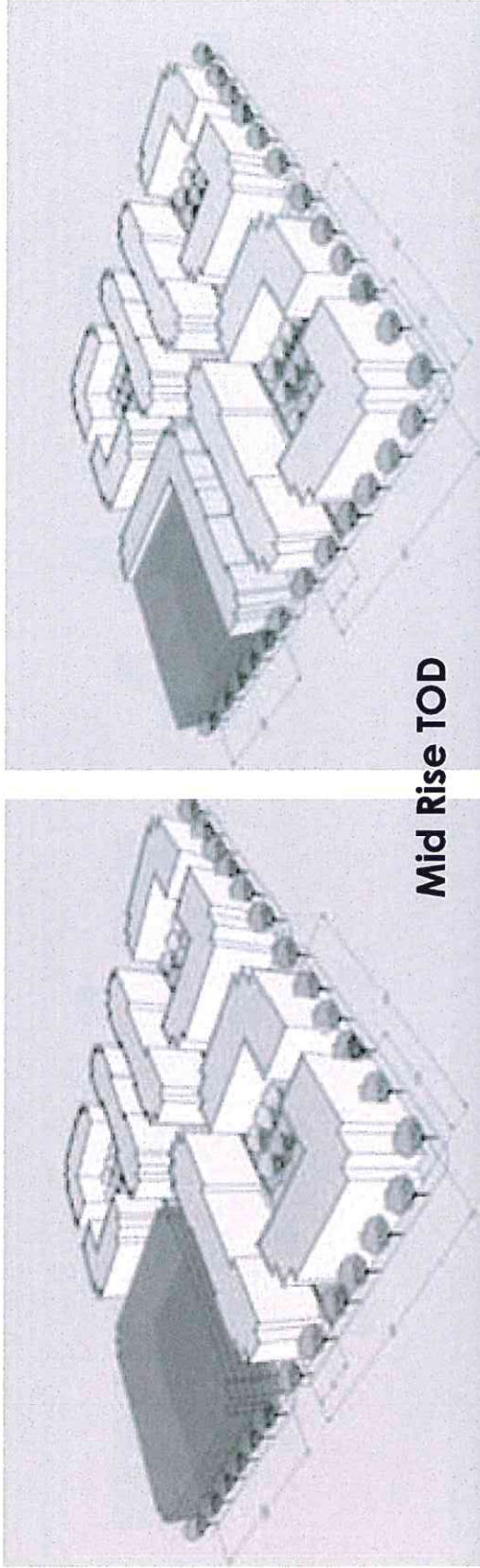


Change 2.2

Acres	8
Units	801
Parking Spaces	1,800
Parking Cost	\$33.3 m
New Transit Riders	
New Transit Revenue	

TCRP 128 by Cervero, Arrington

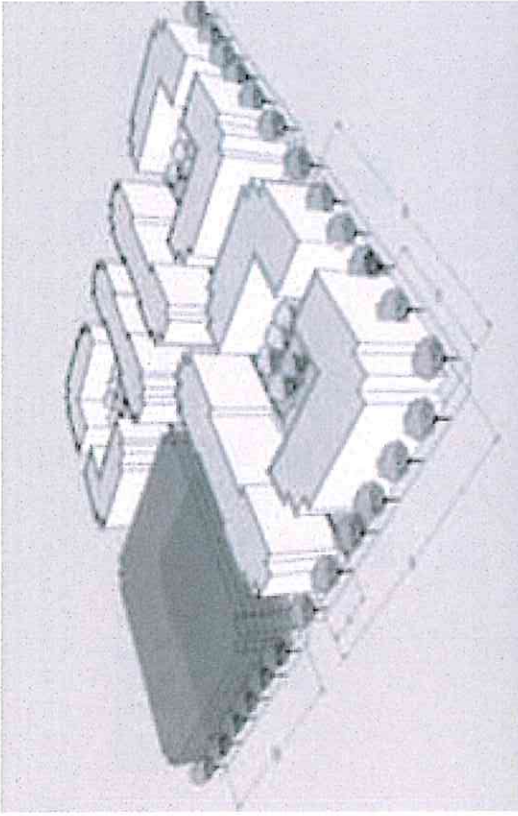
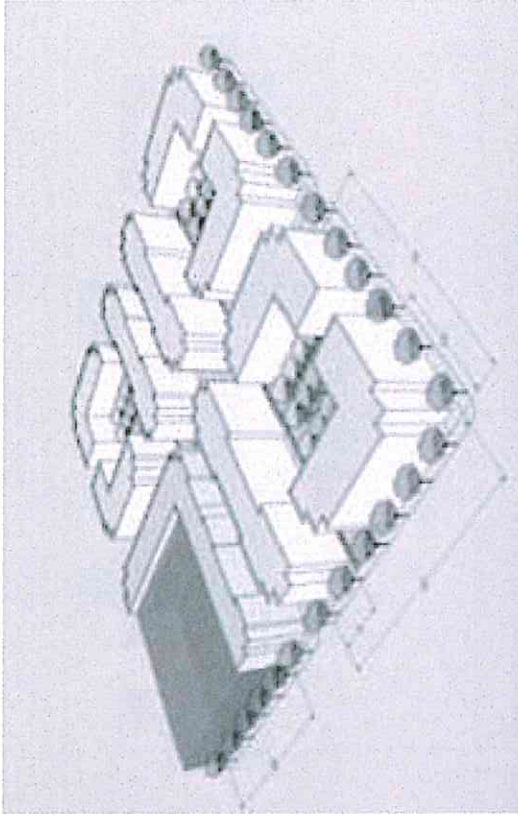
2.2 Parking Spaces per Unit vs. 1.1



	2.2	1.1
Change		
Acres	None	8
Units	+162	963
Parking Spaces	-648	1,152
Parking Cost	-\$12 m	\$21 m
New Transit Riders	+52,650	
New Transit Revenue	+\$53,330	

TCRP 128 by Cervero, Arrington

2.2 Parking Spaces per Unit vs. 0.9

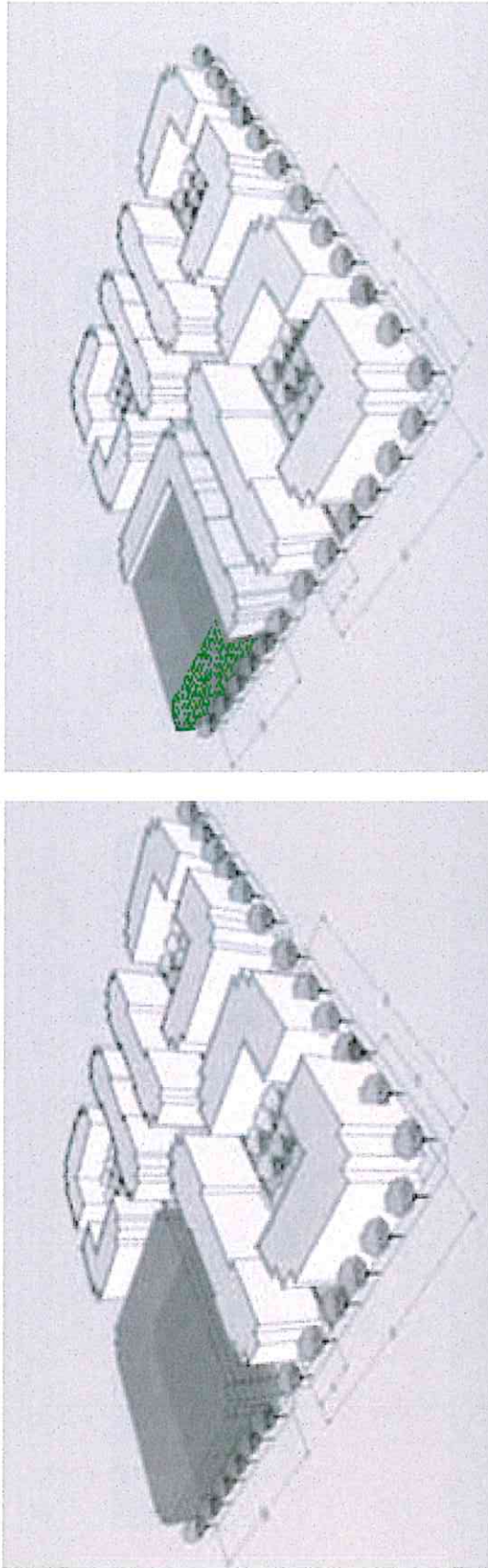


Change 2.2

Acres	8
Units	801
Parking Spaces	1800
Parking Cost	\$33.3 m
Traffic Reduction Strategies	

2.2 Parking Spaces per Unit

vs. 0.9



Change

2.2

0.9

Acres

None

8

8

Units

+200

801

1,001

Parking Spaces

-899

1,800

901

Parking Cost

-\$16.6 m

\$33.3 m

\$16.7 m

Traffic Reduction

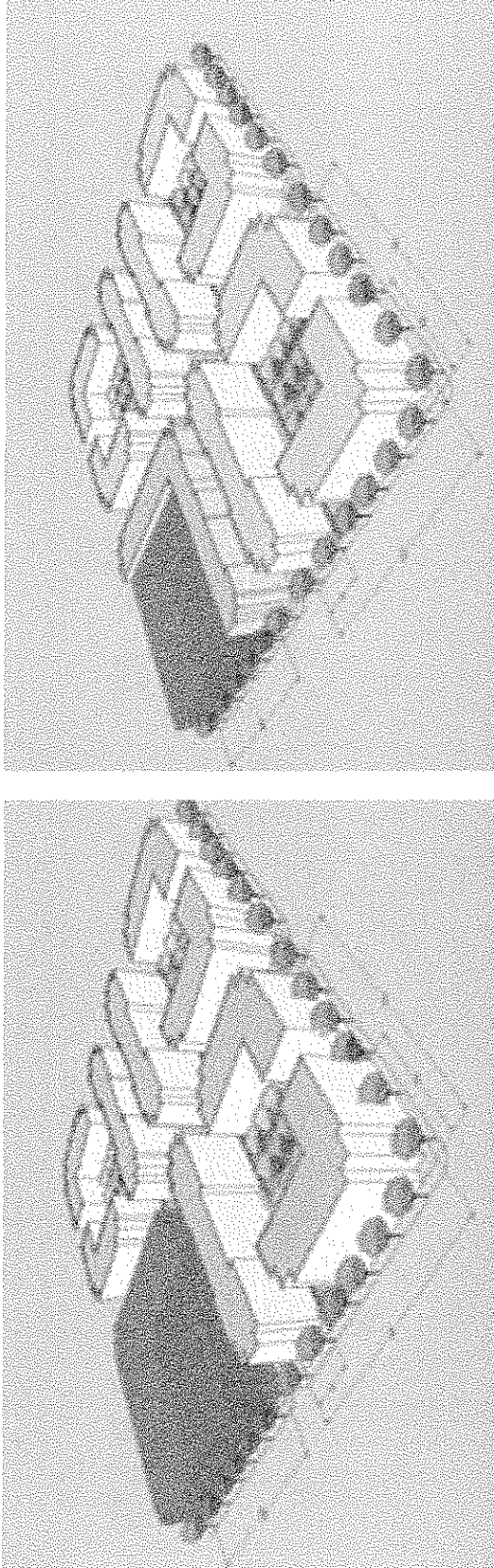
+\$6 m

Strategies



1 free pass &
1 free carshare
membership
per unit

2.2 Parking Spaces per Unit vs. 0.7

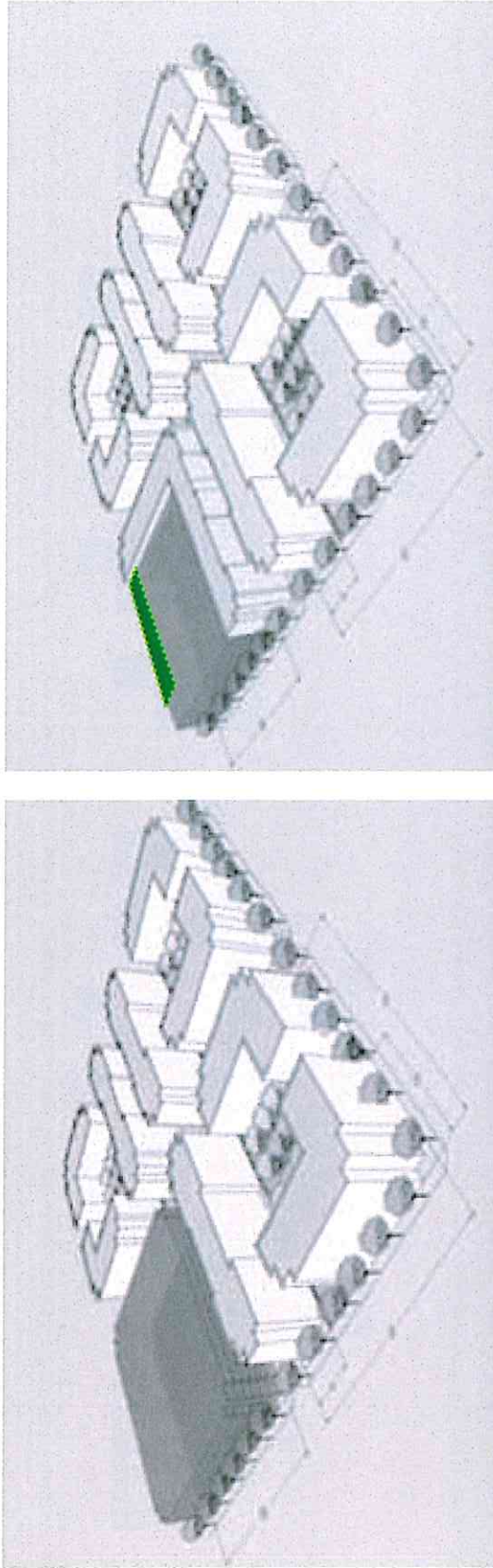


Change 2.2

Acres	8
Units	801
Parking Spcs	1800
Parking Cost	\$33.3 m
Traffic Reduction Strategies	

2.2 Parking Spaces per Unit

vs. 0.7



Change

2.2

0.7

Acres

None

8

8

Units

+220

801

1,021

Parking Spaces

-1,086

1,800

714

Parking Cost

-\$20.1 m

\$33.3 m

\$13.2m

Traffic Reduction Strategies

+\$6 m



**1 free pass &
1 free carshare
membership
per unit**

We are stuck, and change is too slow


- **Even when changed = common denominator**
- **Incomplete, hard to access data**
- **City staff -- overwhelmed**
- **Developers – no incentives**


**Communities Hate Traffic – and don't trust
developers or city staff**






Certification Standards

 Projected Driving by Residents
(Vehicle Miles Traveled per Household)

 Traffic Reduction Strategies

 Appropriate Amount of Parking

DISCOUNT TRANSIT PASSES



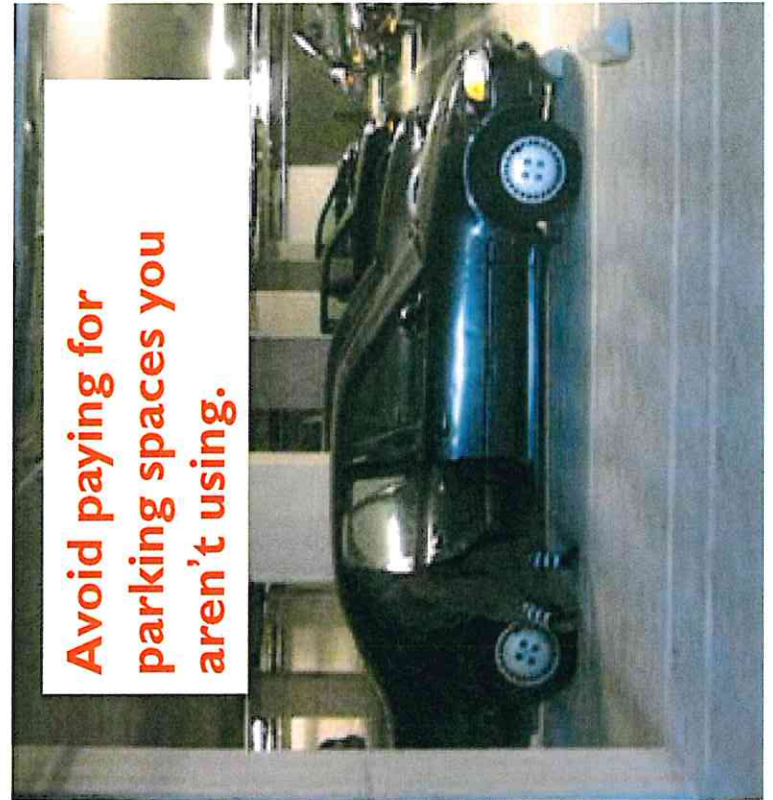
FREE CARSHARE MEMBERSHIP



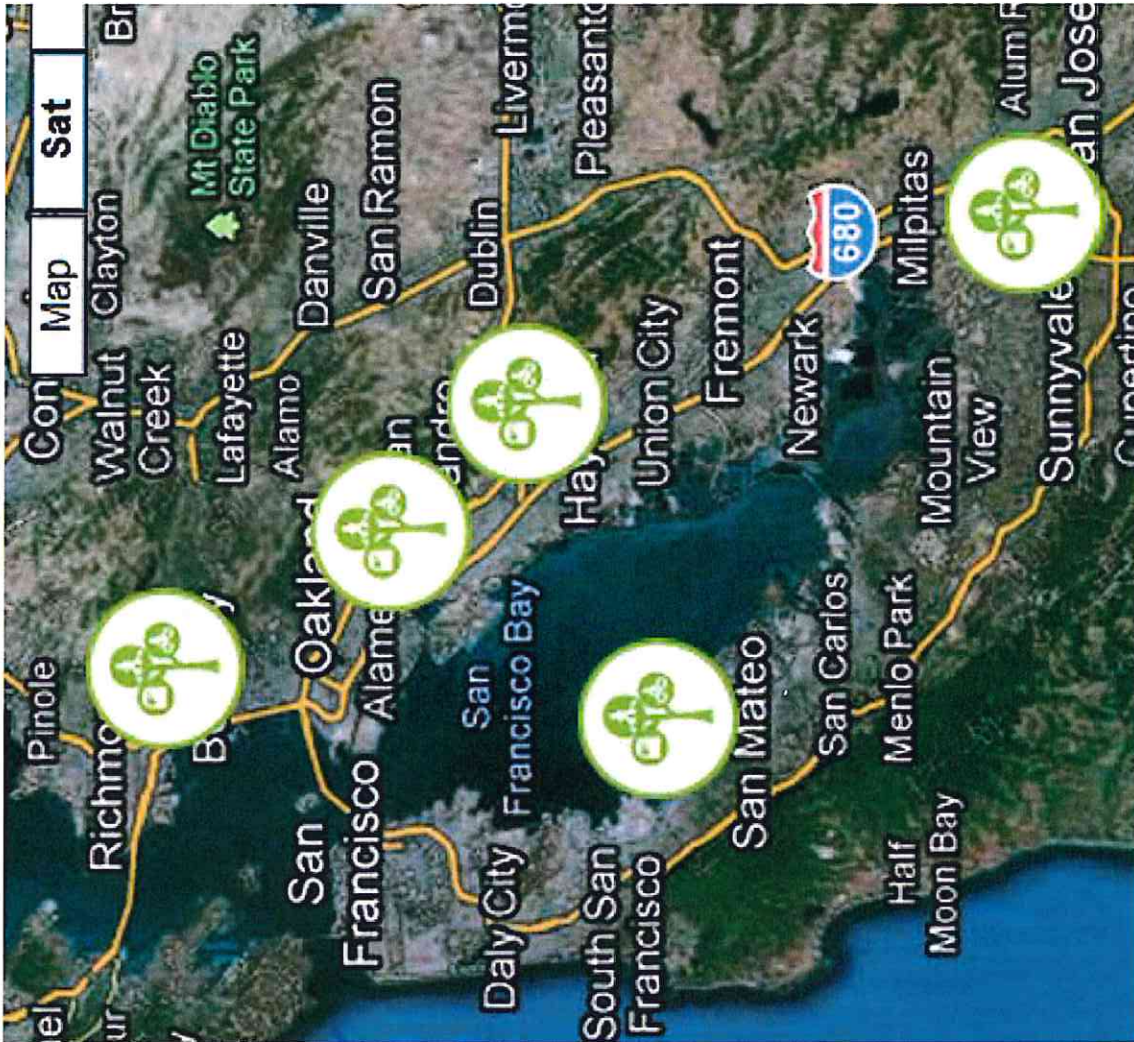
UNBUNDLE PARKING

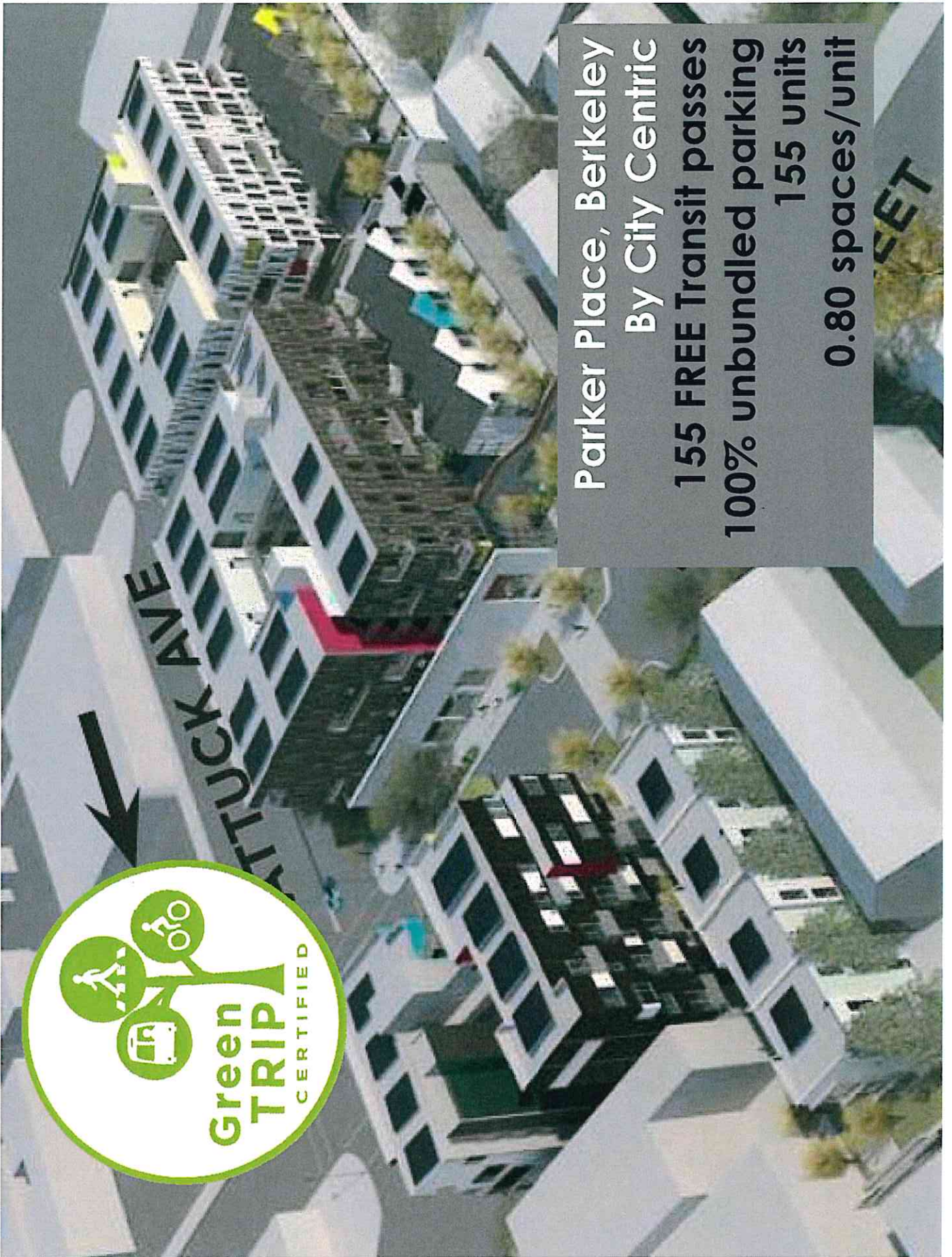


Pay for parking separately from cost of renting or purchase of home.



First Five GreenTRIP Certified Projects








**Parker Place, Berkeley
By City Centric**

155 FREE Transit passes
100% unbundled parking

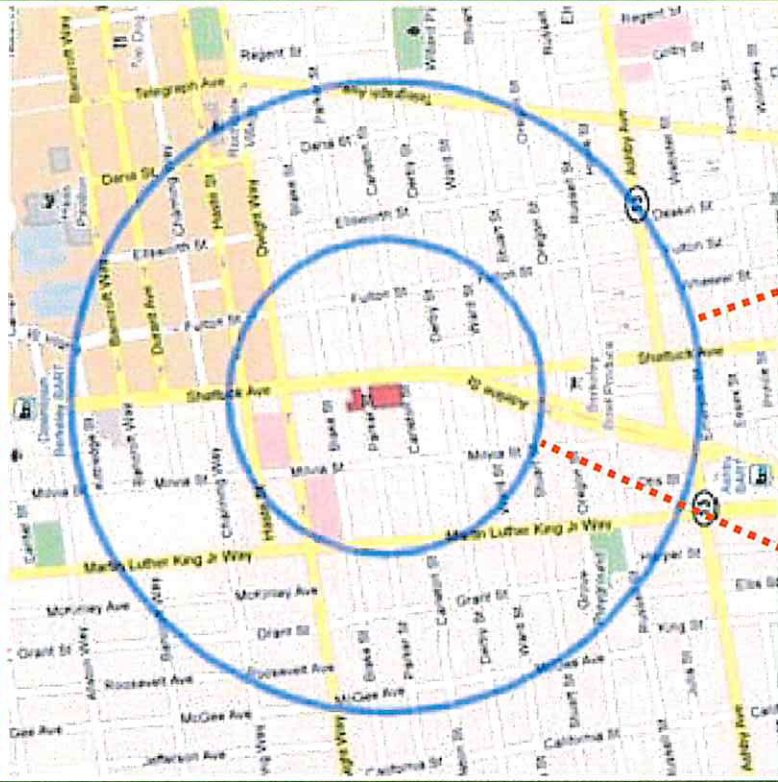
155 units
0.80 spaces/unit

GREENTRIP STANDARDS **PARKER PLACE**

 <p>PROJECTED DAILY DRIVING BY RESIDENTS</p> <p>LESS THAN 25 MILES/DAY</p> <p>Bay Area Average Household = 50 miles/household/day</p>	<p>(Vehicle Miles Traveled per Household per Day)</p> <p><input checked="" type="checkbox"/> 15 MILES/DAY</p> <p>PER HOUSEHOLD, BASED ON URBEMIS PROJECTION URBEMIS 2007 v9.2.4</p>
 <p>APPROPRIATE AMOUNT OF PARKING</p> <p>MAXIMUM 1 SPACE/UNIT</p> <p>Average spaces per home, excluding spaces shared with non-residential uses.</p>	<p><input checked="" type="checkbox"/> LESS THAN 1 SPACE/UNIT</p> <p>RESIDENTIAL PARKING SPACES: 113 HOMES: 155</p>
 <p>TRAFFIC REDUCTION STRATEGIES</p> <p>AT LEAST 2 OF 3 TRAFFIC REDUCTION STRATEGIES</p> <p>The project must have at least two of these three traffic reduction strategies:</p> <ul style="list-style-type: none"> • UNBUNDLE PARKING • DISCOUNT TRANSIT PASSES • FREE CARSHARE MEMBERSHIP 	<p><input checked="" type="checkbox"/> UNBUNDLED PARKING & TRANSIT PASSES</p> <p>UNBUNDLED PARKING</p> <ul style="list-style-type: none"> • ALL PARKING SPACES WILL BE SOLD OR LEASED SEPARATELY FROM THE COST OF HOUSING <p>AC TRANSIT EASY PASSES TO BE OFFERED:</p> <ul style="list-style-type: none"> • 1 FREE ANNUAL AC TRANSIT PASS/UNIT OR • 2 ANNUAL AC TRANSIT PASSES/UNIT WITH DEEP DISCOUNTS



PROJECT CONTEXT MAP



**1/2 mile:
10 min
walk**

**1/4 mile:
5 min
walk**

PARKER PLACE

TRIP REDUCTION CREDITS

The following is an inventory of URBEMIS model inputs. The projected driving is affected by the following trip reduction credits.



**18%
REDUCTION**



**5%
REDUCTION
2%
REDUCTION**



**13%
REDUCTION**



**7%
REDUCTION**



**1%
REDUCTION**



DENSITY

111 UNITS/ACRE

SOURCE: CITY CENTRIC

Mix of Uses

**5,238 JOBS IN 1/2 MILE
7,009 HOMES IN 1/2 MILE**

LOCAL RETAIL PRESENT

SOURCE: 2000 CENSUS

TRANSIT SERVICE

**1,417 WEEKDAY BUSES IN 1/4 MILE
262 DAILY RAIL IN 1/2 MILE**

SOURCE: AC TRANSIT & BART

PEDESTRIAN/BICYCLE FRIENDLINESS

461 INTERSECTIONS PER SQ. MILE

**100% STREETS W/ SIDEWALKS ON BOTH SIDES
94% ARTERIALS/COLLECTORS W/ BIKE LANES OR
WHERE SUITABLE, DIRECT PARALLEL ROUTES**

SOURCE: BERKELEY BIKING AND WALKING MAP

AFFORDABLE HOUSING

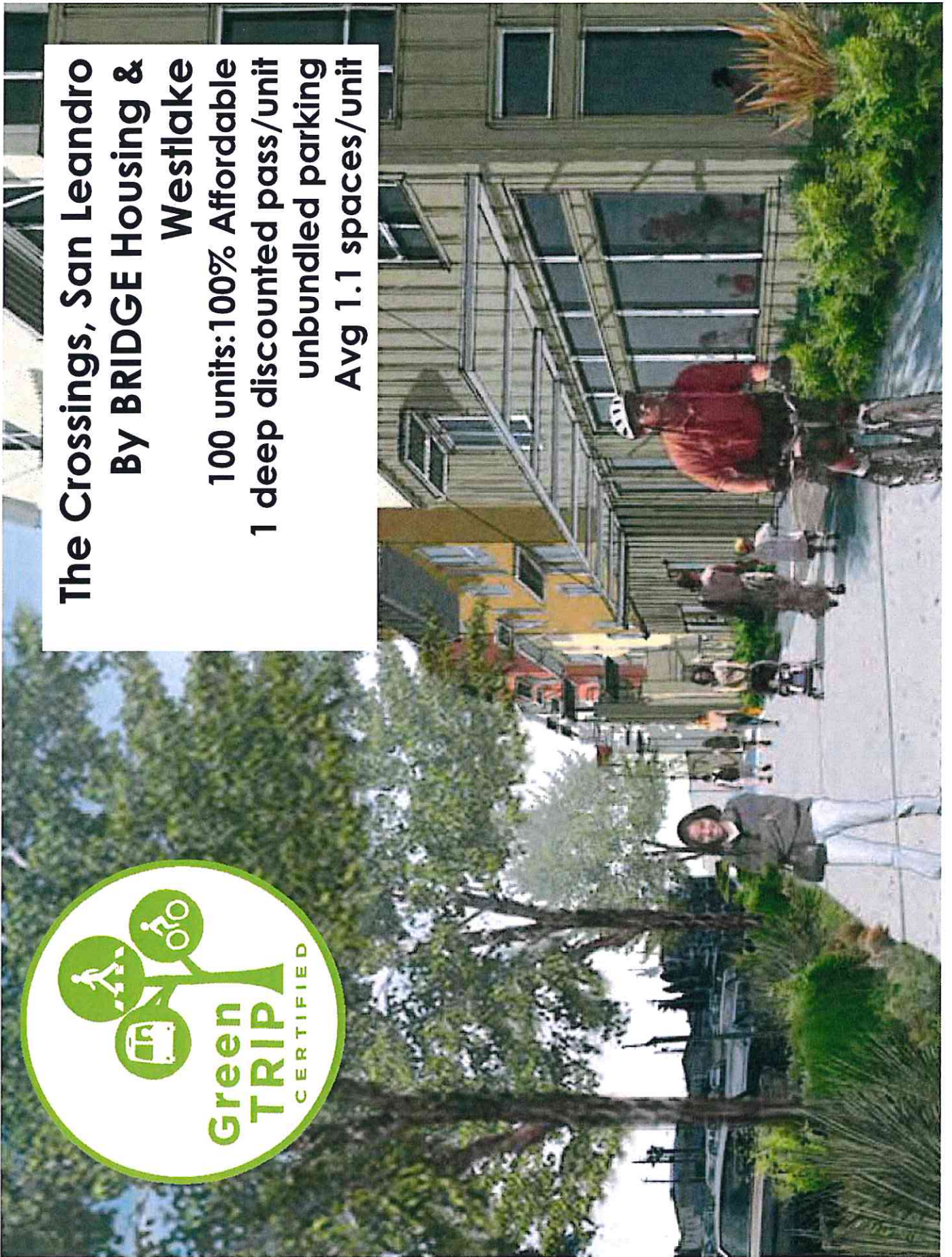
**21% OF UNITS ARE DEED
RESTRICTED BELOW MARKET RATE
HOUSING**

SOURCE: CITY CENTRIC



The Crossings, San Leandro By BRIDGE Housing & Westlake

100 units: 100% Affordable
1 deep discounted pass/unit
unbundled parking
Avg 1.1 spaces/unit



GreenTRIP

TRAFFIC REDUCTION + INNOVATIVE PARKING
CERTIFIED

THE CROSSINGS

SAN LEANDRO, CA

20

VEHICLE MILES TRAVELED
PER HOUSEHOLD
PER DAY



60%

LESS DRIVING THAN
THE AVERAGE BAY AREA
HOUSEHOLD

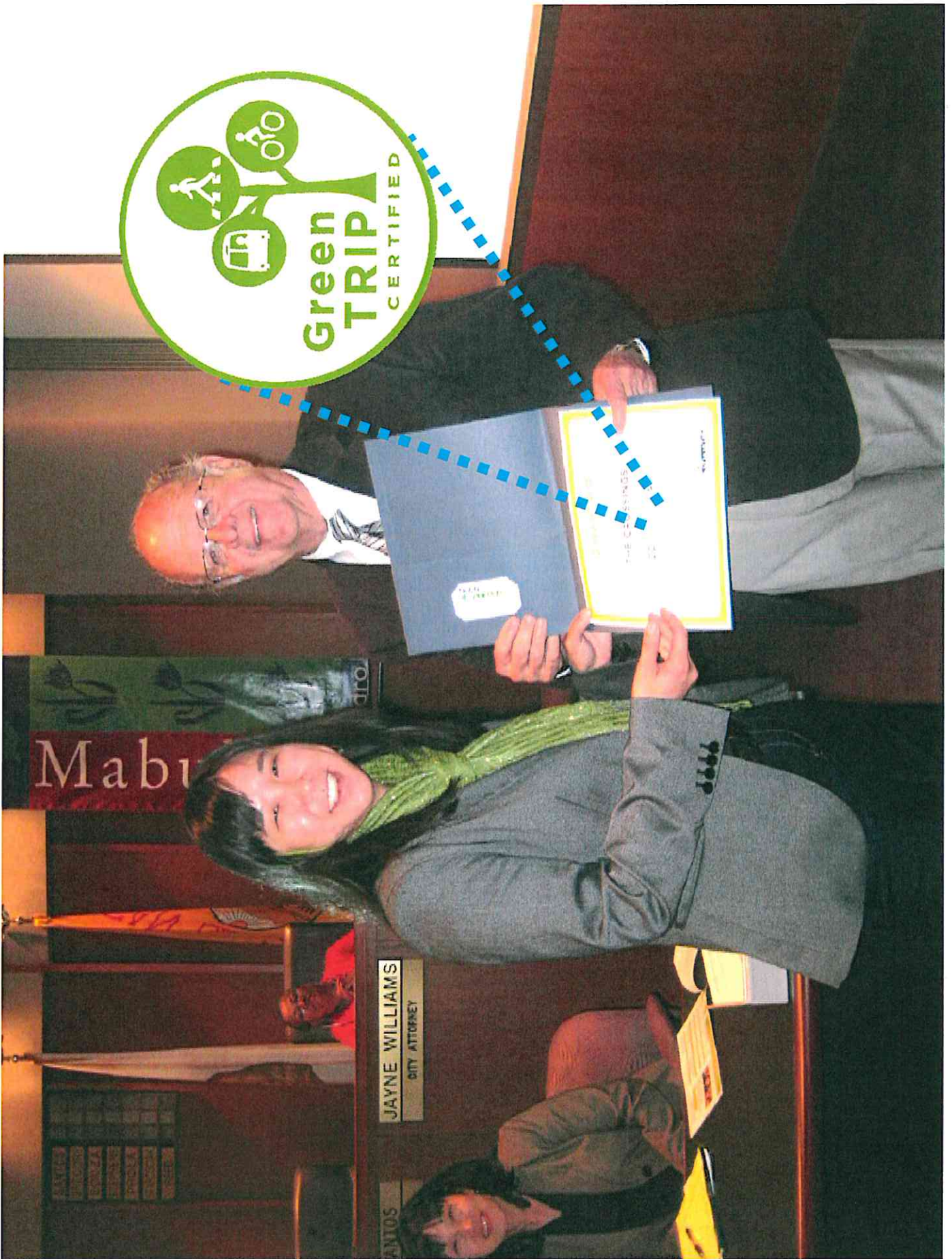
670 Tons less
CO2 than
Avg. Bay
Area HH

APPROVED DESIGN OF THE CROSSINGS HAS SUCCESSFULLY MET GREENTRIP CERTIFICATION STANDARDS. RESIDENTS OF EACH HOME IN THE CROSSINGS ARE PROJECTED TO DRIVE LESS THAN 20 VMT/HH/DAY WHICH IS 60% LESS THAN THE TYPICAL BAY AREA HOUSEHOLD DRIVES. THE CROSSINGS WILL PROVIDE A MAXIMUM OF 1.1 PARKING SPACES PER HOME AND UNBUNDLE ALL PARKING SPACES FOR THE CORNERSTONE PART OF THE CROSSINGS.

[WWW.GREENTRIP.ORG](http://www.GREENTRIP.ORG)

Stuart Cohen
Stuart Cohen, Executive Director
February 26, 2010







**Results – First five certified projects:
40 year commitment**



2,010: FREE Transit Passes



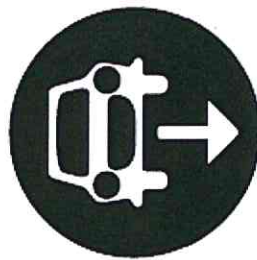
600: FREE Carshare Memberships



355: 100% Unbundled Parking Spaces



Impacts



59,400 Fewer miles daily



2.1 M Fewer Pounds GHG/year



\$9.8 M Annual Direct
Transportation Savings



Major Challenges for Scaling

- 1) Moving upstream
- 2) Proprietary
- 3) DATA gaps
- 4) Few models
- 5) Issues not mainstreamed

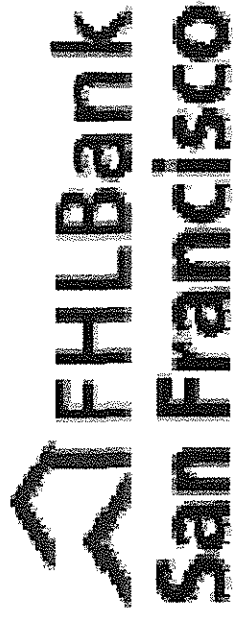
GreenTRIP 2.0: Great Access/Deep Affordability

- 1) Continue GreenTRIP Certification**
- 2) Catalyze research to create needed DATA**
- 3) Web-Based GreenTRIP Database**
- 4) Community Engagement and Education**

GreenTRIP 2.0: Great Access/Deep Affordability

I) Continue GreenTRIP Certification

- **New Greater Focus on Dedicated Affordable Housing**
- **Thanks to:**



GreenTRIP 2.0: Great Access/Deep Affordability

- 1) Continue GreenTRIP “Classic”
- 2) **Catalyze research to create needed DATA**

- Consolidate and analyze existing data
- Conduct site-based research to fill in gaps
- Link with other studies that modify ITE parking and trip generation rates

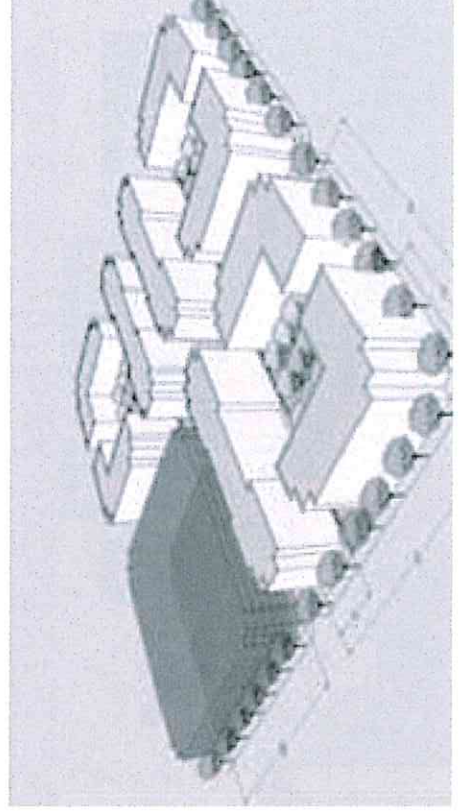


GreenTRIP 2.0: Great Access/Deep Affordability

- 1) Continue GreenTRIP “Classic”
- 2) Catalyze research to created needed DATA

3) Web-Based GreenTRIP Database

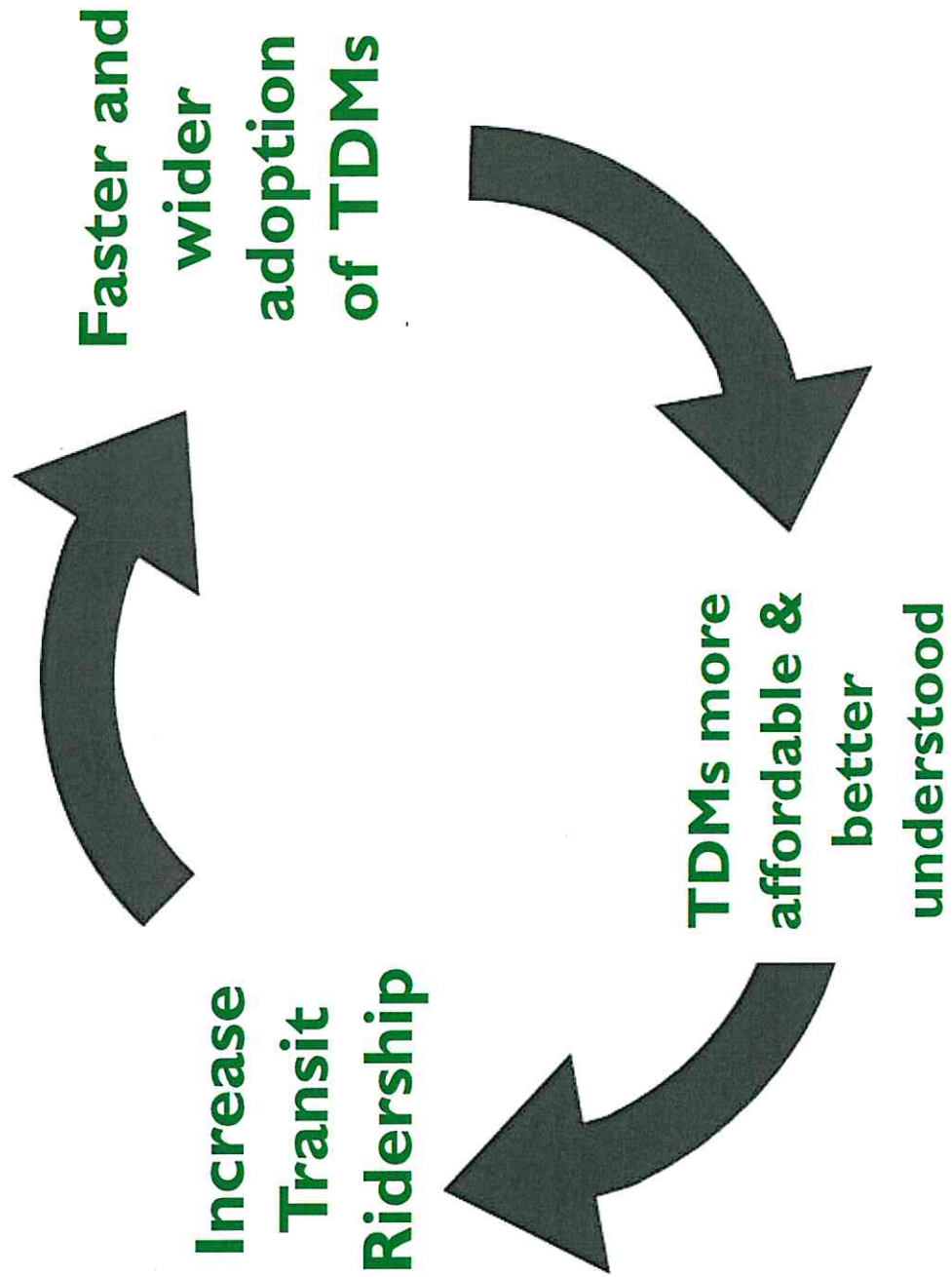
- All can view, toggle, see data sources
- Constantly updated, including new TDMs
- Ultimately, overlay zones to embed in codes



GreenTRIP 2.0: Great Access/Deep Affordability

- 1) Continue GreenTRIP “Classic”
- 2) Catalyze research to created needed DATA
- 3) Web-Based GreenTRIP Database
- 4) **Community Engagement & Education**
 - Changing specific plans and zoning
 - Trainings and workshops
 - Engaging health, affordable housing and others
 - Bring info to regional scale -- SB 375 implementation

Get Positive Feedback Loop for Transit and TDMs Rolling!



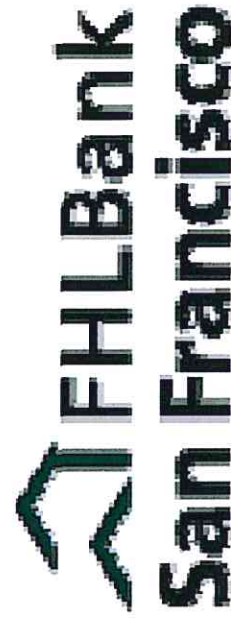
Funded by:



SILICON | community®
 VALLEY | foundation
 SERVING SAN MATEO AND SANTA CLARA COUNTIES



THE ROCKEFELLER FOUNDATION



www.GreenTRIP.org

Ann Cheng
Program Director
Ann@TransFormCA.org
(510) 740-3150 x316



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LinkedIn!

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Groups You've Joined (8) [Reorder »](#)



GreenTRIP Community

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For questions or comments, please contact us at info@switzernetwork.org.

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Follow us on Twitter: <http://www.twitter.com/switzernetwork>

Become a member of our LinkedIn Group: <http://linkd.in/switzernetwork>



The Robert & Patricia Switzer Foundation drives positive environmental change by recognizing and fostering a diverse network of environmental leaders, and mobilizing them through the Switzer Fellowship Network.

ANNOUNCEMENTS & EVENTS

Switzer Fellowship Network
 The Switzer Fellowship Network is a diverse community of environmental leaders, and mobilizing them through the Switzer Fellowship Network. The network is a diverse community of environmental leaders, and mobilizing them through the Switzer Fellowship Network.

FEATURED FELLOW

Dr. Robert Switzer
 Dr. Robert Switzer is a distinguished environmental leader and a member of the Switzer Fellowship Network. He is currently working on a project to reduce carbon emissions in the transportation sector.

More Announcements & Events

Switzer Fellowship Network
 The Switzer Fellowship Network is a diverse community of environmental leaders, and mobilizing them through the Switzer Fellowship Network. The network is a diverse community of environmental leaders, and mobilizing them through the Switzer Fellowship Network.

News

Switzer Fellowship Network
 The Switzer Fellowship Network is a diverse community of environmental leaders, and mobilizing them through the Switzer Fellowship Network. The network is a diverse community of environmental leaders, and mobilizing them through the Switzer Fellowship Network.

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Letter 29. Individual (Jon Spangler)

- 29-1 The comment is noted.
- 29-2 The comment is expressing a preference for a particular alternative evaluated in the draft EIR. The comment is not a comment on the adequacy of the environmental analysis. As described on page 5-1 of the Draft EIR, pursuant to *CEQA Guidelines* §15126.6(a)-(c), the range of alternatives shall include alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project. The EIR must consider a reasonable range of alternatives in order to foster informed decision making and public participation, but need not consider every possible alternative.
- 29-3 The comment is expressing displeasure with the proposed project and expressing a preference for a particular alternative with more housing that was evaluated in the draft EIR. The comment is not a comment on the adequacy of the environmental analysis.
- 29-4 The comment is expressing a policy preference for more housing at Alameda Point than is currently planned in the proposed project. The comment is not a comment on the adequacy of the environmental analysis. An “adequate island-wide and regional transportation infrastructure to replace single occupancy vehicles” is not part of the project description and was therefore not analyzed in the Draft EIR. The recently released Final EIR prepared by MTC and ABAG for Plan Bay Area addresses the region’s plans for regional growth and regional transportation improvements to lessen but not replace the region’s reliance on the single occupancy vehicle.
- 29-5 The comment is expressing a preference for a particular type of housing. The comment is not a comment on the adequacy of the environmental analysis.
- 29-6 Comment noted.
- 29-7 The comment is expressing a preference for a particular alternative with more housing than was evaluated in the draft EIR. The comment is not a comment on the adequacy of the environmental analysis. The Multifamily Alternative and the High Density Alternative, like the proposed project, would be required to implement Mitigation Measure 4.C-2a on page 4.C-37 of the Draft EIR, which requires that a TDM program be developed and monitored specifically to reduce vehicular trips to and from Alameda Point.
- 29-8 The comment is noted. The comment is not a comment on the adequacy of the environmental analysis.
- 29-9 Comment noted.

- 29-10 Comment noted. As described on page 5-6 of the Draft EIR, from a regional environmental perspective, the High Density Alternative would perform better than the proposed project when considering the regional environmental issues of global climate change and regional greenhouse gas emissions. By allowing more development at Alameda Point and within the inner Bay Area, this alternative would perform better when considering project objectives related to climate change and greenhouse gas emissions. From a local perspective, however, the increased traffic from this alternative would cause increased local traffic and associated air quality and noise impacts, but from a regional and global perspective these local impacts would be off-set by a corresponding decrease in regional vehicular miles traveled (from shorter commutes) and the associated reductions in air quality and noise impacts associated with regional traffic. City of Alameda and CEQA thresholds in Appendix G, require an emphasis on environmental impacts in the vicinity of the proposed project.
- 29-11 Comment noted.
- 29-12 As stated on page 4.F-23 of the Draft EIR, in the analysis of Air Quality and Greenhouse Gases, the state's green building standards (adopted by the City as the Alameda Green Building Standards Code) contain standards for planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality, and these standards would apply to development at Alameda Point. The standards are revised every three years, and new provisions will take effect in January 2014. Among these are non-residential provisions applying stormwater pollution prevention best management practices and water efficiency requirements to building additions, not just new buildings; updated bicycle parking requirements for additions and alternations; and new requirements to reduce waste from construction demolition. For residential construction, new and updated provisions include application of green building requirements to building additions and alterations; revised energy efficiency requirements; new water conservation requirements; and a new provision requiring reduced generation of construction and demolition waste. Given recent trends, it can be anticipated that such building code provisions will continue to become more stringent with the passage of time, meaning that construction that begins at Alameda Point several years from now will likely be required to meet even higher standards.
- 29-13 The purpose of the draft EIR is to evaluate the environmental impacts of the proposed project. Whether the proposed project meets community objectives or the "highest and best sustainability practices available worldwide" is a policy evaluation that is appropriate for the public hearings on the proposed project, but it not required to be included in the Draft EIR by CEQA.
- 29-14 Comment noted.
- 29-15 Comment noted.

- 29-16 The role of the Draft EIR is to evaluate the environmental impacts of the proposed project. As described in Chapter 3, *Project Description*, individual decisions by the Planning Board and City Council over the 20 to 30 year build out of Alameda Point will determine many of the specific requirements, technologies, and improvements needed.
- 29-17 Please see response to Comment 29-4. The Draft EIR recommended a series of transportation improvements consistent with City of Alameda General Plan policy. The Final EIR is not required to and cannot “include plans for a robust transit and alternatives-based transportation system and address the funding of adequate alternatives (bus rapid transit, a second transbay BART Tube under Alameda). . . .” The City will continue to work with regional transit providers (WETA, BART, AC Transit) to explore regional improvements to improve transit access to Alameda Point, the City of Alameda and the region as a whole, but it is not the job of the Alameda Point Final EIR to develop these plans nor is it appropriate for the City of Alameda to unilaterally approve any such improvements without the cooperation and support of the regional transit agencies.
- 29-18 Higher density housing typically generates fewer automobile trips *per unit* than single family housing. However, if a project with multifamily housing has more units than a project with single-family housing, the multi-family project may in fact generate more automobile trips than the single-family project. The trip generation estimates provided in the Draft EIR were generated using common transportation forecasting technologies and methodologies typically used by regional transportation experts.
- 29-19 Pursuant to CEQA *Guidelines* §15130(b)(1)(A), a reasonable analysis of the cumulative impacts should include “a list of past, present, and *probable* future projects producing related or cumulative impacts” (emphases added). Non-qualitative analysis, such as the biological analysis included in this EIR analyzes the reasonably foreseeable impacts of the proposed project, which has a buildout period of 20 to 30 years, and cumulative growth in the region based on current projects; hence, the CEQA analysis focuses on projects and plans that are reasonably foreseeable. Attempting to predict the future past this reasonably foreseeable time period would be speculative.
- 29-20 The conveyance of the property from the Navy to the City was a separate action that has already occurred and is not part of the proposed project. The suggestion to renegotiate this transaction is noted.
- 29-21 The Draft EIR used thresholds of significance established by the City of Alameda for the purpose of CEQA. The City agrees that the comment raises a number of interesting policy tradeoffs and considerations for public discussion, but these questions are not required to be answered by the Draft EIR to ensure an adequate environmental analysis. Please see response to Comment 29-19.
- 29-22 Please see response to Comment 29-21. The transportation impacts of the proposed project are described in Section 4.C, *Transportation and Circulation* and the greenhouse gases emissions of the proposed project are described in Section 4.F, *Air Quality and*

Greenhouse Gases, of the Draft EIR. Energy consumption related to transportation modes is not specifically presented, although as presented on page 4.F-51 of the Draft EIR, the net GHG emissions associated with the project would be below BAAQMD's "efficiency threshold" of 4.6 metric tons of CO₂e per service population per year. This would represent a cumulatively less-than-significant GHG impact. Although not assumed for purposes of the above-described analysis, implementation of Mitigation Measures 4.F-2a, 4.F- 4, and 4.F-9b would further reduce GHG emissions associated with construction and operations of the project.

- 29-23 The specific data being requested is not necessary to make the necessary determinations regarding the project's impact on the environment because the determinations of significance are based upon pre-determined thresholds of significance. The analysis of the energy use and greenhouse gas emissions of the proposed project is presented in Section 4.F, *Air Quality and Greenhouse Gases*, of the Draft EIR. Chapter 5, *Alternatives*, of the Draft EIR, presents multiple alternatives to the proposed project. Beginning on page 5-20, the Draft EIR presents the greenhouse gas emissions for each of the alternatives, which is a function of energy consumption. Specifically, the Transit Oriented Alternative found that the net GHG emissions associated with this alternative would be below BAAQMD's "efficiency threshold" of 4.6 metric tons of CO₂e per service population per year. This would represent a cumulatively less-than-significant cumulative GHG impact. Although this alternative would result in greater overall emissions of GHGs than the project, the emissions per increase in service population would be less than the project since the alternative includes substantially more residential population.
- 29-24 See response to Comment 29-23.
- 29-25 See response to Comment 29-23. Chapter 5, *Alternatives*, of the Draft EIR, found that transportation impacts were roughly the same across for all the alternatives, with the Less Density Alternative having fewer transportation impacts on local intersections, as stated on page 5-14 of the Draft EIR. Vehicle miles traveled is not a approved significance threshold in the City of Alameda (see page 4.C-17 of the Draft EIR).
- 29-26 As stated on page 4.B-2 of the Draft EIR, the City of Alameda currently has more employed residents than jobs. It is estimated that the City has approximately 26,970 jobs and 37,799 employed persons, which indicates that many of Alameda's employed residents commute to work outside of the City. The ratio of jobs to employed residents within the City of Alameda is 0.71. The Draft EIR further found that the project's addition of approximately 2,779 residents and 7,900 job opportunities (8,900 jobs proposed minus 1,000 existing jobs) would provide balance to the City's jobs/housing ratio by providing more job opportunities that would not require Alameda's employed residents to commute out of the City to work. As a result, implementation of the proposed project or an alternative with more jobs and less housing would improve the citywide jobs/housing balance. Please see response to Comment 29-19.

- 29-27 As discussed in Chapter 6 of the Draft EIR, page 6-3, the proposed project is consistent with SB 375 and the *Plan Bay Area*. As a designated Priority Development Area (PDA), the proposed project is part of the regional sustainability strategy to encourage infill development, both employment and housing, in the core of the Bay Area, rather than the outskirts. The *Plan Bay Area* is specifically designed to place housing near jobs to reduce vehicle miles travelled regionally.
- 29-28 As discussed in Chapter 6 of the Draft EIR, page 6-3, the proposed project is consistent with SB 375 and the *Plan Bay Area*. Please see response to Comment 29-27.
- 29-29 Please see responses to Comments 29-12, 29-13 and 29-21.
- 29-30 Chapter 5, *Alternatives*, of the Draft EIR, presents an analysis of alternatives to the proposed project, including a comparative environmental assessment, beginning on page 5-11 of the Draft EIR. This comparison of the significant environmental effects of the alternatives to the impacts of the proposed project is summarized in Table 5-7 of the Draft EIR. Please see responses to Comments 29-12, 29-13 and 29-21.

Eugenie Thomson P.E.

October 21, 2013

Mr. Andrew Thomas
Alameda City Hall
2263 Santa Clara Avenue
Alameda, CA 94501

Subject: Comments to the Alameda Point Draft Environmental Impact Report

Dear Mr. Thomas:

I am dismayed that my request in my comments to the Notice to the Preparation (NOP), were largely ignored. My request was that the traffic impact analysis include an evaluation of much longer it will take residents to leave the island and secondly to provide the increase in daily traffic volumes in front of the residents' homes. These two main traffic concerns have been raised by many residents and could have been addressed in the DEIR.

30-1

In addition, I had pointed out that the earlier traffic analysis in the 2009 General Plan Amendment EIR and then the Traffic Election Report for the SunCal Measure B in September of 2009, both had incorrectly ignored the congestion at the west end of Alameda. And the Traffic Election Report had also stated that the SunCal plan with 5000 more homes would only result in minuscule increases in traffic volumes outbound in the AM peak hour at the Posey Tube. These same points were repeated in my letter to the City dated June 24th, 2013 regarding the Scoping for the Neptune Point Project for its cumulative analysis and in my scoping comments for this project NOP.

30-2

Rather than correcting the obvious errors illustrated before with the City traffic model and methodology, instead we receive another – an unintelligible very large techno-speak document - containing numerous critical flaws and omissions. The Draft Environmental Impact Report for the Alameda Point Project states the “unimaginable” traffic conclusion.

30-3

According to the DEIR the Alameda Point Project with 1425 new homes and approximately 9000 more jobs, will **increase** traffic into the Posey Tube by only **ONE car per hour** for the existing plus project condition and increase by **eight cars per hour** for the cumulative plus project condition, for the AM peak hour. That and **NO** traffic congestion in the west end of Alameda, are unrealistic conclusions in the DEIR.

(See the excel summary tables provided at the end of this letter and see Appendix G summary from this DEIR in <https://www.dropbox.com/sh/19tfzo5v68reev2/ESla1H-RA.1>)

30-4

October 21, 2013

The Alameda Point Project will dramatically affect traffic flow and quality of life on Alameda Island and Bay Farm and we deserve to judge this very large project based on clear, concise, accurate traffic information. 30-5

Because of my background and professional credentials, members of the Alameda community again have asked me to review and interpret the report. In doing so, I found it to be a long, complex, techno-speak document that took a significant amount of time to understand, despite my 35 years' training and experience in civil and transportation engineering including the Alameda tubes and immediate areas and having lived in Alameda since 1980. There simply is no way a layperson could fully comprehend the data and projections contained it, or judge their veracity. The lack of a summary and the techno speak document have mislead the public. 30-6

Specifically, the Traffic Impact Analysis in the DEIR concludes the project increase would only be 1 (one) additional vehicle per hour for outbound traffic into the Posey Tube during the AM peak hour if project were built today (see existing plus project as per Appendix G of the DEIR). And a mere 1 (one) vehicle per hour, due to the project at the all estuary crossings, for the cumulative plus project (year 2035) condition and traffic volumes dropping with the project at some of the island crossings. See below.

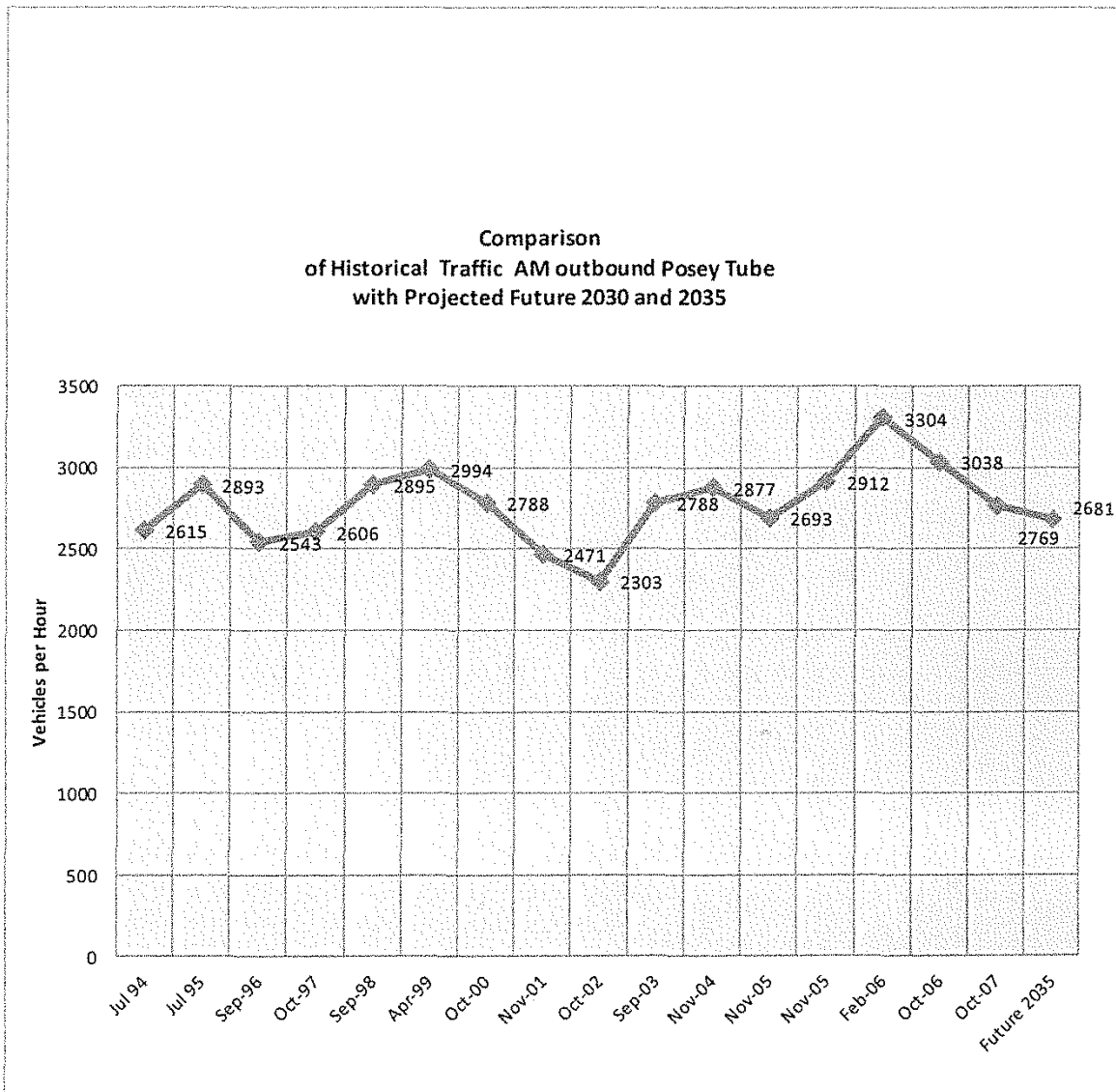
Traffic Volume Summary at Island Gateways for Existing and Cumulative Peak Hour Conditions without and with Project

		Vehicles Per Hour					
		AM Peak Hour (vph)					
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Posey Tube	Outbound	2588	2589	1	2673	2681	8
Park St Bridge	Outbound	1937	2004	67	2150	2147	-3
Miller Sweeney Bridge	Outbound	814	878	64	1573	1561	-12
High St Bridge	Outbound	783	802	19	1212	1210	-2
Bay Farm bridge	Outbound	1738	1725	-13	3158	3168	10
Total of all Island Gateways	Outbound	7860	7998	138	10766	10767	1
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-2B & G-2C	Figures G-4B & G-4C		Figures G-6B & G-6C	Figures G-8B & G-8C	

30-7

October 21, 2013

Another example of a flaw is the outbound traffic into the Posey tube will be 2681 vehicles per hour in the AM Peak hour after the Alameda Point Project in the year 2035 which would be lower than existing recorded traffic counts at the Posey tube since the Base closure. That too is illogical and not explained in the DEIR.



30-8

Source: Historical volumes as per Capacity Management Memo to City Council, by Matt Naclerio, past Public Works Director, October 1st, 2008. Caltrans counts show similar historical counts. The 2035 Forecast was provided in the Appendix G of the Alameda Point DEIR for Cumulative (2035) plus project condition. (see the northbound approach at the 7th and Harrison Intersection, intersection number 38 Figure G- 8C in Appendix G of the DEIR.)

Comment Letter 30

October 21, 2013

It is possible the future forecasts are low because it is based upon existing count data base which could have been diminished due to an unusual number of vacancies the South Shore Shopping Center and other commercial properties as a result of the recession. But the DEIR does not include what existing count data was used, nor is the traffic model technical documentation included in the DEIR. Certainly, a drop in existing traffic in the future, with the Alameda Point Project, is highly unlikely, considering the already entitled and approved development plus project is included in this future 2035 forecast for the Posey Tube.

30-9

Approving or disapproving this Project is a decision that is critically important to the future of our city. If approved, this project will have a direct personal effect on every citizen, impacting the traffic they must navigate daily, that wind through our neighborhoods.

30-10

And I cannot stress it enough we Alamedans want to know how much more time it will take to leave or enter the island, and how many more cars will be passing by in front of our homes. Those questions have not been addressed; instead, we have been provided a techno-speak document that is overwhelming, complex and misleading, and our attempts to simplify and clarify the document are being quashed. It is difficult to understand why this is happening, in light of the fact that most of the work had already been performed and the data is so readily available.

30-11

It could have been presented very simply in the form of (a) a table showing increases in commute travel times, from today to after the Alameda Point plan, from different residential locations to the freeway; and (b) a figure showing the current daily traffic volumes and the increases generated by the Alameda Point plan. That is what the voters have asked for in every public workshop.

30-12

Traffic does not impact our roadways; it impacts our quality of life. It is well known that high traffic volumes on neighborhood streets break down the social fabric of a neighborhood, and our island is comprised primarily of neighborhood streets. The traffic impacts generated by the plan will increase the time it takes to leave and return to the island, leaving less time to spend with our families. These issues are vitally important to Alamedans. We deserve to know the answers to our questions. Why are the questions not being answered for the citizens of our community? Shouldn't traffic neighborhoods impacts be addressed? And corridor delay (like the travel time delay leaving the island) is an acceptable practise for traffic impact assessment and is appropriate because Alameda is an island.

30-13

I sincerely hope that, on reflection, you will consider a summary memorandum and correction of the key traffic facts. The attached comments present the key ommisions and further explain why I believe this Traffic Impact Section of the DEIR is misleading and needs correction. At a minimum the DEIR should be recirculated as the changes will results in major modifications to the impact analyses.

30-14

Comment Letter 30

October 21, 2013

Sincerely,



Eugenie P. Thomson, P.E.
Professional Civil and Traffic Engineer

ept/ept

cc: Mayor Gilmore and Councilmembers

October 21, 2013

Detailed Comments

The DEIR does NOT address the concerns of the majority of Alameda voters.

The DEIR's scope of the impact assessment omitted the impacts of the plan on Bay Farm Island residents leaving the island. For example, how much extra time would it take to leave the island in the morning? The two basic traffic questions asked by the public repeatedly at public hearings have not been addressed.

The DEIR does not include the impacts to the island neighborhoods.

If the Project is built:

- a) How much more travel time will be involved when leaving or entering Alameda Island?
- b) How many more cars will travel through our neighborhoods? (a criteria used to evaluate neighborhood impacts)

30-15

Suggestion:

a) Develop a table showing the travel times during the commute periods, today and in the future, with the Sun Cal plan and other background already entitled by City Council or approved. These data should encompass travel times to and from several residential areas, such as the West End, middle of the island, East End and Bay Farm. (This should be fairly easy to accomplish by updating and expanding the effort done for the Traffic Election Report prepared for the Sun Cal measure.)

b) Put together a map showing daily volumes on major streets for today and for the future. ¹

c) Include the above results in a two- or three-page summary memorandum.

Sources of Major Assumptions and other technical procedures were not provided.

The tables and assumptions in the report provided could not be checked or tracked. For example, no documentation was provided to substantiate the vehicle trip rate and to be able to compare this to the Trip Generation Manual published by the Institute of Transportation Engineers (ITE). It appears lower trip rates than the Average ITE trip rates were employed in the analysis and which were further reduced for the project forecast volumes included in the cumulative analysis.

30-16

What is the source of this major assumption? The technical backup was not provided and should be explained. Clearly, these assumptions should be validated based on facts, yet the DEIR lacks accountability. One should be able to track how the final traffic forecasts were developed from the existing counts.

The documentation should be provided to make adequate and complete comments to the DEIR.

¹ This data exists, the model plots from Kittelson Associates (previously Dowling Associates who did the City Traffic Model and recent reports) should be available for the No Project alternative and would take less than a day to rerun, only a few input factors need to be updated for the Alameda Point project.

October 21, 2013

The traffic forecasts associated with the project are small considering its size.

The project traffic was summarized for all the island gateways because no summary was provided in the DEIR. Had this been provided the public would have an understanding of the overall island traffic impacts. The four tables at the end of this section, are the AM and PM peak hour traffic forecasts used for the basis of the traffic impacts and conclude the following:

- In the AM peak hour, the Project adds only one car per hour to the Posey Tube in existing plus project condition and only 8 vph in the cumulative plus project condition. This minuscule project volume increases were not reflected to be diverted to the other crossings.
- The Incoming project traffic drops dramatically to a small amount of 144 vph in the cumulative condition into the Webster Tube and that results in grossly under estimating the inbound traffic impacts with the project.
- In the PM peak hour for the cumulative plus project conditions, the project volumes are 102 vph for the Posey Tube and 104 vph for the Webster Tube. These small project volumes in the PM peak hour analysis grossly reduces the actual traffic impacts at the west end of Alameda and Oakland.

30-17

No explanation of the above results nor a summary was not provided in the DEIR and this should be fully explained.

Table 2-2 the traffic impact summary table indicates NO traffic congestion at the west end of Alameda

The lack of congestion at the approaches to the Posey Tube is inconsistent with the diversion to the other crossings. Diversion will only occur if there is a significant travel time advantage. It is difficult to believe the DEIR's finding of no congestion today and none whatsoever in the future upon the roadways approaching the Posey tube.

As pointed out in my letter to the City June 24, 2013, I explained that the City Traffic Model in the Traffic Election Report for the SunCAI plan had indicated major gridlock in the west end but it was hidden in the report. The Alameda Point project DEIR once again omits what the Traffic Model has concluded. See my discussion below from my June 24th, 2013 letter to the City.

30-18

*"In January of 2013, in rereading the September 14, 2009 Traffic Election report for the SunCal Measure, I focused on its discussion of travel time. I discovered this report quietly documented that major delays in the morning peak, would be expected using the Posey Tube in the future with the Land Use assumed in the 09GPA EIR. (Note: this report used the 09GPA EIR as the base condition upon which the SunCAI plan was evaluated). And this very significant characteristic of future traffic patterns that was **never** even touched on in the 2009 GPA EIR. (This EIR only discussed delays at individual intersections, all but one of which (8th and Central) are on the east end of the island would experience significant congestion after all the growth is built at the west.) Specifically, Table 20 (Travel Times – AM Peak Hour of the Traffic Election Report, see Exhibit G for copy) indicated the travel time from Alameda Point to I-880 would increase from 6.5 minutes (existing year) to 16.0 minutes in 2035 with the existing GPA (i.e., the housing and jobs assumptions in the 2009 GPA EIR).²*

² Existing General Plan 2035, Table 20, Travel Model Performance Travel Times AM Peak Hour, page 25. Copy of report included in Exhibit G in my June 24th letter to the City.

October 21, 2013

This 9.5 minute-per-vehicle delay translates into increased queue lengths from 7th and Harrison back through the tube, and significantly lengthened queues on each of the roadways approaching the mouth of the tube (Webster, Constitution, Stargell and Mariner Square Drive). This situation can only be described as **gridlock, and it would affect many more trips than just the ones going into the Posey Tube.**

Furthermore, the 2009 GPA EIR concluded no impacts for the roads approaching the Alameda Tubes, even though primarily all future development would occur on the West End. I believe this surprisingly unrealistic conclusion was reached because:

- In the 2030 model runs, the analyst and city staff used a capacity for the Posey Tube of 2,900 vph (vehicles per hour)³, which is significantly lower than the capacity for a two-lane expressway.
- The analyst and city staff only used the 2030 model runs to identify differences in volumes, compared to calibrating runs of the model for existing conditions.
- The analyst and city staff ignored the information in the 2030 model run that indicated significant future delays to traffic using the Posey Tube in the AM
- Because they had trouble calibrating the model for Alameda local streets, the analyst and city staff decided to simply add the difference in model volumes (2007 and 2030 model volume difference) to the existing counts. Because the 2030 model calculations assumed significant congestion at the tubes, significant amounts of incremental traffic were routed away from the tubes to the bridges. (As a result, only small incremental volumes were added to already relatively low existing volumes at the tubes, yielding unrealistically low 2030 volumes to be used for analysis.)
- The analyst and city staff performed only intersection impact analysis. There was no documentation in the 2009 GPA EIR of how the tubes themselves were expected to operate, even though a major underlying hidden assumption was that there would be significant delays at the tubes.

This likely west-end traffic gridlock has never been clearly characterized as a problem in any city document of which I am aware.

To the contrary, the 2009 GPA EIR incorrectly comes to the opposite conclusion of no congestion on the roads outbound approaching the Posey Tube in the AM Peak.

And this happens once again with the Alameda Point DEIR.

At a minimum the City should review the traffic model used in the DEIR and fully explain why the delay at the west end concluded in the Traffic Model has been eliminated in this DEIR and other previous reports.

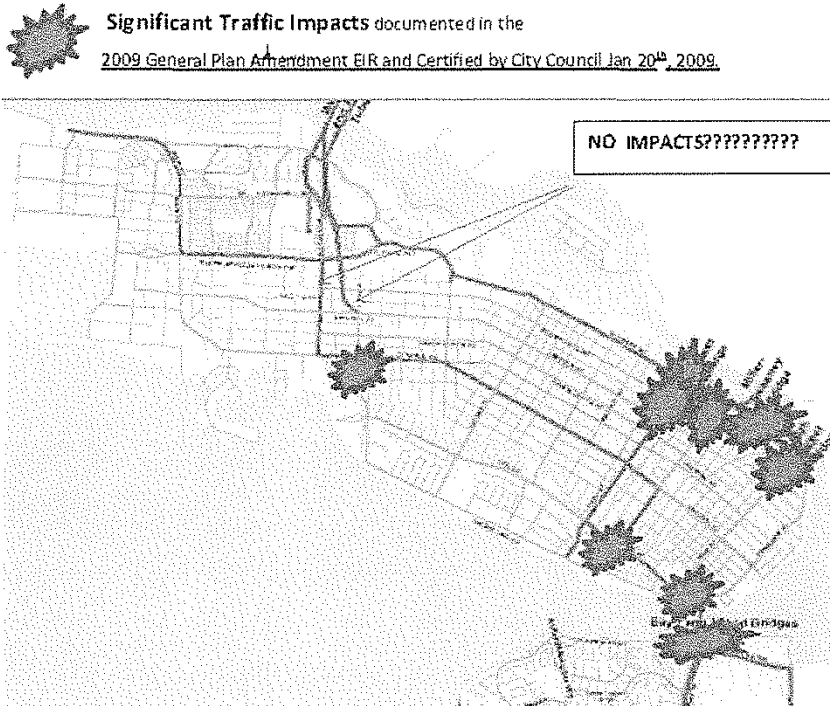
The following graphic included in my June 24th, 2013 letter, illustrate the no impacts from the 09 GPA DEIR

³ Technical Studies for the EIR, 2007 citywide Traffic Model by Dowling Associates; Figure 22 Year 2030 City Network (See Exhibit C-6) which shows the codes defined in Figure 6, which includes a table: Model Roadway Network Facility Type Capacities and Speeds.

30-18
cont.

October 21, 2013

repeated again this DEIR for Alameda Point, i.e. no impacts at the west end of Alameda.



30-18
cont.

The above highlighted Intersections were identified with major congestion with levels of service E or F for the Year 2030 during either the AM or PM peak hours in the 09GPA EIR: 8th/Central, Otis/Broadway, Otis/Fernside, Otis/Island, Fernside/High, Fernside/Tilden Way, Tilden Way/Broadway, Clement/Park and Blanding/Park. Source: Table 4.2-3 09GPA DEIR.

The city adopted a Statement of Economic Overriding Considerations on Jan 20th, 2009 because there were no improvements to mitigate these major impacts at the east end of the island. What was not considered was how much additional time for example it would take to leave the island and Bay Farm.

The lack of congestion analysis ignored data that the traffic analysts had in their files regarding expected major increases in delay expected at the approaches to the tubes (as evidenced by the subsequent Traffic Election Report). This west end delay should be the predominant traffic impact in the future, as to be expected before more significant problems develop in the east end.

Comment Letter 30

October 21, 2013

The existing delays at the intersections stated in the DEIR are significantly lower than what Alamedans have stated to occur.

It is difficult to believe there is only a 30 second delay at Doolittle and Island Drive when leaving Bay Farm Island. The Bay Farm residents have stated many times their congestion is very bad and any more development will be too much.

Similarly the delays at other intersection like at the 6th and Jackson for the southbound right turn movement today in the morning are shown to be only 1.3 seconds (LOS A) in Appendix G (Synchro output for existing no project AM peak)

Is it possible that the intersection operations analyses results were not validated via field surveys ?

The intersection impact analysis omits the operations effects due to roadway downstream constraints. As a result the operations do not accurately reflect the delay.

For example, the freeway weave and ramp merge at the 6th Street northbound on ramp to I 880 & I 980, today causes backup all the way to the 7th and Harrison intersection, but the intersection analysis states the southbound right turn movement has only 1.3 seconds of delay (Level of Service A) for the future plus project conditions. (Appendix G, Sychro Analysis, 2035 AM with Project,). This is illogical considering the problems at the I880 ramp and weave, today. This constraint currently overwhelms the current roadway system and will only become rapidly more significant with any growth in traffic.

Similarly other intersections like Blanding and Park Streets are affected by downstream roadway constraints which result in back up through the intersection.

All intersections should be re-evaluated if downstream constraints affect the intersections' operations. (i.e. without consideration of downstream constraints, the existing intersection analysis is not an engineering analysis, it is only a data processing analysis).

The Broadway Jackson Interchange or other major mitigation was not included in the DEIR.

The Broadway Jackson Interchange or other freeway type of mitigation was not included likely due to the lack of funding at this time. And this interchange project or other form of Chinatown mitigation introduces major changes in travel patterns in Chinatown and to/ from the Alameda Point Project in and around Chinatown. It is reasonably foreseeable that the new County Transportation Sales Tax Measure will pass in the next year because this Measure in the last election failed with such a small percentage. And reasonable foreseeable events should be considered in an EIR, therefore an assessment of the traffic impacts with and without Broadway Jackson Interchange or other mitigations acceptable to Chinatown should be done.

Seismic Analysis is suggested

Seismic Analysis for the Posey and Webster Tube was not included in the DEIR. According to Caltrans letters dated from Caltrans to the City of Alameda in 2002, the tubes have a seismic rating of minimum performance level. A professional engineering report " Retrofit Strategy Report" for the Alameda Tubes dated September 30, 1996

October 21, 2013

prepared by Parsons Brinckerhoff Quade and Douglas Inc. and approved and adopted by Caltrans states that minimum performance levels after an earthquake in Table 10-2 would result in:

"Delays to motorists due to tube closure requiring long term (more than a year) diversion of traffic to the bridge crossings between Oakland and Alameda"

As major seismic events are no different (even less controversial) than the Rising Sea Levels, the earthquake event is reasonably foreseeable and should be evaluated in this DEIR. With almost 70,000 vehicles per day using the tubes, traffic impacts and mitigations need to be assessed for the without and with project conditions.

30-22
cont.

Furthermore this Seismic Strategy Report mentioned the steel re -enforcement was corroded and the field test indicated this condition to be a problem. The report is unclear if this was planned to be fixed.

Per the report the primary damage to the tubes (retrofitted to minimum performance levels) is expected to be cracks and significant leakage; the tubes may be flooded within a day but that no loss of life would be expected. The report also indicates that repairs may not be possible, thus requiring replacement of the tube(s).

At a minimum wouldn't it be appropriate to construct protective traffic devices similar to railroad crossings so vehicles do not continue to enter the tubes immediately after an earthquake? This measure and other measures should be considered for safety of the public and be evaluated for both without and with project conditions.

Induced Growth Analysis was not included.

The seismic and inaccessibility uncertainties are likely to be major impediments for any major employers at Alameda Point but not for individual home buyers. Therefore the DEIR should also evaluate the scenario where only a small fraction of the projected employment growth occurs. The project would then become overwhelmingly residential and result in future changes for a project with more houses. This growth inducement concern should be addressed in the DEIR.

30-23

The report preparers are listed as licensed Professional Engineers while they do not have licenses.

Mr. Jack Hutchinson of ESA is not licensed as a Professional Engineer in California stated in Chapter 7. Neither is Robert Haun, Acting Public Works Director a licensed Professional Engineer. Please make these corrections.

30-24

October 21, 2013

Traffic Volume Summary at Island Gateways for Existing and Cumulative Peak Hour Conditions without and with Project

Vehicles Per Hour

AM Peak Hour (vph)

Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Posey Tube	Outbound	2588	2589	1	2673	2681	8
Park St Bridge	Outbound	1937	2004	67	2150	2147	-3
Miller Sweeney Bridge	Outbound	814	878	64	1573	1561	-12
High St Bridge	Outbound	783	802	19	1212	1210	-2
Bay Farm bridge	Outbound	1738	1725	-13	3158	3168	10
Total of all Island Gateways	Outbound	7860	7998	138	10766	10767	1
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-2B & G-2C	Figures G-4B& G-4C		Figures G-6B& G-6C	Figures G-8B& G-8C	

AM Peak Hour

Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Webster Tube	Inbound	1905	2561	656	2929	3073	144
Park St Bridge	Inbound	864	1058	194	1896	2177	281
Miller Sweeney Bridge	Inbound	777	1075	298	1395	1479	84
High St Bridge	Inbound	656	759	103	942	1074	132
Bay Farm bridge	Inbound	2292	2442	150	2436	2637	201
Total of all Island Gateways	Inbound	6494	7895	1401	9598	10440	842
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-2B & G-2C	Figures G-4B& G-4C		Figures G-6B& G-6C	Figures G-8B& G-8C	

October 21, 2013

Traffic Volume Summary at Island Gateways for Existing and Cumulative Peak Hour Conditions without and with Project

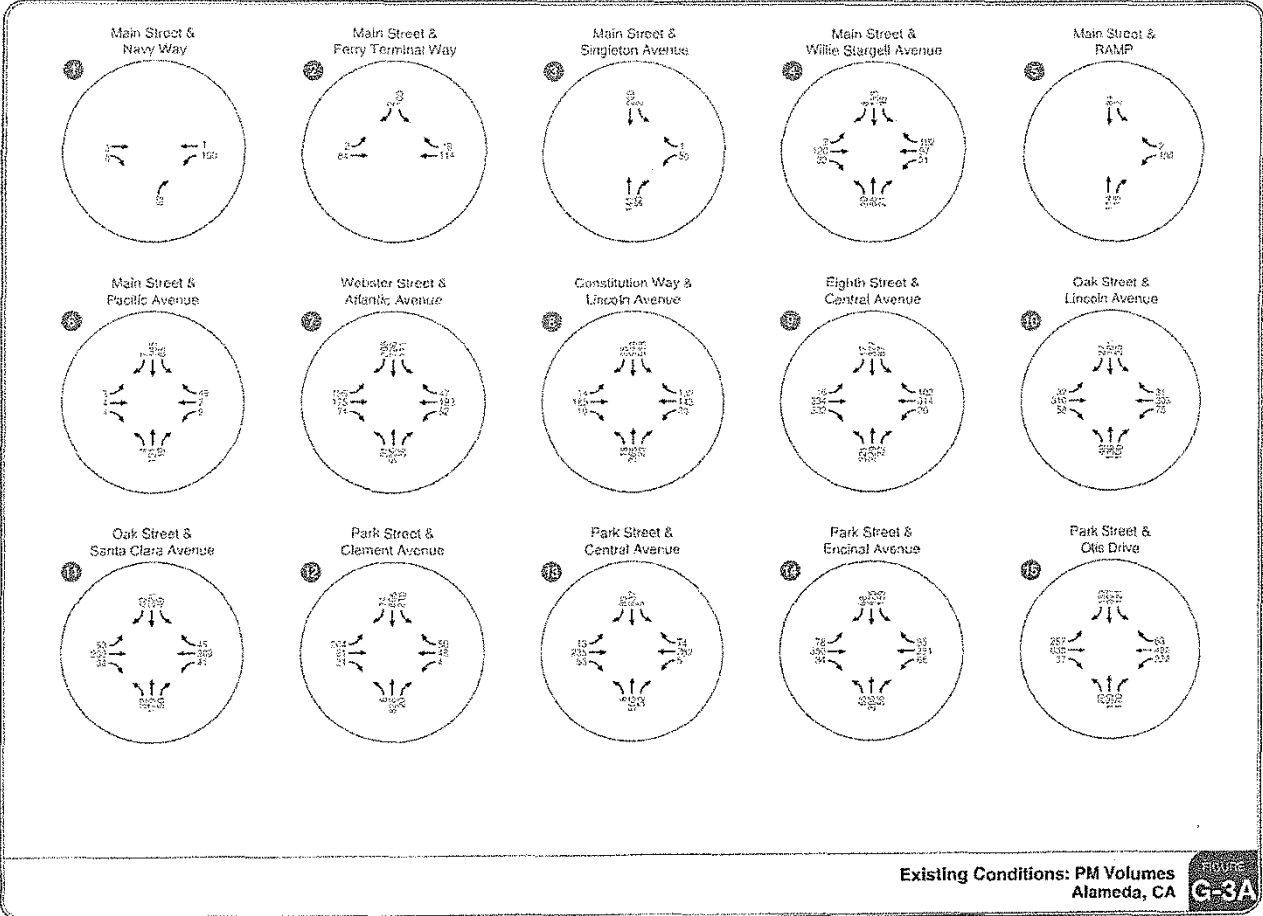
PM Peak Hour							
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Posey Tube	Outbound	2125	2737	612	3331	3433	102
Park St Bridge	Outbound	1437	1487	50	2228	2307	79
Miller Sweeney Bridge	Outbound	641	930	289	1375	1487	112
High St Bridge	Outbound	550	686	136	919	1030	111
Bay Farm bridge	Outbound	1987	2128	141	1899	1976	77
Total of all Island Gateways	Outbound	6740	7968	1228	9752	10233	481
Environmental Impact Report, Appendix G		Figures G-3B & G-3C	Figures G-5B & G-5C		Figures G-7B & G-7C	Figures G-9B & G-9C	

PM Peak Hour							
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
Webster Tube	Inbound	3392	3488	96	3882	3986	104
Park St Bridge	Inbound	1451	1566	115	2027	2167	140
Miller Sweeney Bridge	Inbound	1103	1228	125	1559	1639	80
High St Bridge	Inbound	715	847	132	883	1103	220
Bay Farm bridge	Inbound	1783	1887	104	2849	2819	-30
Total of all Island Gateways	Inbound	8444	9016	572	11200	11714	514
Source: Alameda Point Draft Environmental Impact Report, Appendix G		Figures G-3B & G-3C	Figures G-5B & G-5C		Figures G-7B & G-7C	Figures G-9B & G-9C	

Exist. PM Peak Hr. Traffic Summary /ra Al. Pt. DEIR App. G
 by G. Thomas KE.
 10/12/2013

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August 2013



Existing Conditions: PM Volumes
 Alameda, CA

WIRE
G-3A

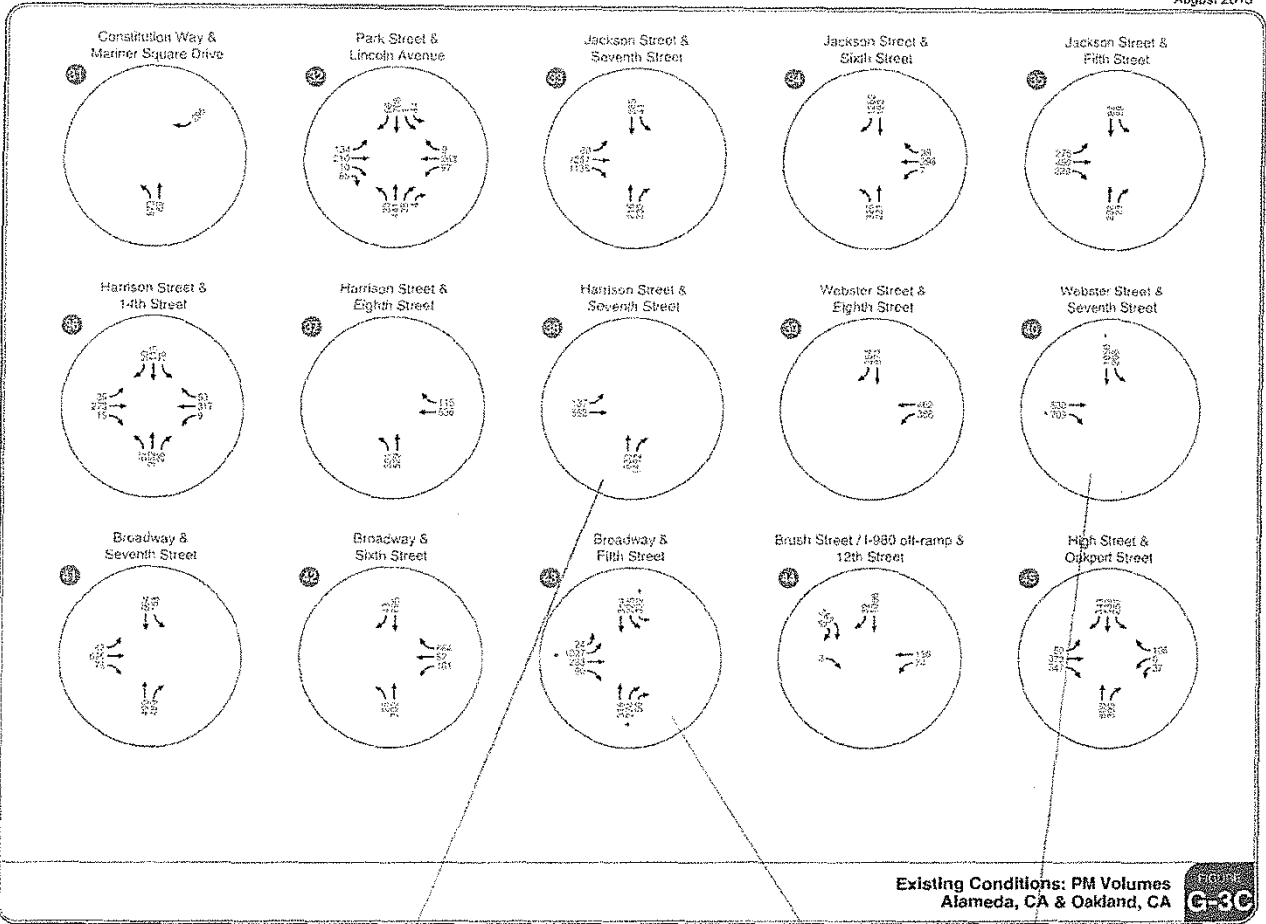
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EXISTING PM PEAK HOUR

<u>ISLAND GATEWAYS</u>	<u>INBOUND</u>	<u>OUTBOUND</u>	<u>SOURCE (Figure #)</u>
Posey Tube		2125 vph	G-3C
Webster Tube	3392 vph		G-3C
Park St. Bridge	1451 vph	1437 vph	G-3B
Fruitvale Av Bridge	1103 vph	641 vph	G-3B
High St. Bridge	715 vph	550 vph	G-3B
Bay Farm Island Bridge	1783 vph	1987 vph	G-3B
TOTAL =	8444 vph	6740 vph	

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August 2013



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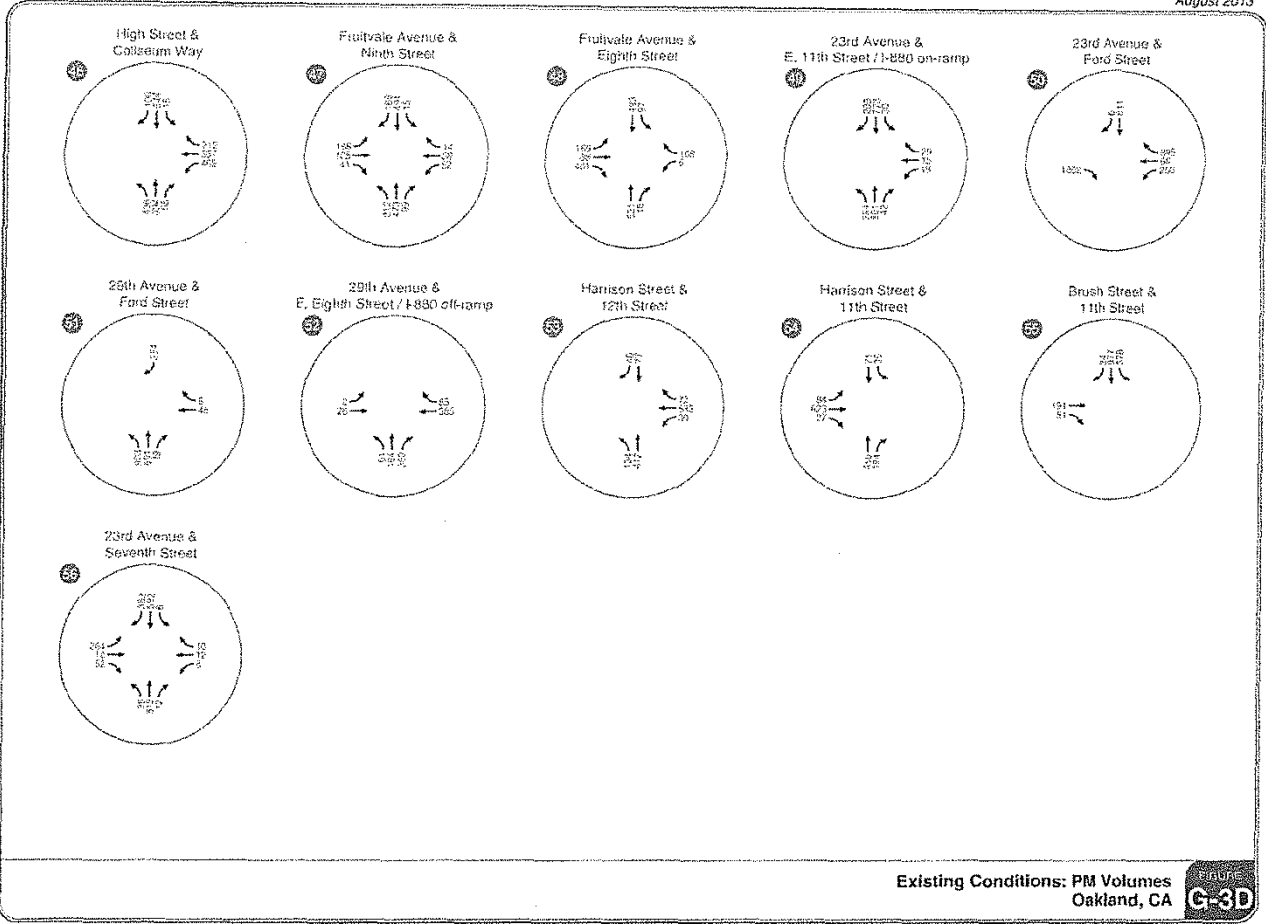
Posey Tube Outbound = $633 + 1492 = 2125$ vph

Webster Tube Inbound =
 $1027 + 274 + 332 + 709 + 1050$
 $= 3392$ vph

Summary by E. Thomson 10/10/13

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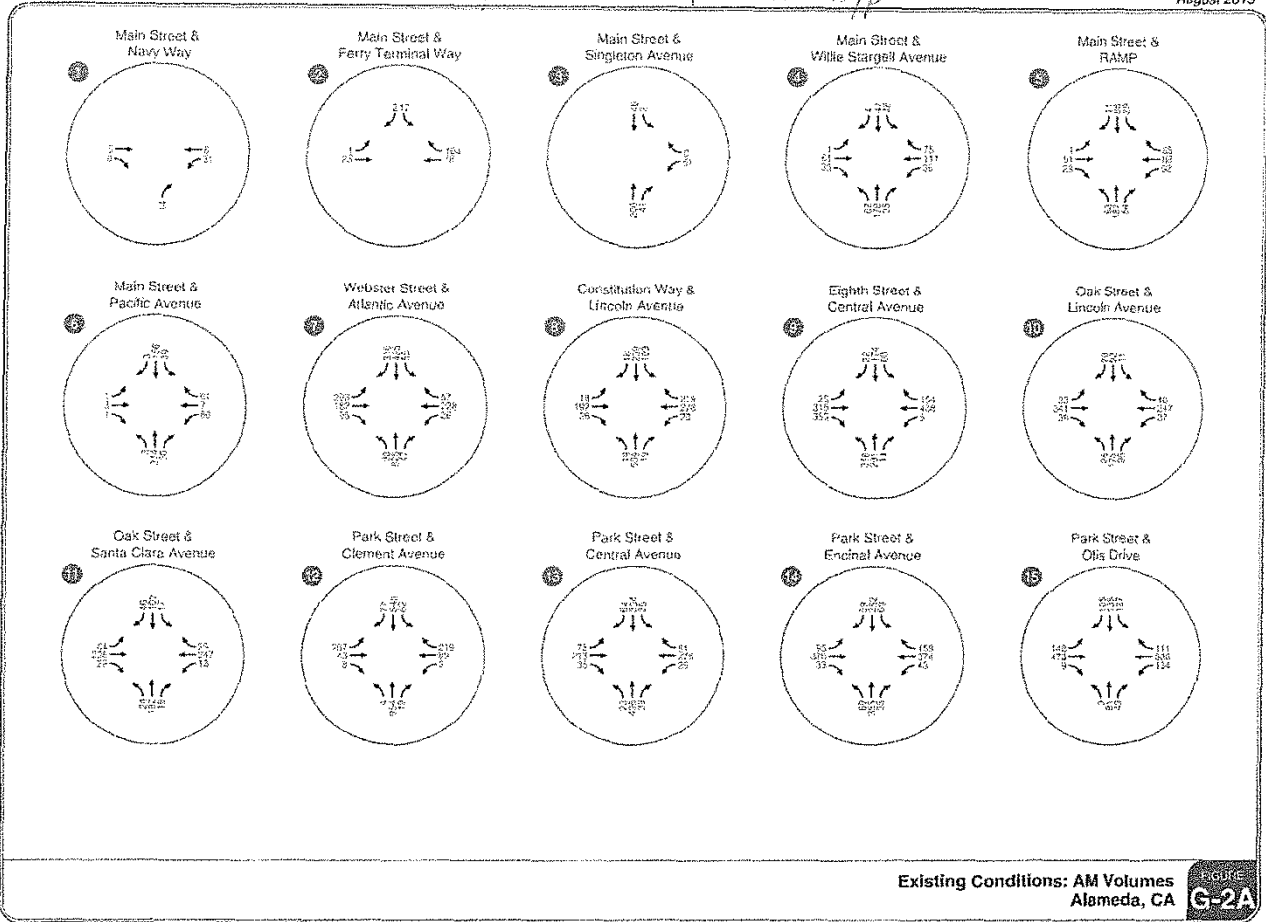
G-3D

Existing AM Peak Hr Traffic Summary of Ala Pt. DEIR
 (Appendix G)
 by E. Thomson P.E. 10/12/13

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see G4 Website - Draft EIR App G.

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Existing Conditions: AM Volumes
 Alameda, CA

Figure G-2A

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EXISTING	AM	PEAK	HOURLY @ ISLAND GATEWAYS	SOURCE
		<u>INBOUND</u>	<u>OUTBOUND</u>	Figure
Island Gateways				see G-2C
Possey Tube			2588 vph	
Webster Tube		1905 vph		
Park St. Bridge		864 vph	1937 vph	see G-2B
Fruitvale Bridge		777 vph	814 vph	see G-2B
High St. Bridge		656 vph	783 vph	see G-2B
Bay Farm Bridge		2292 vph	1738 vph	see G-2B
Total		6494 vph	7860 vph	

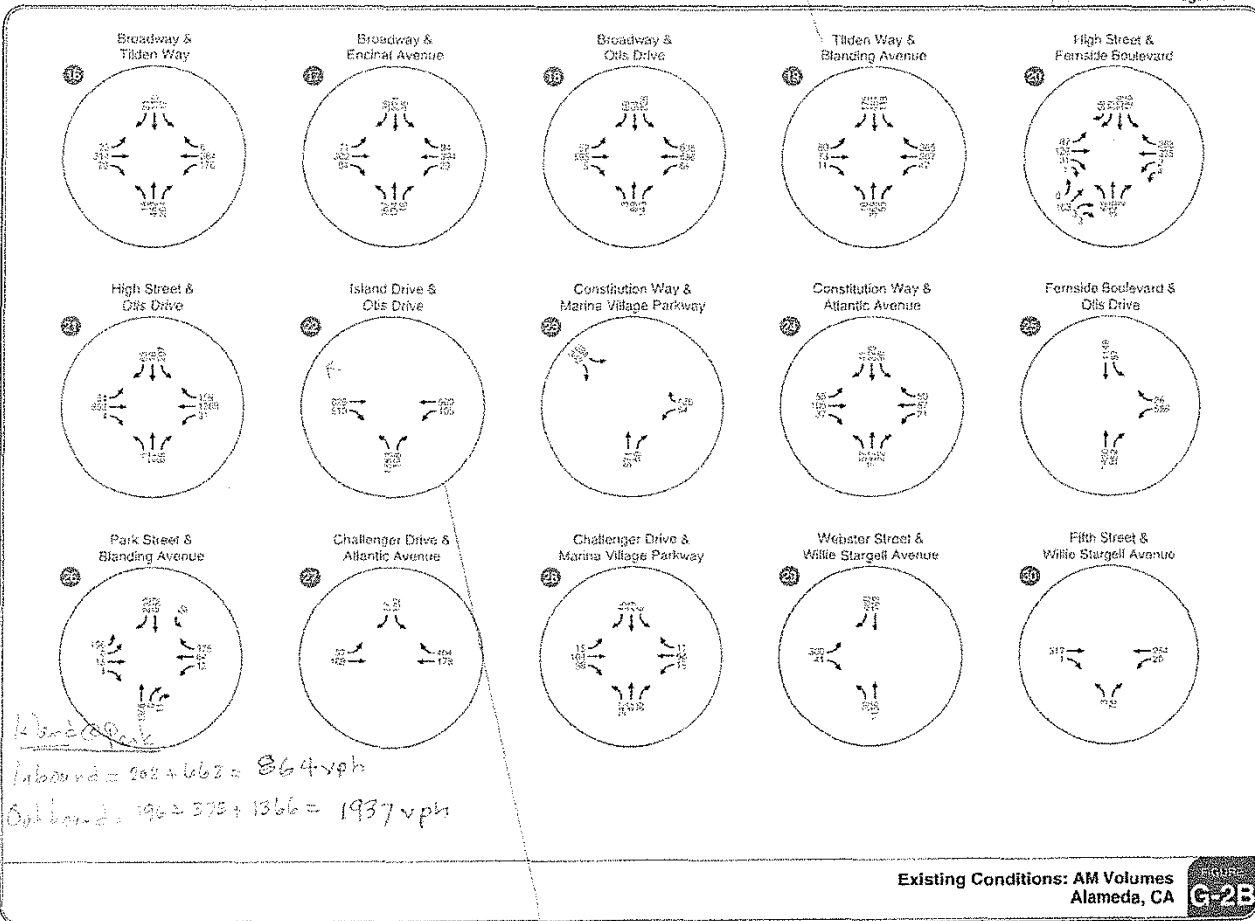
Comment Letter 30

Island @ Fruitvale Bridge
 Inbound = $175 + 484 + 118 = 777$ vph
 Outbound = $80 + 369 + 365 = 814$ vph

Island @ High St. Bridge
 Inbound = $58 + 73 + 377 + 104 = 656$ vph
 Outbound = $87 + 163 + 375 + 269 = 783$ vph

Alameda Point EIR - Administrative Draft

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Island @ Park
 Inbound = $202 + 662 = 864$ vph
 Outbound = $190 + 375 + 1366 = 1937$ vph

Existing Conditions: AM Volumes
 Alameda, CA **C-25**

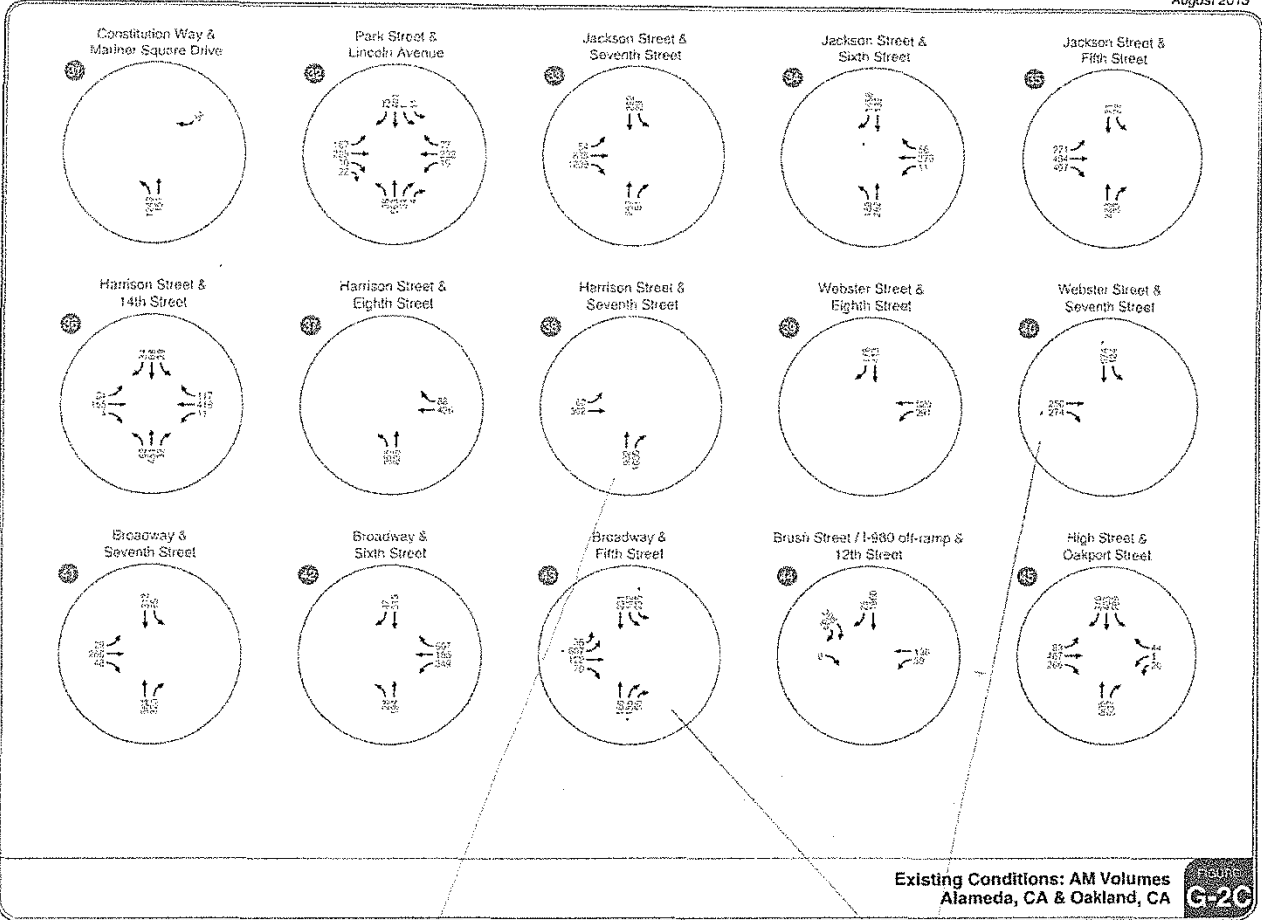
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Island @ SF Bridge
 Inbound = $1303 + 909 = 2292$ vph
 Outbound = $838 + 910 = 1738$ vph

Summary by E. Thomas P.E. 10/12/13

Alameda Point EIR - Administrative Draft

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Brush Tube Outbound = $902 + 1686 = 2588 \text{ vph}$

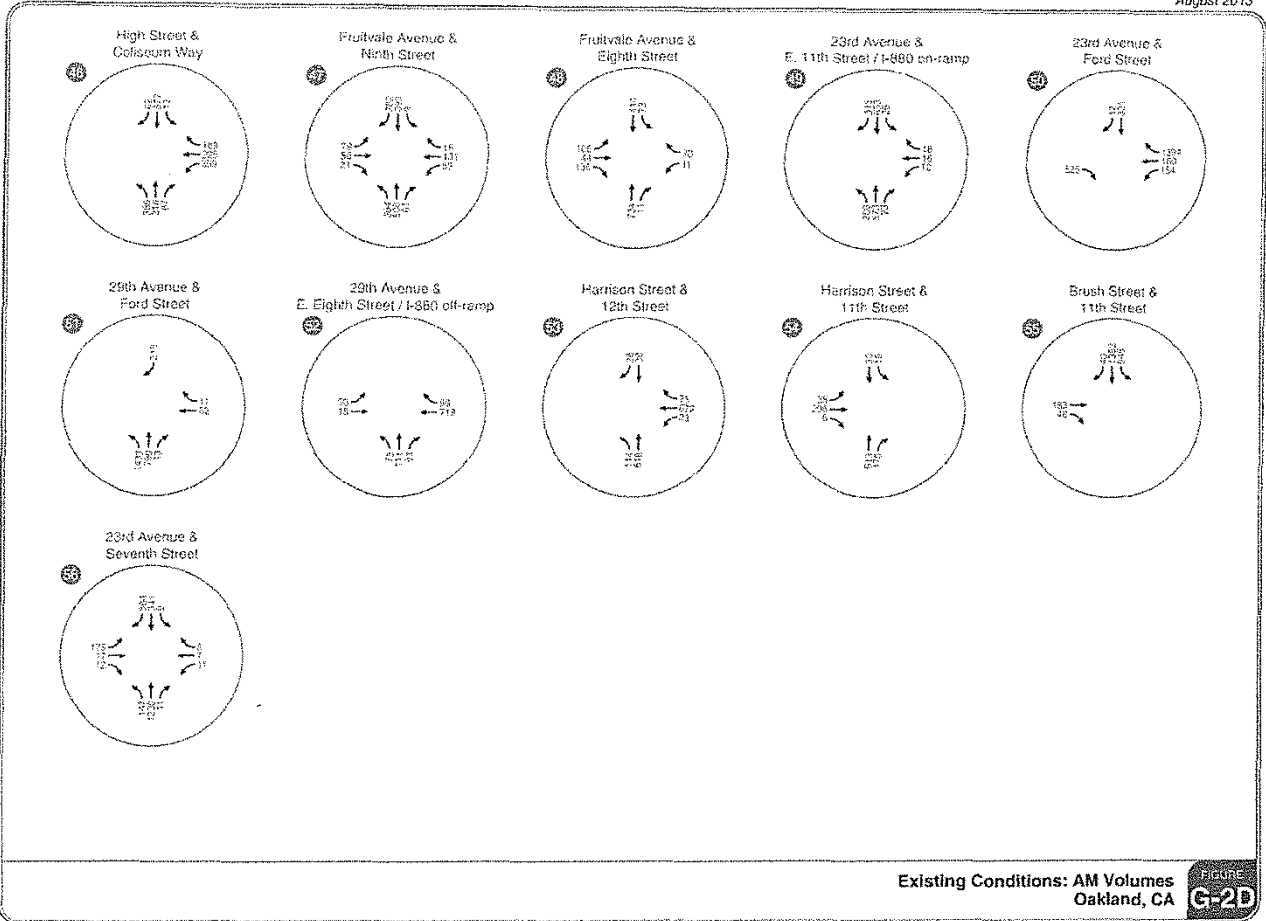
Webster Tube Inbound

$= 607 + 295 + 155 + 574 + 274 =$
 $= 1905 \text{ vph}$

Summary by E. Thomson P.E. 10/12/13

Alameda Point EIR - Administrative Draft

August 2013



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FIGURE
G-2D

EXISTING AM PK HR TRAFFIC
w/ PROJECT

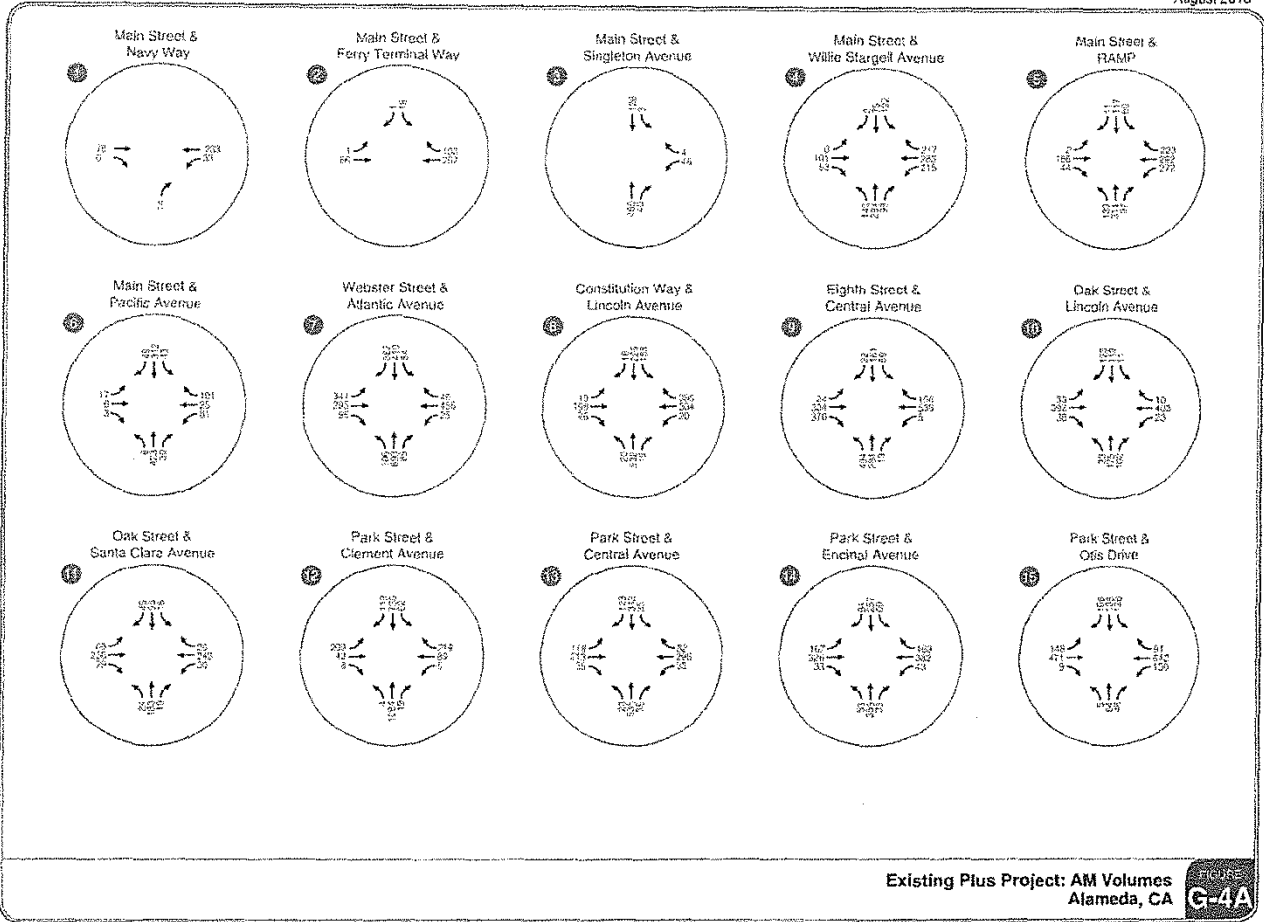
SUMMARY

From DEIR Appendix G

by E. Thomson P.E.
10/12/13

Alameda Point EIR - Administrative Draft

August 2013



Existing Plus Project: AM Volumes
Alameda, CA

G-4A

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EXISTING AM PK HR PLUS PROJECT

@ ISLAND GATEWAYS

Island Gateways	INBOUND	OUTBOUND	SOURCE (FIG. #)
Posey Tube		2589 vph	G-4C
Webster Tube	2561 vph		G-4C
Park St. Bridge	1058 vph	2004 vph	G-4B
Fruitvale Ave Bridge	1075 vph	878 vph	G-4B
Hijl St Bridge	759 vph	802 vph	G-4B
Bay Farm Island Bridge	2442 vph	1725 vph	G-4B
T. I. I.	7895 vph	7998 vph	

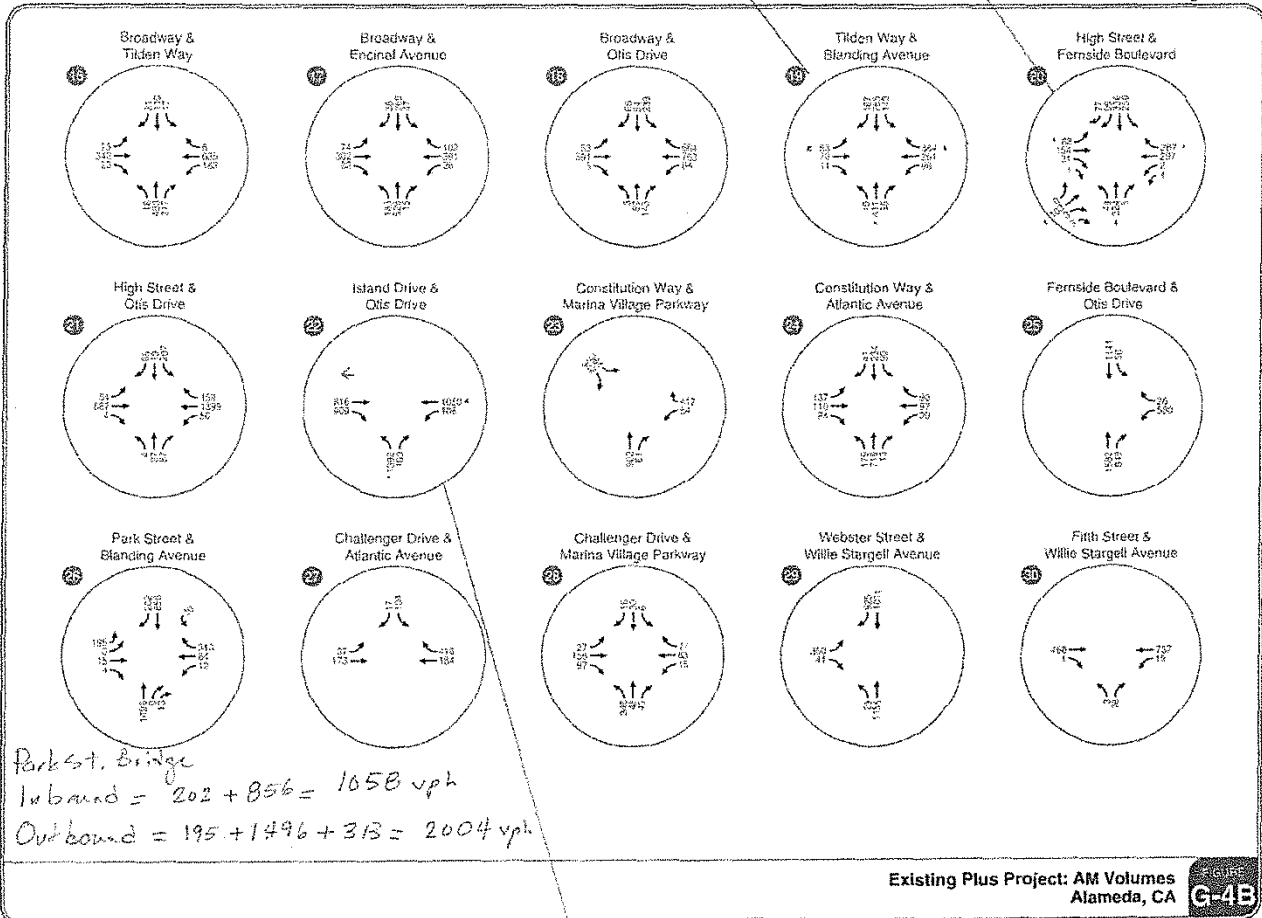
Miller Sweeney (Fruitvale) Bridge
 Inbound = 167 + 765 + 143 = 1075 vph
 Outbound = 83 + 411 + 384 = 878 vph

Higl St. Bridge
 Inbound = 77 + 96 + 336 + 250 = 759 vph
 Outbound = 88 + 103 + 324 + 207 = 802 vph

Alameda Point EIR - Administrative Draft

August 2013

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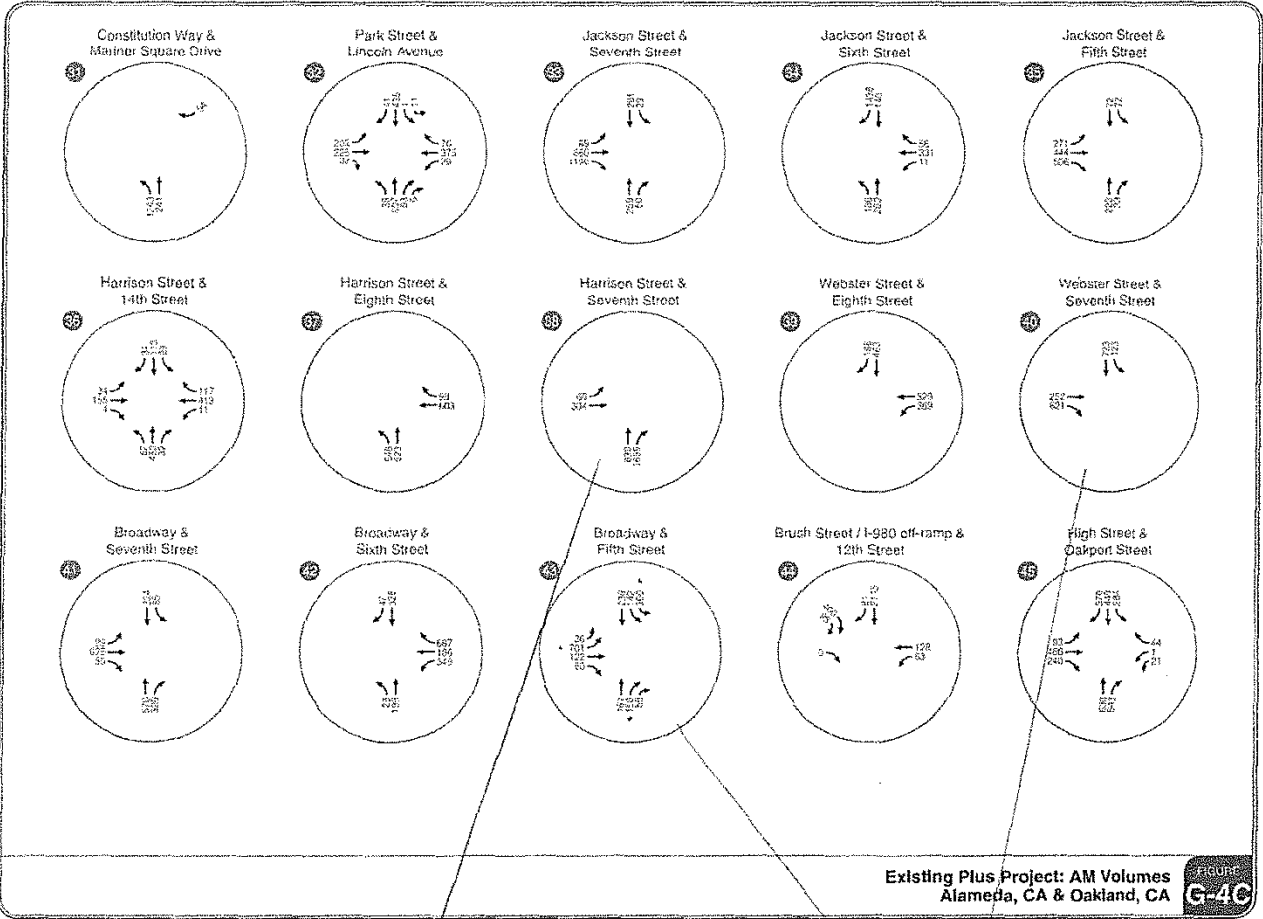
Park St. Bridge
 Inbound = 202 + 856 = 1058 vph
 Outbound = 195 + 1496 + 313 = 2004 vph

Existing Plus Project: AM Volumes Alameda, CA **G-4B**

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Bay Farm Bridge
 Inbound = 1392 vph + 1050 = 2442 vph
 Outbound = 816 + 909 = 1725 vph

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Existing Plus Project: AM Volumes
Alameda, CA & Oakland, CA

FIGURE G-4C

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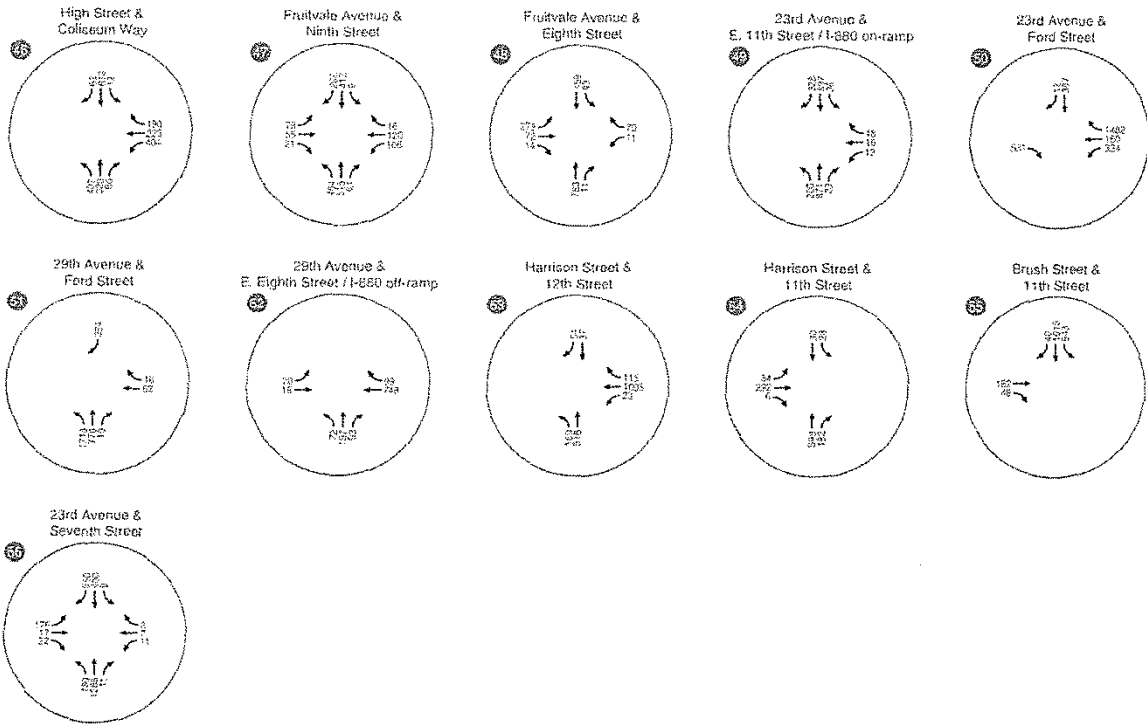
Possey Tube Outbound =
 $890 + 1699 = 2589 \text{ vph}$

Webster Tube
 Inbound
 $= 701 + 360 + 156 + 621 +$
 $723 = 2561 \text{ vph}$

Alameda Point EIR - Administrative Draft

August 2013

Highway 101 Project: Highways 4010, Fg22.dwg Aug 07, 2013 - 0:29pm - 2013/08/07 10:29:40



Existing Plus Project: AM Volumes
Oakland, CA

G-4D

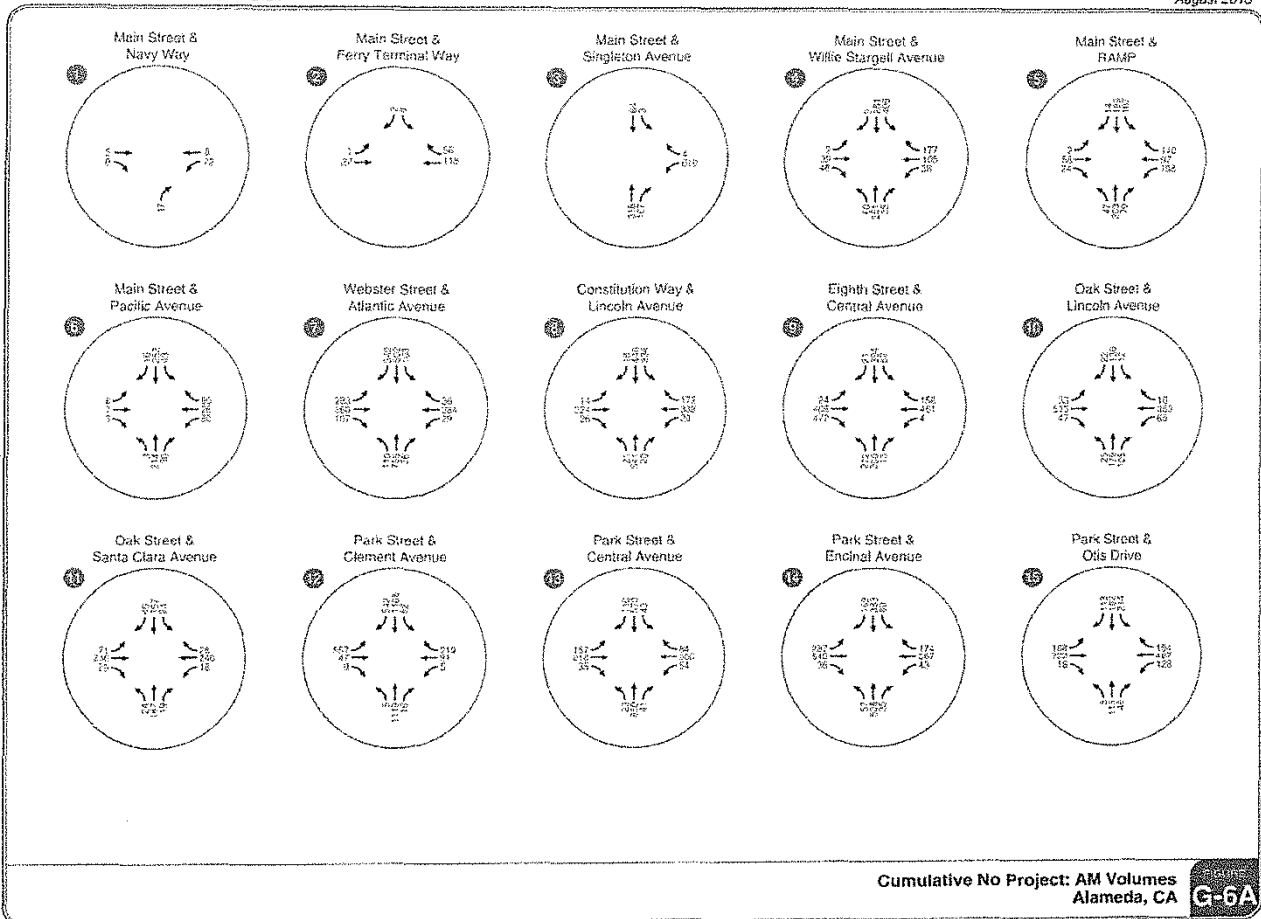
KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE NO PROJECT (AM PKHR) TRAFFIC SUMMARY
 from Alameda Point DEIR

by E. Thomson PE 10/12/13

Alameda Point EIR - Administrative Draft

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Cumulative No Project: AM Volumes Alameda, CA

G-6A

KITTELSON & ASSOCIATES, INC.
 TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE NO PROJECT - AM PK HR. TRAFFIC VOLUMES

ISLAND GATEWAYS	INBOUND	OUTBOUND	SOURCE
Paseo Tube Webster Tube	2929 vph	2673 vph	G-6C
Park St. Bridge	1896 vph	2150 vph	G-6B
Fruitvale Arc. Bridge	1395 vph	1573 vph	G-6B
High St Bridge	942 vph	1212 vph	G-6B
Bay Farm Bridge	2436 vph	3158 vph	G-6B
Total	9598 vph	16766 vph	

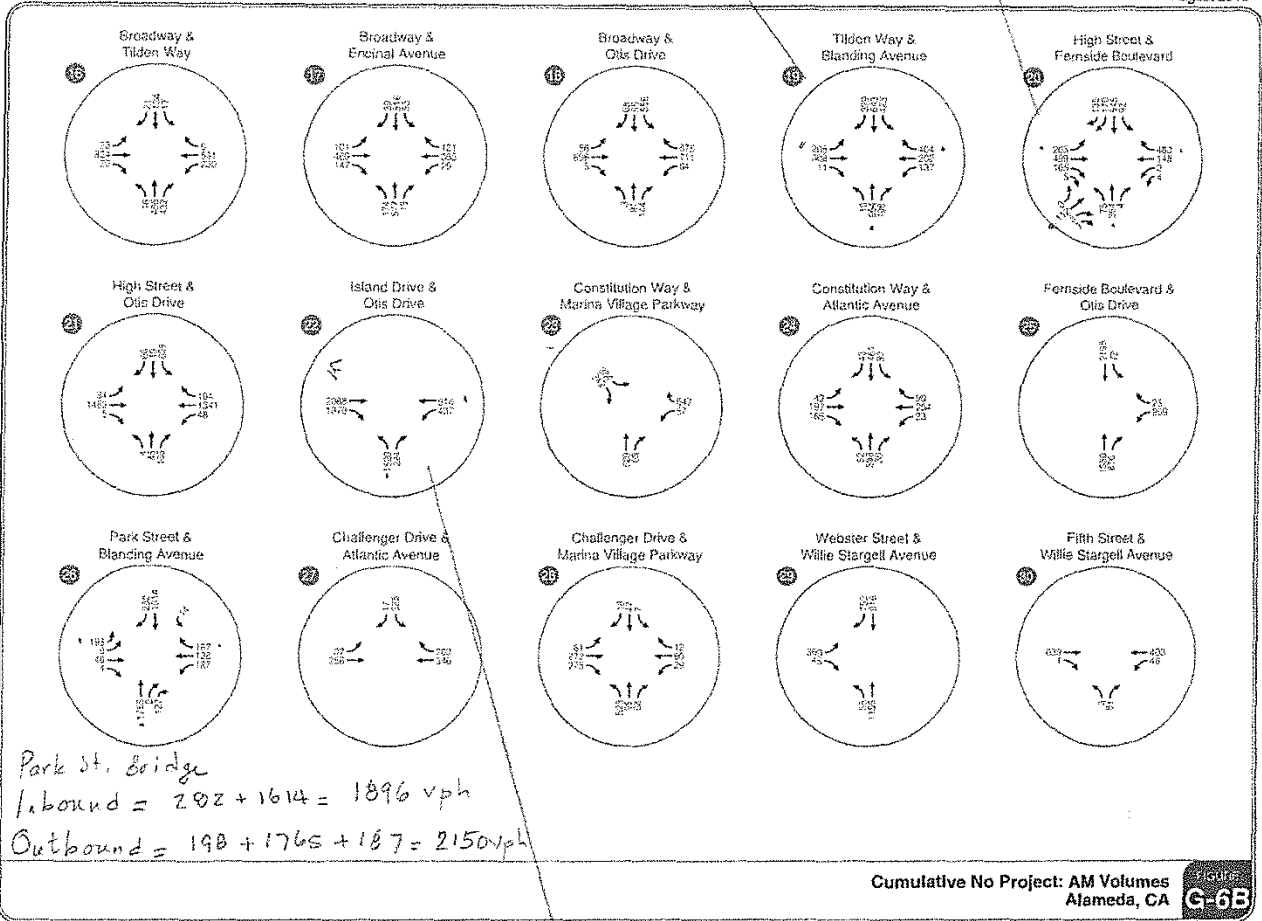
Comment Letter 30

Miller Sweeney Bridge (Fruitvale)
 Inbound = $329 + 643 + 423 = 1395$ vph
 Outbound = $205 + 964 + 404 = 1573$ vph

High Street Bridge
 Inbound = $135 + 170 + 545 + 92 = 942$ vph
 Outbound = $263 + 112 + 354 + 403 = 1212$ vph

Alameda Point EIR - Administrative Draft

August 2013



Park St. Bridge
 Inbound = $202 + 1614 = 1816$ vph
 Outbound = $198 + 1765 + 187 = 2150$ vph

Bay Farm Bridge
 Inbound = $1520 + 916 = 2436$ vph
 Outbound = $2088 + 1070 = 3158$ vph

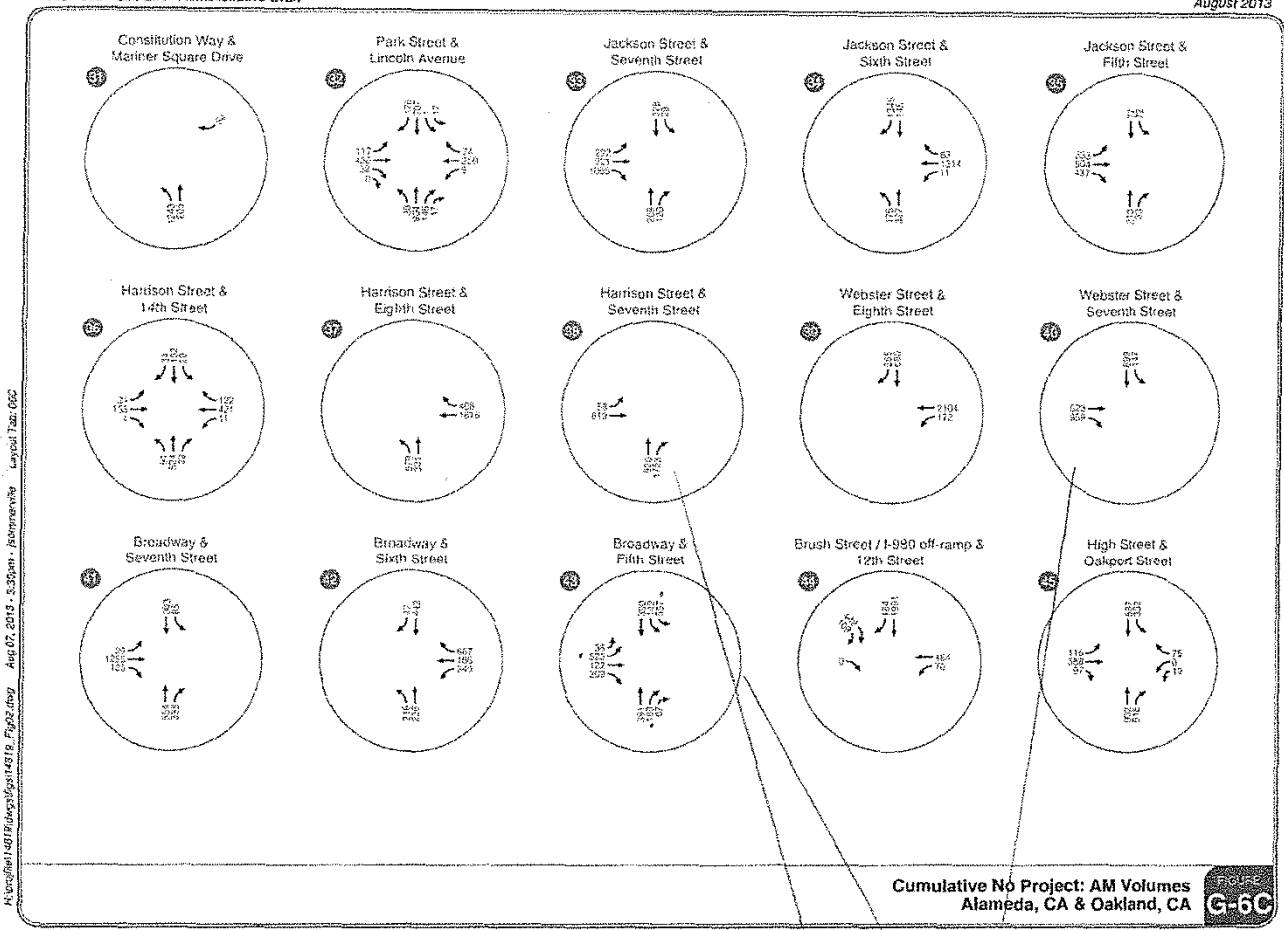
Cumulative No Project: AM Volumes
 Alameda, CA **G-6B**

KITTELSON & ASSOCIATES, INC.
 TRANSPORTATION ENGINEERING / PLANNING

Summary by E. Thomson PE 10/12/13

Alameda Point EIR - Administrative Draft

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KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING / PLANNING

Posey Tube Outbound
 $920 + 1753 = 2673 \text{ vph}$

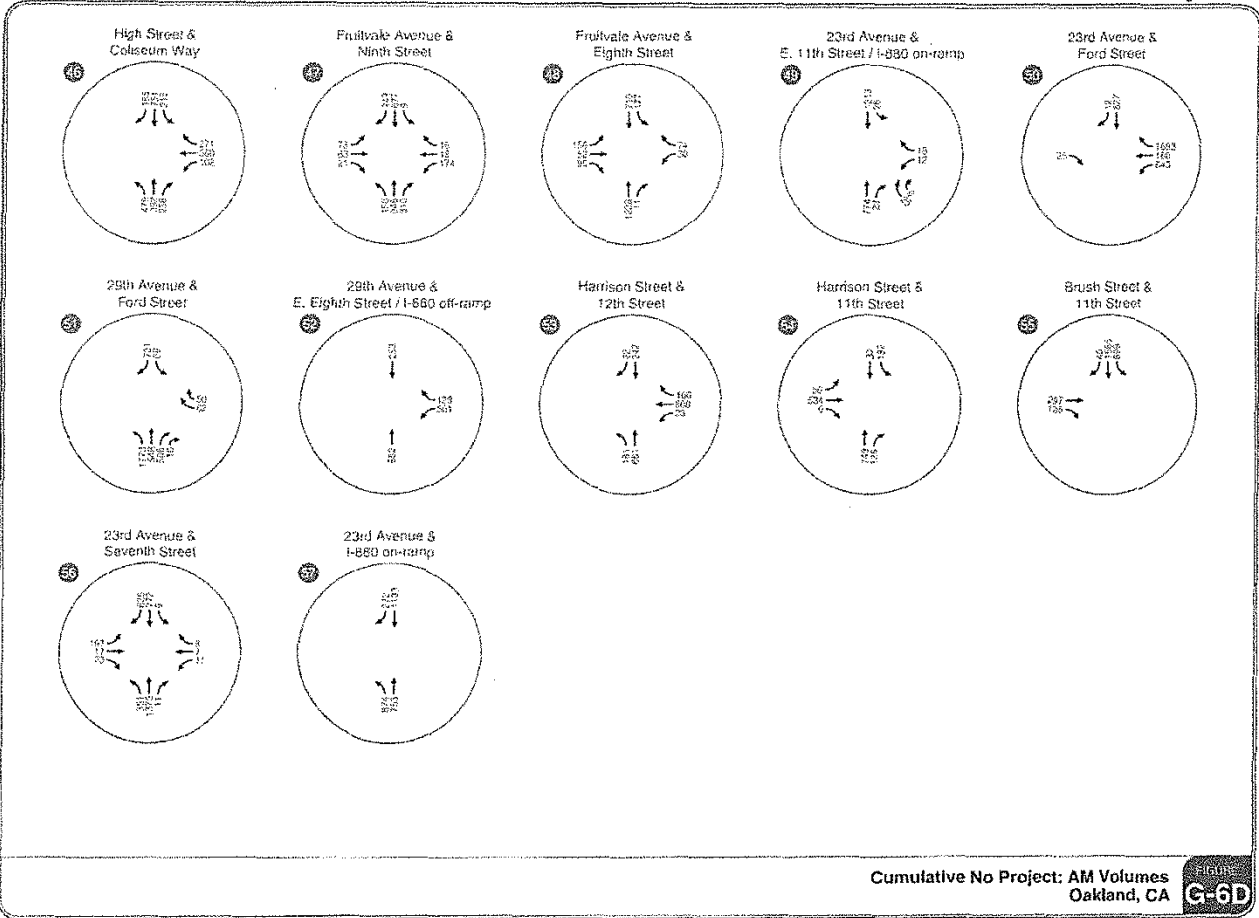
Webster St. Inbound
 $525 + 557 + 189 + 959 + 699$
 $= 2929 \text{ vph}$

Summanbi E. Thomas P.E. 10/12/13

Alameda Point EIR - Administrative Draft

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Cumulative No Project: AM Volumes
Oakland, CA

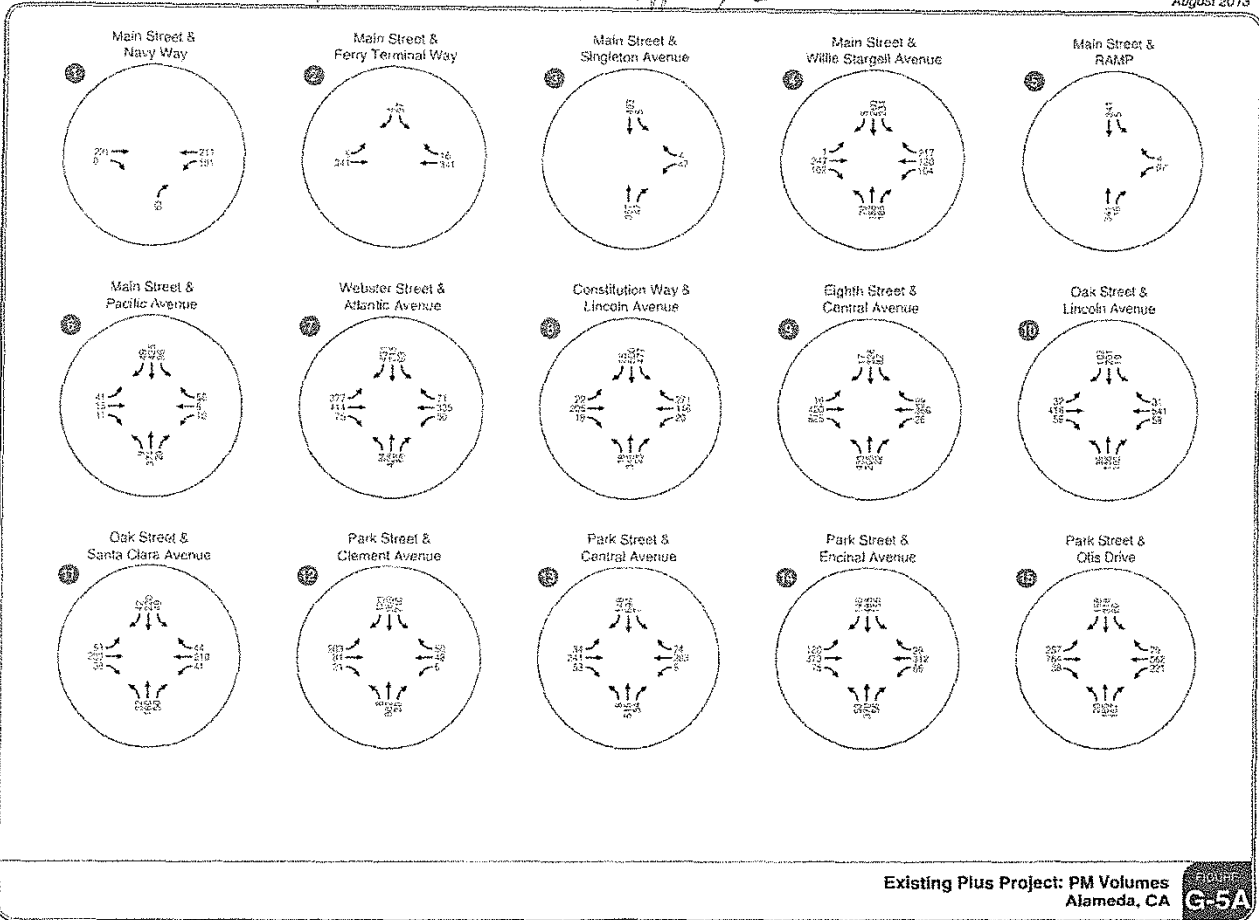
C-6D

KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING / PLANNING

Existing PM PK Plus Project
 Traffic Summary of Alameda Point DEIR
 by E. Thomson 10/12/13

Alameda Point EIR - Administrative Draft - provided in Draft EIR Appendix G

August 2013



Existing Plus Project: PM Volumes
 Alameda, CA G-5A

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 TRANSPORTATION ENGINEERING / PLANNING

EXISTING PM PK UR PLUS PROJECT @ ISLAND GATEWAYS

ISLAND GATEWAYS	INBOUND	OUTBOUND	SOURCE (Fig #)
Possey Tube		2737 vph	G-5C
Webster Tube	3488 vph		G-5C
Park St. Bridge	1566 vph	1487 vph	G-5B
Fruitvale Ave Bridge	1228 vph	930 vph	G-5B
High St. Bridge	847 vph	686 vph	G-5B
Bay Farm Island Bridge	1887 vph	2128 vph	G-5B
TOTAL	9016 vph	7968 vph	

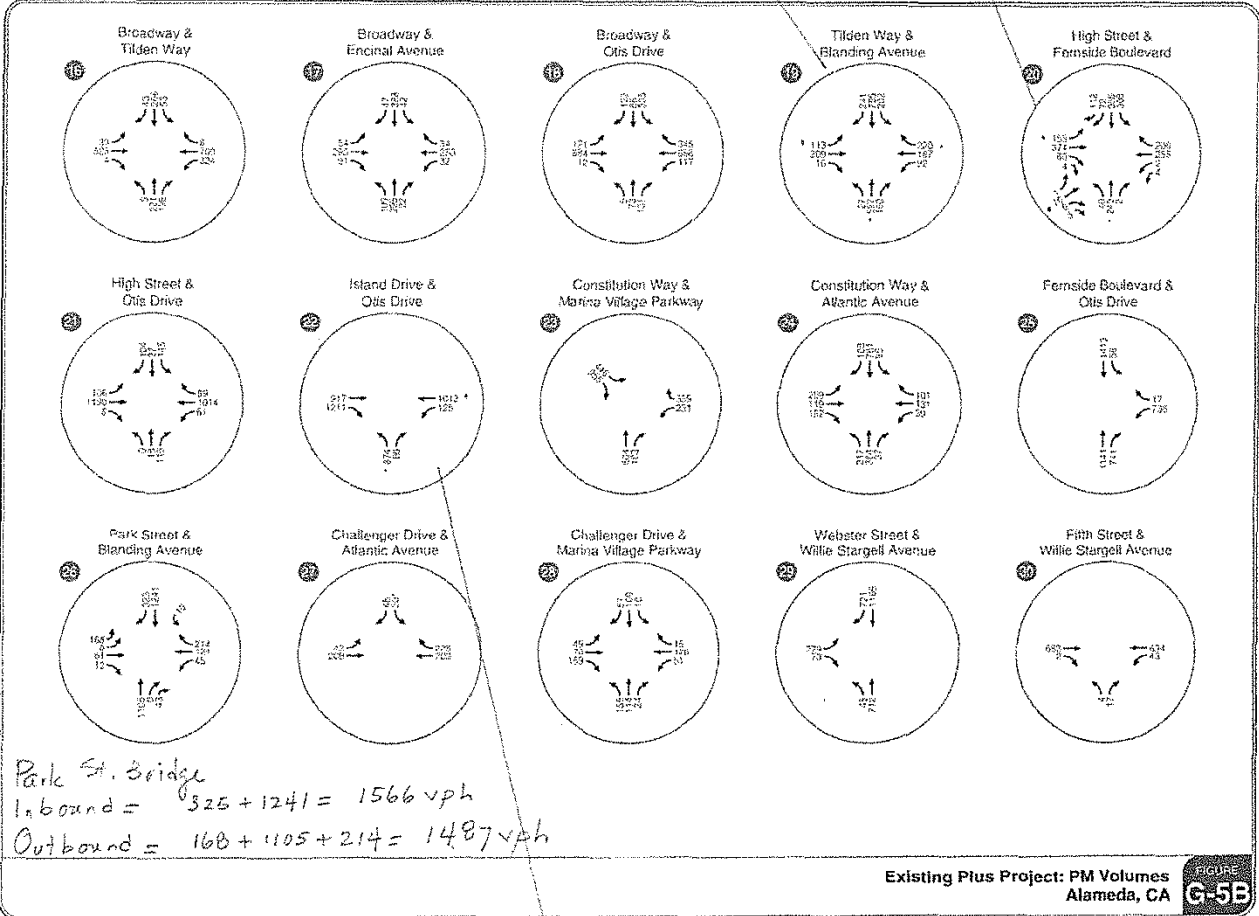
Miller Sweeney Bridge (Fruitvale)
 Inbound = $241 + 785 + 200 = 1226 \text{ vph}$
 Outbound = $113 + 597 + 220 = 930 \text{ vph}$

High St. Bridge
 Inbound = $112 + 72 + 355 + 308 = 847$
 Outbound = $155 + 76 + 249 + 206 = 686 \text{ vph}$

Alameda Point EIR - Administrative Draft

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Park St. Bridge
 Inbound = $525 + 1241 = 1566 \text{ vph}$
 Outbound = $168 + 1105 + 214 = 1487 \text{ vph}$

Existing Plus Project: PM Volumes
 Alameda, CA

FIGURE
G-5B

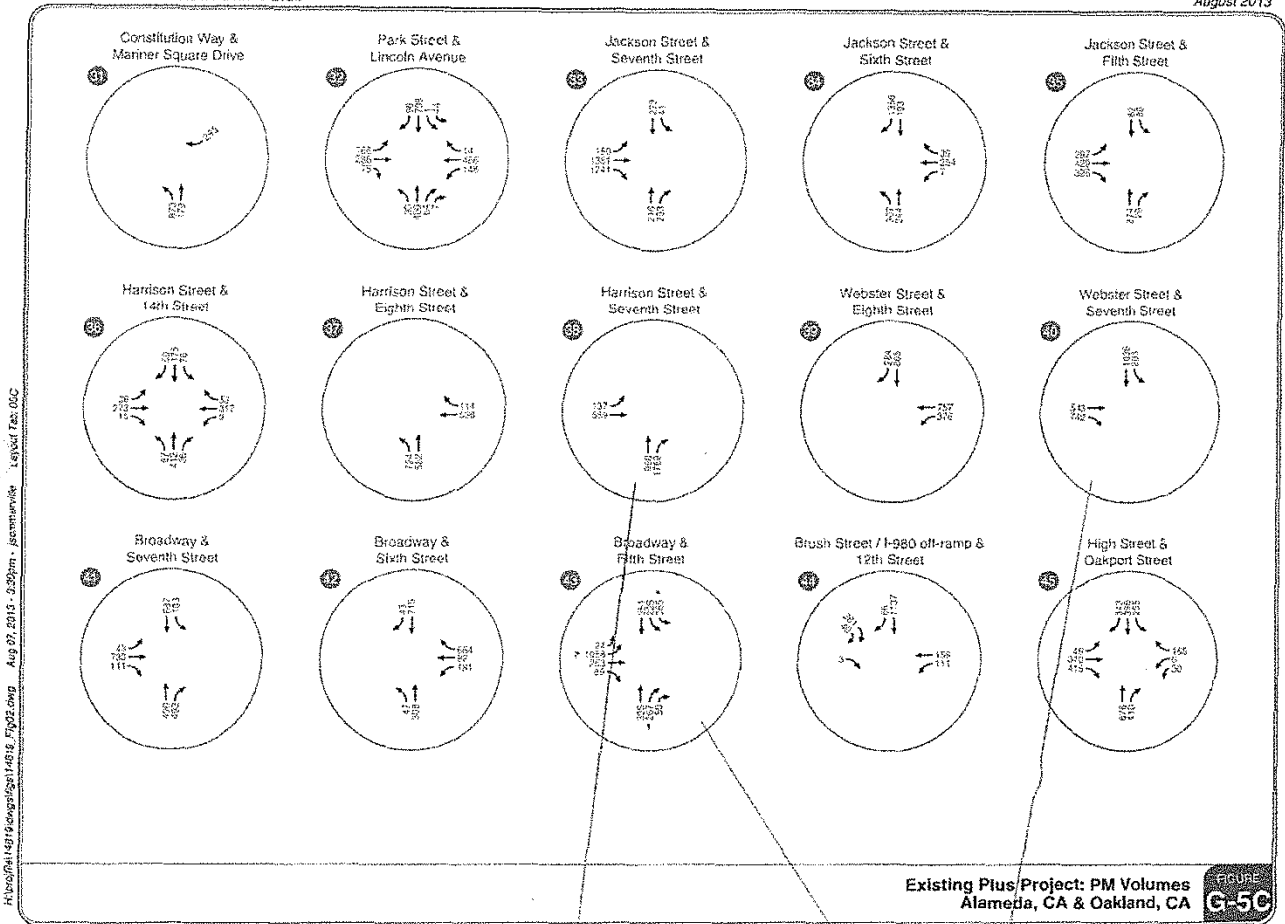
KITTELSON & ASSOCIATES, INC.
 TRANSPORTATION ENGINEERING / PLANNING

Bay Farm Bridge
 Inbound = $874 + 1013 = 1887 \text{ vph}$
 Outbound = $917 + 1211 = 2128 \text{ vph}$

by E. Thomson P.E. 10/12/13

Alameda Point EIR - Administrative Draft

August 2013



H:\300\01\02\03\04\05\06\07\08\09\10\11\12\13\14\15\16\17\18\19\20\21\22\23\24\25\26\27\28\29\30\31\32\33\34\35\36\37\38\39\40\41\42\43\44\45\46\47\48\49\50\51\52\53\54\55\56\57\58\59\60\61\62\63\64\65\66\67\68\69\70\71\72\73\74\75\76\77\78\79\80\81\82\83\84\85\86\87\88\89\90\91\92\93\94\95\96\97\98\99\100\101\102\103\104\105\106\107\108\109\110\111\112\113\114\115\116\117\118\119\120\121\122\123\124\125\126\127\128\129\130\131\132\133\134\135\136\137\138\139\140\141\142\143\144\145\146\147\148\149\150\151\152\153\154\155\156\157\158\159\160\161\162\163\164\165\166\167\168\169\170\171\172\173\174\175\176\177\178\179\180\181\182\183\184\185\186\187\188\189\190\191\192\193\194\195\196\197\198\199\200\201\202\203\204\205\206\207\208\209\210\211\212\213\214\215\216\217\218\219\220\221\222\223\224\225\226\227\228\229\230\231\232\233\234\235\236\237\238\239\240\241\242\243\244\245\246\247\248\249\250\251\252\253\254\255\256\257\258\259\260\261\262\263\264\265\266\267\268\269\270\271\272\273\274\275\276\277\278\279\280\281\282\283\284\285\286\287\288\289\290\291\292\293\294\295\296\297\298\299\300\301\302\303\304\305\306\307\308\309\310\311\312\313\314\315\316\317\318\319\320\321\322\323\324\325\326\327\328\329\330\331\332\333\334\335\336\337\338\339\340\341\342\343\344\345\346\347\348\349\350\351\352\353\354\355\356\357\358\359\360\361\362\363\364\365\366\367\368\369\370\371\372\373\374\375\376\377\378\379\380\381\382\383\384\385\386\387\388\389\390\391\392\393\394\395\396\397\398\399\400\401\402\403\404\405\406\407\408\409\410\411\412\413\414\415\416\417\418\419\420\421\422\423\424\425\426\427\428\429\430\431\432\433\434\435\436\437\438\439\440\441\442\443\444\445\446\447\448\449\450\451\452\453\454\455\456\457\458\459\460\461\462\463\464\465\466\467\468\469\470\471\472\473\474\475\476\477\478\479\480\481\482\483\484\485\486\487\488\489\490\491\492\493\494\495\496\497\498\499\500\501\502\503\504\505\506\507\508\509\510\511\512\513\514\515\516\517\518\519\520\521\522\523\524\525\526\527\528\529\530\531\532\533\534\535\536\537\538\539\540\541\542\543\544\545\546\547\548\549\550\551\552\553\554\555\556\557\558\559\560\561\562\563\564\565\566\567\568\569\570\571\572\573\574\575\576\577\578\579\580\581\582\583\584\585\586\587\588\589\590\591\592\593\594\595\596\597\598\599\600\601\602\603\604\605\606\607\608\609\610\611\612\613\614\615\616\617\618\619\620\621\622\623\624\625\626\627\628\629\630\631\632\633\634\635\636\637\638\639\640\641\642\643\644\645\646\647\648\649\650\651\652\653\654\655\656\657\658\659\660\661\662\663\664\665\666\667\668\669\670\671\672\673\674\675\676\677\678\679\680\681\682\683\684\685\686\687\688\689\690\691\692\693\694\695\696\697\698\699\700\701\702\703\704\705\706\707\708\709\710\711\712\713\714\715\716\717\718\719\720\721\722\723\724\725\726\727\728\729\730\731\732\733\734\735\736\737\738\739\740\741\742\743\744\745\746\747\748\749\750\751\752\753\754\755\756\757\758\759\760\761\762\763\764\765\766\767\768\769\770\771\772\773\774\775\776\777\778\779\780\781\782\783\784\785\786\787\788\789\790\791\792\793\794\795\796\797\798\799\800\801\802\803\804\805\806\807\808\809\810\811\812\813\814\815\816\817\818\819\820\821\822\823\824\825\826\827\828\829\830\831\832\833\834\835\836\837\838\839\840\841\842\843\844\845\846\847\848\849\850\851\852\853\854\855\856\857\858\859\860\861\862\863\864\865\866\867\868\869\870\871\872\873\874\875\876\877\878\879\880\881\882\883\884\885\886\887\888\889\890\891\892\893\894\895\896\897\898\899\900\901\902\903\904\905\906\907\908\909\910\911\912\913\914\915\916\917\918\919\920\921\922\923\924\925\926\927\928\929\930\931\932\933\934\935\936\937\938\939\940\941\942\943\944\945\946\947\948\949\950\951\952\953\954\955\956\957\958\959\960\961\962\963\964\965\966\967\968\969\970\971\972\973\974\975\976\977\978\979\980\981\982\983\984\985\986\987\988\989\990\991\992\993\994\995\996\997\998\999\1000

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Existing Plus/Project: PM Volumes
Alameda, CA & Oakland, CA

FIGURE
E-50

Posey Tube Outbound
= 968 + 1769 = 2737 vph

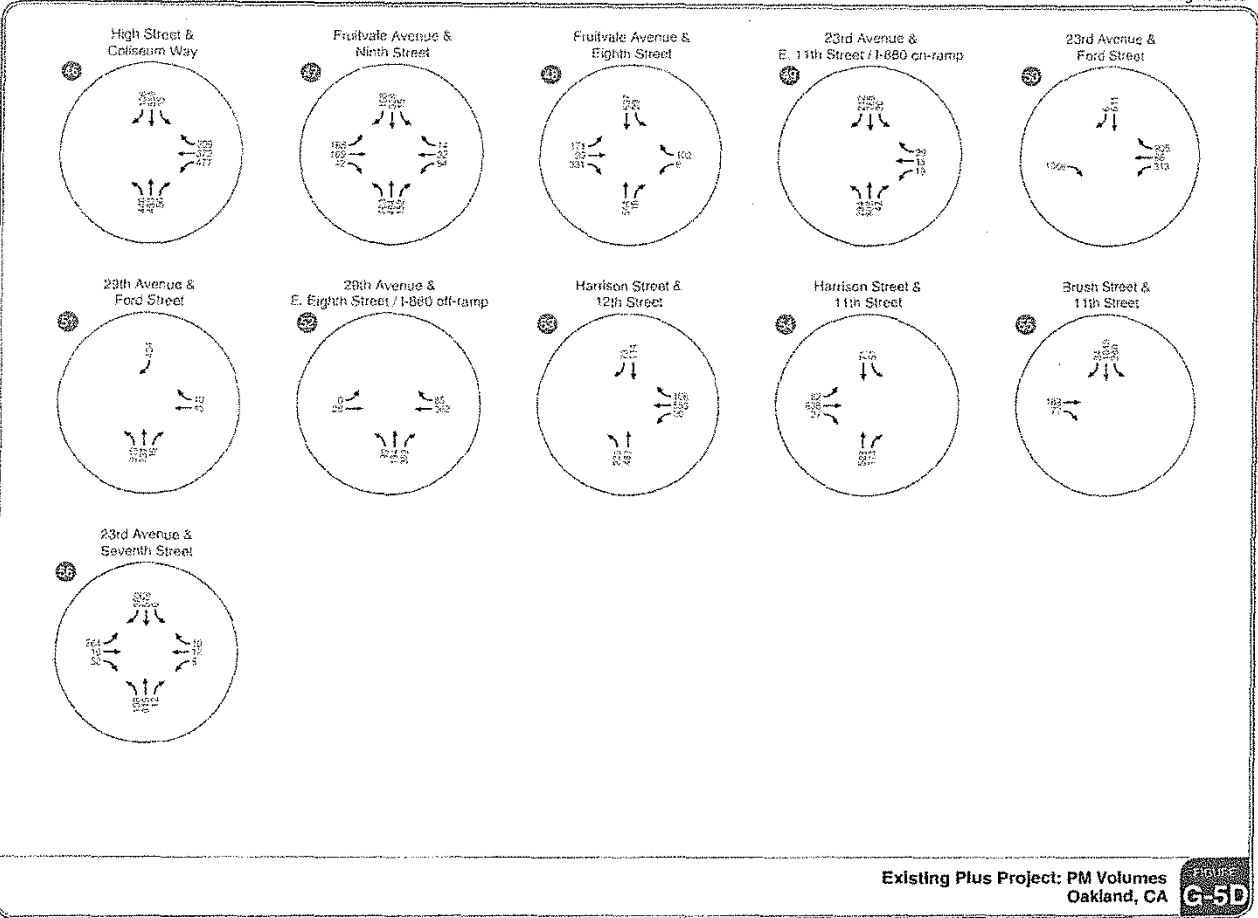
Webster Tube Inbound
1058 + 385 + 267 + 742 +
1036 = 3488 vph

by E. Thomson P.E. 10/12/13

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August 2013

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Existing Plus Project: PM Volumes
Oakland, CA

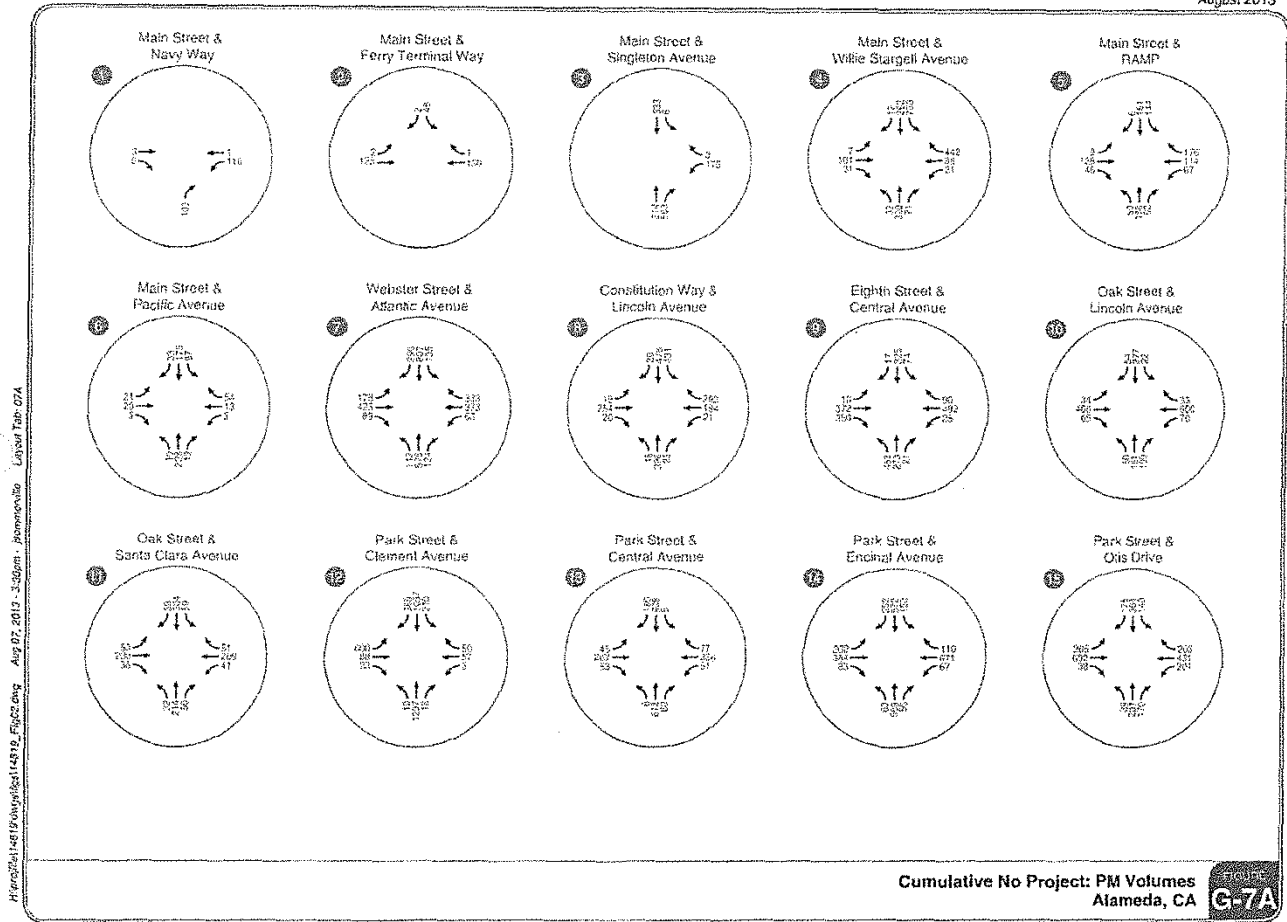


KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE NO PROJECT (PN ALHR) TRAFFIC SUMMARY
 of ALAMEDA POINT b) E. Thomson P.E. 10/12/13
 DRAFT ENV. IMPACT REPORT Source: Appendix G

Alameda Point EIR - Administrative Draft

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Cumulative No Project: PM Volumes Alameda, CA

G-7A

KITTELSON & ASSOCIATES, INC.
 TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE NO PROJECT PM PEAK HOUR TRAFFIC VOLUMES @ ISLAND GATEWAYS

ISLAND GATEWAY	IN BOUND	OUTBOUND	SOURCE
Posey Webster Tube	3882 vph	3331 vph	G-7C
Park St. Bridge	2027 vph	2228 vph	G-7B
Fruitvale Bridge	1559 vph	1375 vph	G-7B
High St. Bridge	883 vph	919 vph	G-7B
Bay Farm Island Bridge	2849 vph	1899 vph	G-7B
TOTAL	11,200 vph	9752 vph	

Miller Sweeney Bridge (Fruitvale)

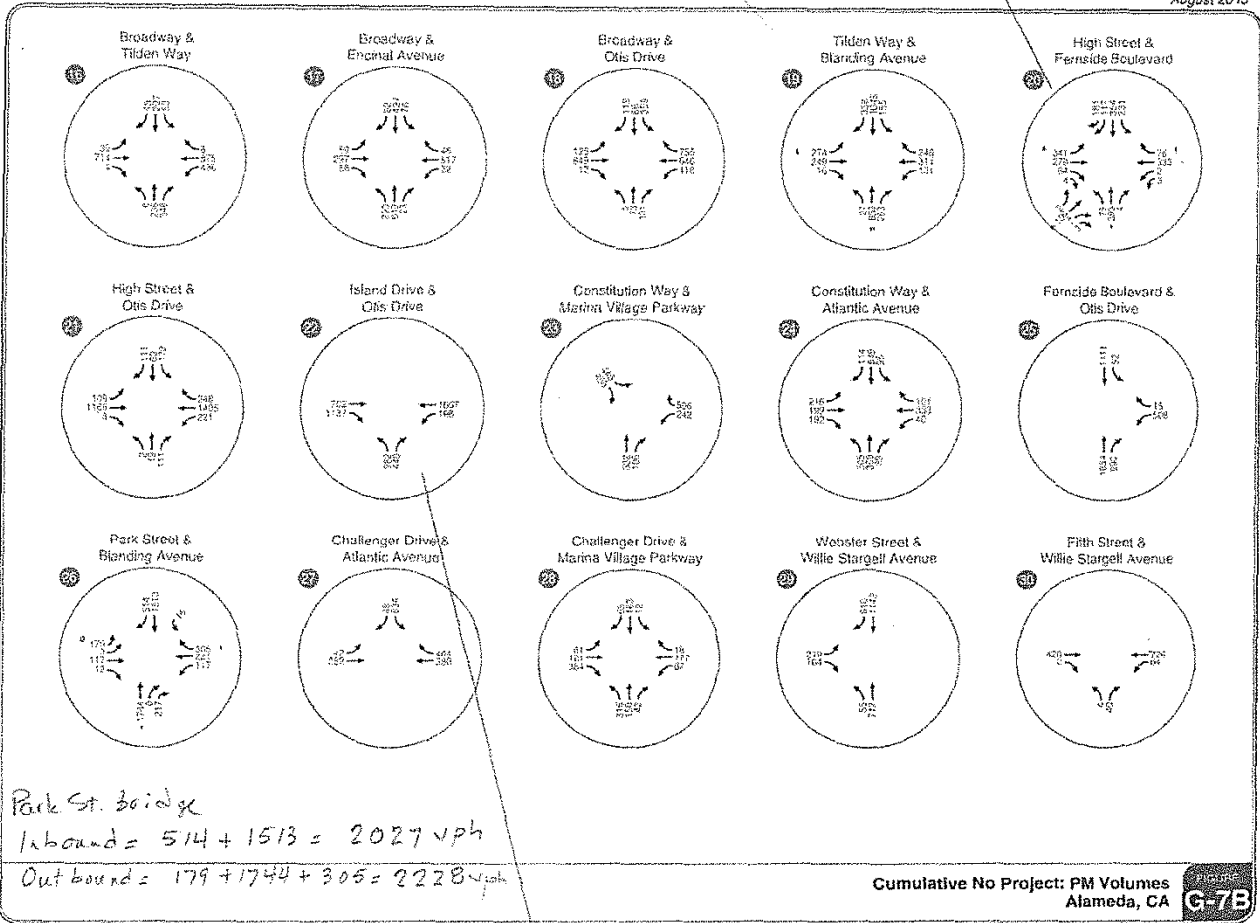
Inbound = $358 + 1046 + 155 = 1559$ vph
 Outbound = $274 + 853 + 248 = 1375$ vph

High St. Bridge

Inbound = $181 + 117 + 354 + 231 = 883$ vph
 Outbound = $341 + 109 + 76 + 393 = 919$ vph

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August 2013



Park St. bridge

Inbound = $514 + 1513 = 2027$ vph
 Outbound = $179 + 1744 + 305 = 2228$ vph

Cumulative No Project: PM Volumes
 Alameda, CA

G-7B

KITTELSON & ASSOCIATES, INC.
 TRANSPORTATION ENGINEERING / PLANNING

Bay Farm Island Bridge

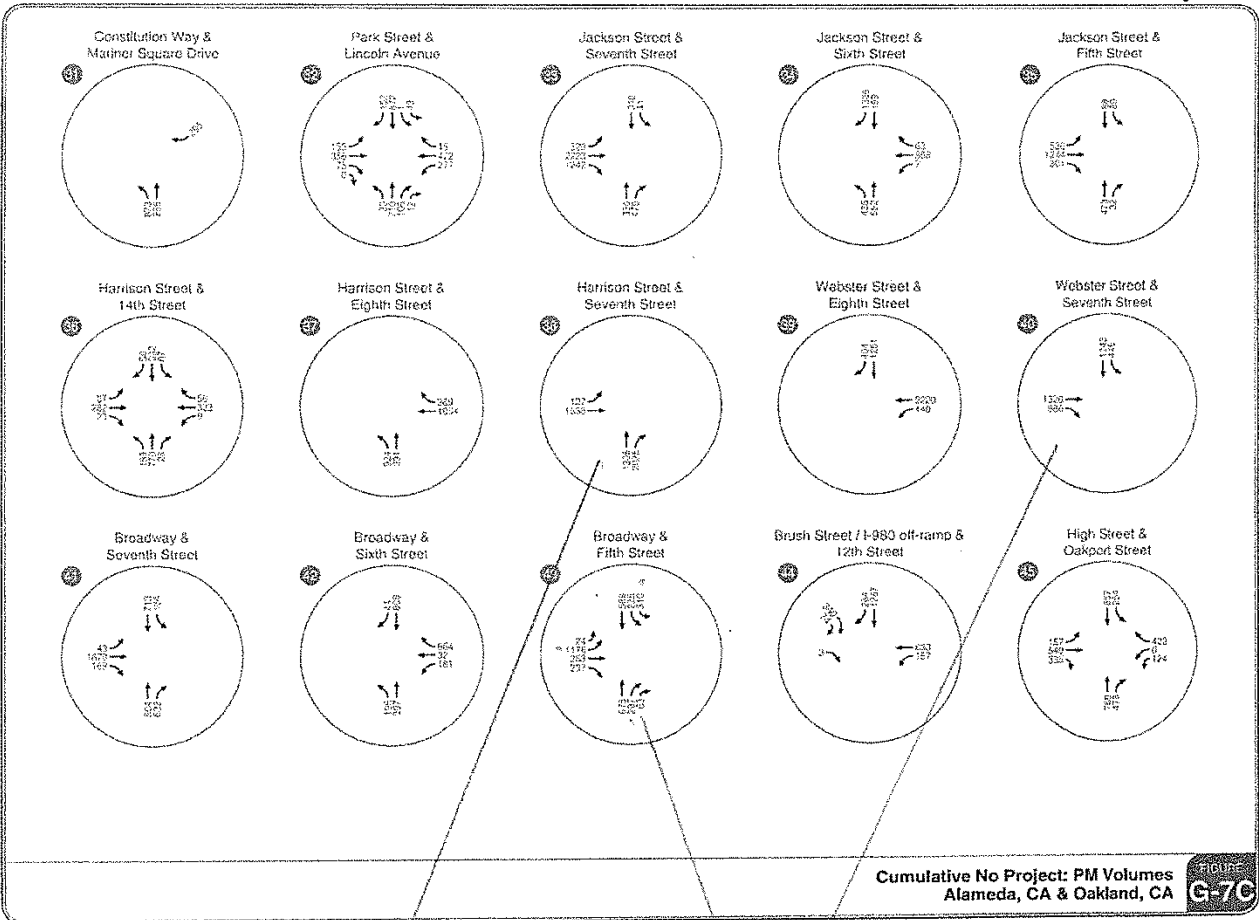
Inbound = $982 + 1867 = 2849$ vph
 Outbound = $762 + 1137 = 1899$ vph

Summary by E. Thomas P.E. 10/17/13

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Alameda Point EIR - Administrative Draft - August 2013 - 3-3356 - Appendix A
 Figure G-7C
 Layout Tab: 07C



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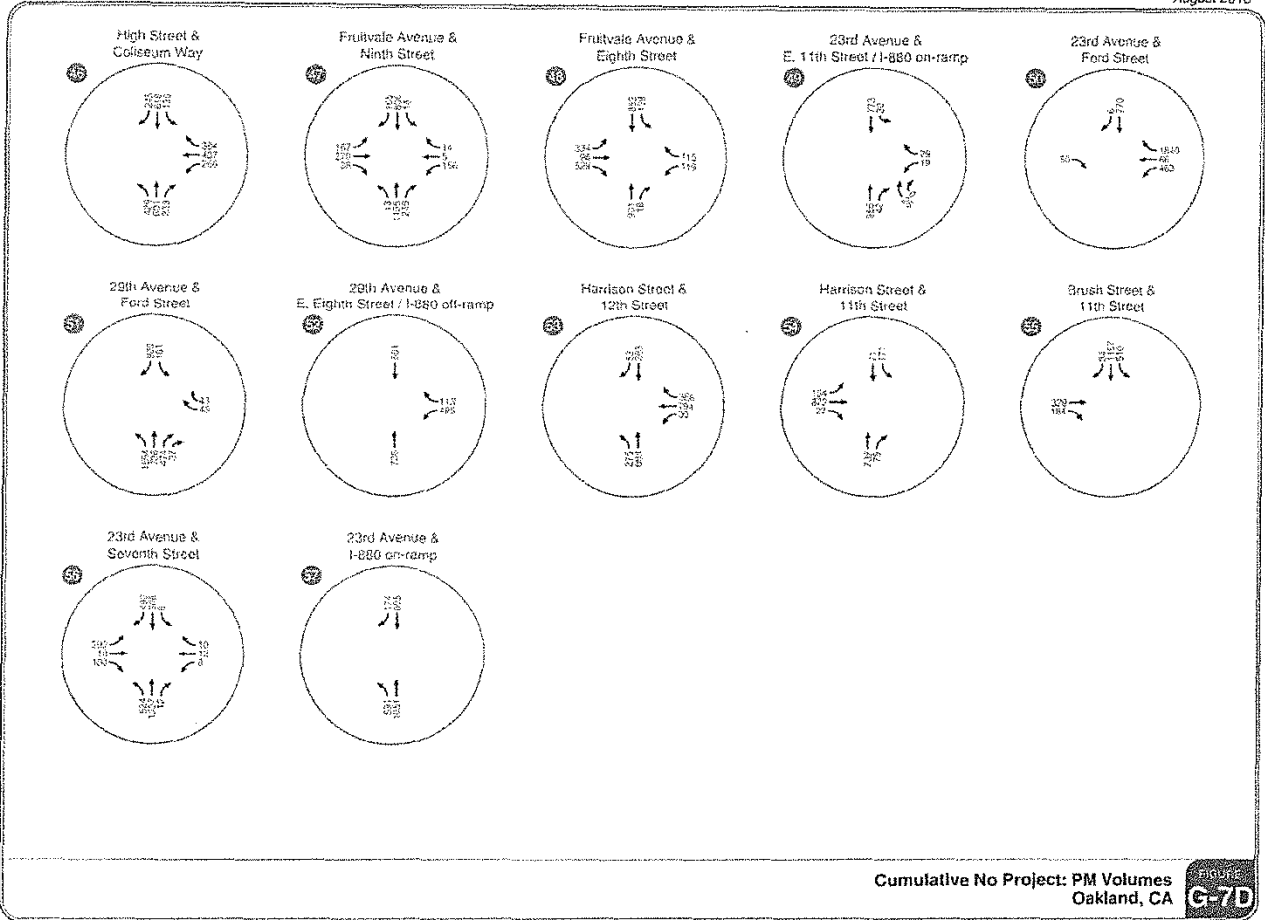
Posay Tube Outbound
 $1306 + 2025 = 3331 \text{ vph}$

Webster Tube Inbound
 $= 1176 + 267 + 310 + 886 + 1243$
 3882 vph

Summary by E. Thamer P.E.
 10/12/13

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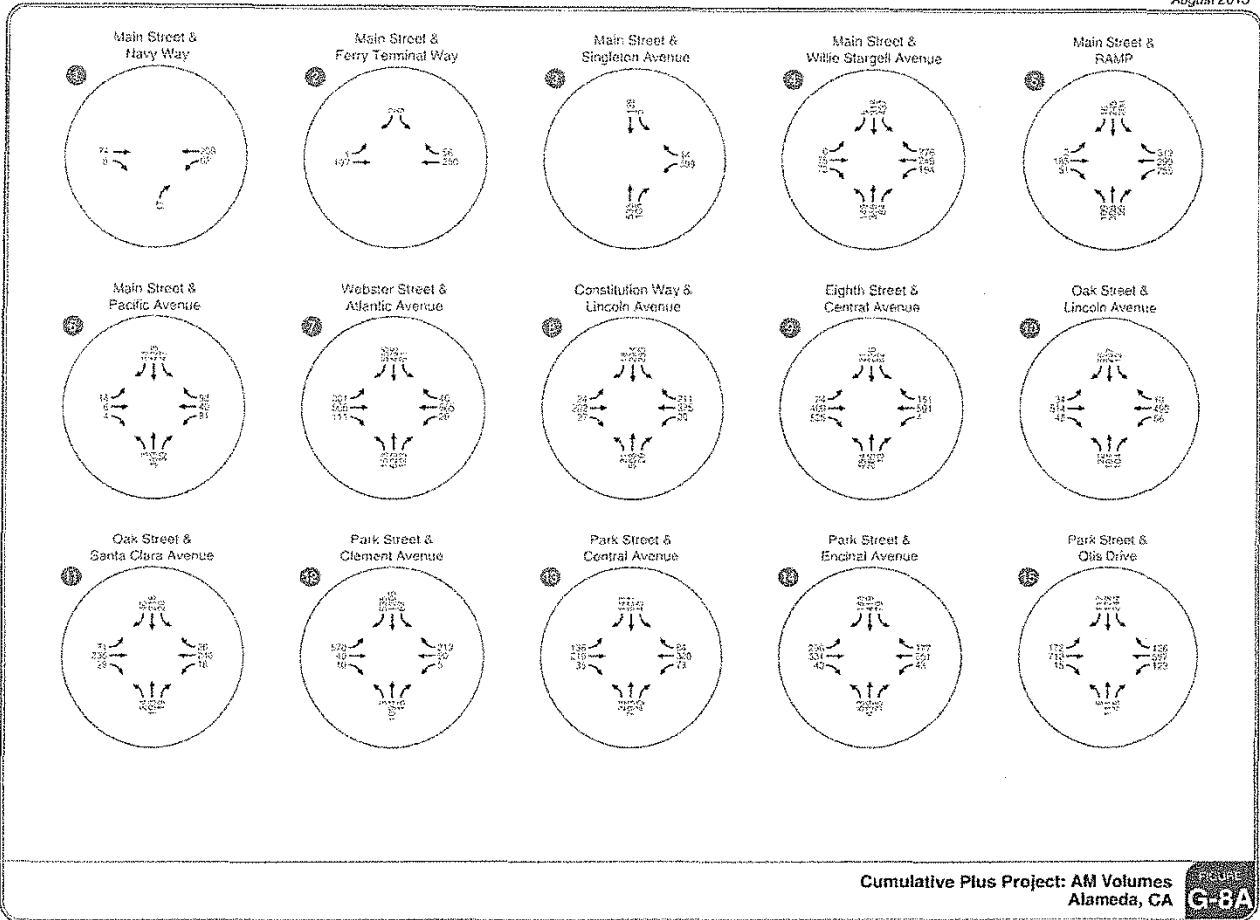
KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE w/ PROJECT (AM PK) HOURLY VOLUME
Summary

by E. Thomson P.E. 10/12/13

Alameda Point EIR - Administrative Draft

August 2013



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TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE w/ PROJECT AM PK HOUR TRAFFIC VOLUMES

ISLAND GATEWAYS	INBOUND	OUTBOUND	Source (Fig #)
Pasey Webster Tube	3073 vph	2681 vph	G-8C
Park St. Bridge	2177 vph	2147 vph	G-8B
Fruitvale Bridge	1479 vph	1561 vph	G-8B
High St. Bridge	1074 vph	1210 vph	G-8B
Bay Farm Island Bridge	2637 vph	3168 vph	G-8B
TOTAL	10,440 vph	10,767 vph	

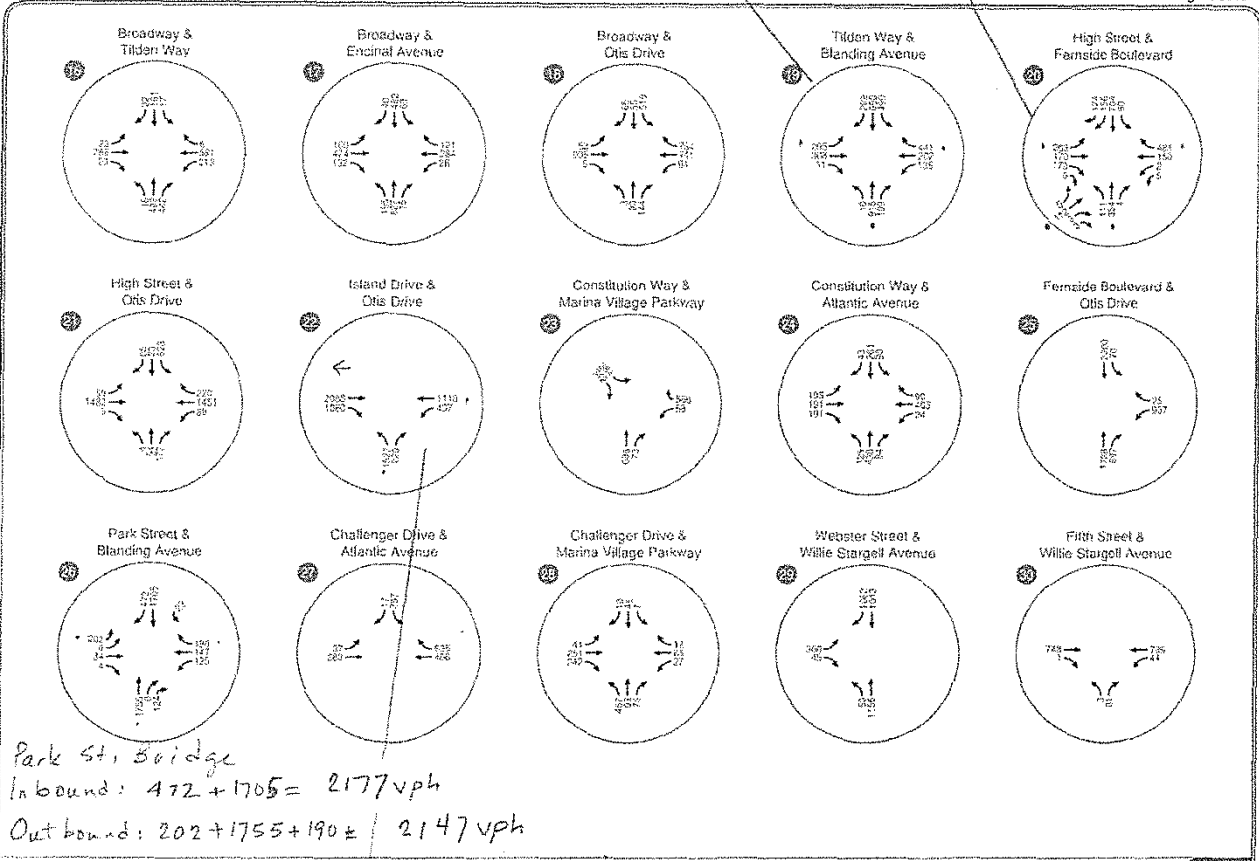
Miller Sweeney (Fruitvale) Bridge
 Inbound = $299 + 690 + 490 = 1479$ vph
 Outbound = $205 + 915 + 441 = 1561$ vph

High Street Bridge
 Inbound = $124 + 156 + 704 + 90 = 1074$ vph
 Outbound = $263 + 112 + 354 + 481 = 1210$ vph

Alameda Point EIR - Administrative Draft

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 Layout Tab: 08B



Park St. Bridge
 Inbound: $472 + 1705 = 2177$ vph
 Outbound: $202 + 1755 + 190 = 2147$ vph

Cumulative Plus Project: AM Volumes Alameda, CA **G-8B**

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 TRANSPORTATION ENGINEERING / PLANNING

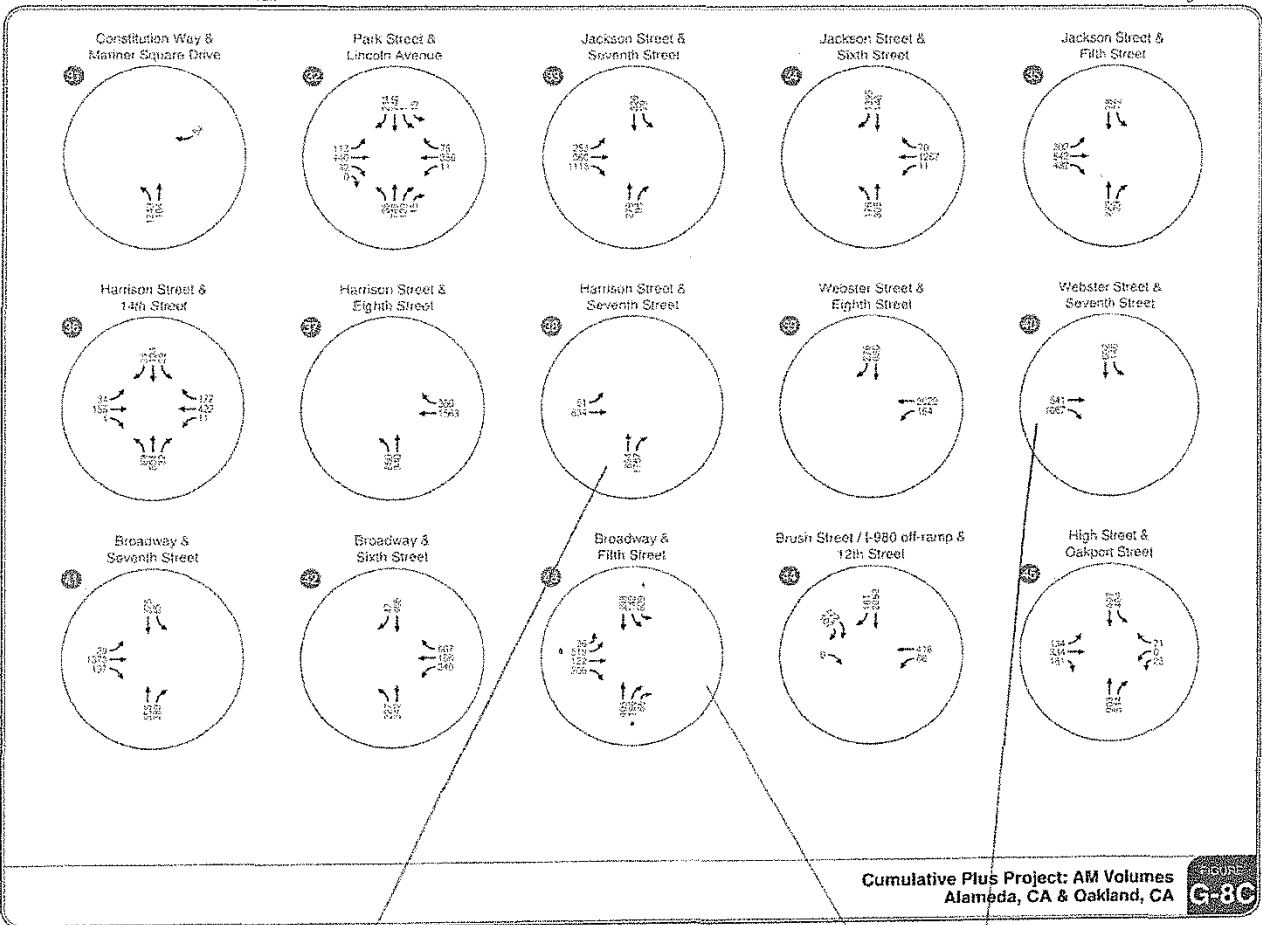
Bay Farm Island Bridge
 Inbound: $1527 + 1110 = 2637$ vph
 Outbound: $2088 + 1080 = 3168$ vph

Summary by E. Thomson PE.
 10/12/13

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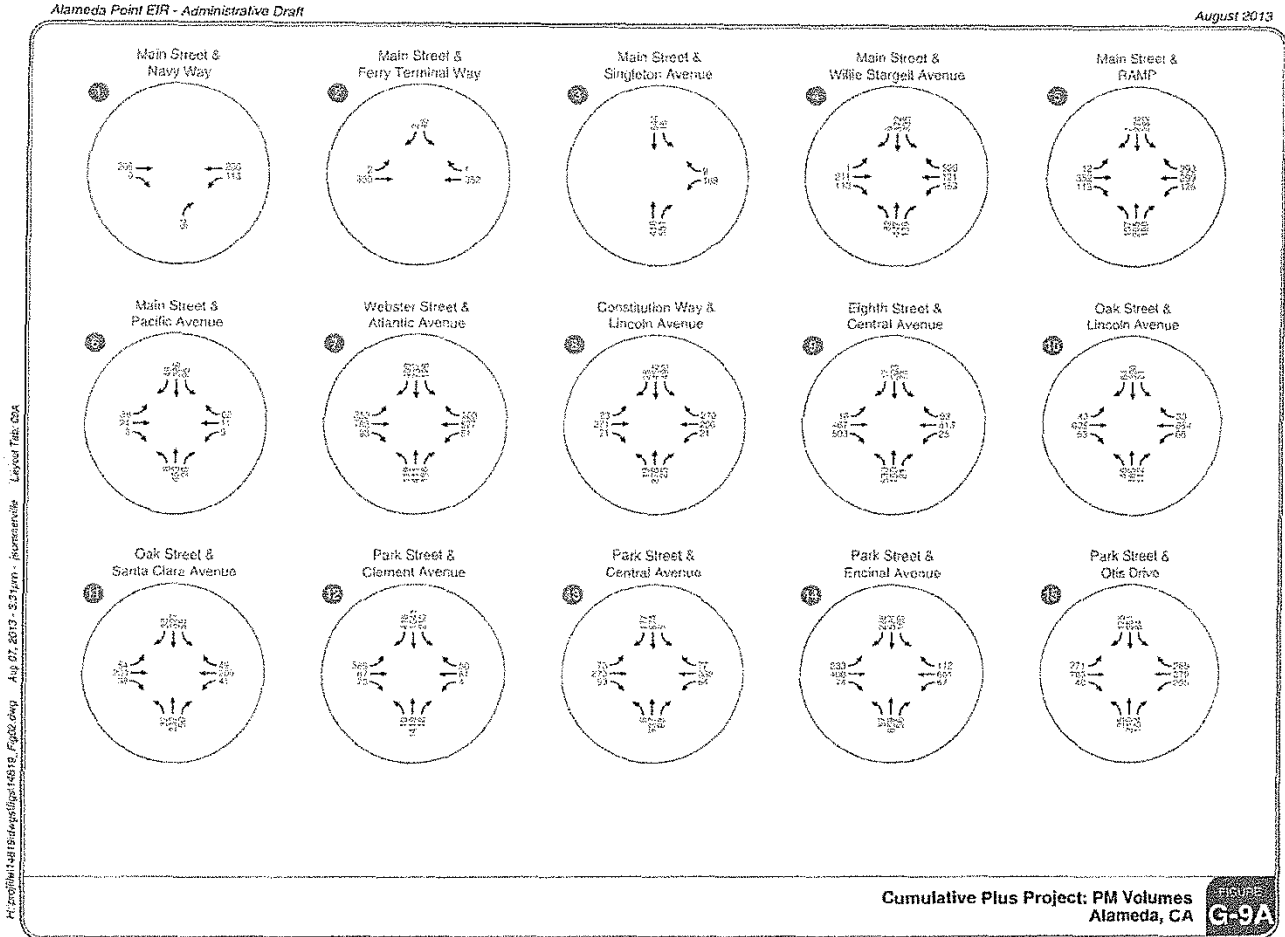
Posey Tube Outbound = $894 + 1787 = 2681 \text{ vph}$

Webster Tube Inbound = $519 + 609 + 186 + 1067 + 692 = 3073 \text{ vph}$

Summary by E. Trautman P.E.
10/17/12

CUMULATIVE WITH PROJECT (PM PK HR) TRAFFIC SUMMARY
 } ALAMEDA POINT DEIR

by E. Thomson PE. 10/12/13
 Source: Appendix G



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KITTELSON & ASSOCIATES, INC.
 TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE WITH PROJECT PM PEAK HOUR TRAFFIC
 VOLUMES @ ISLAND GATEWAYS

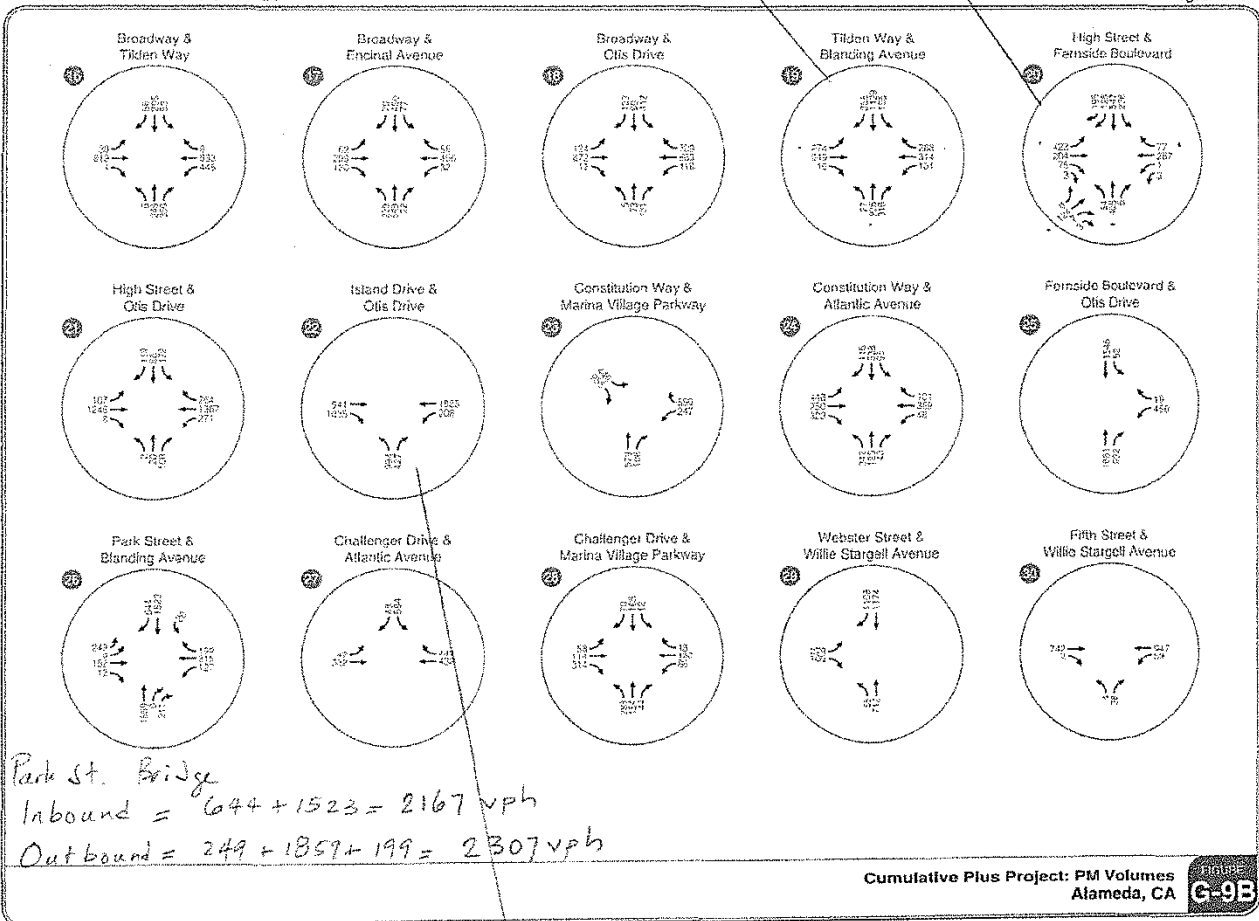
ISLAND GATEWAYS	INBOUND	OUTBOUND	SOURCE
POSEY TUBE WEBSTER TUBE	3986 vph	3433 vph	G-9A
PARK ST. BRIDGE	2167 vph	2307 vph	G-9B
FRUITVALE BRIDGE	1639 vph	1487 vph	G-9B
HIGH ST BRIDGE	1103 vph	1030 vph	G-9B
BAY FARM ISLAND BRIDGE	2819 vph	1976 vph	G-9B
TOTAL	11,714 vph	10,233 vph	

Willen Sweeney (Fruitvale) Bridge
 Inbound = $355 + 1129 + 155 = 1639$ vph
 Outbound = $274 + 925 + 288 = 1487$ vph

High St. Bridge
 Inbound = $195 + 125 + 547 + 236 = 1103$ vph
 Outbound = $423 + 124 + 406 + 77 = 1030$ vph

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August 2013



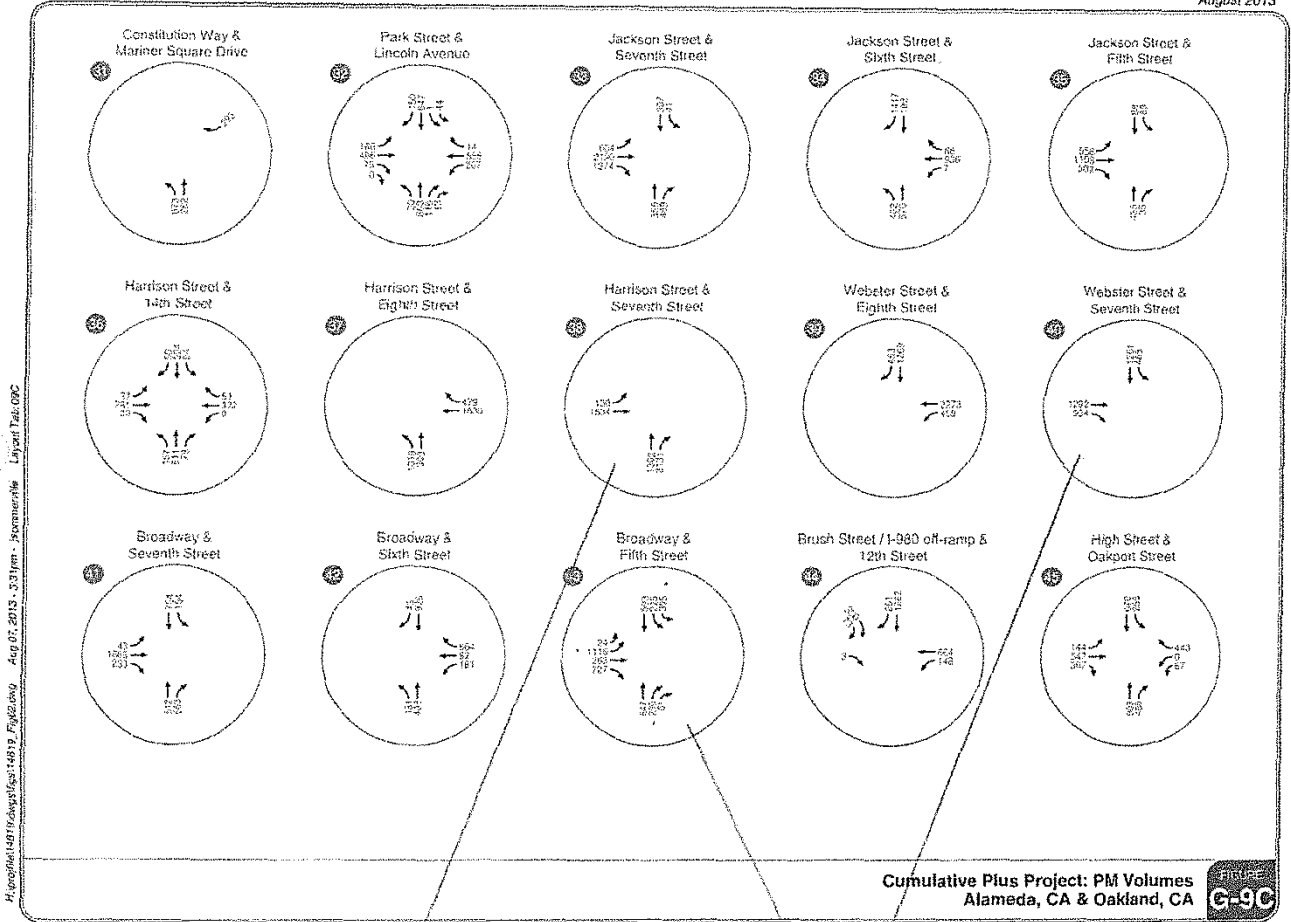
Park St. Bridge
 Inbound = $644 + 1523 = 2167$ vph
 Outbound = $249 + 1859 + 199 = 2307$ vph

Bay Farm Island Bridge
 Inbound = $994 + 1825 = 2819$ vph
 Outbound = $941 + 1035 = 1976$ vph

Summary by E. Thawson P.E. 10/12/13

Alameda Point EIR - Administrative Draft

August 2013



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TRANSPORTATION ENGINEERING / PLANNING

Poser Tube
 Outbound = $1302 + 2131 = 3433$ vph

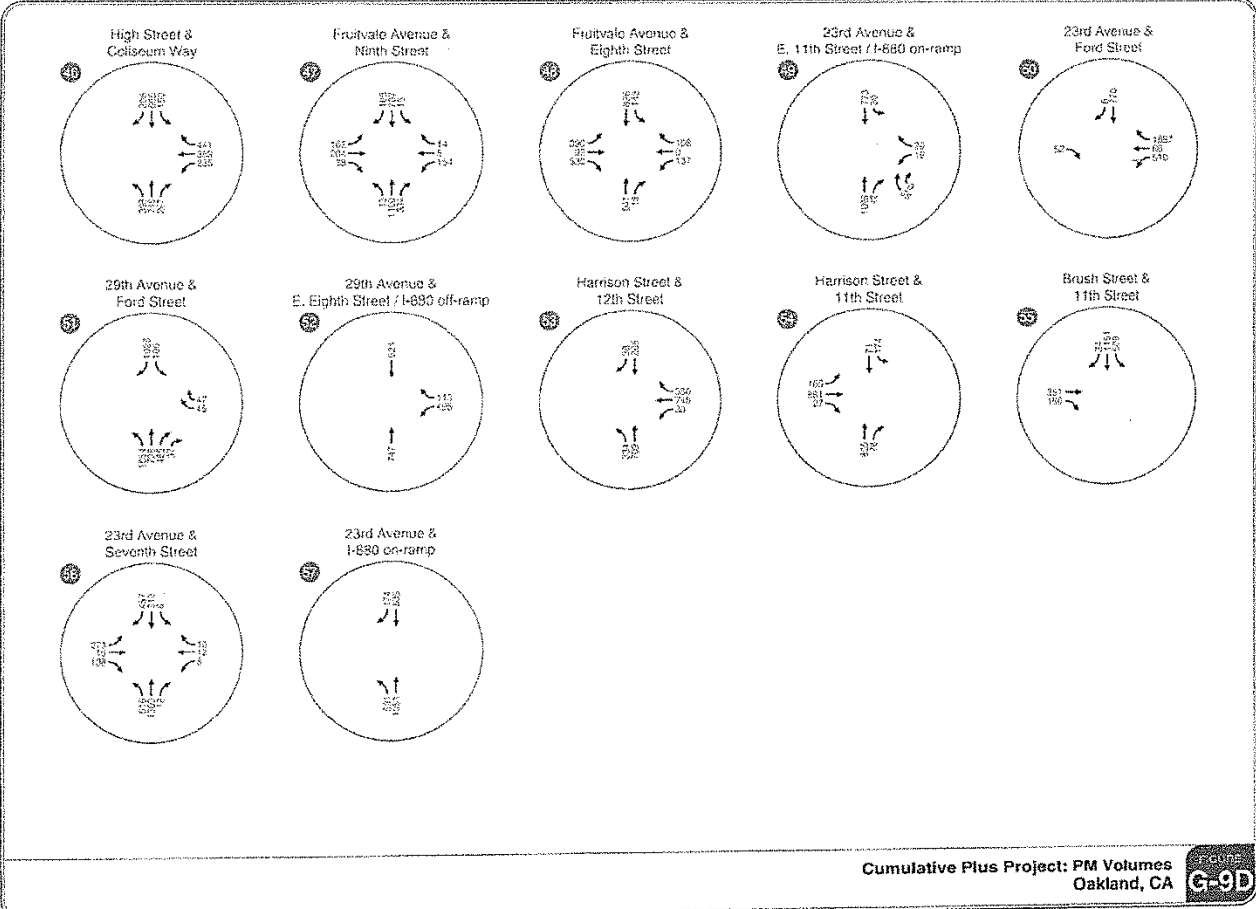
Webster Tube
 Inbound
 = $1116 + 280 + 395 + 934 + 1261$
 3986 vph

Summary by E. Thamm 10/12/13

Alameda Point EIR - Administrative Draft

August 2013

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Cumulative Plus Project: PM Volumes
Oakland, CA

G-9D

KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING / PLANNING

Letter 30. Individual (Eugenie Thomson)

- 30-1 Traffic impacts are analyzed in Section 4.C of the Draft EIR. The analysis was performed using the City's adopted thresholds of significance and methodologies, as explained beginning on page 4.C-17 under Significance Criteria. The significance thresholds are used to measure whether intersections and roadways are operating at an acceptable level of service (LOS) for four (4) different travel modes, including automobiles, transit, bicycling, and walking. The adopted thresholds do not call for an analysis of "daily traffic volumes in front of resident's homes" or "how much longer it will take to leave the island." Any attempt to measure these factors would require a great deal of speculation and assumptions about personal driving behavior, commute choices, and which resident's homes to study. The increase in average delay is reported for each study intersection; it would be speculative to calculate travel time for any individual driver.
- 30-2 As discussed starting on page 4.C-22, under the heading Travel Demand Modeling Approach, the Draft EIR explains the use the countywide travel demand model recommended by the Alameda County Transportation Commission (CTC) to determine how the existing transportation network would be impacted by the proposed project. The Model and the methodology used to determine the impacts of the Alameda Point development are the same models and methodologies used by the City of Oakland and other Bay Area local agencies and regional transportation agencies to evaluate transportation impacts.

Under Cumulative plus Project conditions, the Model projected that in 2035 project trip generation would add about 350 and 870 vehicles destined for the northbound Posey Tube during the AM and PM peak hours, respectively. However, due to the capacity constraint during the AM peak hour, the Model's traffic assignment function diverted project traffic away from the northbound Posey Tube during the AM peak hour. Outbound traffic using the Posey Tube is currently and historically has been operating at capacity, ranging from about 2,300 to 2,900 vehicles on a workday in the a.m. peak hour. Recognizing this capacity constraint, the Model did not simply add more traffic to the Posey Tube, but instead assigned trips to other travel flow paths. This capacity constraint is reflected in the change in peak hour volumes at the analysis intersections throughout the City of Alameda and into Oakland. For example, the Model assigned trips that would use the Tubes, if capacity were available, to alternate routes, such as Lincoln Avenue, Central Avenue, Otis Drive, and Clement Avenue. As disclosed in the Draft EIR Section 4.C, *Transportation and Circulation*, the impacts of the proposed project are experienced at locations adjacent to these crossings.

Thus, the overall combined change in volumes at the island gateways (tunnels and bridges) that is described and analyzed in the Draft EIR is a combination of the newly

added project traffic as well as the secondary effect of some of this project traffic displacing and diverting non-project traffic to other gateways.

- 30-3 As discussed on page 4.C-22 of the Draft EIR, the traffic model used was the Alameda CTC countywide model as it better capture growth outside the city and the proposed project is considered a regionally significant project. Draft EIR Chapter 4, Section 4.C, *Transportation and Circulation*, found eight significant and unavoidable impacts related to transportation and presents mitigation measures as feasible to reduce the impacts of project generated traffic, as required by CEQA.
- 30-4 The comment is incorrect. The transportation analysis prepared for the Draft EIR found that the project would generate a significant number of new trips and that the result of these new trips would result in a variety of impacts to all four modes of transportation (automobile, bicycle, transit, and pedestrian.) Also, please see responses to Comments 30-2, 30-3, 30-5 through 30-9.
- 30-5 The analysis of traffic impacts was prepared using the Alameda CTC travel demand model, which is the accepted countywide for travel demand forecasting. The City's adopted methodologies for analyzing vehicle, bicycle, pedestrian, and transit level of service were employed to identify potential impacts to each mode. The traffic impact analysis was performed using the adopted City thresholds of significance and methodologies, as explained beginning on page 4.C-17 under Significance Criteria. Please also see responses to Comments 7-7 and 30-2 for additional details on the travel model.
- 30-6 The methodology and outline of Section 4.C, *Transportation and Circulation*, of the Draft EIR, like all the other sections in the EIR, is presented in the same fashion as other EIRs prepared by the City of Alameda and other jurisdiction in the Bay Area and statewide. The thresholds used for the transportation analysis were developed by the City of Alameda Transportation Commission at a series of public hearings with City staff, professional transportation consultants, and the public. Using these thresholds, the Draft EIR provides a complete multi-modal analysis of the project as required by General Plan Transportation Element policy. The City does not agree that the transportation analysis in the EIR is unusually difficult to follow. Ample subheadings of sections, concise descriptions, and explanations are provided in addition to more technical tables and diagrams. Additionally, Chapter 2 provides an executive summary of the project impacts.
- 30-7 The comment is incorrect. The Draft EIR did not "conclude" that the project would result in one (1) single trip in the tubes. The Draft EIR concluded that the proposed project would generate a variety of significant unavoidable impacts (see Chapter 2, *Executive Summary*, provides a convenient and easy to understand summary of the impacts). As documented in the Final EIR for the Alameda Point General Plan Amendment in 2003, the Alameda Landing Supplemental EIR in 2006, and a variety of other City of Alameda traffic studies over the last 10 years, the capacity of the Webster and Posey Tubes is a fixed to a specific number of automobiles that can cross between the two cities during the

- AM or PM peak commute periods. The City of Alameda conducts an annual count of automobiles using the tubes in the AM and PM period and reports those counts annually. It is well documented that the existing tubes have been at or near capacity for the last six to seven years. Therefore, the Draft EIR found that regional growth and other development that is planned in Alameda over the next 20 to 30 years will exceed the capacity of the Webster and Posey Tubes. The Draft EIR finds that limited capacity of the tube causes many automobile trips to divert to other crossings during the AM and PM peak period. It should also be expected that the peak hours of congestion will “spread” as more commuters choose to leave earlier or delay their commute to later in the morning to avoid the peak hours of congestion. Also see response to Comment 17-5.
- 30-8 As shown in the figure, historical traffic counts range between a low of 2,300 to a high of 3,304. Recent counts from 2012 for the Posey tubes in the AM range from 2,368 to 2,888 for the mid-week (Tuesday through Thursday) workday. These volumes for the AM peak hour are fairly consistent despite the changes in activity at Alameda Point since its height of activity as the naval air station. See response to Comment 17-6.
- 30-9 See response to Comment 30-8. New traffic counts were collected for most Alameda intersections in 2012 and some Oakland intersections in 2013. Other counts were provided from recent studies performed for the Marina Cove II project, the VA Center Draft EA, and the Central Estuary study in Oakland.
- 30-10 Comment noted.
- 30-11 Please see responses to Comments 30-1 and 30-6. The Draft EIR included the information required to be included to determine whether significant transportation impacts would occur. The thresholds used were those recommended by the City of Alameda Transportation Commission.
- 30-12 Please see response to Comment 30-1 and comment 30-11.
- 30-13 See comment 30-12. As discussed in the Draft EIR on pages 4.C-8, 4.C-13-4.C-16, and illustrated in Figure 4.C-2, the transportation analysis examined 32 study intersections in the City of Alameda. The effects of increased traffic on air quality and noise are addressed in the discussions of Impact 4.F-2, Impact 4.F-3, 4.G-1, and 4.G-3, respectively. In addition, the General Plan identifies the “quality of life” issues that must be considered and the Transportation Commission developed thresholds to measure the potential impacts and limits on mitigations that would be detrimental to quality of life.
- 30-14 Chapter 2 of the Draft EIR is an Executive Summary, and includes a summary of all of the transportation impacts and mitigation measures identified in the Draft EIR. No modification to the transportation impact analysis is necessary.
- 30-15 Please see responses to Comments 30-1, 30-7, and 30-12. The traffic impact analysis was using the adopted City thresholds of significance and methodologies, which are listed in

- the Draft EIR beginning on page 4.C-17 under Significance Criteria. Travel times are not an adopted City threshold. The study intersections used in the transportation analysis are those that are operating poorly or would be directly impacted by the proposed project. Two intersections, that provide access to Bay Farm Island are included in the LOS analysis: Island Drive at Otis Drive and Fernside Boulevard at Otis Drive.
- 30-16 Appendix G of the Draft EIR includes 786 pages of transportation background data and is cited throughout Section 4.C, *Transportation and Circulation*, of the Draft EIR. The traffic appendix includes LOS output sheets, volume data, and the CMP analysis data. The traffic appendix was included in the materials that were made available during the public review period for the Draft EIR.
- 30-17 Please see responses to comments 30-7, 2-1, 7-9, and 17-4. An Executive Summary was presented as Chapter 2 of the Draft EIR and included a summary of all the identified transportation impacts and mitigation measures. Please also see responses to Comments 30-3 and 30-14.
- 30-18 Please see responses to Comments 30-7, 2-1, 7-9, and 17-4. The Draft EIR disclosed significant and unavoidable impacts to automobile, bicycle, transit and pedestrian levels of service from the proposed project. The Webster and Posey Tubes are limited in their capacity to accommodate additional traffic during the already congested AM and PM peak periods. Finally, every EIR and traffic study prepared by the City of Alameda over the last 10 years has acknowledged and disclosed the Webster and Posey Tubes constraints and the fact that these tubes cannot accommodate a significant increase in additional cars during the AM and PM commute period. This “finding” is of course, not a surprise to the many commuters who currently use the Webster and Posey Tubes to access their off-island jobs. For these reasons, the City of Alameda General Plan Transportation Element adopted in 2008 includes a number of policies to focus City actions on reducing automobile trips from future developments through transportation demand management strategies (TDM) and ensuring that the City of Alameda severely restricts actions to enlarge the roadway system to accommodate more cars. To address future transportation congestion, the City of Alameda Transportation Element includes policies emphasizing the need to implement policies to make alternatives to the automobile (transit, bicycling, walking) more cost effective and efficient alternatives for Alameda commuters. Please see responses to Comments 30-2 and 30-3.
- 30-19 The delay represents the average delay for all vehicles at the intersection during the peak hour, which is reported per the Highway Capacity Manual methodology. During the peak hour, a specific approach or movement, such as the traffic leaving Bay Farm Island, may experience more than the average delay. At the intersection of 6th and Jackson streets, the 1.5 seconds of delay for the southbound right applies the uncontrolled movement based on the Highway Capacity Manual methodology.
- 30-20 The intersection analysis is consistent with the methodology and approach applied by the City of Oakland in its own impact analysis for environmental documents. See responses

- to Comments 2-1, 17-9, and 30-2 regarding the capacity constraint the affects the projected peak hour volumes at the Posey Tube as well as on the freeways.
- 30-21 See response to Comment 17-15. It would not be appropriate for the Draft EIR to expect a regional transportation sales tax measure to pass after a similar measure recently failed. Furthermore, after 12 years of efforts by Alameda CTC and City of Alameda to identify improvements for the Broadway Jackson Interchanges, the Chinatown community and the City of Oakland have been unable to agree to a proposed improvement plan. For these two reasons, it would not be appropriate for the Draft EIR to state that these improvements are “reasonably foreseeable.” Additionally, these proposed improvements are neither programmed nor funded. If the Draft EIR had assumed that the sales tax measure had passed and the improvements were constructed, the Draft EIR would have also concluded that the impacts in Chinatown would be lessened and the Draft EIR would have understated the impacts of the project.
- 30-22 See response to Comment 17-16. As also presented in response to Comment 17-19, the City of Alameda disagrees with the comment. It would not be appropriate for the Draft EIR to expect a regional transportation sales tax measure to pass after a similar measure recently failed. Furthermore, over 10 years of efforts by Alameda CTC and City of Alameda to identify improvements for the Broadway Jackson Interchanges, the Chinatown community and the City of Oakland have been unable to agree to a proposed improvement plan. For these two reasons, it would not be appropriate for the Draft EIR to state that these improvements are “reasonably foreseeable” because they are neither programmed nor funded. Furthermore, if the Draft EIR had assumed that the sales tax measure had passed and the improvements were constructed, the Draft EIR would have also concluded that the impacts in Chinatown would be lessened and the Draft EIR would have understated the impacts of the project.
- As stated on page 4.C-22 of the Draft EIR, “for consistency with recent model forecasts for other studies in Alameda, the recently updated Alameda Countywide travel demand model, which is based on ABAG *Projections '09* and includes network changes and regional improvements outside the City of Alameda, was used. The zonal detail, street network and land use from the City of Alameda travel model developed as part of the Transportation Element were merged into the Alameda Countywide travel model. The updated 2035 street network includes improvements such as the improvements at the 23rd Avenue/29th Avenue interchanges on I-880.” Proposed street network projects that have received limited to zero funding or that are yet to receive substantive community and municipal support were not included in the model.
- 30-23 As presented in Chapter 5, *Alternatives*, of the Draft EIR, three of the six evaluated alternatives to the proposed project evaluated included more residential uses than what is proposed under the project.
- 30-24 John (Jack) Hutchison is a California Licensed Professional Engineer, P.E. No. 1411.

Lesley Lowe

From: PHILIP TRIBUZIO <tribuzio@sbcglobal.net>
Sent: Sunday, September 15, 2013 11:37 PM
To: Jott@alamedaca.gov
Subject: Alameda Point Transportation

ennifer Ott, Chief Operating Officer Alameda Point

Jott@alamedaca.gov

Andrew Thomas, City Planer

2363 Santa Clara Avenue **Alameda, CA 94501**

Regarding transportation at Alameda Point as applied in DEIR.

With bay area public transit limited, and congested vehicle traffic becoming more time consuming and congested,

I submit for your consideration an inclusion of facilities for a growing use of fast efficient and flexible air transport.

The FAA wont allow fixed wing aircraft to operate off Alameda, but presently allow helicopters to normally use Alameda air space.

The present control tower west of the lagoon is a perfect location with room for two or more concrete landing areas.

A helicopter operation would be consistent with EIR requirements.

A helicopter operation would conform with historic, existing land use. Very low construction activity as most facilities presently exist. A helicopter operation would limit noise and air pollution and be an addition to the transit hub in the population center of the bay area.

All the above can be managed by the city planing department as franchised real estate.

As an Alameda home owner, I believe such a transport hub would add to Alameda property values.

Respectfully submitted as input proposal to Alameda Point development in regard to DEIR and ferry and water taxi hub.

Philip Tribuzio.

416 Shell Gate Road, Alameda 94501 E<tribuzio@sbcglobal.net>

31-1

Letter 31. Individual (Philip Tribuzio)

- 31-1 Helicopter service to Alameda Point is not part of the proposed project; however, the commenter's suggestion will be forwarded to the Planning Board and City Council for consideration.

>>> PHILIP TRIBUZIO <tribuzio@sbcglobal.net> 10/6/2013 4:56 PM >>>

Jennifer Ott; jott@alamedaca.gov October 6, 2013.

In reference to my input on planning commission DEIR.

An addendum to my suggestion of a helicopter operation at alameda point that would be Multi- passenger long distant helicopters of the ``Osprey” design that would increase value of the transport hub with air transport to distant towns without air ports.

TAKE NOTE; President Obama made use of a military Osprey to transport his dog to their vacation area.

It was safefor his dog, so it would be safe for people.

32-1

Philip Tribuzio.

Letter 32. Individual (Philip Tribuzio)

32-1 Please see response to Comment 31-1.

Andrew THOMAS - Response to DEIR

From: Ewart Wetherill <redwetherill@sbcglobal.net>
To: <athomas@alamedaca.gov>
Date: 10/21/2013 3:44 PM
Subject: Response to DEIR

28 Cove Road

Alameda, California 94502

21 October 2013

Andrew Thomas, Planning Department, City of Alameda

Re: Draft Environmental Impact Report (EIR)

Dear Mr. Thomas:

This memo is in response to your call for comments on the proposed Draft EIR for development of Alameda Point.

The EIR format, typically compiled by competent and well-practiced professionals, has evolved into a detailed and intimidating compilation with a very limited review period. This makes it difficult to absorb for anyone not intimately acquainted with the method of analysis, the need for constant reference sources and the bewildering use of acronyms. However, if one uses the CEQA "rule of reason" noted in Section 5, Alternatives it becomes apparent that the report is very narrowly focused and includes some underlying assumptions that should be questioned. Several items of particular concern are noted below.

33-1

Vehicular traffic

We do not know the criteria used in computer modeling of projected changes in traffic levels but some items do not appear to be consistent with county or regional studies. We question seriously whether the criteria used are really applicable to an island community with few points of access and egress.

33-2

The tables in Appendix G suggest that adding 1400+ houses will not increase outbound morning traffic; this is certainly not consistent with the change in traffic flow after closing of the naval base or with the cumulative effect of total traffic that should reasonably be anticipated by including housing projects already approved under the auspices of ABAG.

33-3

Potential hazards

We have found no serious reference to the condition of the Posey and Webster tubes. Past experience has shown that they will be the obvious route of choice for traffic approaching or leaving Alameda

33-4

Point, and expecting drivers to fight already-crowded street traffic to use any of the bridges is unrealistic. And yet we have been unable to get any response from the Planning Board to questions submitted on two recent occasions concerning the safety of commuters in either tube in the event of a major earthquake on the Hayward Fault less than four miles away. One engineering report received by the City from Caltrans in 2003 stated that strengthening of the tubes had been intended in 2002 but was set aside because of lack of funds. Consequently, this belated upgrading should be an integral part of any further development that would increase traffic to/from Alameda.

33-4
cont.

Rise in sea level

Ways to accommodate rising sea level are well documented in the study proposing a new "town centre" at Alameda Point. This proposal is clearly geared to sell the view of San Francisco bay and to find a way to utilize left-over hangars etc. However, it does not explain why Alameda, which already struggles with two retail centres, would benefit from a third. Further, we have a shining example in Jack London Square to demonstrate that a bayside location, a ferry terminal and better accessibility do not ensure a successful retail centre. However, these considerations are secondary to the question of who pays the cost of the extremely expensive remedial site work that would be required to make this proposal even remotely sensible. We are also told on good authority that at very high tides one end of the Webster tube is already close to flooding.

33-5

33-6

33-7

Environmental concerns

So far the city of Alameda has escaped the worst of the steadily-deteriorating urban sprawl of the East Bay because of its separation by water. However, having still more vehicles - and particularly heavy diesel trucks - traversing the island, using both residential and main shopping streets - can only inflict still more air and noise pollution on the unfortunate residents.

33-8

Alternatives

One alternative to this proposed development has been obvious since the closing of the naval base and airfield - do little or nothing and let the site return to nature in the same way that former salt ponds have been successfully removed in the South Bay. With the rise in sea level, the remaining land area could in time become a place of recreation with significant value to the city. This would have some costs but on a very small scale and with less hidden costs than what is being proposed. We recommend that this alternative be given at least a small fraction of the time and effort that has obviously been invested in this Environmental Impact Report.

33-9

Sincerely,

Ewart A. Wetherill, AIA emeritus

Letter 33. Individual (Ewart Wetherill)

- 33-1 As explained in Chapter 4, page 4-1 of the Draft EIR, the Draft EIR has been prepared in accordance with CEQA, as amended (Public Resources Code § 21000, et seq.), and the CEQA *Guidelines* (California Code of Regulations § 15000 through 15378) and includes a discussion of all the resources areas of Appendix G with the exception of Agricultural and Forestry and Mineral Resources, which are not found in the project area as discussed in Chapter 6, Section E. The format of the document is presented in Chapter 1, *Introduction*, and further described in the introduction to Chapter 4, *Environmental Analysis*. The public review and comment period for the Draft EIR was from September 3, 2013 to October 21, 2013, which is longer than the 45-days required by CEQA *Guidelines* § 15105(a).
- 33-2 As explained on page 4.C-23 of the Draft EIR, for consistency with recent model forecasts for other studies in Alameda, the recently updated Alameda Countywide travel demand model, which is based on ABAG *Projections '09* and includes network changes and regional improvements outside the City of Alameda, was used. Alameda-specific zonal detail, street network and land use from the City of Alameda travel model developed as part of the Transportation Element were merged into the Alameda Countywide travel model. The updated 2035 street network includes improvements such as the improvements at the 23rd Avenue/29th Avenue interchanges on I-880.
- 33-3 The Draft EIR found that the proposed project would generate a variety of significant unavoidable impacts (see Chapter 2, *Executive Summary* for a summary of the impacts.) As documented in the Final EIR for the Alameda Point General Plan Amendment in 2003, the Alameda Landing Supplemental EIR in 2006, and a variety of other City of Alameda traffic studies over the last 10 years, the capacity of the Webster and Posey Tubes is a fixed to a specific number of automobiles that can cross between the two cities during the AM or PM peak commute periods. The City of Alameda conducts an annual count of automobiles using the tubes in the AM and PM period and reports those counts annually. It is well documented that the existing tubes have been at or near capacity for the last six to seven years. Therefore, the Draft EIR found that regional growth and other development that is planned in Alameda over the next 20 to 30 years will exceed the capacity of the Webster and Posey Tubes. The Draft EIR finds that limited capacity of the tube causes many automobile trips to divert to other crossings during the AM and PM peak period. In addition to diversion of commute hour traffic, it should also be expected that the peak hours of congestion will “spread” as more commuters choose to leave earlier or delay their commute to later in the morning to avoid the peak hours of congestion. Also see response to Comment 30-7.
- 33-4 Originally constructed in 1928, the Posey tube is the older of the two subterranean roadways, with the Webster Street tube completed much later in 1963. Both had similar designs and were later found to be vulnerable to earthquakes largely due to the presence of potentially liquefiable materials immediately surrounding the tubes. Beginning in April

- 2000, Caltrans performed major seismic upgrades through jet grouting methods to stabilize and strengthen surrounding soils by injecting a cement slurry mixture into the subsurface materials around the tubes. Work was completed on October 31, 2003, and is now considered by Caltrans in a 2011 report to meet current seismic standards.²⁴ Nevertheless, the potential for the tubes to incur some level of damage following a substantial earthquake cannot be fully ruled out and that could require temporary closure of one or both tubes. If such circumstances occur, traffic would likely be routed to one of the other bridges that provide access to the island and expanded ferry service would be provided by the Water Emergency Transit Authority as mandated by Senate Bills 976 and 1093. However, considering the more recent seismic upgrades that the tubes have received, catastrophic failure of the tubes is not considered likely.
- 33-5 The comment concerns the economic feasibility of the amount of retail use proposed for the project site, which does not address the environmental adequacy of the EIR. The comment is noted.
- 33-6 Please see response to Comment 33-5. As described in Chapter 3, *Project Description*, private investment at Alameda Point would be necessary to fund the public and private improvements envisioned by the plan. In addition, as discussed in the on page 4.J-36 of the Draft EIR the Navy has completed a substantial amount of cleanup work and prepared a Finding of Suitability for Transfer (FOST) for a large portion of the project area. The Navy is also committed to “continue to complete cleanup requirements and prepare FOST(s) for the remaining portions of Alameda Point that are to be transferred to the City, including sites that are still active prior to commencement of construction for proposed development.”
- 33-7 Sea-level rise occurring from global warming is a worldwide issue of concern. The Draft EIR analyzed the impacts of sea level rise on the project site (see Impact 4.I-8). The Draft EIR is not required to analyze the impacts of sea level rise at other off-site locations or on the regional transportation network.
- 33-8 The impacts of the proposed project related to *Air Quality* and *Noise* are discussed in Sections 4.F and 4. G of the Draft EIR, respectively.
- 33-9 The comment is noted and will be forwarded to the Planning Board and City Council for consideration. Under CEQA *Guidelines* §15126.6, the Draft EIR is not required to study the suggested alternative in which the site would be entirely vacated and eventually inundated by San Francisco Bay.

²⁴ Caltrans, State Route 260 Transportation Concept Report, http://www.dot.ca.gov/dist4/systemplanning/docs/tcr/sr_260_tcr_final.pdf, June 2011.

Andrew,

I appreciate all of the hard work that City Staff has put into providing such a wealth of information on the impacts of the proposed development at Alameda Point. Please accept the following, hastily written comments on the EIR. If there are questions about them, please feel free to contact me.

Transportation:

- The EIR repeatedly states that Transportation Demand Management (TDM) is “speculative.” This is true of any future planning, including the modeling that all EIR’s rely on. This fact does not make TDM ineffective or unworthy of analysis. At the joint Planning Board/Transportation Commission meeting, both bodies recommended that the city continue to pursue the 10/30 reduction strategies for TDM at Alameda Point. 34-1
- The City of Alameda is committing to implement TDM, in accordance with the General Plan. General Plan policy 4.4.2.a requires that “Transportation related mitigations for future development should first implement TDM measures.” Therefore, once the city’s analysis has determined where impacts may occur, the city should apply the TDM reductions to the projections and determine which of those impacts are mitigated. If impacts continue to exist, then a second set of mitigations, consistent with the General Plan, should be proposed. These should include looking at what level of TDM would be required to entirely mitigate the impacts. The city can then decide whether TDM, on its own, will be enough. I appreciate that the city identified the level of impact in the DEIR, I encourage you to do so when proposing second-level mitigations in the FEIR. 34-2
- The EIR currently proposes mitigations that are forbidden by the General Plan. As the city has not begun the process to amend these general plan policies, the EIR should not be proposing mitigations (and the fees that will be charged to implement them) that are not permitted. Additionally, the EIR appears to misinterpret the General Plan policy 4.4.2.a. I was the chair of the Transportation Commission when this policy was written. “Roadways will not be widened to create additional automobile travel lanes” should not be interpreted to mean that adding lanes via removing parking. The intent of this policy was to continue to use the existing capacity of city street network and reduce traffic rather than adding through- and turn-lanes which create significant livability issues in neighborhoods, and degrade the pedestrian and cycling environment. 34-3
- In the instances where staff proposes to add turn lanes as a second mitigation, the impacts on additional pedestrian exposure to vehicle traffic and to the on-street bicycle environment should be analyzed and disclosed. 34-4
- Bicycle Network is not well evaluated. This network evaluation should be as extensive as the Auto network and should not be limited to priority bicycle streets, but also high attractions locations like Webster streets. Key West/East streets, like Santa Clara, Otis, etc. are not included. 34-5
- Pedestrian LOS should be measured at all Alameda intersections that Auto LOS is measured. 34-6

- Transit LOS needs to include Santa Clara, The city’s main transit corridor, as well as Lincoln, and any other transit priority street. | 34-7
- Transit LOS on corridors that lead off island are incorrect. As stated in the EIR “A segment that crosses a City boundary shall also include five bus stops, but the last stop shall be the first bus stop outside the City of Alameda.” Currently no segments cross the estuary, though transit on Fruitvale, Park and Webster all do. | 34-8
- Table 4.C-10 presents “existing” and “existing plus project” pedestrian LOS data. This table does not present all of the data for all intersections. All modes should be treated similarly. If the EIR is going to present the Auto Intersection LOS regardless of impact, then the same should be done for all modes. (same comment for transit and bicycle LOS). | 34-9
- The Pedestrian LOS numbers for Existing Webster/Atlantic do not seem correct. Could you confirm the calculations are using the appropriate assumptions, including that “Green Time” does not include flashing red, when pedestrians are not legal suppose to enter the intersection. It’s hard to believe that pedestrians on all four legs of the intersection only wait an average of 30 seconds for a light. | 34-10
- Analysis of the Alternatives should be presented side by side with the other analysis so that decision-makers and the public have the opportunity to decide whether there is an environmentally superior alternative and what the impacts of the alternatives are. | 34-11

Addition EIR comments:

- The amended General Plan Table 2-7 (Page 3-33) reverts to previous names (Civic Core, Inner Harbor, Marina, West Neighborhoods) that do not match current planning labels. This will likely cause confusion. Additionally, General Plan Table 2.7 does not match the development assumption numbers presented in Table 3-1. | 34-12
- Page 3-37 lists the “Bay Plan” as projecting seal level rise for 2050 at 16 inches. Isn’t the projections 18-inches? | 34-13
- Page 4.a-20 – General plan overriding policy for over 20 years has been “De-emphasis of the SOV.” This should be listed as it’s one of the major planning guidelines of the entire General Plan. | 34-14
- Climate Change/Sea Level rise sections should be update to include data from IPCC V.5. | 34-15
- There should be analysis of how this plan helps to meet AB32 state mandates for reaching 1990 levels of GHG by 2020. | 34-16
- Page 4.F-14 is missing General Plan policy 4.2.3.d:
 “Support and prioritize trip reduction strategies that maximize air quality benefits and reduce greenhouse gas emissions.
 1. Support the use of alternative fuel vehicles for all transportation modes.
 2. Encourage shift of trips to alternative transportation modes. This includes short trips, as these will have a disproportionate impact on air quality.” | 34-17
- Page 4.F-41: Table 4.f-8. Under “street sources” it seems unlikely that Main Street will have twice the PM2.5 concentration as Atlantic and Stargell combined. | 34-18

Page 4.G-9 does not include Objective 4.2.3.a “Street projects should be designed to minimize the requirements for sound mitigation measures. Do not implement street projects that necessitate a soundwall.” 4.2.3.b “Ensure that transportation system improvements comply with accepted noise standards in residential areas. Monitor the noise impacts of the existing transportation system. Identify strategies to mitigate excessive noise conditions.”

↑
34-18
cont.

- Analysis of 4.g-3 makes the mistake of assuming that TDM impacts are hard to quantify. Additionally, the mitigation appears to assume that there is nothing that can be done about traffic related noise. This is not correct. Slowing the speed on RAMP would drop the auto related noise significantly. This is a simple, easy to implement solution that could be recommended. The same could happen on Main Street. Additionally, analysis of the impacts of various roadway materials, windows for residences along truck routes, etc. should be done.

34-19

- Page 4.I-29: Can you confirm that the area proposed for projection from sea level rise will be able to protect above 55” if needed at some point?

34-20

- The alternatives selected do not reflect those that were requested by the community. For some reason, increases in the amounts of retail were included in alternatives that looked at the impacts of housing increases. These should be separated into their own analysis to provide a more accurate picture of the impacts that the community requested be studied.

34-21

- I have attached scans of Table 5-6 with hand-written adjustments to some of the analysis. On page 5-31, the analysis of the Multifamily alternative appears to assume that all infrastructure needed to build the base project would be built, and therefore, not enough funding would be raised to build it. In this scenario, much of the infrastructure for the main street neighborhood would not need to be provided. This savings would likely offset any reductions in funding from selling multi family units instead of SFH. The rest of my comments are noted.

34-22

A quick non-EIR related comment: As the city in the Bay Area that is likely to see the largest impact from sea level rise, it is odd that we should develop Climate Change policies for the General Plan. I hope that in the coming year we can rectify that.

Thank you again for the opportunity to comment.

John Knox White

Page 5-31: Row 5, Multifamily:

There is no reason that this would be less likely to reinvest in infrastructure. This rating appears to assume that 100% of the infrastructure must be replaced, which is contrary to Alameda staff's statements that this is not a requirement or goal of this project.

Rating should be: **0**

Page 5-31: Row 6, Multifamily:

As with top, this presupposes the requirement that the non-reuse area of the point project will need to subsidize the reuse area, which is not consistent with staff's presentation of the requirements of this project

Rating should be: **0**

Page 5-31: Row 7, Multifamily:

The Multifamily proposal builds proposed housing in a configuration that has been shown to better meet this sustainability criteria than the "project" therefore it should not be rated equal to the project's rating

Rating should be: **1**

Page 5-31: Row 9, Multifamily:

How does the Multifamily alternative reduce views of the water and public access more than the "project"? Access and views will be the same in both options

Rating should be: **0**

Page 5-32: Row 3, Multifamily:

This alternative would not limit or reduce the orderliness of phasing, sizing or financing of site infrastructure any more than the "project"

Rating should be: **0**

Page 5-32: Row 4, Multifamily:

There is no reason to suspect that the Multifamily alternative would have a negative impact on the fiscal neutrality policy.

Rating should be: **0**

Page 5-32: Row 10, Multifamily:

20% of the housing in the multifamily alternative (268 existing units) are single family homes, therefore this alternative provides "a diversity of housing types" and should receive the same rating as the "project."

Rating should be: **0**

Page 5-32: Row 13, Multifamily:

APC can relocate in numerous areas of the point and could fit into any of the alternatives in this document (except no-project). There is no reason to assume that APC's relocation could only occur in the "project" or something bigger.

Rating should be: **0**

Page 5-34: Rows 2-8, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **LS**

Page 5-34: Row 9, TOD and High Density:

How would these alternatives create less safety than the project, via simply the land use decisions in the alternatives.

Rating should be: **LS**

Page 5-35: Row 1, Multifamily, TOD and High Density:

All three of these alternatives are more consistent with city policies, plans and programs,

Rating should be: **LS (less)**

Page 5-35: Rows 2-7, TOD and High Density:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM. Additionally, all three of these alternatives are more consistent with city policies, plans and programs. Some of these items (rows 4-7) have greater impact, but it's a good thing (like higher transit use, which makes better service possible).

Rating should be: **LS**

Page 5-36: Row 3, Preservation:

This should take into account whether the proposal can actually support the preservation

Rating should be: **possibly SU**

Page 5-37: Row 6, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **SU**

Page 5-38: Row 4, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **SU**

Page 5-38: Row 6, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM .

Rating should be: **LS (possibly LS (down) if impacts of increased Open Space are taken into account)**

Page 5-38: Rows 8-9, TOD:

Why will these impacts be greater than the “project?”

Page 5-39: Row 1, TOD:

Why will these impacts be greater than the “project?”

Page 5-39: Row 4, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **SU**

Page 5-44: Row 4, TOD:

Why will these impacts be greater than the “project?”

Page 5-44: Row 5, TOD:

Why would this have larger foreseeable negative impacts on Public Service and recreation? Additional units would cover the additional costs, using the same financial assumptions in the “project.”

Rating should be: **LS**

Letter 34. Individual (John Knox White)

34-1 The City of Alameda agrees with the comment. Transportation Demand Management (TDM) is a well-documented, proven, and effective program to reduce automobile use and the resulting transportation impacts from single occupancy vehicles, which were identified in the Draft EIR. General Plan Policy 4.4.2.a establishes TDM as the primary strategy that the City of Alameda should utilize to reduce or eliminate transportation impacts caused by project generated increases in automobile trips. The Draft EIR recommends that TDM be the primary mitigation imposed to reduce transportation impacts caused by the project. The Draft EIR describes the TDM program as part of the proposed project starting on page 3-22, under the Circulation Framework. The Draft EIR further identifies the TDM program in Chapter 4.C, *Transportation and Circulation* as Mitigation Measure 4.C-2a under Impact 4.C-2, related to impacts of the proposed project on the local roadway network. In addition, Mitigation Measure 4.C-2b, which is a monitoring program, would be established to regularly assess the success of the TDM program. The text on page 4.C-37 of the Draft EIR is amended as follows:

~~“Accordingly, it would be speculative to assume that the TDM mitigation measure would reduce the impact to less than significant. Therefore, if determined by the Monitoring and Improvement Program to be needed, Mitigation Measure 4.C-2.c is recommended if the monitoring reveals that the TDM measures have not successfully reduce the project automobile volumes as the impacted location.~~

34-2 As explained in Section 4.C, *Transportation and Circulation* of the Draft EIR, Mitigation Measure 4.C-2a would be the first mitigation measure applied to address transportation impacts of the proposed project. Mitigation Measure 4.C-2b, a monitoring program, would be established to regularly assess the success of the TDM program. Depending on the success of the TDM program, the City would determine which of the intersection improvements identified in the EIR and incorporated into the Mitigation Monitoring and Report Program would be required to address residual transportation impacts.

The mitigation measures identified in the Draft EIR are consistent with Policy 4.4.2.a. These measures are specifically designed to ensure that TDM is the primary mitigation measure to reduce the vehicle trips and, therefore, reduce or eliminate transportation impacts. The mitigation measures require the City to monitor the impacted locations throughout the project buildout period to confirm that the TDM program has successfully reduced any project impact to a less than significant level. In the event, and only in the event, that the City monitoring shows that the TDM programs are not avoiding or sufficiently reducing an impact, the “second level” mitigations, calling for physical improvements, could be implemented to mitigate the level of service impact at a particular location. This structure of first and second level mitigation is consistent with Policy 4.4.2.

- 34-3 Please see Chapter 5, under *Revisions to the Draft EIR*, for revisions to text for proposed revisions to certain mitigation measures to further ensure compliance with Policy 4.4.2.a.
- 34-4 The Impact Analysis in Section 4.C, *Transportation and Circulation* of the Draft EIR, contains an assessment of secondary pedestrian, bicycle, and transit level of service impacts at every location where a mitigation measure would require signal modifications or restriping to accommodate an additional turn lane. Following the description of each mitigation measure, the impact finding describes the resulting level of impact to each of the four modes of transportation (auto, transit, pedestrian, bicycle) that are designated for analysis in the City's multi-modal evaluation scheme.
- 34-5 The citywide bicycle network was evaluated in the Draft EIR (see pages 4.C-4, 4.C-17, and 4.C-45). The City's bicycle thresholds, presented on page 4.C-17 of the Draft EIR and adopted by the Transportation Commission, establish the following three factors that can impact bicycle level of service: an increase in traffic speed, an increase in traffic volume, and a decrease in street/lane width (space for bicycles). To do the analysis, the City's transportation consultants reviewed the projected increase in traffic volumes and traffic speeds resulting from the project across the entire city roadway network. This analysis identified locations of potential bicycle impacts. For those segments where the volume or speed increased significantly, an analysis of bicycle impacts occurred, as presented starting on page 4.C-45 of the Draft EIR. The bicycle impacts analysis concluded that bicycle impacts would occur at the following locations and that the following mitigation measures should be implemented to maintain bicycle level of service:

- Stargell Avenue Bikeway Improvements (Mitigation Measure 4.C-2m)
- Main Street Bikeway Improvements (Mitigation Measure 4.C-2n)
- Central Avenue Bikeway Improvements (Mitigation Measure 4.C-2o)
- Oak Street Bikeway Improvements (Mitigation Measure 4.C-5ziv)

Similar to the automobile impacts, the first level mitigation measure would be Mitigation Measure 4.C-2a (TDM Program). Pursuant to Mitigation Measure 4.C-2b, the City would monitor these roadway segments. If, and only if, the TDM program is unsuccessful, will the second level mitigation (the physical improvements to improve bicycle level of service) be required.

- 34-6 Section 4.C, *Transportation and Circulation*, of the Draft EIR contains an analysis of the potential impacts of the project on all four (4) modes of transportation (automobile, transit, bicycle, and walking). However the analysis for each mode is different, because the thresholds of significance are different and the methods for measuring impacts are different for each mode, as explained beginning on page 4.C-17 of the Draft EIR.

As described on Draft EIR page 4.C-17, the threshold for a pedestrian impact is determined by either of the following two factors: an increase in signal timing delay for pedestrians or the increase in the curb to curb width of the street. Accordingly, the analysis in the Draft

EIR examined the pedestrian level of service on intersections where the Draft EIR was proposing either a change to signal timing or a widening of the right of way.

- 34-7 The study segments for transit LOS were selected by identifying all transit priority streets in Alameda, and then focusing on those streets for which the model projected substantial changes in auto volumes. For example, while Santa Clara Avenue is a transit priority street the Model did not project substantial changes in auto volumes on Santa Clara Avenue, and, as a result, it was not included in the transit LOS analysis. In accordance with the adopted Threshold of Significance for transit, if the project is not generating enough traffic on the street to slow the speed of the traffic on that street, then there would not be an impact to transit speed.
- 34-8 As described on page 4.C-17 of the Draft EIR in the explanation of Alameda’s multi-modal significance criteria, a segment, for the purposes of analysis, is defined as the impacted bus stop location plus the two previous stops and the two subsequent stops. When a segment crosses a City boundary the last stop shall be the first bus stop outside the City of Alameda. None of the segments analyzed in the Draft EIR crossed a City boundary; however, because the segments internal to Alameda were long enough to capture any potential impacts of the proposed project on transit on roadways experiencing a large increase in automobile trips.
- 34-9 Please see response to Comment 34-6. The thresholds for each mode are different. For example, if the project does not cause an increase of automobile traffic at a particular intersection, there is no need to change the configuration of the intersection or the timing of the signal, and therefore, there is no possibility of a pedestrian impact. The pedestrian, transit, and bike LOS results tables were inadvertently left out of the Draft EIR appendix, but have been included in **Appendix B** of the Final EIR.
- 34-10 Pursuant to the HCM 2000²⁵ methodology for calculating pedestrian delay along a crosswalk at a signalized intersection, the calculation considers the amount of “effective green time” allowed for a pedestrians to cross, which includes the green and yellow portions of the cycle allocated to that movement. The comment refers to “flashing red,” which is understood to refer to the “Flashing Don’t Walk” pedestrian indicator. Pedestrians are permitted to be in the intersection during this interval, but they are advised not to begin crossing the intersection during the “Flashing Don’t Walk” interval because the remaining effective green time would not be adequate for traversing the crosswalk at an average walking speed. The calculations presented in the Draft EIR are correct.
- 34-11 The Draft EIR provided an extensive analysis of alternatives as required by and consistent with the requirements of the California Environmental Quality Act, in Chapter 5, *Alternatives*. The descriptive analysis is followed by Table 5-6, beginning on page 5-31 of the Draft EIR, which summarizes the analysis in the side-by-side format suggested by the comment.

²⁵ Transportation Research Board. 2000. *Highway Capacity Manual 2000*.

- 34-12 The General Plan land use designations and names were approved by the City Council in 2003. As described on page 3-33 of the Draft EIR, the proposed project includes a General Plan Amendment to revise Table 2-7 and the street classifications at Alameda Point.
- 34-13 The San Francisco Bay Conservation Development Commission's (BCDC) conducted a vulnerability assessment, in which the two selected sea level rise projections were 16 inches by 2050 and 55 inches by 2100.
- 34-14 General Plan Policy 4.2.4.c: "Encourage mixed use development that utilizes non-single occupancy vehicle transportation modes" is reproduced on page 4.C-14 of the Draft EIR and is acknowledged as an applicable policy. Policy 4.2.4.c is also discussed under Impact 4.C-10, related to *Consistency with Adopted Policies, Plans or Programs Supporting Alternative Transportation*.
- 34-15 The June 7, 2013, Final Draft of the IPCC report has been accepted but not approved in detail, and the report is not to be cited, quoted, or distributed.²⁶ The flood protection system for the proposed project would be designed for an 18-inch sea level rise above the 100-year flood protection level; this design level accounts for the recent information available in the CO-CAT document released in March 2013 and IPCC report in September 2013. Please see response to Comment 34-13.
- 34-16 As described on page 1-7 of the Draft EIR, the proposed project is included in *Plan Bay Area* as a Priority Development Area (PDA). Through incentives, *Plan Bay Area* encourages future development within PDAs. According to ABAG, "this allows the region to reduce the emission of GHGs, house our population in a wide range of neighborhoods, preserve our natural resources, and support the creation of and greater access to new employment opportunities."²⁷ As such, the development of the proposed project is part of the region's strategy for reducing GHG pursuant to the requirements of SB 375 and AB 32. Further, as discussed in Impacts 4.F-7 and 4.F-10, the proposed project would not have a significant impact on GHGs. As stated in the analysis the net GHG emissions associated with the project would be below BAAQMD's "efficiency threshold" of 4.6 metric tons of CO₂e per service population per year. This would represent a cumulatively less-than-significant GHG impact. Although not relied on in the above analysis, implementation of Mitigation Measures 4.F-2a, 4.F- 4, and 4.F-9b would further reduce GHG emissions associated with construction and operations of the project.
- 34-17 General Plan Policy 4.2.3.d is added to page 4.F-14 of the Draft EIR:

4.2.3.d Support and prioritize trip reduction strategies that maximize air quality benefits and reduce greenhouse gas emissions.

²⁶ Please note that the recent June 7, 2013 Final Draft of the IPCC report has been accepted but not approved in detail and as stated in the report it is not to be cited, quoted, or distributed.

²⁷ ABAG and MTC, 2013. Plan Bay Area. *Strategy for a Sustainable Region*. July 2013

1. Support the use of alternative fuel vehicles for all transportation modes.
2. Encourage shift of trips to alternative transportation modes. This includes short trips, as these will have a disproportionate impact on air quality.

34-18 The BAAQMD Roadway TAC Screening tables were used to predict emissions along the specified roads. The estimated PM_{2.5} emissions on Main Street would have twice the PM_{2.5} concentration as Atlantic or Stargell avenues due to the inherent differences in concentrations for North-South and East-West roads included in the BAAQMD Roadway TAC Screening tables, as well as the distance of sensitive receptors from the roadways.

Regarding the General Plan Objective 4.2.3a and 4.2.3b, and Policies 4.2.3a and 4.2.3b are added to page 4.G-9 of the Draft EIR.

4.2.3.a Street projects should be designed to minimize the requirements for sound mitigation measures. Do not implement street projects that necessitate a soundwall.

4.2.3.b Ensure that transportation system improvements comply with accepted noise standards in residential areas. Monitor the noise impacts of the existing transportation system. Identify strategies to mitigate excessive noise conditions.

34-19 Using rubberized asphalt for the noise-impacted streets where appropriate could reduce noise levels. One noise study showed that rubberized asphalt resulted in an average of a 4 dBA reduction in traffic noise levels compared to conventional overlays (Sacramento County, 1999), which represents a 60 percent reduction in traffic noise energy and a clearly perceptible decrease in traffic noise. Achieved noise reductions from fences or barriers can vary, but typically range from approximately 5 to 10 dBA, depending on construction characteristics, height, and location. Sound barriers are not permitted per General Plan policy, but it is noted that sound barriers currently exist along portions of Appezato Parkway (Atlantic Avenue) and Willie Stargell Avenue. However, for existing uses along other impacted street segments, there are many locations where soundwalls or fences would not be feasible due to space constraints or driveways (e.g., Main Street). Also, rubberized asphalt repaving could improve the impacted streets, but areas that are not completely repaved may still experience significant noise impacts.

While these measures could substantially reduce the impact of increased traffic noise on the exterior and interior environment of existing and proposed noise-sensitive uses, as required by City policy and would be implemented by Mitigation Measure 4.C-2a, identified in the Draft EIR, the preferred approach would be to reduce vehicle trips through a TDM program. The TDM program will be designed to be enforceable and successful. As a result, noise from project generated traffic would be reduced in proportion to the reduction in overall trips.

- Regarding reduced speed limits, the citywide speed limit is 25 miles per hour. The City could evaluate lower speed limits as a matter of policy. However, the EIR does not identify reducing speed limits as a potential mitigation measure because if a street is designed for a particular speed, posting a sign to lower the speed does not necessarily cause drivers to slow down.
- 34-20 As discussed under Impact 4.I-8, the flood protection measures would be designed with the ability to adapt to 55 inches (approximately 1.4 meters) of sea level rise. Additionally, the MIP plans for flood protection, including seal-level rise, beyond 55 inches.
- 34-21 As stated on page 5-1 of the Draft EIR, the range of alternatives shall include alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project (*CEQA Guidelines* § 15126.6(a)-(c)). CEQA requires that an EIR describe and evaluate a range of reasonable alternatives to the proposed project, or to the location of the proposed project, and evaluate the comparative merits of the alternatives (*CEQA Guidelines* § 15126.6(a), (d)). The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (§ 15126.6(a), (f)). CEQA does not require an analysis of every conceivable alternative. Further, as stated on page 5-2 of the Draft EIR, the selection of alternatives was designed to create a range of alternatives that would achieve at least some of the project objectives. In addition, the Draft EIR did present alternatives with more housing and retail (High Density Alternative) and with less housing and retail (the Preservation/Less Development Alternative) for a reasonable range of Alternatives.
- 34-22 In general, the alternatives that would result in more development were found to have greater impacts. Although higher density at Alameda Point could conceivably result in less development elsewhere in the Bay Area that might be less accessible to transit, it would be speculative to make this determination in the EIR for this project, given that the City of Alameda has no jurisdiction over development elsewhere in the region. Moreover, reducing or avoiding regional impacts does not necessarily translate into a reduction in the local impacts.

The comment is correct that if additional areas of Alameda Point are identified as areas where no new development would be approved, these decisions could result in a lower cost for some elements of the infrastructure plan, which could in turn reduce construction related impacts to air quality, transportation, and noise. However, there are implications of not developing certain areas, such as the Main Street Neighborhood, that could result in the inability to serve the long-term needs of the Supportive Housing Units due to the failure of deteriorating existing infrastructure.

**Comments- Alameda Point Draft EIR Planning Board October 28, 2013
Brian Schumacher bdschumacher@gmail.com**

After looking through the whole paper copy of the Alameda Point Draft EIR to decide what I had to skip, I was going to focus on the Transportation section for traffic issues and Hydrology for sea level rise. But I never got to the sea level issues.

The more I looked at Transportation the more time I spent.

Alameda Point is quiet today, compared to the stated plans for adding 1400 homes, 3200 residents, 8900 jobs, and 5 million sqft of businesses.

Yet the intersections, across the Island, that are crowded today (showing the worst Level of Service Level F) are much the same ones as in the year 2035.

The report should explain why they dont differ more, and why the analysis and traffic model of development at the Point is accurate and complete, and not in error.

The F Level of Service Level means that the average wait is at least 2 minutes but it could be longer, and a few intersections show over 2000 or 3000 seconds average waiting time during peak commute hour, but this doesn't make sense either because drivers will just do something else.

The reason given in several places is background growth, as if this outcome is inevitable.

But because of an EIRs complexity the contractor specialist should clearly present all findings conclusions and recommendations, with clear summaries of important points.

Simply adding a summary to the Final EIR would be too little too late. Many residents could say something like 'Well why didn't they say so, because I would have said they need a different plan.'

Instead, for a project that will take over two decades, the Draft EIR Comments should be used during another 2 months, to guide more analysis and writing of a Supplemental Draft EIR, before the City approves a Final EIR.

35-1

35-2

Letter 35. Individual (Schumacher)

35-1 The Draft EIR concluded that the proposed project would generate significant and unavoidable impacts (see Chapter 2, *Executive Summary* for a summary of the impacts.) As documented in the EIR for the Alameda Point General Plan Amendment in 2003, the Alameda Landing Supplemental EIR in 2006, and a variety of other City of Alameda traffic studies over the last 10 years, the capacity of the Webster and Posey Tubes is fixed to a specific number of automobiles that can cross between the two cities during the AM or PM peak commute periods. The City of Alameda conducts an annual count of automobiles using the tubes in the AM and PM periods and reports those counts annually. It is well documented that the existing tubes have been at or near capacity for the last six to seven years. Therefore, the Draft EIR found that regional growth and other development that is planned in Alameda over the next 20 to 30 years will exceed the capacity of the Webster and Posey Tubes. The Draft EIR finds that the limited capacity of the tubes causes many automobile trips to divert to other crossings during the AM and PM peak periods. In addition to diversion of commute hour traffic, it should be expected that the peak hours of congestion will “spread” as more commuters choose to leave earlier or delay their commute to later in the morning to avoid the peak hours of congestion. Also see response to Comment 30-7.

35-2 As set forth in CEQA *Guidelines* § § 15126.2 and 15126.4, before deciding whether to approve a project, public agencies must consider the significant environmental impacts of the project and must identify feasible measures to minimize those impacts. Pursuant to CEQA *Guidelines* §15063(b), if any aspect of the proposed project, either individually or cumulatively, may cause a significant effect on the environment, the lead agency must prepare an Environmental Impact Report (EIR) unless the project can be modified to mitigate all of the significant adverse environmental effects before an EIR is prepared (CEQA *Guidelines* §15063(c)(2)). The City of Alameda has determined that the size, scale, and potential impacts resulting from the proposed project require the preparation of an EIR and presented a full transportation impact analysis in Section 4.C, *Transportation and Circulation* of the Draft EIR.

The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving the proposed project and must reflect the Lead Agency’s independent judgment and analysis of the significant environmental effects of the proposed project on the environment (California Environmental Quality Act (CEQA) *Guidelines*, §15090).

CHAPTER 4

Responses to Comments at the Public Hearing on the Draft EIR

The public hearings on the Draft EIR were held on September 9 and 25, 2013. The following is a summary of comments received at the public hearings, followed by responses that address those topics. Some of the topics raised have been previously responded to in Chapter 3 (Written Comments on the Draft EIR and Responses to Comment).

A. Responses to Comments from September 9, 2013 Hearing

The following comments were made at the Planning Board public hearing on the Draft EIR on September 9, 2013:

Ethan Clifton

The commenter stated that the Draft EIR proposes to change the timing of the traffic lights and restripe the street; and that Oakland's Chinatown will be heavily impacted by the project.

Response: This comment appears to refer to proposed mitigation measures that require specific improvements at intersections including optimization of signal timing and restriping of lanes. As discussed in Section 4.C, *Transportation and Circulation* of the Draft EIR, the proposed project would alter travel patterns in Alameda and in Oakland's Chinatown. The Draft EIR identifies implementation of a Transportation Demand Management (TDM) program as the primary and initial mitigation measure, which would be implemented prior to any physical improvements. The TDM program is part of the proposed project, as described starting on page 3-22, under the Circulation Framework. The Draft EIR further requires the TDM program to be implemented pursuant to Mitigation Measure 4.C-2a under Impact 4.C-2, Chapter 4.C, *Transportation and Circulation*, to mitigate the impacts of the proposed project on the local roadway network. As required by Mitigation Measure 4.C-2b, a monitoring program would be established to regularly assess the success of the TDM program.

Doug deHaan

The commenter stated that the City has completed many EIRs and traffic studies regarding Alameda Point in the past; that the EIR talks about the ferry service which only goes to San Francisco which is not where the bulk of residents work; that BART is far too cost prohibitive;

and that he is worried about the flood plain. The commenter urged the board members to look at the past studies.

Response: Under CEQA, analysis of a project's environmental impacts should be performed based on the physical environmental conditions as they exist at the time the notice of preparation (NOP) was published (CEQA *Guidelines* § 15125). In accordance with these guidelines, the Draft EIR relied on current data and information to develop the CEQA baseline. For discussion regarding the traffic model that was used for the proposed project, please refer to response to Comment 7-9 in Chapter 3 of this Final EIR regarding the travel demand model. The proposed project would be accessible from both BART and the existing and future ferry terminal, using existing transit service, and future service options developed as part of the TDM program.

The Draft EIR includes an extensive analysis of the flood hazards at Alameda Point in Sections 4.H, I, and M. The Master Infrastructure Plan is specifically designed to address existing flooding issues and potential future flooding issues related to sea level rise.

Karen Bey

The commenter stated that she is looking forward to the completion of the TDM plan. She mentioned that she rides the ferry and has noticed a huge increase in ridership recently. She feels the City needs more ferry terminals, since it is surrounded by water, and feels the developers should help pay for them.

Response: The commenter's support of the TDM plan and proposed ferry services is acknowledged. As described in Draft EIR Chapter 3, *Project Description*, starting on page 3-22, developers would be required to comply with the proposed TDM plan and provide an annual financial contribution to fund TDM services. Further, the proposed project does not require the removal of the existing ferry terminal if the service moves to the Seaplane Lagoon.

B. Responses to Comments from September 25, 2013 Hearing

The following comments were made at the joint City Council-Planning Board public hearing on the Draft EIR on September 25, 2013:

Dorothy Kamimoto

The commenter stated when streets were adversely affected, that there would be hearing ahead of time. She also stated her concern that Bayview Drive has been previously identified as the second most traffic-impacted street in the City, and is particularly still used as a shortcut for large trucks. Concern that traffic calming measures have not yet been finished, and additional concerns that the development overall will degrade quality of life.

Response: With respect to the commenter's concern about public notification of potential effects on street, the purpose of the public hearings held on September 9 and September 25,

2013 were to receive public comments about the Draft EIR for the Alameda Point project, which includes a transportation analysis of impacts on Alameda streets in Section 4.C. Please refer to responses to Comments 12-1, 20-1 and 24-1 that address the commenter's concerns about traffic levels and mitigation measures along Bayview Drive.

Susan Galleymore

The commenter stated that there has not been enough emphasis on environmental health impacts. In particular, she is concerned about how certain contaminants (e.g. VOCs) will impact the surrounding environment, including potential unknown synergistic effects that are hard to study.

Response: Draft EIR Section 4.J, *Hazards and Hazardous Materials*, addresses the potential for exposure to the public of contaminants including volatile organic compounds encountered during excavation or other ground disturbing activities (see discussion under Impact 4.J-7 of Draft EIR on page 4.J-42).

Helen Sause

The commenter stated her concerns about utilities limiting density; concerns about limited housing limiting the job growth desired; concerns about a better jobs/housing balance; concerns about increasing public amenities; and concerns about streets following grid patterns.

Response: Draft EIR Chapter 3, *Project Description*, describes that the majority of the existing utility systems (including wastewater, stormwater, potable water, electrical, natural gas and telecommunications) are beyond their useful service lives and cannot support redevelopment of Alameda Point without replacement or rehabilitation. Therefore, as part of the project, a proposed Master Infrastructure Plan (MIP) was prepared for the infrastructure necessary to support the redevelopment and reuse of Alameda Point. It is anticipated that new utility infrastructure would be installed in a manner designed to support the proposed uses within both the development areas and the reuse areas. The MIP is designed to be adaptable to changing land use intensities and densities in the event that the City changes the land use program in the future.

The Alameda Point project would create housing for approximately 2,779 residents and would also create approximately 7,900 job opportunities. As stated on page 4.B-2 of the Draft EIR, the City of Alameda currently has more employed residents than jobs. It is estimated that the City has approximately 26,970 jobs and 37,799 employed persons, which indicates that many of Alameda's employed residents commute to work outside of the City. The ratio of jobs to employed residents within the City of Alameda is 0.71. A major cause of the existing imbalance is that Alameda lost 18,000 jobs when the U.S. Navy closed NAS Alameda. The addition of jobs to Alameda Point would improve the jobs-housing balance in Alameda and help reduce off-island commute traffic in conformance with the policies of the General Plan.

The street network within the Adaptive Reuse Sub-area would be determined by the existing street patterns, which is a contributing characteristic of the NAS Alameda Historic District. Within the Town Center and Waterfront Sub-area, the NAS Alameda Historic District grid of streets would be extended into this area, and would generally follow grid patterns. The street network within the Enterprise Sub-area and Main Street Sub-area also

would follow a grid pattern, while preserving the historic “beehive” street network in the historic residential sub-area.

Regarding public amenities, as stated starting on page 4.L-11 of the Draft EIR, the project would have a less-than-significant impact on public services such as libraries and recreational space. Specifically, the proposed project would provide for development of approximately 1,158 net new housing units that are anticipated to result in a population of approximately 2,215 new residents in the project site by 2035. These additional residents would use the 258 acres of new park and recreation facilities that are proposed as part of the project because they are located near the residential uses. The proposed parks and open space areas include a waterfront promenade, a bay trail, historic open spaces, parade grounds, neighborhood parks, walking and bike trails, sidewalks, and bike paths.

Chuck Kapelky

The commenter stated that future technology may even further alleviate community concerns.

Response: This comment is acknowledged.

Bill Smith

The commenter stated that the project does not provide enough housing. Statement that the Alameda Point development overall will be good.

Response: Please refer to the response to Helen Sause’s comment regarding the jobs/housing imbalance.

John Spangler

The commenter stated that it is essential that the sea level rise berm is raised to at least the median of a projection; that a high density option is preferable, in that it will be financially more advantageous; that the 51A bus should have a headway of 8-15 minutes, to reduce traffic congestion; that a smart grid should be installed, with simple, universal plug and play pre-wiring; that building codes should be stricter than State code; that Risk Assessment Health Values should be consulted for toxics; that the infrastructure cost of 575 million is an underestimate if SunCal estimated the cost to be 700 million.

Response: The Draft EIR includes an extensive analysis of the sea level rise issue. See Section 4.I, *Hydrology and Water Quality* starting on page 4.I-25 of the Draft EIR.

The City of Alameda prepared a Master Infrastructure Plan which documents the improvements required by development to minimize risks from sea level rise and seismic events. As stated on page 4.H-19 of the Draft EIR, the entire project site is located in an area that is already considered to have a high potential for liquefaction. In fact, the project site is located within an area identified by the California Geological Survey to be in a liquefaction hazard zone where any new development or redevelopment must meet the requirements of Special Publication 117A to demonstrate adequate mitigation of any identified liquefaction hazards. The report referenced in the comment describes an

increased risk of liquefaction for existing structures in areas where a rising groundwater level from sea level rise might begin to saturate currently dry sandy soils. However, for improvements associated with the proposed project, groundwater levels are already relatively shallow and preliminary geotechnical evaluations of the site have identified liquefaction hazards that would require substantive measures such as deep dynamic compaction of soils, vibratory compaction of soils, and soil/cement mixing such that a rising groundwater table would not reduce the stability of these improvements.

The Draft EIR is required to evaluate the various options, but the Draft EIR is not responsible for selecting a preferred option.

The City of Alameda is working actively with AC Transit to increase transit services to Alameda Point to support a transit oriented development.

The comment regarding the importance of a smart grid system and building codes that are stricter than the California Building Code is acknowledged. As stated on page 4.F-23 of the Draft EIR, in the analysis of Air Quality and Greenhouse Gases, the state's green building standards (adopted by the City as the Alameda Green Building Standards Code) contain standards for planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality, and these standards would apply to development at Alameda Point. The standards are revised every three years, and new provisions will take effect in January 2014. Among these are non-residential provisions applying stormwater pollution prevention best management practices and water efficiency requirements to building additions, not just new buildings; updated bicycle parking requirements for additions and alternations; and new requirements to reduce waste from construction demolition. For residential construction, new and updated provisions include application of green building requirements to building additions and alterations; revised energy efficiency requirements; new water conservation requirements; and a new provision requiring reduced generation of construction and demolition waste. Given recent trends, it can be anticipated that such building code provisions will continue to become more stringent with the passage of time, meaning that construction that begins at Alameda Point several years from now will likely be required to meet even higher standards.

Risks from toxic materials that remain following the Navy's use of the property are discussed in detail in Section 4.J, *Hazards and Hazardous Materials*. As stated on page 4.J-30 of the Draft EIR, the land-use restrictions for affected property will be identified in the automated permit-tracking system that the City uses for its permitting activities, and that review of the City Program will be incorporated into the permitting process to ensure review of any potential restrictions on site use. The City's Land-Use Tracking Program and Site Management Plan (City Program) is described in detail beginning on page 4.J-28 of the Draft EIR. The City Program will address both closed sites where no further action is required because investigations have determined that there is no threat or minimal threat to human health, and open petroleum sites where additional investigation and/or cleanup work is necessary. Restrictions such as prohibitions on the use of underlying groundwater is not likely to affect future residents, because the natural brackish conditions of the groundwater combined with the available high quality water supply service should preclude any reasonable desire to use site groundwater.

The estimated costs of the infrastructure improvements are not relevant to the adequacy of the environmental analysis included in the Draft EIR.

Karen Bey

The commenter stated that there should be high density alternatives and that low density should not be limited; that she believes the development can and should make Alameda a highly visible, highly sought-after destination, and that a ferry terminal is preferable, so that visitors can visit more freely.

Response: The Draft EIR evaluates high density alternatives to the proposed project. As described in Draft EIR Chapter 5, *Alternatives*, both the High Density Alternative and the Transit Oriented Mixed Use Alternative include higher amounts of development than the proposed project. Specifically, the Transit Oriented Mixed Use Alternative increases the number of residential units to 3,400 units to create a more transit supportive development and maintains the total number of square feet of non-residential uses but changes the mix of non-residential uses. The High Density Alternative includes 4,841 housing units (compared to 1,425 units as proposed) and 3.8 million square feet of non-residential uses. As described in Chapter 5, *Alternatives*, and summarized in Draft EIR Table 5-7, environmental impacts associated with these high density alternatives (e.g., traffic, air quality and GHG emissions, noise, and public services) would likely be more severe than the proposed.

The City is actively working with the Water Emergency Transit Authority to move the ferry service to the Seaplane Lagoon and increase the amount of ferry service provided.

Diane Lichtenstein

The commenter stated that the development follows the Community Reuse Plan developed 16 years prior. She is concerned that the EIR is not specific about community site and cultural amenities, in particular with regard to school accessibility. She is concerned that the analysis of schools insufficiently takes into account that students will have to travel farther distances to attend charter and other schools, which are predicted to pick up the slack as public schools remain at full capacity. She stated that this will reduce the community character of Alameda, and that the EIR generally follows the goals of the Reuse Plan, but does not see any clear mechanisms for implementation oversight, and that more emphasis should be given to cultural amenity preservation and development.

Response: The City of Alameda is committed to working with Alameda Unified School District (AUSD), the State of California, and/or other parties to identify resources for providing educational facilities at Alameda Point. As described starting on page 4.L-5 of the Draft EIR, pursuant to Senate Bill 50, payment of school district impact fees by new development is full mitigation for potential impacts to school facilities from new development. All new development at Alameda Point will be required to pay the AUSD impact fees.

Adrian Lackadat

The commenter stated that she is impressed by what exists at Alameda Point; that there is a good synergy and co-existence between the open spaces and light industrial property, that she does not see any Light Industrial Zone that meets the water, and that it would be beneficial for businesses if there were such a zone.

Response: As described on Draft EIR page 3-31, light industrial uses would be allowed within the Enterprise Sub-area, which is situated just north of the open space area.

Alex Danenbaum

The commenter stated that traffic would be expected to increase in the Oakland Chinatown area and in the Posey tube, just as the EIR indicates. He expressed his belief that there should be more coordination with the City of Oakland to further resolve this issue.

Response: The City of Alameda is committed to working with the City of Oakland and the Chinatown community to make improvements to the regional transportation network to reduce congestion in and around Chinatown, the Webster and Posey Tubes and the I-880 freeway.

Doug deHann

The commenter stated that sea level rise, retail development, transportation, and earthquake issues should be taken seriously.

Response: The Draft EIR includes an extensive analysis of the sea level rise and seismic stability. See Section 4.I. *Hydrology and Water Quality* of the Draft EIR evaluates the proposed project impacts related to flooding due to sea level rise and Section 4.H, *Geology and Seismicity*, addresses seismicity concerns. The City of Alameda prepared a Master Infrastructure Plan which documents the improvements required by the proposed development to minimize risks from sea level rise and seismic events.

As stated on page 4.H-19 of the Draft EIR, the entire project site is located in an area that is already considered to have a high potential for liquefaction. In fact, the project site is located within an area identified by the California Geological Survey to be in a liquefaction hazard zone where any new development or redevelopment must meet the requirements of Special Publication 117A to demonstrate adequate mitigation of any identified liquefaction hazards. The report referenced in the comment describes an increased risk of liquefaction for existing structures in areas where a rising groundwater level from sea level rise might begin to saturate currently dry sandy soils. However, for improvements associated with the proposed project, groundwater levels are already relatively shallow and preliminary geotechnical evaluations of the site have identified liquefaction hazards that would require measures to be implemented during project construction, such as, deep dynamic compaction of soils, vibratory compaction of soils, and soil/cement mixing such that a rising groundwater table would not reduce the stability of these improvements.

Further, regarding earthquake safety, as explained in the Draft EIR, the City has a Comprehensive Emergency Services Management Plan to protect the safety and welfare of

residents, employees and visitors in Alameda in the event of an emergency such as a flood, tsunami or earthquake. Continuation of existing conditions is not a significant impact for purposes of CEQA; please see pages 4.I-16 to 4.I-17 of the Draft EIR.

The City of Alameda is working actively with AC Transit, BART, and WETA to increase transit services to Alameda Point in order to support a transit oriented development. The required TDM program is designed to provide additional local services to supplement, expand, and connect to the services provided by the regional transit providers

Bob Sacuria

The commenter stated that sea level rise is viewed simplistically. Statement that there are other factors to be concerned about, including storm surge issues, which would affect people living below sea level.

Response: As stated on Page 4.I-4 of the Draft EIR and under Impact 4.I-6 in Section 4.I, *Hydrology and Water Quality* of the Draft EIR, because the project site abuts the tidal canal, the highest tide levels associated with storm surge events can be high enough to cause localized flooding of the lowest lying portions of the site under existing conditions. As also discussed in Chapter 3, *Project Description*, of the Draft EIR, the perimeter coastal areas within Alameda Point will be designed to protect future development from wave/wind run up in coordination with an Adaptive Management Plan to incorporate flood protection measures. The project site would be developed in accordance with FEMA criteria (incorporating the 100-year storm levels) and with additional consideration to sea level rise as further discussed in Impact 4.I-8 in Section 4.I, *Hydrology and Water Quality*. A combination of specific project design features, the storm drainage and flood protection systems onsite, along with City's emergency management plan and its Alert and Warning System, would reduce impacts associated with exposing people to significant flood risks from 100-year storm events.

Doug Biggs

The commenter stated that that the air pollutants mitigation seems too passive and that ideally there would be more active mitigation. He expressed concern that the EIR does not seem to fully address environmental justice issues, and that there should be more community monitoring.

Response: The air quality mitigation measures identified in the EIR were developed consistent with the Bay Area Air Quality Management District's (BAAQMD) *CEQA Air Quality Guidelines*. Regarding community monitoring, please see the responses to Letter 11, stating that the City is willing to develop community monitoring programs with the Collaborative.

Craig Miott

The commenter made statements about the high quality of the NAS Alameda Historic District. He also made statements about a need for improving BART access.

Response: Please see responses to letter 25 from Craig Miott. As described on Draft EIR pages 3-26 and 3-27, portions of the Town Center and Waterfront Sub-area and Main Street

Neighborhood Sub-area include buildings in the NAS Alameda Historic District and the entire Adaptive Reuse Sub-area is situated within the Historic District. Rehabilitation of contributing structures in the NAS Alameda Historic District that overlap with these particular Sub-areas would be reviewed for conformance with the *Guide to Preserving the Character of the NAS Alameda Historic District* and new buildings would be reviewed for conformance with the character defining features of the NAS Alameda Historic District.

Regarding improving access to BART, the Alameda Point project includes proposed shuttle service connecting Alameda Point to the Oakland City Center 12th Street BART Station. As described in Chapter 3 of the Draft EIR (page 3-24), the shuttle service is expected to evolve with each phase of development of Alameda Point, but implementation and operation of the shuttle service would be flexible so that it can adapt to development patterns guided by market forces. Further, existing service is provided by AC Transit.

Amanda Shepard

The commenter stated that the development may not attract large quantities of people and that the development should ideally be kept dense and small.

Response: Comments noted.

CHAPTER 5

Revisions to the Draft EIR

The following revisions are made to the Draft EIR and incorporated as part of the Response to Comments on the Draft EIR. Revised or new language is underlined. Deleted language is indicated by ~~strikethrough~~ text.

The revisions in this chapter clarify, amplify or make insignificant modifications to the EIR. They do not consist of significant new information showing that a new significant impact would result from the project or from a new mitigation measure, that there would be a substantial increase in the severity of an environmental impact, or that a feasible project alternative or mitigation measure that is considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project. Accordingly, the revisions in this chapter do not constitute “significant new information” and it is therefore not necessary for the Lead Agency to recirculate the EIR for public comment prior to certification of the Final EIR (CEQA *Guidelines* §15088.5).

Section A, below, identifies staff-initiated changes made to the Draft EIR. Section B identifies changes made to the EIR in response to comments on the Draft EIR; please refer to Chapter 3 of this document.

Revised Mitigation Measures

The Draft EIR identifies certain Mitigation Measures in Section 4.C, *Transportation and Circulation*, to mitigate significant transportation impacts, that involves several actions. First, the City will be required to implement a Transportation Demand Management Program and a Monitoring Program (Mitigation Measures 4.C-2a (TDM Program) and 4.C-2b (Monitoring)). The monitoring program is to be used to determine whether the Transportation Demand Management Program has been effective, and whether additional, second-step mitigation is necessary to modify the operation of a signal or the lane striping of any intersection for which this mitigation is required. As written in the Draft EIR, these mitigation measures also identify the second-step mitigation, consisting of physical changes (e.g., adding left-turn lanes or shared-through-right lanes), in order further improve the Level of Service (LOS) at the intersection. In response to Comment 34-3, staff has determined that several of the second-step measures, which would require restriping intersections would be inconsistent with General Plan Policy 4.4.2.a; therefore, these measures were determined to be infeasible. The revisions to Mitigation Measures 4.C-2c, 4.C-2l, 4.C-5b, 4.C-5c, 4.C-5d, 4.C-5f, 4.C-5g, 4.C-5i, 4.C-5w, 4.C-5x, and 4.C-5z, presented below, would not result in environmental impacts beyond those already identified in the Draft EIR, which were determined to be significant and unavoidable. Revisions are also made to Mitigation Measures 4.C-2b, 4.C-2d, 4.C-2e, 4.C-2f, 4.C-5l, 4.C-5m, 4.C-5n,

4.C-5o, and 4.C-5r, to clarify instances in which monitoring is not applicable; to Mitigation Measure 4.C-2n, to correct an editorial error; and Mitigation Measure 4.C-2o, to clarify that the City could not unilaterally implement this measure. As with the foregoing, none of these revisions would result in environmental impacts beyond those already identified in the Draft EIR. Mitigation Measure 4.E-2a is revised to further minimize potential impacts to eelgrass, and Mitigation Measure 4.E-4c is revised to further minimize potential impacts on nesting birds; these changes would reduce impacts and would not result in impacts not identified in the Draft EIR. Finally, required mitigation measures are recapitulated for Impacts 4.E-5, 4.E-6, and 4.E-7, and Mitigation Measure 4.F-7b is revised to correct an editorial error. None of these last revisions results in any change in impacts beyond those identified in the Draft EIR.

All mitigation measures that are revised as part of this Response to Comments on the Draft EIR are presented in the revisions to **Table 2-2** of the *Executive Summary* of the Draft EIR, at the end of this chapter and are shown in ~~strikeout~~/underline.

A. Staff-Initiated Changes to the Draft EIR

The text changes presented in this section are initiated by Lead Agency staff.

The following text edits have been made to correct Mitigation Measure numbering in the Draft EIR, on the following pages and as further reference through the Draft EIR, including in Chapter 2, Executive Summary:

As referenced on page 4.C-40: Mitigation Measure 4.C-3a is renumbered to Mitigation Measure 4.C-2g

As referenced on page 4.C-41: Mitigation Measure 4.C-3b is renumbered to Mitigation Measure 4.C-2h

As referenced on page 4.C-42: Mitigation Measure 4.C-3c is renumbered to Mitigation Measure 4.C-2i

As referenced on page 4.C-46: Mitigation Measure 4.C-4c is renumbered to Mitigation Measure 4.C-2o

As referenced on page 4.C-46: Mitigation Measure 4.C-4b is renumbered to Mitigation Measure 4.C-2n

As referenced on page 4.C-77: Mitigation Measure 4.C-10a is renumbered to Mitigation Measure 4.C-5x

As referenced on page 4.C-80: Mitigation Measure 4.C-4b is renumbered to Mitigation Measure 4.C-5zi

As referenced on page 4.I-24: all three mentions of Mitigation Measure 4.I-2 is renumbered to Mitigation Measure 4.I-4

The impact statement text on page 4.C-36 of the Draft EIR is amended as follows:

Impact 4.C-2: Development facilitated by the proposed project would potentially result in a transportation impact at study ~~intersection~~ locations under Existing plus Project conditions. (Significant)

Mitigation Measure 4.C-2b on page 4.C-37 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-2b (Monitoring and Improvement Program): Prior to issuance of the first building permits for any development project at Alameda Point, the City of Alameda shall adopt a Transportation Network Monitoring and Improvement Program to: 1) determine the cost of the transportation network improvements identified in this EIR; 2) identify appropriate means and formulas to collect fair share financial contributions from Alameda Point development; 3) monitor conditions at the locations that will be impacted by the redevelopment of Alameda Point; 4) monitor traffic generated by Alameda Point; and 5) establish the appropriately time to implement ~~the~~ any necessary secondary physical improvements described required in this EIR to minimize or eliminate significant transportation impacts prior to the impacts occurring at affected locations where a secondary impact mitigation is recommended.

Mitigation Measure 4.C-2d on page 4.C-38 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-2d (Jackson/Sixth): The City of Alameda shall implement Mitigation Measures 4.C-2a (TDM Program) ~~and 4.C-2b (Monitoring), which could improve intersection LOS by reducing vehicle trips.~~

Mitigation Measure 4.C-2e on page 4.C-39 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-2e (Brush/11th): The City of Alameda shall implement Mitigation Measures 4.C-2a (TDM Program) ~~and 4.C-2b (Monitoring), which could improve intersection LOS by reducing vehicle trips.~~

Mitigation Measure 4.C-2f on page 4.C-39 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-2f (23rd/Seventh): The City of Alameda shall implement Mitigation Measures 4.C-2a (TDM Program) ~~and 4.C-2b (Monitoring), which could improve intersection LOS by reducing vehicle trips.~~

The third bullet under Mitigation Measure 4.C-2n on page 4.C-46 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-2n (Main Street Bike): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall implement the following physical improvements:

- construct a Class II bicycle lane or improve the existing Class I bicycle path on the west side of the street between Appezzato Parkway and Pacific Avenue to current City standards;
- provide connectivity to existing Class I bicycle path on the east and west sides of the street north of Appezzato Parkway. Appropriate intersection treatments for connectivity may include striping, signage, and/or bicycle boxes at the intersection of Main Street and Appezzato Parkway; and
- if Mitigation Measure 4.C-4c (~~described below~~) is implemented, provide connectivity to that bicycle facilities on west side of the street north of the Main Street-Pacific Street intersection.

Mitigation Measure 4.C-2o on page 4.C-47 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-2o (Central Avenue Bike): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall use its best efforts to implement the following physical improvements:

- construct a Class II bicycle lane or improve the existing Class I bicycle path on the west (south) side of the street between the Main Street-Pacific Street intersection and Lincoln Avenue to current City standards;
- extend a Class I bicycle path to Third Street; and
- restripe and sign the street segment between Third Street and Fourth Street to provide Class II bicycle lanes between Lincoln Avenue and Fourth Street.

The impact statement text on page 4.C-56 of the Draft EIR is amended as follows:

Impact 4.C-5: Cumulative development, including the proposed project, would potentially result in transportation impacts at local study ~~intersections~~ locations under Cumulative plus project conditions. (Significant)

Mitigation Measure 4.C-5l on page 4.C-69 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-5l (Jackson/Sixth): The City of Alameda shall implement TDM ~~and Monitoring~~ (Mitigation Measures 4.C-2a ~~and 4.C-2b~~).

Mitigation Measure 4.C-5m on page 4.C-69 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-5m (Webster/Eighth): The City of Alameda shall implement TDM ~~and Monitoring~~ (Mitigation Measures 4.C-2a ~~and 4.C-2b~~).

Mitigation Measure 4.C-5n on page 4.C-70 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-5n (Broadway/Fifth): The City of Alameda shall implement TDM ~~and Monitoring~~ (Mitigation Measures 4.C-2a ~~and 4.C-2b~~).

Mitigation Measure 4.C-5o on page 4.C-70 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-5o (Brush/12th): The City of Alameda shall implement TDM ~~and Monitoring~~ (Mitigation Measures 4.C-2a ~~and 4.C-2b~~).

The discussion on page 4.C-71 of the Draft EIR is amended as follows:

High/Coliseum. The signalized intersection of High Street and Coliseum Way (#46) would operate at LOS E with 74 seconds of delay during the p.m. peak hour under 2035 Cumulative conditions. Under 2035 Cumulative plus Project conditions, project-related vehicle traffic would degrade the LOS to LOS F with 82 seconds of delay. The project traffic would ~~cause to~~ degrade the LOS from E to F and increase delay by 8 seconds.

Mitigation Measure 4.C-5r on page 4.C-72 of the Draft EIR is amended as follows:

Mitigation Measure 4.C-5r (29th/Ford): The City of Alameda shall implement TDM ~~and Monitoring~~ (Mitigation Measures 4.C-2a ~~and 4.C-2b~~).

The discussion in the last paragraph on page 4.C-74 of the Draft EIR, continuing to page 4.C-75, is amended as follows:

Implementation of Mitigation Measure 4.C-5u would reduce projected pedestrian delay during both peak hours to LOS C or LOS B and would reduce the increase in pedestrian delay to less than 10 percent. It would increase average speed along Webster Street, thereby benefitting transit service along that corridor. The addition of an eastbound queue jump lane, as proposed under Mitigation Measure 4.C-5y, would require widening the intersection and providing a receiving lane of adequate length for buses. This mitigation would degrade auto LOS at the intersection to LOS E, which would be considered a significant impact. Procedures for prioritizing improvements to the different (potentially

competing) travel modes establish the following order of modal preference for Webster Street and Appezato Parkway (both Regional Arterials): transit, pedestrians, bicycles, and automobiles. Therefore, the suitability of implementing Mitigation Measure 4.C-5u was considered in the context of impacts to travel modes ranked higher than automobiles. However, this impact would be **significant and unavoidable**.

The following mitigation measure statement is added on page 4.F-90 of the Draft EIR following the fourth bullet. The edit provides a summary of mitigation required in the Draft EIR to reduce impacts to a less than significant level:

Mitigation Measure 4.E-5: The City of Alameda shall implement **Mitigation Measures 4.E-1a through 4.E-1h** (avoid and minimize impacts on special-status wildlife), **Mitigation Measures 4.E-2a through 4.E-2c** (avoid and minimize impacts to sensitive natural communities), **Mitigation Measures 4.E-3a through 4.E-3c** (avoid and minimize impacts to jurisdictional waters), and **Mitigation Measures 4.E-4a through 4.E-4f** (avoid and minimize impacts to migratory and breeding wildlife).

The following mitigation measure statement is added on page 4.F-91 of the Draft EIR following the second paragraph. The edit provides a summary of mitigation required in the Draft EIR to reduce impacts to a less than significant level:

Mitigation Measure 4.E-6: The City of Alameda shall implement **Mitigation Measures 4.E-1a through 4.E-1h** (avoid and minimize impacts on special-status wildlife), **Mitigation Measures 4.E-2a through 4.E-2c** (avoid and minimize impacts to sensitive natural communities), **Mitigation Measures 4.E-3a through 4.E-3c** (avoid and minimize impacts to jurisdictional waters), and **Mitigation Measures 4.E-4a through 4.E-4f** (avoid and minimize impacts to migratory and breeding wildlife).

The following mitigation measure statement is added on page 4.F-94 of the Draft EIR following the first paragraph. The edit provides a summary of mitigation required in the Draft EIR to reduce impacts to a less than significant level:

Mitigation Measure 4.E-7: The City of Alameda shall implement **Mitigation Measures 4.E-1a through 4.E-1h** (avoid and minimize impacts on special-status wildlife), **Mitigation Measures 4.E-2a through 4.E-2c** (avoid and minimize impacts to sensitive natural communities), **Mitigation Measures 4.E-3a through 4.E-3c** (avoid and minimize impacts to jurisdictional waters), and **Mitigation Measures 4.E-4a through 4.E-4f** (avoid and minimize impacts to migratory and breeding wildlife).

Mitigation Measure 4.F-7b on page 4.F-47 of the Draft EIR is amended as follows:

Mitigation Measure 4.F-7b: The City shall ~~include~~ promote use of clean fuel-efficient vehicles through preferential parking, installation of charging stations, and low emission electric vehicle carsharing programs to reduce the need to have a car or second car vehicles in the TDM Program.

The impact statement 4.I-4 on page 4.I-23 of the Draft EIR is amended as follows:

Impact 4.I-4: Development facilitated by the proposed project would potentially result in ~~increased use at~~ intensified use of the project site, including maintenance of new landscaping areas and open lawns, which would affect receiving water quality. (Significant)

B. Changes to the Draft EIR in Response to Comments

The text changes presented in this section were initiated by comments on the Draft EIR.

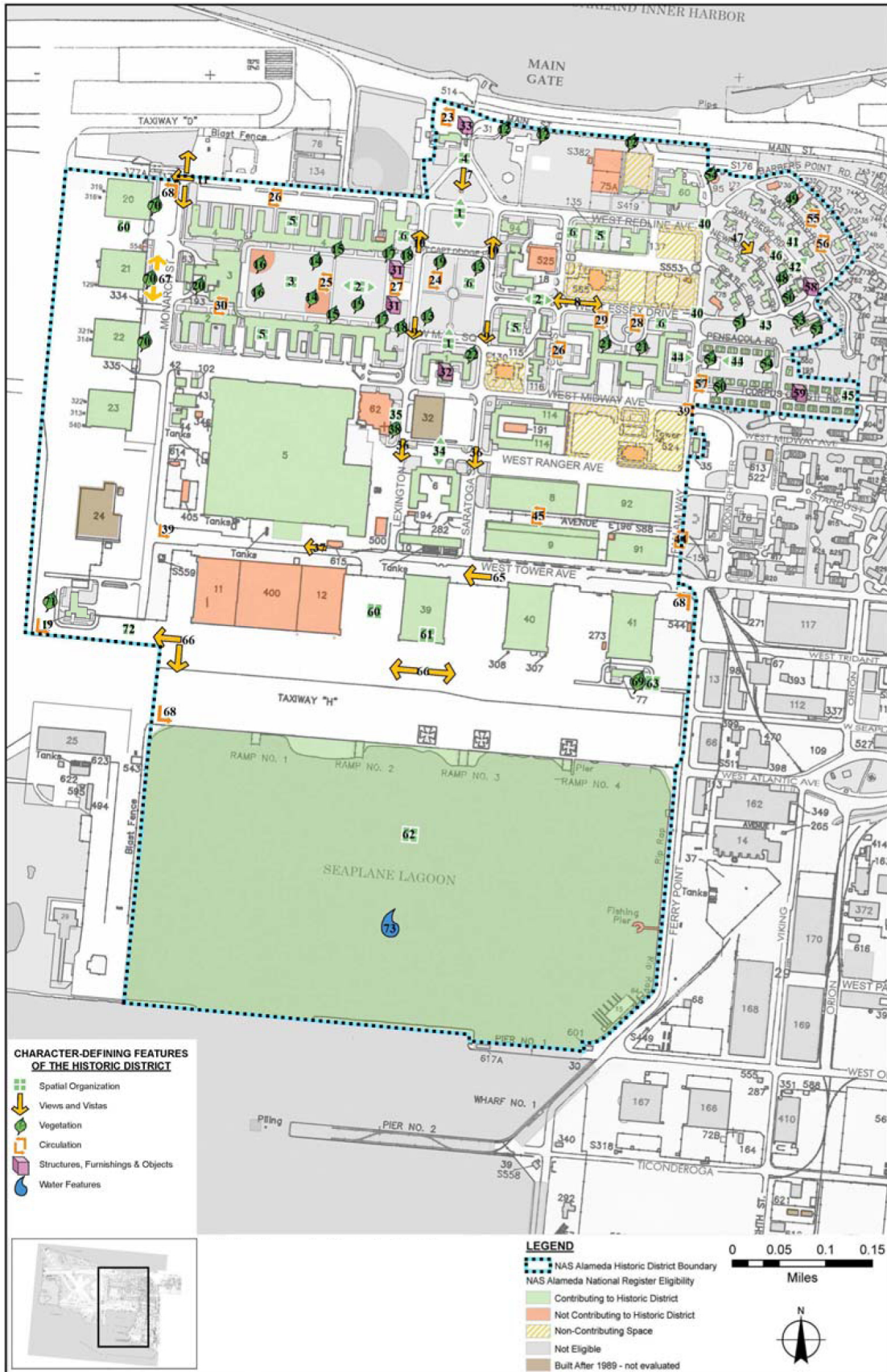
Figure 3-4 on page 3-13 of the Draft EIR is corrected to show the Tower (Building 19) as a contributor to the NAS Alameda Historic District, as shown on the following page.

[Chapter 3, Comment 10-2]

The following bullet on page 3-18 of the Draft EIR is revised to correct the description of the VA project site:

- Approximately 624 acres ~~Over 700 acres~~ of former runways to the west of the urban areas of Alameda Point, which are planned for a Nature Reserve, ~~30~~ 112.4-acres of Veterans' facilities, and public park lands;

[Chapter 3, Comment 1-4]



SOURCE: The Department of the Interior Alameda Point Project . 130025
Figure 3-4
 NAS Alameda Historic District (Revised)

The text on page 4.C-37 of the Draft EIR is amended as follows:

~~“Accordingly, it would be speculative to assume that the TDM mitigation measure would reduce the impact to less than significant. Therefore, if determined by the Monitoring and Improvement Program to be needed, Mitigation Measure 4.C-2.c is recommended if the monitoring reveals that the TDM measures have not successfully reduce the project automobile volumes as the impacted location.~~

[Chapter 3, Comment 34-1]

The following edit has been made to Mitigation Measure 4.C-2c on page 4.C-37:

Mitigation Measure 4.C-2c (Otis/Fernside): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when and if required to avoid the impact or reduce its severity, shall implement the following improvements:

- Remove the right turn island for the westbound approach on Otis Drive, add a dedicated right turn lane with approximately 50 feet of storage length, and move the ~~westbound/northbound~~ stop-bar upstream approximately 20 feet to accommodate the right turn lane storage length. Restripe Fernside Boulevard with two receiving lanes.
- Optimize signal timing.

[Chapter 3, Comment 34-3]

The following edits have been made to Mitigation Measure 4.C-2l on page 4.C-44:

Mitigation Measure 4.C-2l (Atlantic/Constitution Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall implement the following physical improvements:

- modify the ~~phasing sequence~~ existing signal phasing for eastbound and westbound Atlantic Avenue approaches from split to permitted protected lefts; and
- optimize the signal timing.

[Chapter 3, Comment 34-3]

The last sentence on page 4.C-54 of the Draft EIR is corrected as follows:

As shown, the change in traffic due to the project has minimal effect on the ramp operations with ~~no~~ little change in LOS and minimal, if any, change in density under ~~existing~~ cumulative conditions.

[Chapter 3, Comment 2-6]

The following edits have been made to Mitigation Measure 4.C-5b on page 4.C-58:

Mitigation Measure 4.C-5b (Park/Encinal): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following physical improvements:

- ~~Convert one eastbound through lane on Encinal Avenue to a left turn lane to provide two left turn lanes and a shared through right lane on the eastbound approach; and~~
- Optimize offsets and splits.

~~With these improvements, the LOS at the intersection of Park Street and Encinal Avenue would remain at LOS F during the p.m. peak hour with a reduction in auto delay from 110.8 seconds to 94.4 seconds under Cumulative plus Project conditions. Restriping the eastbound approach to provide a left turn lane would not require widening of the intersection beyond the current right-of-way. This impact would remain significant and unavoidable, as the level of service would remain LOS F.~~

[Chapter 3, Comment 34-3]

The following edits have been made to Mitigation Measure 4.C-5c on page 4.C-59:

Mitigation Measure 4.C-5c: (Broadway/Otis): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement, the following physical improvements:

- ~~Add a southbound left turn lane on Broadway to provide two left turn lanes and a shared through right for that approach;)~~
- ~~Convert the southbound Broadway left turn phase to permitted protected;~~
- ~~Convert to actuated uncoordinated timing plan during the p.m. peak hour; and~~
- Optimize the signal timing during both peak hours.

~~With the implementation of Mitigation Measure 4.C-5c, the LOS at the intersection of Broadway and Otis Drive would improve to LOS C in the a.m. and p.m. peak hours under Cumulative plus Project conditions. Restriping the southbound approach to provide an additional left turn lane would not require removal of on-street parking north of the intersection. This improvement would require Caltrans review and approval because Otis Street east of this intersection and Broadway north of this intersection comprise State Route 61. However, because the City of Alameda cannot implement the improvement without Caltrans approval, this impact would remain **significant and unavoidable**.~~

[Chapter 3, Comment 34-3]

The following edits have been made to Mitigation Measure 4.C-5d on page 4.C-60:

Mitigation Measure 4.C-5d: (Tilden/Blanding/Fernside): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:

- ~~• Add a westbound left turn to provide a left turn lane, a through lane and a right turn lane on the westbound Fernside Boulevard approach.~~
- ~~• Add an eastbound left turn lane to provide a left turn lane, a through lane and a right turn lane on the eastbound Blanding Avenue approach.~~
- Optimize the offsets and splits.

~~With Mitigation Measure 4.C-5d, the LOS would improve to LOS D during the a.m. and p.m. peak. The geometric reconfigurations of this improvement could be accommodated through removal of part of the existing concrete islands on the southern side of the intersection.~~

[Chapter 3, Comment 34-3]

The following edit has been made to Mitigation Measure 4.C-5f on page 4.C-63:

Mitigation Measure 4.C-5f (High/Otis): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:

- ~~• Add a northbound right turn lane on High Street to provide a shared through left and right turn lane on the north bound approach;~~
- ~~• Add an overlap phase for the northbound High Street right turn movement and prohibit the conflicting westbound Otis Drive U-turn movement; and~~
- Optimize the signal timing at High and Otis for both peak hours, and

- Install traffic calming strategies on Bayview Drive to include strategies, such as: restriping Bayview Drive to create narrower driving lanes to reduce speeding, installing a cross walk and caution sign at the location of the public coastal access easement, and/or construction of sidewalk bulb-outs to improve pedestrian safety at the intersections of Bayview/Court Street and Bayview/Broadway.

[Chapter 3, Comment 12-1]

The following edits have been made to Mitigation Measure 4.C-5g on page 4.C-64:

Mitigation Measure 4.C-5g (Island Drive/Otis Drive and Doolittle Drive): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:

- ~~Add a westbound left turn lane to provide two left turn lanes and two through lanes on the westbound Doolittle Drive approach; and~~
- Optimize signal timing during both peak hours.

[Chapter 3, Comment 34-3]

The following edits have been made to Mitigation Measure 4.C-5i on page 4.C-66:

Mitigation Measure 4.C-5i (Park/Blanding): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:

- ~~Add two eastbound left turn lanes to provide two left turn lanes and a shared through/right turn lane on the eastbound Blanding Avenue approach;~~
- ~~Add a westbound left turn lane to provide a left turn lane, a through lane and a right turn lane on the westbound Blanding Avenue approach;~~
- ~~Separate the operation of the Nursing Home driveway from the Park Street and Blanding Avenue intersection;~~
- Change east-west signal phasing to protected phasing; and
- Optimize signal timing during both peak hours.

[Chapter 3, Comment 34-3]

The following edits have been made to Mitigation Measure 4.C-5w on page 4.C-76:

Mitigation Measure 4.C-5w (Appezato/Constitution Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:

- Modify the ~~phasing sequence existing signal phasing for eastbound and westbound approaches from split to permitted-protected lefts~~; and
- Optimize the signal timing.

[Chapter 3, Comment 34-3]

The following edits have been made to Mitigation Measure 4.C-5x on page 4.C-77:

Mitigation Measure 4.C-5x (Park Street Transit): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:

- Provide transit signal priority at intersections along this corridor; and
- ~~Separate the operation of the Nursing Home driveway from the Park Street and Blanding Avenue intersection; and~~
- Optimize splits at the Park Street and Blanding Avenue intersection during a.m. and p.m. peak hours.

[Chapter 3, Comment 34-3]

The following edits have been made to Mitigation Measure 4.C-5z on page 4.C-78:

Mitigation Measure 4.C-5z (Stargell Avenue Transit): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, implement the following improvements:

- Provide ~~eastbound and westbound~~ queue jump lanes on Willie Stargell Avenue at Main Street ~~and at Fifth Street~~ or construct exclusive transit lanes on Willie Stargell Avenue;
- Install transit signal priority at intersections along this corridor; and
- Optimize cycle length at the Main Street and Willie Stargell Avenue intersection during a.m. and p.m. peak hours.

[Chapter 3, Comment 34-3]

The following edit has been made to Impact 4.C-7 on page 4.C-82:

Impact 4.C-7: The change in traffic volumes on the freeway ramps due to the project results in ~~no~~ little change in LOS and minimal, if any, change in density under existing conditions. (Less than Significant)

[Chapter 3, Comment 2-6]

The following edits have been made to Mitigation Measure 4.E-2a on page 4.E-64:

Mitigation Measure 4.E-2a: Prior to marina or ferry terminal construction, the City shall ensure that the project applicant conducts a pre-construction survey to determine if native oysters and eelgrass are present in Seaplane Lagoon.

- The eelgrass survey shall be conducted according to the methods contained in the California Draft Eelgrass Mitigation Policy (CDEMP) (NMFS 2011), with the exception that the survey shall be conducted within 120 days (rather than 60 days, as recommended in the CDEMP) prior to the desired construction start date, to allow sufficient time for modification of project plans (if feasible) and agency consultation.
- If found within or immediately adjacent to the construction footprint, the project applicant shall first determine whether avoidance of the beds is feasible. If feasible, impacts to the oyster or eelgrass bed shall be avoided. If complete avoidance is not feasible, the applicant shall request guidance from the National Marine Fisheries Service (or other applicable agency) as to the need and/or feasibility to move affected beds....

[See Chapter 3, Comment 4-4]

The following bullet has been added at the end of Mitigation Measure 4.E-2a on page 4.E-65:

- The relocation or compensatory mitigation site for eelgrass or oyster beds shall be located within San Francisco Bay.

[See Chapter 3, Comment 4-5]

The second bullet under Mitigation Measure 4.E-4c has been revised on page 4.E-79 as follows:

- To avoid and minimize potential impacts on nesting raptors and other birds, preconstruction surveys shall be performed not more than ~~two weeks~~ one week prior to initiating vegetation removal and/or construction activities during the breeding season (i.e., February 1 through August 31).

[Chapter 3, Comment 15-21]

The first sentence of the second full paragraph on page 4.E-93 has been revised as follows:

As described above, the proposed project includes all of the applicable measures from the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BO), as embodied in the Navy's Declaration of Restrictions, that were developed to ensure that the cumulative development of land now owned by the VA and the City would not result in significant impacts on the California least tern (see the Regulatory Framework section above for details on each measure).

[Chapter 3, Comment 15-28]

The following policy has been added in sequential order on page 4.F-14:

4.2.3.d Support and prioritize trip reduction strategies that maximize air quality benefits and reduce greenhouse gas emissions.

1. Support the use of alternative fuel vehicles for all transportation modes.
2. Encourage shift of trips to alternative transportation modes. This includes short trips, as these will have a disproportionate impact on air quality.

[Chapter 3, Comment 34-17]

The following policies have been added in sequentially order on page 4.G-9:

4.2.3.a Street projects should be designed to minimize the requirements for noise mitigation measures. Do not implement street projects that necessitate a soundwall.

4.2.3.b Ensure that transportation system improvements comply with accepted noise standards in residential areas. Monitor the noise impacts of the existing transportation system. Identify strategies to mitigate excessive noise conditions.

[Chapter 3, Comment 34-18]

The following text changes are made to Impact 4.L-3 on page 4.L-10:

Impact 4.L-3: Development facilitated by the proposed project could potentially result in new students for local schools, ~~but would not~~ and potentially require new or physically altered school facilities to maintain acceptable performance objectives. (Less than Significant)

Students generated from development of the proposed project would be within the boundaries of Paden or Ruby Bridges Elementary School, Wood Middle School, and

Encinal High School. The Alameda Unified School District (AUSD) employs a student generation factor as a basis for determining the number of students generated by proposed residential development projects. The results of applying AUSD generation factors to the proposed project are shown in **Table 4.L-4**. As shown, the proposed project is anticipated to result in 427 new students: 186 elementary school students, 96 middle school students, and 145 high school students.

Even though Paden Elementary, Ruby Bridges Elementary, Wood Middle School and Encinal High School would generally serve students resulting from development of the proposed project, ~~However, the~~ AUSD has reported that the aforementioned school sites have all long exceeded their true capacities (McPhetridge, 2013). To mitigate potential impacts resulting from an increase of approximately 427 new students, AUSD levies development fees for residential and commercial development. Pursuant to SB 50, payment of the development fees for schools is considered full and complete mitigation for the impacts of a development project on school facilities. Payment of the adopted development fees ensures that the project would result in less than significant impacts related to the provision of school facilities, the City, together with AUSD, is committed to working with the State of California and/or other party to identify additional, legally appropriate ways to alleviate costs of construction. As a result, the proposed project's impacts on schools would be less than significant.

[Chapter 3, Comment 6-1]

The last sentence of the first paragraph under the heading "Wastewater" is revised on page 4.M-2 as follows:

Wastewater from the project site is collected and conveyed to an existing pump station (Pump Station ~~No. 1R~~), located just west of the Main Gate at the northern edge of Alameda Point. As described below, wastewater collected at this pump station is transported via force main to the EBMUD Main Wastewater Treatment Plant (MWWTP) for treatment.

[Chapter 3, Comment 8-1]

The last sentence under the section heading "Onsite Wastewater Collection System" and the first sentence under the heading "Offsite Wastewater Transmission Facilities" has been revised on page 4.M-2 as follows:

Recent flow monitoring conducted by the EBMUD just upstream of Pump Station ~~RNo. 1~~ indicates the existing peak wet weather wastewater flow from Alameda Point is approximately 1.80 mgd.

Offsite Wastewater Transmission Facilities

The existing onsite wastewater collection system directs wastewater to Pump Station ~~RNo. 1~~, described above. Since 2003, wastewater from this pump station gets directed eastward via an approximately 8,600-foot-long 20-inch force main to the Alameda Siphon facility near the Webster/Posey Tubes.

[Chapter 3, Comment 8-1]

The third sentence of the first paragraph under the heading “Wastewater Treatment” on page 4.M-3 is revised as follows:

The interceptor system then transports wastewater to EBMUD’s MWWTP, which has a current average dry weather flow ~~capacity~~ of approximately 54 mgd.

[Chapter 3, Comment 8-2]

The second sentence of the second paragraph on page 4.M-3 is revised as follows:

The existing capacity of Pump Station ~~RNo. 1~~ is approximately 7.5 mgd, and the 20-inch diameter force main has a capacity of 12.1 mgd. The Alameda Siphon has an existing peak wastewater flow of approximately 28 mgd.

[Chapter 3, Comment 8-1]

The last sentence of the last paragraph on page 4.M-3 has been revised as follows:

~~A draft of t~~This flow monitoring study was completed in March 2012 and approved by the EPA in December 2012 has been prepared, and EBMUD is currently working with the EPA and various stakeholders to develop a long-term plan for region-wide reductions (EBMUD, 2013; CBG, 2013).

[Chapter 3, Comment 8-3]

The following paragraph is inserted after the first paragraph on page 4.M-8:

City of Alameda NPDES Permit No. CA0038474

The proposed project would be subject to the requirements of the NPDES permit for the City of Alameda’s sewer collection system and wastewater discharges (Permit No. CA0038474, Order No. R2-2009-0081) (RWQCB, 2009). This permit prohibits the

discharge of untreated or partially treated wastewater to any surface water stream or to any drainage system intended to convey storm water runoff to surface waters. It also prohibits discharge of chlorine, or any other toxic substance used for disinfection and cleanup of wastewater spills, to any surface water body. Provisions of this permit include proper sewer system management and reporting, consistent with statewide requirements. The City is required to specifically control inflow and infiltration and report any noncompliance, except that the City does not need to report noncompliance with Prohibition III.D. This particular prohibition ensures the City properly operates and maintains its wastewater collection systems so as to not cause or contribute to violations of the Clean Water Act. However, because EBMUD's NPDES permit (CA0038440) requires EBMUD to report such discharges from its wet weather facilities, the City does not need to comply with Prohibition III.D. The NPDES permit also summarizes the 2009 Stipulated Order that EBMUD entered with the EPA, SWRCB, and RWQCB (see above for details).

[Chapter 3, Comment 8-4]

The second sentence of the last paragraph on page 4.M-10 has been revised as follows:

At buildout, the project would generate an incremental increased of wastewater treatment demand peak wet weather flow by ~~of~~ approximately 0.23 mgd.

[Chapter 3, Comment 8-5]

The fourth sentence of the first paragraph under Impact 4.M-2 is revised on page 4.M-11 as follows:

With a current average dry weather flow ~~capacity~~ of approximately 54 mgd, EBMUD has adequate dry weather capacity at the MWWTP for the projected wastewater flows.

[Chapter 3, Comment 8-2]

The first incomplete sentence on page 4.M-12 has been revised as follows:

... diameter) and five lift stations, and would connect to the existing Pump Station ~~RNo. 4~~ located at the Main Gate.

[Chapter 3, Comment 8-1]

The following reference has added after (Municode, 2013) on page 4.M-19:

Regional Water Quality Control Board (RWQCB), 2009. Waste Discharge Requirements for the City of Alameda Sanitary Collection System, Alameda County, Order No. R2-2009-0081, NPDES No. CA0038474, adopted on November 18, 2009.

[Chapter 3, Comment 8-4]

The following text has been added under the No Project/No New Development Alternative on page 5-5 of the Draft EIR:

This alternative would result in further deterioration of infrastructure services on residents resulting in increased displacement risks to residents due to the lack of reliable infrastructure services and exposure to flood hazards. This alternative would not achieve the goal of rebuilding and maintain long-term operations of supportive housing and is unlikely to achieve the first source hiring goals.

[Chapter 3, Comment 11-14]

The following text has been added under the Preservation/Less Development Alternative on page 5-6 of the Draft EIR:

This alternative would attract limited investment and inadequate resources to rebuild housing and infrastructure. Residents would continue to be exposed to flood hazards and deteriorating, unreliable infrastructure, thereby increasing displacement risks for residents. This alternative does not achieve the objective of rebuilding and maintaining long-term operation of supportive housing.

[Chapter 3, Comment 11-15]

The following text has been added under the Existing General Plan Alternative: More Housing and Less Jobs on page 5-8 of the Draft EIR:

This alternative is unlikely to achieve the project objectives] of job creation, economic development and reuse of historic buildings. Buildout of a greater number of residential units in the Main Street Neighborhood is more likely to achieve rebuilding of supportive housing, but less likely to achieve first source hiring goals.

With limited commercial development, preservation and adaptive reuse of existing historic buildings will not be achieved, thereby limiting re-investment in the district. This

alternative would perform better at achieving the project objective of rebuilding and long-term operations of supportive housing but is unlikely to achieve first source hiring goals.

[Chapter 3, Comment 11-16]

The following text has been added under the Multifamily Alternative on page 5-8 of the Draft EIR:

This alternative would result in land areas remaining undeveloped and less infrastructure investment because it would not include new single-family residential uses. This alternative may not achieve the project objective of rebuilding and long-term operation of supportive housing.

[Chapter 3, Comment 11-17]

The following text has been added under the Transit-Oriented Mixed-Use Alternative on page 5-9 of the Draft EIR:

This alternative would provide higher levels of development and infrastructure investment, thus making it easier to achieve the project objectives of rebuilding and maintaining long-term operation of supportive housing and achieving first source hiring goals. This alternative assumes that the real estate market can accomplish project objectives even with the imposition of Navy fees for housing above the no cost conveyance limits of 1,425 units.

[Chapter 3, Comment 11-18]

The following text has been added under the High-Density Alternative on page 5-10 of the Draft EIR:

This alternative would provide higher levels of development and infrastructure investment, thus making it easier to achieve the project objectives of rebuilding and maintaining long-term operation of supportive housing and achieving first source hiring goals. This alternative assumes that the real estate market can accomplish project goals even with the imposition of Navy fees for housing above the no cost conveyance limits of 1,425 units.

[Chapter 3, Comment 11-10]

**TABLE 2-2 (REVISED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
A. Land Use Consistency and Compatibility		
Impact 4.A-1: Development facilitated by the proposed Alameda Point project would not physically divide an established community within the City of Alameda. (Less than Significant)	None required.	
Impact 4.A-2: Development facilitated by the proposed project could potentially conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan and zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)	None required.	
Impact 4.A-3: Development facilitated by the proposed project could potentially conflict with an applicable Habitat Conservation Plans or Natural Community Conservation Plans. (Less than Significant)	None required.	
Impact 4.A-4: Development facilitated by the proposed project, combined with cumulative development in the defined geographic area, including past, present, reasonably foreseeable future development, could potentially have significant adverse cumulative impacts in the area. (Less than Significant)	None required.	
B. Population and Housing		
Impact 4.B-1: Development facilitated by the proposed project could potentially induce substantial population or housing growth both directly and indirectly. (Less than Significant)	None required.	
Impact 4.B-2: Development facilitated by the proposed project could potentially displace a substantial number of people or housing. (Less than Significant)	None required.	
Impact 4.B-3: Development facilitated by the proposed project, in conjunction with potential past, present, and future development in the surrounding region could potentially introduce additional population to the region, and would result in unanticipated population, housing, or employment growth, or the displacement of existing residents or housing units on a regional level. (Less than Significant)	None required.	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation		
<p>Impact 4.C-1: Development facilitated by the proposed project would generate temporary increases in traffic volumes on area roadways during construction. (Significant)</p>	<p>Mitigation Measure 4.C-1: The City shall require that project applicant(s) and construction contractor(s) shall develop a construction management plan for review and approval by the Public Works Department prior to issuance of any permits. The plan shall include at least the following items and requirements to reduce traffic congestion during construction:</p> <ol style="list-style-type: none"> 1. A set of comprehensive traffic control measures shall be developed, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. 2. The Construction Management Plan shall identify haul routes for movement of construction vehicles that would minimize impacts on motor vehicle, bicycle, and pedestrian traffic, circulation, and safety, and specifically to minimize impacts to the greatest extent possible on streets in the project area. The haul routes shall be approved by the City. 3. The Construction Management Plan shall provide for notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures would occur. 4. The Construction Management Plan shall provide for monitoring surface streets used for haul routes so that any damage and debris attributable to the haul trucks can be identified and corrected by the project applicant. 	<p>Less than Significant</p>
<p>Impact 4.C-2: Development facilitated by the proposed project would potentially result in a transportation impact at study locations <u>locations</u> under Existing plus Project conditions. (Significant)</p>	<p>Mitigation Measure 4.C-2a (TDM Program): Prior to issuance of building permits for each development project at Alameda Point, the City of Alameda shall prepare, and shall require that the sponsor of the development project participate in implementation of, a Transportation Demand Management (TDM) program for Alameda Point aimed at meeting the General Plan peak-hour trip reduction goals of 10 percent for residential development and 30 percent for commercial development.</p> <p>Mitigation Measure 4.C-2b (Monitoring and Improvement Program): Prior to issuance of the first building permits for any development project at Alameda Point, the City of Alameda shall adopt a Transportation Network Monitoring and Improvement Program to: 1) determine the cost of the transportation network improvements identified in this EIR; 2) identify appropriate means and formulas to collect fair share financial contributions from Alameda Point development; 3) monitor conditions at the locations that will be impacted by the redevelopment of Alameda Point; 4) monitor traffic generated by Alameda Point; and 5) establish the appropriate time to implement the <u>any</u> necessary secondary physical improvements described <u>required</u> in this EIR to minimize or eliminate significant transportation impacts prior to the impacts occurring at <u>affected locations where a secondary impact mitigation is recommended.</u></p>	<p>Auto Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
Impact 4.C-2 (cont.)	<p>Mitigation Measure 4.C-2c (Otis/Fernside): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when and if required to avoid the impact or reduce its severity, shall implement the following improvements:</p> <ul style="list-style-type: none"> Remove the right turn island for the westbound approach on Otis Drive, add a dedicated right turn lane with approximately 50 feet of storage length, and move the westbound right stop-bar upstream approximately 20 feet to accommodate the right turn lane storage length. Restripe Fernside Boulevard with two receiving lanes. Optimize signal timing. <p>Mitigation Measure 4.C-2d (Jackson/Sixth): The City of Alameda shall implement Mitigation Measures 4.C-2a (TDM Program) and 4.C-2b (Monitoring), which could improve intersection LOS by reducing vehicle trips.</p> <p>Mitigation Measure 4.C-2e (Brush/11th): The City of Alameda shall implement Mitigation Measures 4.C-2a (TDM Program) and 4.C-2b (Monitoring), which could improve intersection LOS by reducing vehicle trips.</p> <p>Mitigation Measure 4.C-2f (23rd/Seventh): The City of Alameda shall implement Mitigation Measures 4.C-2a (TDM Program) and 4.C-2b (Monitoring), which could improve intersection LOS by reducing vehicle trips.</p> <p>Mitigation Measure 4.C-2g (Main/Pacific Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall implement the following physical improvements:</p> <ul style="list-style-type: none"> change the signal timing to a two-phase timing plan (i.e., northbound and southbound move concurrently; then eastbound and westbound move concurrently); and optimize cycle length. <p>Mitigation Measure 4.C-2h (Webster/Alpezzato Parkway Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall optimize the signal timing during the p.m. peak hour.</p>	<p>Significant and Unavoidable</p> <p>Significant and Unavoidable</p> <p>Significant and Unavoidable</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant. Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant. Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant. Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant. Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant. Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant. Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
<p>Impact 4.C-2 (cont.)</p>	<p>Mitigation Measure 4.C-2i (Park/Otis Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall optimize the signal timing during the a.m. and p.m. and peak hours.</p> <p>Mitigation Measure 4.C-2j (Broadway/Tilden Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall optimize the signal timing during the a.m. and p.m. peak hours.</p> <p>Mitigation Measure 4.C-2k (High/Fernside Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall optimize the signal timing during the p.m. peak hour.</p> <p>Mitigation Measure 4.C-2l (Atlantic/Constitution Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall implement the following physical improvements:</p> <ul style="list-style-type: none"> • modify the phasing sequence existing signal phasing for eastbound and westbound Atlantic Avenue approaches from split to permitted protected lefts; and • optimize the signal timing. 	<p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
<p>Impact 4.C-2 (cont.)</p>	<p>Mitigation Measure 4.C-2m (Stargell Avenue Bike): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall construct a Class I or Class II bicycle facility between Main Street and Webster Street.</p> <p>Mitigation Measure 4.C-2n (Main Street Bike): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall implement the following physical improvements:</p> <ul style="list-style-type: none"> • construct a Class II bicycle lane or improve the existing Class I bicycle path on the west side of the street between Appezzato Parkway and Pacific Avenue to current City standards; • provide connectivity to existing Class I bicycle path on the east and west sides of the street north of Appezzato Parkway. Appropriate intersection treatments for connectivity may include striping, signage, and/or bicycle boxes at the intersection of Main Street and Appezzato Parkway; and • if Mitigation Measure 4.C-4c (described below) is implemented, provide connectivity to that bicycle facilities on west side of the street north of the Main Street-Pacific Street intersection. <p>Mitigation Measure 4.C-2o (Central Avenue Bike): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, shall <u>use its best efforts</u> implement the following physical improvements:</p> <ul style="list-style-type: none"> • construct a Class II bicycle lane or improve the existing Class I bicycle path on the west (south) side of the street between the Main Street-Pacific Street intersection and Lincoln Avenue to current City standards; • extend a Class I bicycle path to Third Street; and • restripe and sign the street segment between Third Street and Fourth Street to provide Class II bicycle lanes between Lincoln Avenue and Fourth Street. 	<p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
Impact 4.C-3: The increase in traffic on the freeway mainline due to the project would result in negligible changes in density (vehicles per lane) and no change in LOS, with the exception of the segment of I-980 south of I-580. (Less than Significant)	None required.	
Impact 4.C-4: The change in traffic volumes on the freeway ramps due to the project would result in no change in LOS and minimal, if any, change in density (vehicles per lane). (Less than Significant)	None required.	
Impact 4.C-5: Cumulative development, including the proposed project, would potentially result in transportation impacts at local study intersections locations under Cumulative plus project conditions. (Significant)	<p>Mitigation Measure 4.C-5a (Park/Clement): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following physical improvements:</p> <ul style="list-style-type: none"> • Add northbound left turn pocket along Park Street; • Optimize the signal offsets and splits; and • Complete the Clement Avenue extension, which would reduce the demand for left turn movements onto Park Street from eastbound traffic on Clement Avenue. <p>Mitigation Measure 4.C-5b (Park/Encinal): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following physical improvements:</p> <ul style="list-style-type: none"> • Convert one eastbound through lane on Encinal Avenue to a left turn lane to provide two left turn lanes and a shared through-right lane on the eastbound approach; and • Optimize offsets and splits. <p>Mitigation Measure 4.C-5c (Broadway/Otis): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following physical improvements:</p> <ul style="list-style-type: none"> • Add a southbound left turn lane on Broadway to provide two left turn lanes and a shared through-right for that approach; • Convert the southbound Broadway left turn phase to permitted protected; • Convert to actuated uncoordinated timing plan during the p.m. peak hour; and • Optimize the signal timing during both peak hours. 	<p>Auto Travel Impact Significance after Mitigation: Significant and Unavoidable. Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant. Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant. Transit Travel Secondary Impact after Auto Mitigation: Less than Significant. Auto Travel Impact Significance after Mitigation: Significant and Unavoidable. Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant. Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant. Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
Impact 4.C-5 (cont.)	<p>Mitigation Measure 4.C-5d: (Tilden/Blanding/Fernside): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> • Add a westbound left turn to provide a left turn lane, a through lane and a right turn lane on the westbound Fernside Boulevard approach. • Add an eastbound left turn lane to provide a left turn lane, a through lane and a right turn lane on the eastbound Blanding Avenue approach. • Optimize the offsets and splits. <p>Mitigation Measure 4.C-5e (High/Fernside): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> • Adjust the signal cycle phasing during the a.m. and p.m. peak hours such that the southbound left turn from High Street is a permitted rather than protected movement; and • Optimize signal timing. <p>Mitigation Measure 4.C-5f (High/Otis): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> • Add a northbound right turn lane on High Street to provide a shared through-left and right turn lane on the northbound approach; • Add an overlap phase for the northbound High Street right turn movement and prohibit the conflicting westbound Otis Drive U-turn movement; and • Optimize the signal timing for both peak hours, and • Install traffic calming strategies on Bayview Drive to include strategies, such as: restriping Bayview Drive to create narrower driving lanes to reduce speed, installing a cross walk and caution sign at the location of the public coastal access easement, and/or construction of sidewalk bulb-outs to improve pedestrian safety at the intersections of Bayview/Court Street and Bayview/Broadway. 	<p>Auto Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Auto Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Auto Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>C. Transportation and Circulation (cont.)</p> <p>Impact 4.C-5 (cont.)</p>	<p>Mitigation Measure 4.C-5g (Island Drive/Otis Drive and Doolittle Drive): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> • Add a westbound left turn lane to provide two left turn lanes and two through lanes on the westbound Doolittle Drive approach; and • Optimize signal timing during both peak hours. <p>Mitigation Measure 4.C-5h (Fernside Boulevard and Otis Drive): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and implement Mitigation Measure 4.C-2-c (Otis/Fernside), and fund a fair share contribution to add a westbound right-turn overlap phase from Fernside Boulevard.</p> <p>Mitigation Measure 4.C-5i (Park/Blanding): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> • Add two eastbound left turn lanes to provide two left turn lanes and a shared through/right turn lane on the eastbound Blanding Avenue approach; • Add a westbound left turn lane to provide a left turn lane, a through lane and a right turn lane on the westbound Blanding Avenue approach; • Separate the operation of the Nursing Home driveway from the Park Street and Blanding Avenue intersection; • Change east-west signal phasing to protected phasing; and • Optimize signal timing during both peak hours. 	<p>Auto Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant. Mitigation Measure 4.C-5h (Fernside Boulevard and Otis Drive): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and C-2b) and implement Mitigation Measure 4.C-2-c (Otis/Fernside), and fund a fair share contribution to add a westbound right-turn overlap phase from Fernside Boulevard.</p> <p>Auto Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Auto Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
Impact 4.C-5 (cont.)	<p>Mitigation Measure 4.C-5j (Challenger/Atlantic): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, a fairshare to contribution optimize signal timing during the p.m. peak hour.</p> <p>Mitigation Measure 4.C-5k (Park/Lincoln): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, the City shall fund a fairshare to optimize signal timing during the p.m. peak hour.</p> <p>Mitigation Measure 4.C-5l (Jackson/Sixth): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b).</p> <p>Mitigation Measure 4.C-5m (Webster/Eighth): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b).</p> <p>Mitigation Measure 4.C-5n (Broadway/Fifth): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b).</p> <p>Mitigation Measure 4.C-5o (Brush/12th): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b).</p> <p>Mitigation Measure 4.C-5p (High/Oakport): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and work with the City of Oakland to optimize the signal timing to allow for more green time for northbound traffic.</p>	<p>Auto Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Auto Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Auto Mitigation: Less than Significant.</p> <p>This impact would remain significant and unavoidable.</p> <p>This impact would remain significant and unavoidable.</p> <p>This impact would remain significant and unavoidable.</p> <p>Because the potential future mitigation for this intersection, and the cost of that mitigation, are not known, and because the City of Alameda has no jurisdiction over the mitigation, this impact is conservatively considered to be significant and unavoidable.</p> <p>Because the potential future mitigation for this intersection, and the cost of that mitigation, are not known, and because the City of Alameda has no jurisdiction over the mitigation, this impact is conservatively considered to be significant and unavoidable.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>C. Transportation and Circulation (cont.)</p> <p>Impact 4.C-5 (cont.)</p>	<p>Mitigation Measure 4.C-5q (High/Coliseum): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and work with the City of Oakland to optimize the signal timing.</p> <p>Mitigation Measure 4.C-5r (29th/Ford): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b).</p> <p>Mitigation Measure 4.C-5s (23rd Ave./Seventh St.): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and work with the City of Oakland to modify the northbound to provide a separate left-turn lane and a shared through-right-turn lane, and optimize the signal.</p> <p>Mitigation Measure 4.C-5t (Main/Pacific Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fairshare contribution to change signal timing to two-phase timing plan (i.e., northbound and southbound move concurrently; then eastbound and westbound move concurrently) and optimize cycle length.</p> <p>Mitigation Measure 4.C-5u (Webster/Alpezzato Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to optimize signal timing.</p> <p>Mitigation Measure 4.C-5v (High/Fernside Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and Mitigation Measure 4.C-5e (optimize signal timing during the p.m. peak hour).</p>	<p>Because the potential future mitigation for this intersection, and the cost of that mitigation, are not known, and because the City of Alameda has no jurisdiction over the mitigation, this impact is conservatively considered to be significant and unavoidable.</p> <p>Because no feasible mitigation has been identified to improve the intersection, and because the City of Alameda has no jurisdiction over the mitigation, this impact is conservatively considered to be significant and unavoidable.</p> <p>Because the City of Alameda has no jurisdiction over the mitigation, this impact is conservatively considered to be significant and unavoidable.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Significant and Unavoidable.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>C. Transportation and Circulation (cont.)</p> <p>Impact 4.C-5 (cont.)</p>	<p>Mitigation Measure 4.C-5w (Appezato/Constitution Pedestrian): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> Modify the phasing sequence existing signal phasing for eastbound and westbound approaches from split to permitted protected lefts; and Optimize the signal timing. <p>Mitigation Measure 4.C-5x (Park Street Transit): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> Provide transit signal priority at intersections along this corridor; and Separate the operation of the Nursing Home driveway from the Park Street and Blanding Avenue intersection; and Optimize splits at the Park Street and Blanding Avenue intersection during a.m. and p.m. peak hours. <p>Mitigation Measure 4.C-5y (Appezato Parkway Transit): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the following improvements:</p> <ul style="list-style-type: none"> Install transit signal priority at intersections along this corridor; Optimize cycle length at the Appezato Parkway and Webster Street intersection during a.m. and p.m. peak hours and provide signal priority; and Establish exclusive transit lanes or queue jump lanes from Alameda Point to Webster Street. <p>Mitigation Measure 4.C-5z (Stargell Avenue Transit): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, implement the following improvements:</p> <ul style="list-style-type: none"> Provide eastbound and westbound queue jump lanes on Willie Stargell Avenue at Main Street and at Fifth Street or construct exclusive transit lanes on Willie Stargell Avenue; 	<p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Pedestrian Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Bicycle Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Pedestrian Mitigation: Less than Significant.</p> <p>Transit Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Transit Mitigation: Significant and Unavoidable.</p> <p>Bicycle Travel Secondary Impact after Transit Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Transit Mitigation: Less than Significant.</p> <p>Transit Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Transit Mitigation: Significant and Unavoidable.</p> <p>Bicycle Travel Secondary Impact after Transit Mitigation: Significant and Unavoidable.</p> <p>Auto Travel Secondary Impact after Transit Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Impact Significance after Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Transit Mitigation: Significant and Unavoidable.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>C. Transportation and Circulation (cont.)</p> <p>Impact 4.C-5 (cont.)</p>	<ul style="list-style-type: none"> • Install transit signal priority at intersections along this corridor; and • Optimize cycle length at the Main Street and Willie Stargell Avenue intersection during a.m. and p.m. peak hours. <p>Mitigation Measure 4.C-5zi (Stargell Avenue Bike): The City shall implement Mitigation Measure 4.C-2m (Stargell Avenue bike path).</p> <p>Mitigation Measure 4.C-5zii: The City shall implement Mitigation Measure 4.C-2n (Main Street bicycle improvements).</p> <p>Mitigation Measure 4.C-5ziii (Central Avenue Bike): The City shall implement Mitigation Measure 4.C-2b (Central Avenue bicycle improvements).</p> <p>Mitigation Measure 4.C-5ziv (Oak Street Bike): The City shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and, when required to avoid the impact or reduce its severity, fund a fair share contribution to implement the completion of a bicycle boulevard with appropriate signage and striping along Oak Street from Blanding Avenue to Encinal Avenue to advise motorists and bicyclists to share the street.</p>	<p>Bicycle Travel Secondary Impact after Transit Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Transit Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Bicycle Travel Impact Significance after Mitigation: Significant and Unavoidable.</p> <p>Transit Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Pedestrian Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p> <p>Auto Travel Secondary Impact after Bicycle Mitigation: Less than Significant.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
Impact 4.C-6: The increase in traffic on the freeway mainline due to the project results in negligible changes in density and no change in LOS under cumulative conditions. (Less than Significant)	None required.	
Impact 4.C-7: The change in traffic volumes on the freeway ramps due to the project results in no little change in LOS and minimal, if any, change in density under existing conditions. (Less than Significant)	None required.	
Impact 4.C-8: Development facilitated by the proposed project would potentially result in inadequate emergency access. (Less than Significant)	None required.	
Impact 4.C-9: Development facilitated by the proposed project could potentially increase traffic safety hazards for vehicles, bicyclists, and pedestrians on public roadways due to roadway design features or incompatible uses. (Significant)	Mitigation Measure 4.C-9 (Chinatown Pedestrians): The City of Alameda shall implement TDM and Monitoring (Mitigation Measures 4.C-2a and 4.C-2b) and shall continue to work with the City of Oakland, the ACTC, and Caltrans, to evaluate and implement measures to reduce or divert the volume of traffic that travels through Oakland Chinatown to and from Alameda Point and other City of Alameda destinations.	Because the City of Alameda has no jurisdiction over mitigation other than implementation of the project TDM Program and Monitoring, the impact at four intersections in Oakland Chinatown is conservatively considered to be significant and unavoidable .
Impact 4.C-10: Development facilitated by the proposed project could potentially be inconsistent with adopted policies, plans, and programs supporting alternative transportation. (Less than Significant)	None required.	
Impact 4.C-11: The addition of project-generated traffic would increase traffic volumes on many CMP and MTC roadways above levels identified under 2020 Baseline Conditions. (Less than Significant)	None required.	
Impact 4.C-12: The addition of project-generated traffic would increase traffic volumes on many CMP and MTC roadways above levels identified under 2035 Baseline Conditions. (Less than Significant)	None required.	
Impact 4.C-13: The addition of project-generated traffic would increase ridership on AC Transit buses above that under 2020 Baseline conditions. (Less than Significant)	None required.	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
C. Transportation and Circulation (cont.)		
Impact 4.C-14: The addition of project-generated traffic would increase ridership on AC Transit buses above that under 2035 Cumulative Baseline conditions. (Less than Significant)	None required.	
Impact 4.C-15: The addition of project-generated passengers would increase ridership on BART above that under 2020 Baseline conditions. (Less than Significant)	None required.	
Impact 4.C-16: The addition of project-generated passengers would increase ridership on BART above that under 2035 Cumulative Baseline conditions. (Less than Significant)	None required.	
D. Cultural and Paleontological Resources		
Impact 4.D-1: Development facilitated by the proposed project could potentially have a significant, adverse impact on Historic Resources within the Alameda Historic District. (Significant)	<p>Mitigation Measure 4.D-1a: The City shall implement the requirements of the Historic Preservation Ordinance, which requires a certificate of approval by the HAB for modifications to contributors and resources within the Historic District. As part of the certificate of approval process, project sponsors shall provide:</p> <ol style="list-style-type: none"> 1) An analysis of the proposal's conformity with the <i>Guide to Preserving the Character of the Naval Air Station Alameda Historic District</i> as adopted and amended by the City Council; 2) An analysis of the proposal's conformity with general management and design guidelines contained within the NAS Alameda Cultural Landscape Report (JRP, 2012), including application of the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes</i>. These include special treatments organized by functional area for such topics as spatial organization, topography, vegetation, views and vistas, circulation, as well as structures, furnishings and objects; and 3) An analysis of impacts to the integrity of the Historic District, as a whole, and an analysis of alternatives to avoid potential impacts on the District as a whole, on an individual resource. <p>Mitigation Measure 4.D-1b: Prior to approval of new buildings within the Historic District the City shall complete and adopt Guidelines for New Infill Development within the Historic District. All new building will be reviewed for conformance with the guidelines.</p> <p>Mitigation Measure 4.D-1c: As a condition of approval for demolition or removal of a contributor to the Historic District, the City shall require that the project applicant:</p>	Significant and Unavoidable

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>D. Cultural and Paleontological Resources (cont.)</p> <p>Impact 4.D-1 (cont.)</p>	<p>1) Document any Historic District contributor contemplated for demolition under the proposed project in accordance with the Historic American Building Survey (HABS) Level II documentation standards of the National Park Service¹ including the following:</p> <ol style="list-style-type: none"> 1. <i>Photographs.</i> Large-format (4 x 5-inch negatives or greater), black and white photographs will be taken of all elevations of the building(s), plus limited context and detail shots. A limited number of historical photos of buildings, where available, should also be photographically reproduced. All photographs should be printed on acid-free archival bond paper on 8 x 10 enlargements. Digital photography may be substituted for large-format photographs where necessary. 2. <i>Written History.</i> Prepare a written history of the resource using the HABS standard outline format. Building-specific historical and architectural information from the National Register Nominations and prior inventories and technical reports can be utilized for this effort. If available, reproduce original building drawings on mylar or through photographic means. 3. <i>Archiving.</i> The completed HABS documentation package (photos, report, and drawings) shall be archived at the City of Alameda, the City of Alameda Public Library, the Alameda Naval Air Station Museum, and the Northwest Information Center of Sonoma State University. <p>2) Prepare and implement a public interpretation plan to describe and convey the historic significance of the NAS Alameda Historic District or resource to the general public. The plan will contain recommendations for the location and design of interpretive elements, such as plaques, markers, exhibits, expansion of the existing Alameda Point self-guided tour,² and other methods for interpreting the history of the former NAS Alameda. Information generated from the HABS documentation effort, described above, as well as historical information from the National Register Nomination and other technical background reports may be utilized. The interpretive plan will be designed by a professional architectural historian meeting the qualifications of the Secretary of the Interior's Standards.</p> <p>3) Prepare and implement an architectural salvage plan for any District contributor contemplated for demolition under the proposed project. The plan will identify architectural components that are worthy of salvage and reuse either as part of the design of the replacement structures, or elsewhere on the project site. The salvage plan will be prepared by a professional architectural historian meeting the qualifications of the Secretary of the Interior's Standards.</p>	

¹ It shall be noted that pursuant to CEQA Guidelines Section 15126(b)(2), "In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur."

² <http://www.alameda-point.com/resources/pdf/self-guided-tour-map.pdf>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>D. Cultural and Paleontological Resources (cont.)</p> <p>Impact 4.D-2: Development facilitated by the proposed project could potentially result in the inadvertent discovery of unique archaeological resources. (Significant)</p>	<p>Mitigation Measure 4.D-2: If cultural resources are encountered, all activity within 100 feet of the find shall halt until it can be evaluated by a qualified archaeologist and a Native American representative. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the archaeologist and Native American representative determine that the resources may be significant, they shall notify the City of Alameda and shall develop an appropriate treatment plan for the resources. The archaeologist shall consult with Native American monitors or other appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature.</p> <p>In considering any suggested measures proposed by the archaeologist and Native American representative in order to mitigate impacts to cultural resources, the project applicant shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project area while mitigation for cultural resources is being carried out.</p> <p>Pursuant to CEQA Guidelines Section 15126(b), <i>Mitigation Measures Related to Impacts on Historical Resources</i>, the City of Alameda will, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered for a project involving an archaeological site:</p> <p>A. Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.</p> <p>B. Preservation in place may be accomplished by, but is not limited to, the following:</p> <ol style="list-style-type: none"> 1. Planning construction to avoid archaeological sites; 2. Incorporation of sites within parks, greenspace, or other open space; 3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site. 4. Deeding the site into a permanent conservation easement. 	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
D. Cultural and Paleontological Resources (cont.)		
Impact 4.D-2 (cont.)	<p>C. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code. If an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation.</p> <p>D. Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.</p>	
Impact 4.D-3: Development facilitated by the proposed project could potentially result in the discovery of unidentified unique paleontological resources. (Significant)	Mitigation Measure 4.D-3: If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing construction activities, all such activities within 100 feet of the find shall be halted until a qualified paleontologist can assess the significance of the find and, if necessary, develop appropriate salvage measures in consultation with the City of Alameda and in conformance with Society of Vertebrate Paleontology Guidelines (SVP, 1995; SVP, 1996).	Less than Significant
Impact 4.D-4: Development facilitated by the proposed project could potentially result in the inadvertent discovery of human remains. (Significant)	Mitigation Measure 4.D-4: In the event of discovery or recognition of any human remains during construction activities, such activities within 100 feet of the find shall cease. The Alameda County Coroner shall be contacted immediately. If the remains are determined to be Native American, and no investigation of the cause of death is required, the Native American Heritage Commission (NAHC) will be contacted within 24 hours. The NAHC will identify and contact the person or persons it believes to be the "most likely descendant (MLD)" of the deceased Native American, who in turn would make recommendations for the appropriate means of treating the human remains and any grave goods.	Less than Significant
Impact 4.D-5: Development facilitated by the proposed project, in conjunction with, past, present, and future development, could potentially adversely affect historic architectural resources in the project vicinity. (Significant)	Mitigation Measure 4.D-5: Implement Mitigation Measure 4.D-1.	Significant and Unavoidable.

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
D. Cultural and Paleontological Resources (cont.)		
<p>Impact 4.D-6: Development facilitated by the proposed project, in conjunction with cumulative development, would have a less-than-significant impact on unique archaeological and paleontological resources, as well as human remains, in the project vicinity. (Significant)</p>	<p>Mitigation Measure 4.D-6: Implement Mitigation Measures 4.D-2, -3, and -4.</p>	<p>Less than Significant</p>
E. Biological Resources		
<p>Impact 4.E-1: Development facilitated by the proposed project would have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the United States Fish and Wildlife Service. (Significant)</p>	<p>Mitigation Measure 4.E-1a: Prior to the start of marina or ferry terminal construction, the City shall require a NMFS-approved sound attenuation monitoring plan to protect fish and marine mammals, if pile driving is planned for the Seaplane Lagoon. This plan shall provide detail on the sound attenuation system, detail methods used to monitor and verify sound levels during pile driving activities, and describe management practices to be taken to reduce impact hammer pile-driving sound in the marine environment to an intensity level of less than 183 dB. The sound monitoring results shall be made available to the NMFS. The plan shall incorporate, but not be limited, to the following best management practices (BMPs):</p> <ul style="list-style-type: none"> • To the extent feasible, all pilings shall be installed and removed with vibratory pile drivers only. Vibratory pile driving will be conducted following the Corps' "Proposed Procedures for Permitting Projects that will Not Adversely Affect Selected Listed Species in California". USFWS and NOAA completed Section 7 consultation on this document, which establishes general procedures for minimizing impacts to natural resources associated with projects in or adjacent to jurisdictional waters. • An impact pile driver may only be used where necessary to complete installation of larger steel pilings in accordance with seismic safety or other engineering criteria • The hammer shall be cushioned using a 12-inch thick wood cushion block during all impact hammer pile driving operations • All piling installation using impact hammers shall be conducted between June 1 and November 30, when the likelihood of sensitive fish species being present in the work area is minimal • If pile installation using impact hammers must occur at times other than the approved work window, the project applicant shall obtain incidental take authorization from NMFS and CDFW, as necessary, to address potential impacts on steelhead trout, chinook salmon, and Pacific herring and implement all requested actions to avoid impacts 	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-1 (cont.)</p>	<ul style="list-style-type: none"> • The project applicant shall monitor and verify sound levels during pile driving activities. The sound monitoring results will be made available to NMFS and the City • In the event that exceedance of noise thresholds established and approved by NMFS occurs, a contingency plan involving the use of bubble curtains or air barrier shall be implemented to attenuate sound levels to below thresholds <p>Mitigation Measure 4.E-1b: During the project permitting phase, the City will ensure that any projects requiring in-water work include consultation with NMFS to determine if the work can be covered under one of the programmatic consultations for federally listed species described above or if a project-level BO would be required and whether an Incidental Harassment Authorization for marine mammals would be needed for dredging or pile driving activities. The project applicant shall also consult with CDFW regarding State special-status fish and the potential need for an incidental take permit (ITP). The project applicant shall submit to the City copies of any IHA and/or ITP received or, alternatively, copies of correspondence confirming that an IHA and/or ITP is not required for the project in question.</p> <p>Mitigation Measure 4.E-1c: As part of the NMFS-approved sound attenuation monitoring plan required for pile driving in the Seaplane Lagoon in Mitigation Measure 4.E-1a, the City shall ensure that the project applicant implements the following actions in addition to those listed in Mitigation Measure 4.E-1a to reduce the effect of underwater noise transmission on marine mammals. These actions shall include at a minimum:</p> <ul style="list-style-type: none"> • Establishment of a 1,600-foot (500-meter) safety zone that shall be maintained around the sound source, for the protection of marine mammals in the event that sound levels are unknown or cannot be adequately predicted • Work activities shall be halted when a marine mammal enters the 1,600-foot (500-meter) safety zone and resume only after the animal has been gone from the area for a minimum of 15 minutes • A "soft start" technique shall be employed in all pile driving to marine mammals an opportunity to vacate the area • Maintain sound levels below 90 dBA in air when pinnipeds (seals and sea lions) are present • A NMFS-approved biological monitor will conduct daily surveys before and during impact hammer pile driving to inspect the work zone and adjacent Bay waters for marine mammals. The monitor will be present as specified by NMFS during the impact pile-driving phases of construction 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E: Biological Resources (cont.)</p> <p>Impact 4.E-1 (cont.)</p>	<p>Mitigation Measure 4.E-1d: Prior to occupancy, the City shall ensure that the project applicant installs dock lighting on all floating docks that minimizes artificial lighting of Bay waters by using shielded, low-mounted, and low light-intensity fixtures and bulbs.</p> <p>Mitigation Measure 4.E-1e: Prior to opening the proposed regional park in the Northwest Territories and the proposed Bay Trail in the Northwest Territories and on the Federal Property, the City shall ensure that measures are taken to identify sensitive resources in these areas and to restrict access of humans and dogs to those resources. Measures to be implemented could include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Surveys conducted by a qualified biologist to identify sensitive resources locations throughout the City's portion of the Northwest Territories and on the Federal Property along the proposed Bay trail alignment • Additional seasonal access restrictions, as appropriate • Educational signage and brochures regarding sensitive resources and the need to avoid them • Fencing trails where they run proximate to sensitive biological resources (e.g. wetlands, known breeding grounds) • On-leash restrictions on dogs throughout or prohibition of dogs altogether in certain areas based on the results of the sensitive resources surveys (e.g., on the Bay Trail in the Federal Property) <p>Mitigation Measure 4.E-1f: Potential direct and indirect disturbances to bats shall be identified by locating colonies, and instituting protective measures prior to construction. No more than two weeks in advance of tree removal, demolition of buildings onsite, or initiation of construction within 100 feet of trees or structures providing potential bat roosting sites, a qualified bat biologist (e.g., a biologist holding a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle and collect bats) shall conduct pre-construction surveys for bat roosts. No activities that could disturb active roosts shall proceed prior to the completed surveys.</p> <p>Mitigation Measure 4.E-1g: If a maternity colony is located within the project site during pre-construction surveys, the project shall be redesigned to avoid impacts if feasible, and a no-disturbance buffer acceptable in size to the CDFW shall be created around the roost. Bat roosts (maternity or otherwise) initiated during construction are generally presumed to be unaffected by increased noise, vibration, or human activity, and no buffer is necessary as long as roost sites are not directly altered or destroyed. However, the "take" of individuals is still prohibited at any time.</p>	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p>	<p>Impact 4.E-1 (cont.)</p> <ul style="list-style-type: none"> If there is a maternity colony present and the project cannot be redesigned to avoid removal of the tree or structure inhabited by the bats, demolition of that tree or structure shall not commence until after young are flying (i.e., after July 31, confirmed by a qualified bat biologist) or before maternity colonies form the following year (i.e. prior to March 1). If a non-maternity roost must be removed as part of the project, the non-maternity roost shall be evicted prior to building/tree removal by a qualified biologist, using methods such as making holes in the roost to alter the air-flow or creating one-way funnel exits for the bats. If significant (e.g., maternity roosts or large non-maternity roost sites) bat roosting habitat is destroyed during building/tree removal, artificial bat roosts shall be constructed in an undisturbed area in the project site vicinity away from human activity and at least 200 feet from project demolition/construction activities. The design and location of the artificial bat roost(s) shall be determined by a qualified bat biologist. <p>Mitigation Measure 4.E-1h: The City shall ensure that the project applicant for development facilitated by the proposed project protects active autumnal/overwintering roost sites used by monarch butterflies by conducting construction activities in and around identified butterfly autumnal roost/overwintering sites outside of the autumnal migratory/overwintering season (October to March), to the greatest extent feasible, to avoid potential impacts on monarch butterfly.</p> <ul style="list-style-type: none"> The project applicant shall retain a biologist familiar with monarch butterfly life history and habitat requirements to conduct surveys for active monarch butterfly roost sites anywhere groves (greater than 3 trees planted together) of mature conifers (e.g. Italian stone pine, Monterey cypress) and/or eucalyptus occur in the Main Street Neighborhood Sub-area and in open space to the south of Main Street as it skirts the northern edge of the project area between November and January and prior to start of construction. All active roost sites encountered during the survey shall be identified and mapped for future reference. The previously active roost site identified in 2002 shall be considered active until proven otherwise. Active sites shall be monitored annually to inform future development. Once identified, such sites shall be considered active until such time as monarchs have not returned to the site for a period of ten years. Once ten years have passed with no significant butterfly use (as determined by the qualified biologist) of a site the restrictions below would no longer apply. No tree removal shall be conducted at any time in or around active roost sites to the extent that such removal would: a) result in the loss of an active roost tree; b) result in changes to the amount of wind affecting an active roost; or c) result in changes of the thermal environment surrounding an active roost tree. 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
E. Biological Resources (cont.)		
<p>Impact 4.E-1 (cont.)</p>	<p>If active roost sites are identified and it is not feasible to avoid the overwintering season and construction activities take place during this time (October through March), the following measures shall apply:</p> <ul style="list-style-type: none"> • Mapped autumnal roost/overwintering roosts within 100 feet of construction areas shall be surveyed not more than two weeks prior to construction to determine whether they are actively being used by butterflies. • If a mapped autumnal roost/overwintering site is supporting butterflies, work activities shall be delayed within 100 feet of the site location until avoidance measures have been implemented. Appropriate avoidance measures shall include the following measures (which may be modified as a result of consultation with CDFW to provide equally effective measures): <ul style="list-style-type: none"> - If the qualified wildlife biologist determines that construction activities shall not affect an active autumnal roost/overwintering site, activities may proceed without restriction. - A no-disturbance buffer may be established around the autumnal roost/overwintering site to avoid disturbance or destruction until butterflies resume their migration. - The extent of the no-disturbance buffers is typically 100 feet but shall be determined by a qualified wildlife biologist in consultation with the CDFW. <p>Mitigation Measure 4.E-2a: Prior to marina or ferry terminal construction, the City shall ensure that the project applicant conducts a pre-construction survey to determine if native oysters and eelgrass are present in Seaplane Lagoon.</p> <ul style="list-style-type: none"> • The eelgrass survey shall be conducted according to the methods contained in the California Draft Eelgrass Mitigation Policy (CDEMP) (NIMFS 2011), with the exception that the survey shall be conducted within 120 days (rather than 60 days, as recommended in the CDEMP), prior to the desired construction start date, to allow sufficient time for modification of project plans (if feasible) and agency consultation. • If found within or immediately adjacent to the construction footprint, the project applicant shall first determine whether avoidance of the beds is feasible. If feasible, impacts to the oyster or eelgrass bed shall be avoided. If complete avoidance is not feasible, the applicant shall request guidance from the National Marine Fisheries Service (or other applicable agency) as to the need and/or feasibility to move affected beds. Any translocation of eelgrass beds shall be conducted consistent with the methods described in the CDEMP and/or those described in Eelgrass Conservation in San Francisco Bay: Opportunities and Constraints (Boyer and Wylie-Echeverria, 2010). Translocation of oyster beds shall be consistent with methods and recommendations presented in Shellfish Conservation and Restoration in San Francisco Bay: Opportunities and Constraints (Zabin et al., 2010) 	<p>Less than Significant</p>
<p>Impact 4.E-2: Development facilitated by the proposed project would have a substantial adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (Significant)</p>	<p>Mitigation Measure 4.E-2a: Prior to marina or ferry terminal construction, the City shall ensure that the project applicant conducts a pre-construction survey to determine if native oysters and eelgrass are present in Seaplane Lagoon.</p> <ul style="list-style-type: none"> • The eelgrass survey shall be conducted according to the methods contained in the California Draft Eelgrass Mitigation Policy (CDEMP) (NIMFS 2011), with the exception that the survey shall be conducted within 120 days (rather than 60 days, as recommended in the CDEMP), prior to the desired construction start date, to allow sufficient time for modification of project plans (if feasible) and agency consultation. • If found within or immediately adjacent to the construction footprint, the project applicant shall first determine whether avoidance of the beds is feasible. If feasible, impacts to the oyster or eelgrass bed shall be avoided. If complete avoidance is not feasible, the applicant shall request guidance from the National Marine Fisheries Service (or other applicable agency) as to the need and/or feasibility to move affected beds. Any translocation of eelgrass beds shall be conducted consistent with the methods described in the CDEMP and/or those described in Eelgrass Conservation in San Francisco Bay: Opportunities and Constraints (Boyer and Wylie-Echeverria, 2010). Translocation of oyster beds shall be consistent with methods and recommendations presented in Shellfish Conservation and Restoration in San Francisco Bay: Opportunities and Constraints (Zabin et al., 2010) 	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-2 (cont.)</p>	<ul style="list-style-type: none"> If it is not possible to translocate oyster or eelgrass beds then the City shall ensure that the project applicant provides compensatory mitigation consistent with the CDEMP for eelgrass (a ratio of 3.01:1 [transplant area to impact area]) and a minimum 1:1 ratio for oyster beds. The relocation or compensatory mitigation site for eelgrass or oyster beds shall be located within San Francisco Bay. <p>Mitigation Measure 4.E-2b: Prior to occupancy the City shall ensure that the marina project applicant prepares educational information regarding sensitive biological resources at Alameda Point, the adjacent Federal Property, and within Bay waters. This information shall be disseminated to all boaters using the marina and shall include, but not be limited to, information educating boat owner/operators about sensitive habitats and species in the Bay and actions they are required to implement to avoid impacts to marine resources.</p> <p>The educational information will be disseminated to visiting boaters through multiple methods including, but not limited to, brochures or pamphlets; marina and/or City websites; boating, cruising, and newspaper periodicals; and social media. The information shall be prepared soliciting input from, and in cooperation with, the National Marine Fisheries Service (NMFS), United States Coast Guard (USCG), California State Lands Commission, National Park Service (NPS), California Department of Parks and Recreation (CDPR), Bay Conservation and Development Commission (BCDC), and local organizations active in protecting Bay marine resources, as appropriate.</p> <p>Educational information shall clearly address in multiple languages, but not be limited to, the following topics:</p> <ul style="list-style-type: none"> Information on the location of eelgrass beds in the vicinity of Alameda Island, as well as the greater central Bay and the importance of protecting and avoiding these sensitive habitats (e.g., by not anchoring in or boating through them) Marinas and safe anchoring locations in the Bay where boaters may dock or anchor their vessels Common sources of pollution from boats and marinas and outline relevant regulations and clean boating policies Information on proper and legal waste handling in the Bay and facilities for onshore disposal Information on invasive species and their impact on Bay marine ecosystems and preventative steps that boaters should take to prevent the introduction or spread of invasive species into the Bay 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-2 (cont.)</p>	<ul style="list-style-type: none"> • Federal and state regulations prohibiting the harassment of marine mammals • Information on the watercraft exclusion zones and no wake zones in effect for the waters off Alameda Island and any other buffer zones established in other Bay locations to protect sensitive biological resources (e.g., Breakwater Island, other bird nesting sites, harbor seal haul outs) • Information about onsite and nearby environmental services that support clean boating practices (such as the locations of sewage pumpouts, oil change facilities, used oil recycling centers, bilge pumpouts, absorbent pad distribution and spent pad collection, and boat-to-boat environmental services) • Information regarding the importance of keeping plastic and other trash out of Bay waters • Signage regarding locations of waste collection containers posted at the marina <p>Mitigation Measure 4.E-2c: The City shall require that the project applicant develop and implement a Marine Invasive Species Control Plan prior to commencement of any in-water work including, but not limited to, construction of piers and seawalls, dredging, pile driving, and construction of new stormwater outfalls. The plan shall be prepared in consultation with the United States Coast Guard (USCG), RWQCB, and other relevant state agencies. Provisions of the plan shall include but not be limited to the following:</p> <ul style="list-style-type: none"> • Environmental training of construction personnel involved in in-water work • Actions to be taken to prevent the release and spread of marine invasive species, especially algal species such as <i>Undaria</i> and <i>Sargasso</i> • Procedures for the safe removal and disposal of any invasive taxa observed on the removed structures prior to disposal or reuse of pilings, docks, wave attenuators, and other features • The onsite presence of qualified marine biologists to assist the contractor in the identification and proper handling of any invasive species on removed Port equipment or materials • A post-construction report identifying which, if any, invasive species were discovered attached to equipment and materials following removal from the water, and describing the treatment/handling of identified invasive species. Reports shall be submitted to the City, as well as the USCG and the RWQCB if requested by the agencies. 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-3: Development facilitated by the proposed project would have a substantial adverse effect on federally protected wetlands, 'other waters', and navigable waters as defined by Sections 404 and 10 of the Clean Water Act and waters of the State through direct removal, filling, hydrological interruption, or other means. (Significant)</p>	<p>Mitigation Measure 4.E-3a: Prior to issuance of final grading or building permits that include work within or in the vicinity of jurisdictional waters, the City shall confirm that the project applicant has obtained all necessary wetland permits and shall further ensure that the project applicant implements measures to avoid or minimize adverse effects on jurisdictional waters and sensitive natural communities. Specifically:</p> <ul style="list-style-type: none"> The existing wetlands in the Northwest Territories shall be preserved and incorporated into compatible open space uses to the maximum extent feasible. Wetlands to be avoided shall be protected by setbacks throughout project construction. Based on recommendations in the <i>Baylands Ecosystem Habitat Goals</i> (Goals Project, 1999) a minimum 300-foot wetland buffer shall be incorporated into project design wherever possible to protect water quality and the wildlife that use the wetlands. Where existing uses preclude the establishment of a 300 foot or larger buffer, the largest buffer possible shall be established. Buffer width should be determined by considering the quality of the wetlands, actual or potential wildlife use, existing and proposed future uses, amount and type of vegetation within the buffer, and angle and direction of slope in proximity to the wetland (McElfish et al. 2008). Open space uses shall incorporate these buffers in the siting of recreational trails and development of facilities to ensure the wetlands and the wildlife that use them are adequately buffered from recreational uses. During project construction, areas to be avoided and provided with setbacks pursuant to the provisions described above shall be further protected by best management practices (BMPs), as described in Mitigation Measure 4.E-3b, below. Such measures shall include the installation of silt fencing, straw wattles, or other appropriate erosion and sediment control methods or devices along roads and at the 100-foot setback limits. To minimize impacts on wetlands and other waters, equipment such as backhoes and cranes used for installation of rip-rap or other shore stabilization measures along the Bay shoreline shall operate from dry land where possible. Any construction operations within Bay waters shall be barge-mounted or use other water-based equipment such as scows, derrick barges, and tugs. <p>Mitigation Measure 4.E-3b: Standard BMPs shall be employed to avoid degradation of aquatic habitat and wetlands by maintaining water quality and controlling erosion and sedimentation during construction as required by compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activities (see also Section 4.H, <i>Hydrology and Water Quality</i>, of this EIR, which addresses impacts on water quality).</p>	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E: Biological Resources (cont.)</p> <p>Impact 4.E-3 (cont.)</p>	<p>BMPs shall include, but not be limited to, the following: (1) installing silt fencing between wetlands and aquatic habitat and construction-related activities, (2) locating fueling stations away from potentially jurisdictional features, and (3) otherwise isolating construction work areas from any identified jurisdictional features. In addition, BMPs to avoid impacts on water quality resulting from dredging or other activities within open waters that are identified in the <i>Long-term Management Strategy for the Placement of Dredged Material in the San Francisco Bay Region</i> (LTMS) (Corps, 2001) shall be implemented. These BMPs include silt fencing and gunderbooms or other appropriate methods for keeping dredged materials or other sediments from leaving a project site.</p> <p>Mitigation Measure 4.E-3c: Where disturbance to jurisdictional waters cannot be avoided, compensation shall be provided at a minimum 1:1 ratio for temporary impacts and permanent loss. Actual compensatory mitigation ratios will be specified in project permits issued by the Corps, RWQCB, and BCDC. Where applicable, compensation shall be detailed on a project-specific basis and shall include development of an onsite wetland mitigation and monitoring plan, which shall be developed prior to the start of the first phase of development or in coordination with permit applications and/or conditions. Alternatively, off-site mitigation may be pursued through an approved mitigation bank, although this option may result in a higher mitigation ratio. At a minimum, such plans shall include:</p> <ul style="list-style-type: none"> • Baseline information, including a summary of findings for the most recent wetland delineation applicable to the project site; • Anticipated habitat enhancements to be achieved through compensatory actions, including mitigation site location (onsite enhancement or offsite habitat creation) and hydrology; • Performance and success criteria for wetland creation or enhancement including, but not limited to, the following³: <ul style="list-style-type: none"> - At least 70 percent survival of installed plants for each of the first three years following planting. - Performance criteria for vegetation percent cover in Years 1-4 as follows: at least 10 percent cover of installed plants in Year 1; at least 20 percent cover in Year 2; at least 30 percent cover in Year 3; at least 40 percent cover in Year 4. 	

³ Vegetation-related criteria listed here apply only mitigation required for impacts to vegetated wetlands and would not be required for mitigation required for impacts to unvegetated wetlands.

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-3 (cont.)</p>	<ul style="list-style-type: none"> - Performance criteria for hydrology in Years 1-5 as follows: Fourteen or more consecutive days of flooding, ponding, or a water table 12 inches or less below the soil surface during the growing season at a minimum frequency of three of the five monitoring years; OR establishment of a prevalence of wetland obligate plant species. - Invasive plant species that threaten the success of created or enhanced wetlands should not contribute relative cover greater than 35 percent in Year 1, 20 percent in Years 2 and 3, 15 percent in Year 4, and 10 percent in Year 5. - If necessary, supplemental water shall be provided by a water truck for the first two years following installation. Any supplemental water must be removed or turned off for a minimum of two consecutive years prior to the end of the monitoring period, and the wetland must meet all other criteria during this period. At the end of the five-year monitoring period, the wetland must be self-sufficient and capable of persistence without supplemental water. - At least 75 percent cover by hydrophytic vegetation at the end of the five-year monitoring period. In addition, wetland hydrology and hydric soils must be present and defined as follows: <ul style="list-style-type: none"> ▪ <i>Hydrophytic vegetation</i> – A plant community occurring in areas where the frequency and duration of inundation or soil saturation produce permanently or periodically saturated soils of sufficient duration to exert a controlling influence on the plant species present. ▪ <i>Wetland hydrology</i> – Identified by indicators such as sediment deposits, water stains on vegetation, and oxidized rhizospheres along living roots in the upper 12 inches of the soil, or satisfaction of the hydrology performance criteria listed above. ▪ <i>Hydric soils</i> – Soils that are saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions, which are often characterized by features such as redox concentrations, which form by the reduction, translocation, and/or oxidation of iron and manganese oxides. Hydric soils may lack hydric indicators for a number of reasons. In such cases, the same standard used to determine wetland hydrology when indicators are lacking can be used. - Five years after any wetland creation, a wetland delineation shall be performed to determine whether created wetlands are developing according to the success criteria outlined in the project permits. If they are not, remedial measures such as re-planting and or re-design and construction of the created wetland shall be taken to ensure that the Project's mitigation obligations are met. 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-3 (cont.)</p> <p>Impact 4.E-4: Development facilitated by the proposed project would interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Significant)</p>	<p>• If permanent and temporary impacts on jurisdictional waters cannot be compensated onsite through the restoration or enhancement of wetland features incorporated within proposed open space areas, the specific project applicant shall provide additional compensatory mitigation for these habitat losses. Potential options include the creation of additional wetland acreage onsite or the purchase of offsite mitigation. Offsite compensatory mitigation would be required to fulfill the performance standards described above.</p> <p>Mitigation Measure 4.E-4a: The City shall deploy buoys between Breakwater Island and the shoreline to create a 500-foot access corridor for all marine craft, including pleasure crafts and ferries, under non-emergency situation, in order to minimize disturbance to biological habitat on the shoreline and on the breakwater. Signs shall be posted that include a speed limit of 10 mph on the harbor side of Breakwater Island.</p> <p>Mitigation Measure 4.E-4b: Prior to the issuance of the first building permit for each new building, or for any exterior renovation that would increase the surface area of glazing by 50 percent or more or that would replace 50 percent or more of existing glazing, the City shall require that the project applicant retain a qualified biologist experienced with bird strike issues to review and approve the design of the building to ensure that it sufficiently minimizes the potential for bird strikes. The City may also consult with resource agencies such as the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or others, as it determines to be appropriate during this review.</p> <p>The project applicant shall provide to the City a written description of the measures and features of the building design that are intended to address potential impacts on birds. The design shall include some of the following measures or measures that are equivalent to, but not necessarily identical to, those listed below, as new, more effective technology for addressing bird strikes may become available in the future:</p> <ul style="list-style-type: none"> • Employ design techniques that create “visual noise” via cladding or other design features that make it easy for birds to identify buildings as such and not mistake buildings for open sky or trees; • Decrease continuity of reflective surfaces using “visual marker” design techniques, which techniques may include: <ul style="list-style-type: none"> - Patterned or fritted glass, with patterns at most 28 centimeters apart; - One-way films installed on glass, with any picture or pattern or arrangement that can be seen from the outside by birds but appear transparent from the inside. 	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-4 (cont.)</p>	<ul style="list-style-type: none"> - Geometric fenestration patterns that effectively divide a window into smaller panes of at most 28 centimeters, and/or - Decals with patterned or abstract designs, with the maximum clear spaces at most 28 centimeters square. • Up to 60 feet high on building facades facing the shoreline, decrease reflectivity of glass, using design techniques such as plastic or metal screens, light-colored blinds or curtains, frosting of glass, angling glass towards the ground, UV-A glass, or awnings and overhangs. • Eliminate the use of clear glass on opposing or immediately adjacent faces of the building without intervening interior obstacles such that a bird could perceive its flight path through the glass to be unobstructed; • Mute reflections in glass using strategies such as angled glass, shades, internal screens, and overhangs; and • Place new vegetation sufficiently away from glazed building facades so that no reflection occurs. Alternatively, if planting of landscapes near a glazed building facade is desirable, situate trees and shrubs immediately adjacent to the exterior glass walls, at a distance of less than 3 feet from the glass. Such close proximity will obscure habitat reflections and will minimize fatal collisions by reducing birds' flight momentum. <p>Lighting. In addition to implementation of the City/VA Lighting MOA, the project applicant shall similarly ensure that the design and specifications for buildings implement design elements to reduce lighting usage, change light direction, and contain light. These include, but are not limited to, the following general considerations that should be applied wherever feasible throughout Alameda Point to reduce night lighting impacts on species other than least terns:</p> <ul style="list-style-type: none"> • Avoid installation of lighting in areas where not required for public safety • Examine and adopt alternatives to bright, all-night, floor-wide lighting when interior lights would be visible from the exterior or exterior lights must be left on at night, including: <ul style="list-style-type: none"> - Installing motion-sensitive lighting - Installing task lighting - Installing programmable timers - Installing fixtures that use lower-wattage, sodium, and yellow-red spectrum lighting. • Install strobe or flashing lights in place of continuously burning lights for any obstruction lighting. 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-4 (cont.)</p>	<ul style="list-style-type: none"> Where exterior lights are to be left on at night, install fully shielded lights to contain and direct light away from the sky. <p>Antennae, Monopole Structures, and Rooftop Elements. The City shall ensure, as a condition of approval for every building permit, that buildings minimize the number of and co-locate rooftop-antennas and other rooftop equipment, and that monopole structures or antennas on buildings, in open areas, and at sports and playing fields and facilities do not include guy wires.</p> <p>Educating Residents and Occupants. The City shall ensure, as a condition of approval for every building permit, that the project applicant agrees to provide educational materials to building tenants and occupants, hotel guests, and residents encouraging them to minimize light transmission from windows, especially during peak spring and fall migratory periods, by turning off unnecessary lighting and/or closing window coverings at night. The City shall review and approve the educational materials prior to building occupancy.</p> <p>Documentation. The project applicant and/or City shall document undertaking the activities described in this mitigation measure and maintain records that include, among others, the written descriptions provided by the building developer of the measures and features of the design for each building that are intended to address potential impacts on birds, and the recommendations and memoranda prepared by the qualified biologist experienced with bird strikes who reviews and approves the design of any proposed projects to ensure that they sufficiently minimize the potential for bird strikes.</p> <p>Mitigation Measure 4.E-4c: The City shall require project applicants to conduct pre-construction breeding bird surveys for projects proposed in areas containing, or likely to contain, habitat for nesting birds as a condition of approval for any development-related permit. Specific measures to avoid and minimize impacts on nesting birds include, but are not limited to, those described below.</p> <ul style="list-style-type: none"> To avoid and minimize potential impacts on nesting raptors and other birds, preconstruction surveys shall be performed not more than two-weeks one week prior to initiating vegetation removal and/or construction activities during the breeding season (i.e., February 1 through August 31) To avoid and minimize potential impacts on nesting raptors and other birds, a no-disturbance buffer zone shall be established around active nests during the breeding season until the young have fledged and are self-sufficient, when no further mitigation would be required Typically, the size of individual buffers ranges from a minimum of 250 feet for raptors to a minimum of 50 feet for other birds but can be adjusted based on an evaluation of the site by a qualified biologist in cooperation with the USFWS and/or CDFW 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-4 (cont.)</p>	<ul style="list-style-type: none"> • Birds that establish nests after construction starts are assumed to be habituated to and tolerant of the indirect impacts resulting from construction noise and human activity. However, direct take of nests, eggs, and nestlings is still prohibited and a buffer must be established to avoid nest destruction. • If construction ceases for a period of more than two weeks, or vegetation removal is required after a period of more than two weeks has elapsed from the preconstruction surveys, then new nesting bird surveys must be conducted. <p>Mitigation Measure 4.E-4d: The City shall ensure that any project applicant for work on City property in the Northwest Territories or on Bay Trail construction through the Federal Property implements the following measures to avoid and minimize impacts on burrowing owl:</p> <ol style="list-style-type: none"> a) Prior to the issuance of grading or building permits, protocol surveys for burrowing owl shall be conducted by a qualified biologist. The survey methodology shall be consistent with the methods outlined in the California Department of Fish and Wildlife (CDFW) <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG March 2012) and shall consist of walking parallel transects 7 to 20 meters apart, adjusting for vegetation height and density as needed, and noting any potential burrows with fresh burrowing owl sign or presence of burrowing owls. A copy of the survey results shall be submitted to the City and CDFW. b) In areas positive for burrowing owl presence the Lead Biologist or biological monitor shall be onsite during all construction activities in potential burrowing owl habitat. c) A qualified wildlife biologist (i.e., a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction surveys of the permanent and temporary impact areas to locate active breeding or wintering burrowing owl burrows not more than 14 days prior to construction and/or prior to exclusion fencing installation. The survey methodology shall be consistent with the methods outlined in the <i>Staff Report</i>. d) If no burrowing owls are detected, no further mitigation is necessary. If burrowing owls are detected, no ground-disturbing activities, such as road construction or installation of solar arrays or ancillary facilities, shall be permitted within the distances specified in Table 4.E-3 from an active burrow during the nesting and fledging seasons (April 1 to August 15 and August 16 to October 15, respectively), unless otherwise authorized by CDFW. The specified buffer distance ranges from 656 feet to 1,640 feet, according to the time of year and the level of disturbance. Buffers shall be established in 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E: Biological Resources (cont.)</p> <p>Impact 4.E-4 (cont.)</p>	<p>accordance with Table 4.E-3 and occupied burrows shall not be disturbed during the nesting season unless a qualified biologist approved by CDFW, verifies through noninvasive methods that either: (1) the birds have not begun egg-laying and incubation; or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. Burrowing owls shall not be moved or excluded from burrows during the breeding season (April 1 to October 15).</p> <p>e) During the nonbreeding (winter) season (October 16 to March 31), consistent with Table 4.E-3, ground-disturbing work shall maintain a distance ranging from 164 feet to 1,640 feet from any active burrows depending on the level of disturbance. If active winter burrows are found that would be directly affected by ground-disturbing activities, owls can be displaced from winter burrows according to recommendations made in the <i>Staff Report</i>. If active winter burrows are found that would not be directly affected and it is not possible to establish a buffer in accordance with Table 4.E-3 then owls shall not be evicted and the largest buffer possible shall be established in consultation with CDFW.</p> <p>f) Burrowing owls should not be excluded from burrows unless or until a Burrowing Owl Exclusion Plan is developed by the project applicant approved by CDFW, and submitted to the City. The plan shall include, at a minimum:</p> <ul style="list-style-type: none"> i. Confirmation by site surveillance that the burrow(s) is empty of burrowing owls and other species preceding burrow scoping; ii. Type of scope to be used and appropriate timing of scoping to avoid impacts; iii. Occupancy factors to look for and what shall guide determination of vacancy and excavation timing (e.g., one-way doors should be left in place 48 hours to ensure burrowing owls have left the burrow before excavation, visited twice daily and monitored for evidence that owls are inside and can't escape). iv. Methods for burrow excavation. Excavation using hand tools with refilling to prevent reoccupation is preferable whenever possible (may include using piping to stabilize the burrow to prevent collapsing until the entire burrow has been excavated and it can be determined that no owls reside inside it); v. Removal of other potential owl burrow surrogates or refugia onsite; vi. Photographing the excavation and closure of the burrow to demonstrate success and sufficiency; 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-4 (cont.)</p>	<p>vii. Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use and to avoid take;</p> <p>viii. Methods to ensure the impacted site shall continually be made inhospitable to burrowing owls and fossorial mammals (e.g., by allowing vegetation to grow tall, heavy diskings, or immediate and continuous grading) until development is complete.</p> <p>g) Site monitoring shall be conducted prior to, during, and after exclusion of burrowing owls from their burrows sufficient to ensure take is avoided. Daily monitoring shall be conducted for one week to confirm young of the year have fledged if the exclusion occurs immediately after the end of the breeding season.</p> <p>h) In accordance with the Burrowing Owl Exclusion Plan a qualified wildlife biologist shall excavate burrows using hand tools. Sections of flexible plastic pipe or burlap bag shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. One-way doors shall be installed at the entrance to the active burrow and other potentially active burrows within 160 feet of the active burrow. Forty-eight hours after the installation of the one-way doors, the doors can be removed, and ground-disturbing activities can proceed. Alternatively, burrows can be filled to prevent reoccupation. Excluded burrowing owls shall be documented if observed using artificial or natural burrows on an adjoining mitigation site (if able to confirm by band re-sight).</p> <p>i) During construction activities, monthly and final compliance reports shall be provided to CDFW, and the City documenting the effectiveness of mitigation measures and the level of burrowing owl take associated with the proposed project.</p> <p>j) Should burrowing owls be found onsite, compensatory mitigation for lost breeding and/or wintering habitat shall be implemented on-site or off-site in accordance with burrowing owl <i>Staff Report</i> guidance and in consultation with CDFW. The project applicant or its contractor shall prepare a Burrowing Owl Habitat Mitigation Plan and, at a minimum, the following recommendations shall be implemented:</p> <p>i. Temporarily disturbed habitat shall be restored, if feasible, to pre-project conditions, including decompacting soil and revegetation.</p> <p>ii. Permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat shall be mitigated such that the habitat acreage, number of burrows and burrowing owl impacted are replaced based on a site-specific analysis and shall include:</p>	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>E. Biological Resources (cont.)</p> <p>Impact 4.E-4 (cont.)</p>	<p>a. Permanent conservation of similar grassland habitat to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and with sufficiently large acreage, and presence of fossorial mammals.</p> <p>1. Mitigation lands should be on, adjacent or proximate to the impact site where possible and where habitat is sufficient to support the number of burrowing owls present.</p> <p>2. The CDFW shall be consulted when determining off-site mitigation acreages.</p> <p>b. Permanent protection of mitigation land through a conservation easement deeded to a nonprofit conservation organization or public agency with a conservation mission. If the project is located within the service area of a CDFW approved burrowing owl conservation bank, burrowing owl conservation bank credits may be purchased.</p> <p>c. Development and implementation of a mitigation land management plan in accordance with burrowing owl <i>Staff Report</i> guidelines to address long-term ecological sustainability and maintenance of the site for burrowing owls.</p> <p>d. Funding the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment.</p> <p>k) Habitat shall not be altered or destroyed, and burrowing owls shall not be excluded from burrows, until mitigation lands have been secured, are managed for the benefit of burrowing owls according to CDFW-approved management, monitoring and reporting plans, and the endowment or other long-term funding mechanism is in place or security is provided until these measures are completed.</p> <p>l) Copies of all completed survey reports and plans shall be submitted to the City and the CDFW.</p> <p>Mitigation Measure 4.E-4e: The City shall ensure that project construction activities on City property that would result in noise levels exceeding existing maximum ambient noise levels in the Northwest Territories or as measured on the Federal Property by more than 10 dBA and/or generally exceeding 60 dBA will avoid and minimize adverse effects on California least tern and other breeding bird reproductive success through one or more of the following measures:</p> <p>a) Demolition and construction on City owned property in the Northwest Territories directly adjacent to the Federal Property, and construction of the</p>	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
E. Biological Resources (cont.)		
Impact 4.E-4 (cont.)	<p>Bay Trail on Federal Property shall take place in September-January, outside the general bird breeding season of February through August, to the extent feasible. When such work is unavoidable, solid plywood fences shall be constructed between the project site and sensitive wildlife habitat prior to initiation of construction to serve as noise attenuation barriers. The fencing shall be a minimum of 8 feet in height. The fences shall shield the breeding birds from major noise generating phases of demolition and;</p> <p>b) In all other areas, major noise generating phases of demolition and construction that would exceed ambient noise levels as measured in the Federal Property by more than 10 dBA shall take place in September-January, outside the general bird breeding season of February through August; OR solid plywood fences shall be constructed as described above.</p> <p>Mitigation Measure 4.E-4f: The City shall prohibit open refuse containers that contain food waste throughout the project area. This prohibition shall be incorporated into the terms and conditions of all City approvals for future development at Alameda Point.</p>	Less than Significant
Impact 4.E-5: Development facilitated by the proposed project would conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Significant)	<p>Mitigation Measure 4.E-5: The City of Alameda shall implement Mitigation Measures 4.E-1a through 4.E-1h (avoid and minimize impacts on special-status wildlife), Mitigation Measures 4.E-2a through 4.E-2c (avoid and minimize impacts to sensitive natural communities), Mitigation Measures 4.E-3a through 4.E-3c (avoid and minimize impacts to jurisdictional waters), and Mitigation Measures 4.E-4a through 4.E-4f (avoid and minimize impacts to migratory and breeding wildlife).</p>	Less than Significant
Impact 4.E-6: Development facilitated by the proposed project would conflict with an adopted local, regional, or State Habitat Conservation Plan. (Significant)	<p>Mitigation Measure 4.E-6: The City of Alameda shall implement Mitigation Measures 4.E-1a through 4.E-1h (avoid and minimize impacts on special-status wildlife), Mitigation Measures 4.E-2a through 4.E-2c (avoid and minimize impacts to sensitive natural communities), Mitigation Measures 4.E-3a through 4.E-3c (avoid and minimize impacts to jurisdictional waters), and Mitigation Measures 4.E-4a through 4.E-4f (avoid and minimize impacts to migratory and breeding wildlife).</p>	Less than Significant
Impact 4.E-7: The proposed project, in conjunction with other past, current, or foreseeable development in Alameda, could result in cumulative impacts on special-status species, habitats, wetlands and other waters of the U.S. (Significant)	<p>Mitigation Measure 4.E-7: The City of Alameda shall implement Mitigation Measures 4.E-1a through 4.E-1h (avoid and minimize impacts on special-status wildlife), Mitigation Measures 4.E-2a through 4.E-2c (avoid and minimize impacts to sensitive natural communities), Mitigation Measures 4.E-3a through 4.E-3c (avoid and minimize impacts to jurisdictional waters), and Mitigation Measures 4.E-4a through 4.E-4f (avoid and minimize impacts to migratory and breeding wildlife).</p>	Less than Significant

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>F. Air Quality and Greenhouse Gases</p> <p>Impact 4.F-1: Development facilitated by proposed project could potentially result in air quality impacts due to construction activities. (Significant)</p>	<p>Mitigation Measure 4.F-1a: Fugitive Dust. The following BAAQMD Best Management Practices for fugitive dust control will be required for all construction activities within the project area. These measures will reduce fugitive dust emissions primarily during soil movement, grading and demolition activities, but also during vehicle and equipment movement on unpaved project sites:</p> <p>Basic Controls that Apply to All Construction Sites</p> <ol style="list-style-type: none"> 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 mph. All streets, 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 CCR). 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. A publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. <p>Mitigation Measure 4.F-1.b: Construction Exhaust. The following control measures for construction emissions will be required for all construction activities within the project area:</p> <ul style="list-style-type: none"> 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. 	<p>Although estimated construction emissions of regional ozone precursors (ROG and NOx) would be reduced below the BAAQMD thresholds for the reasonable conservative development scenario, because construction schedule and phasing have not been determined and development may overlap, there is the potential for project construction emissions to exceed the BAAQMD thresholds. This impact would be considered significant and unavoidable. However, unlike regional ozone, localized emissions of fugitive dust and TACs would be considered less than significant with mitigation based on the substantial emission reductions due to applied controls, even if additional development overlap were to occur.</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>F. Air Quality and Greenhouse Gases (cont.)</p> <p>Impact 4.F-1 (cont.)</p>	<ul style="list-style-type: none"> • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to two minutes. Clear signage shall be provided for construction workers at all access points. • The Project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOx reduction and 45 percent PM reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available. (The Level 3 Verified Diesel Emissions Control (VDEC) required under Mitigation Measure 4.F-1d would also comply with this measure) • Require that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. • Require all contractors to use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines <p>Mitigation Measure 4.F-1c: Demolition Controls. Demolition and disposal of any asbestos containing building material shall be conducted in accordance with the procedures specified by Regulation 11, Rule 2 (Asbestos Demolition, Renovation and Manufacturing) of BAAQMD's regulations.</p> <p>Mitigation Measure 4.F-1d: Toxic Air Contaminants and PM2.5. The project sponsors shall ensure that construction contract specifications include a requirement that all off-road construction equipment used for project improvements be equipped with a Level 3 Verified Diesel Emissions Control (VDEC), which would reduce diesel particulate emissions by at least 85 percent.</p> <p>Mitigation Measure 4.F-1e: Delayed Occupancy. Health risks from construction-related emissions to new residences proposed under the project shall be minimized by delaying issuance of occupancy permits for new residential until after the completion of construction activities at adjacent buildings upwind in prevailing west and northwest winds during individual development phases of the project.</p>	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
F. Air Quality and Greenhouse Gases (cont.)		
<p>Impact 4.F-2: Development facilitated by the proposed project could potentially generate operational emissions that would result in a considerable net increase of criteria pollutants and precursors for which the air basin is in nonattainment under an applicable federal or state ambient air quality standard. (Significant)</p>	<p>Mitigation Measure 4.F-2: The following measures shall be incorporated into the project design for properties within the project area:</p> <ul style="list-style-type: none"> • Implement a Transportation Demand Management (TDM) program, as described in detail in Mitigation Measure 4.C.1a in Section 4.C, Transportation. • Require only natural gas hearths in residential units as a condition of final building permit; • Require smart meters and programmable thermostats; • Meet Green Building Code standards in all new construction; • Install solar water heaters for all uses as feasible; • Use recycled water when available; • Install low-flow fixtures (faucets, toilets, showers); • Use water efficient irrigation systems; and • Institute recycling and composting services. 	<p>Significant and Unavoidable</p>
<p>Impact 4.F-3: Operation of the development facilitated by the proposed project could potentially expose sensitive receptors to substantial concentrations of toxic air contaminants or respirable particulate matter (PM2.5). (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.F-4: Development facilitated by the proposed project could potentially expose persons (new receptors) to substantial levels of TACs, which may lead to adverse health. (Significant)</p>	<p>Mitigation Measure 4.F-4: Implement Mitigation Measures 4.F-1a, 4.F-1b, and 4.F-1e.</p>	<p>Less than Significant</p>
<p>Impact 4.F-5: Development facilitated by the proposed project could potentially expose sensitive receptors to substantial carbon monoxide concentrations. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.F-6: Development facilitated by the proposed project could potentially create objectionable odors affecting a substantial number of people. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.F-7: Development facilitated by the proposed project could potentially conflict with or obstruct implementation of the applicable air quality plan. (Significant)</p>	<p>Mitigation Measure 4.F-7a: Implement Mitigation Measure 4.F-2. Mitigation Measure 4.F-7b: The City shall promote use include of clean fuel-efficient vehicles through preferential parking, installation of charging stations, and low emission electric vehicle carsharing programs to reduce the need to have a car or second car vehicles in the TDM Program.</p>	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
F. Air Quality and Greenhouse Gases (cont.)		
Impact 4.F-8: Development facilitated by the proposed, when combined with past, present and other reasonably foreseeable development in the vicinity, could potentially result in cumulative criteria air pollutant air quality impacts. (Significant)	Mitigation Measure 4.F-8: Implement Mitigation Measures 4.F-2 and 4.F-7b.	Significant and Unavoidable
Impact 4.F-9: Development facilitated by the proposed project could cumulatively expose persons to substantial levels of TACs, which may lead to adverse health effects. (Less than Significant)	None required.	
Impact 4.F-10: Development facilitated by the proposed project could potentially generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (Less than Significant)	None required.	
Impact 4.F-11: Development facilitated by the proposed project could potentially conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. (Less than Significant)	None required.	
G. Noise		
Impact 4.G-1: Construction facilitated by the proposed project could potentially expose persons to or generate noise levels in excess of the City noise standards. (Significant)	<p>Mitigation Measure 4.G-1a: The City will require construction contractors to limit standard construction activities hours to be in compliance with the Noise Ordinance. Pile driving activities greater than 90 dBA limited to between 8:00 a.m. and 4:00 p.m. Monday through Friday. No pile driving shall be allowed on weekends and National holidays.</p> <p>Mitigation Measure 4.G-1b: To reduce daytime noise impacts due to construction, the City will require construction contractors to implement the following measures:</p> <ul style="list-style-type: none"> • Equipment and trucks used for project construction will utilize the best available noise control techniques, such as improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds, wherever feasible. • Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust will be used; 	Significant and Unavoidable

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>G. Noise (cont.)</p> <p>Impact 4.G-1 (cont.)</p>	<p>this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves will be used where feasible, and this could achieve a reduction of 5 dBA. Quieter procedures will be used, such as drills rather than impact equipment, whenever feasible.</p> <ul style="list-style-type: none"> Stationary noise sources will be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible. Haul routes that affect the fewest number of people will be selected. <p>Mitigation Measure 4.G-1c: Pile driving activities within 300 feet of sensitive receptors will require additional noise attenuation measures. Prior to commencing construction, a plan for such measures will be submitted for review and approval by the City to ensure that maximum feasible noise attenuation will be achieved. These attenuation measures will include as many of the following control strategies as feasible:</p> <ul style="list-style-type: none"> Erect temporary plywood noise barriers if they would block the line of sight between sensitive receptors and construction activities, particularly for existing residences in the northern area of the project site and for residences across Main Street; Implement “quiet” pile driving technology (such as pre-drilling of piles or use of sonic pile drivers), where feasible, in consideration of geotechnical and structural requirements and conditions; and Utilize noise control blankets on the building structure as the building is erected to reduce noise emission from the site. <p>Mitigation Measure 4.G-1d: Prior to the issuance of each building permit, along with the submission of construction documents, the project applicant will submit to the City a list of measures to respond to and track complaints pertaining to construction noise. These measures will include:</p> <ul style="list-style-type: none"> Signs will be posted at the construction site that include permitted construction days and hours, a day and evening contact number for the job site, and a contact number with the City of Alameda in the event of noise complaints. The project applicant will designate an onsite complaint and enforcement manager to track and respond to noise complaints; and Notification of neighbors within 300 feet of the project construction area at least 30 days in advance of pile-driving activities about the estimated duration of the activity. 	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
G. Noise (cont.)		
Impact 4.G-2: Construction facilitated by the proposed project could potentially result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. (Significant)	Mitigation Measure 4.G-2: Implement Mitigation Measures 4.G-1a through 4.G-1d.	Less than Significant
Impact 4.G-3: Transportation-related operations facilitated by the proposed project could potentially result in a substantial permanent increase in ambient noise levels in the vicinity or above levels existing without the project. (Significant)	Mitigation Measure 4.G-3: To reduce automobile trips and associated automobile noise impacts, implement Mitigation Measure 4.C2a (TDM Program).	Significant and Unavoidable
Impact 4.G-4: Non-transportation-related operations facilitated by the proposed project could potentially result in a substantial permanent increase in ambient noise levels in the vicinity. (Significant)	<p>Mitigation Measure 4.G-4: During individual project phase design preparation, the City will require a project applicant to comply with the Noise Ordinance and General Plan standards. These measures implement noise control measures to ensure that all non-transportation source operations comply with City standards and will include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • The proposed land uses will be designed so that on-site mechanical equipment (e.g., HVAC units, compressors, generators) and area-source operations (e.g., loading docks, parking lots, and recreational-use areas) are located as far as possible and/or shielded from nearby noise sensitive land uses to meet City noise standards. • On-site landscape maintenance equipment will be equipped with properly operating exhaust mufflers and engine shrouds, in accordance with manufacturers' specifications. • The following activities will be limited to the hours of 7:00 a.m. to 10:00 p.m. unless site-specific analysis confirms that noise impacts to sensitive receptors would be less-than-significant: <ul style="list-style-type: none"> - Truck deliveries; - Operations of motor powered landscape maintenance equipment; and - Outdoor use of amplified sound systems. 	Less than Significant
Impact 4.G-5: Development facilitated by the proposed project could potentially place noise-sensitive residential uses in a noise environment that would exceed the City's goal for exterior/interior noise exposure. (Significant)	Mitigation Measure 4.G-5: The City will require project sponsors for residential development to submit a detailed noise study, prepared by a qualified noise consultant, to determine design measures necessary to achieve acceptable interior noise levels at the proposed new residences. The study will be submitted to the City for review and approval. Design measures such as the following could be required, depending on the specific findings of the noise study: double-paned glass windows facing noise sources; solid-core doors; increased sound insulation of exterior walls (such as through staggered-or double-studs, multiple layers of gypsum board, and incorporation of resilient channels); weather-tight seals for doors and windows; or mechanical ventilation such as an air conditioning system.	Less than Significant

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
G. Noise (cont.)		
Impact 4.G-6: Increases in traffic from development facilitated by the proposed project in combination with other development could potentially result in cumulatively considerable noise increases. (Significant)	Mitigation Measure 4.G-6: Implement Mitigation Measures 4.G-3 and 4.G-5.	Significant and Unavoidable
H. Geology, Soils, and Seismicity		
Impact 4.H-1: In the event of a major earthquake in the region, seismic ground-shaking could potentially injure people and cause collapse of or structural damage to structures and/or retaining walls developed under the proposed project. (Significant)	Mitigation Measure 4.H-1: Prior to approval of a building permit, a site specific, design-level geotechnical investigation shall be prepared for all proposed development on the project site. The investigation shall include detailed characterization of the distribution and compositions of subsurface materials and an assessment of their potential behavior during violent seismic ground-shaking. The analysis shall recommend site preparation and design parameters that would be necessary to avoid or substantially reduce structural damage under anticipated peak ground accelerations in accordance with seismic design requirements within the most current version of the California Building Code and Alameda Municipal Code. The investigation and recommendations shall be in conformance with all applicable city ordinances and policies and consistent with the design requirements of the calculated Seismic Design Category for each site in accordance with the California Building Code. The geotechnical report shall be prepared by a California-registered geotechnical engineer and approved by the City, and all recommendations contained in the report shall be included in the final design of the project. Mitigation Measure 4.H-1 would ensure that the proposed project would be designed to withstand strong seismic ground-shaking, and that the occupants of the proposed development are informed of safety procedures to follow in the event of an earthquake.	Less than Significant
Impact 4.H-2: In the event of a major earthquake in the region, people and property at the project site could potentially be exposed to seismically-induced ground failure, including liquefaction, lateral spreading and earthquake-induced settlement. (Significant)	Mitigation Measure 4.H-2: Prior to issuance of a building permit, earthwork, foundation and structural design for proposed developments under the project shall be conducted in accordance with all recommendations contained in the required geotechnical investigation (Mitigation Measure 4.H-1 a). The investigation must include an assessment of all potentially foreseeable seismically-induced ground failures, including liquefaction, sand boils, lateral spreading and rapid settlement. Mitigation strategies must be designed for the site-specific conditions of the project and must be reviewed for compliance with the guidelines of CGS Special Publication 117A prior to incorporation into the project. Examples of possible strategies include edge containment structures (berms, diked sea walls, retaining structures, compacted soil zones), removal or treatment of liquefiable soils, soil modification, modification of site geometry, lowering the groundwater table, in-situ ground densification, deep foundations, reinforced shallow foundations, and structural design that can accommodate predicted displacements.	Less than Significant

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
H. Geology, Soils, and Seismicity (cont.)		
<p>Impact 4.H-3: In the event of a major earthquake in the region, development facilitated by the proposed project could potentially be subject to adverse effects resulting from seismically induced landslides. (Significant)</p>	<p>Mitigation Measure 4.H-3: Prior to issuance of a building or grading permit for any building located within 50 feet of the northern shoreline, a slope stability plan shall be prepared by a California-licensed geotechnical engineer or engineering geologist and all recommendations implemented in accordance with City requirements. The required geotechnical stability report shall determine the stabilization measures (e.g., cement/soil mixing, construction of a bulkhead wall) necessary to obtain acceptable factors of safety in accordance with California Geological Surveys Special Publication 117A. All construction activities and design criteria shall comply with applicable codes and requirements of the most recent California Building Code, and applicable City construction and grading ordinances.</p>	<p>Less than Significant</p>
<p>Impact 4.H-4: Development facilitated by the proposed project could potentially be located 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. (Significant)</p>	<p>Mitigation Measure 4.H-4: The required geotechnical report for each development project (Mitigation Measure 4.H-1a) shall determine the susceptibility of the project site to settlement and prescribe appropriate engineering techniques for reducing its effects. Where settlement and/or differential settlement is predicted, mitigation measures—such as lightweight fill, geofabric, surcharging, wick drains, deep foundations, structural slabs, hinged slabs, flexible utility connections, and utility hangers—shall be used. These measures shall be evaluated and the most effective, feasible, and economical measures shall be recommended. Engineering recommendations shall be included in the project engineering and design plans, and be reviewed and approved by a registered geotechnical engineer. All construction activities and design criteria shall comply with applicable codes and requirements of the most recent California Building Code, and applicable City construction and grading ordinances.</p>	<p>Less than Significant</p>
<p>Impact 4.H-5: Development facilitated by the proposed project could potentially be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code creating substantial risks to life or property. (Significant)</p>	<p>Mitigation Measure 4.H-5: Prior to issuance of a building permit, subsurface earthwork (e.g., placement of engineered fill), shall be conducted in accordance with all recommendations contained in the required geotechnical investigation (Mitigation Measure 4.H-1). The geotechnical report must include an assessment of all potentially expansive soils that could adversely affect proposed improvements. Geotechnical strategies must be designed for the site-specific conditions of the project and must be reviewed for compliance with the requirements of the most recent California Building Code as well as any additional City of Alameda requirements.</p>	<p>Less than Significant</p>
<p>Impact 4.H-6: Development facilitated by the proposed project, combined with past, present, and reasonably foreseeable probable projects, could potentially result in substantial adverse cumulative impacts to geology, soils, or seismic hazards. (Less than Significant)</p>	<p>Mitigation: Implement Mitigation Measures 4.H-1a, -1b, and 4.H-2 through 4.H-5.</p>	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
I. Hydrology and Water Quality		
<p>Impact 4.1-1: Project construction facilitated by the proposed project, on-land and in-water, would potentially involve activities that could violate water quality standards or waste discharge requirements or otherwise substantially degrade water quality. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.1-2: Development facilitated by the proposed project could potentially involve dewatering and shoring activities, which would potentially result in a discharge, which if contaminated would adversely affect the receiving water quality. (Significant)</p>	<p>Mitigation Measure 4.1-1: The City shall ensure that project applicants for projects at Alameda Point implement the following measures as part associated with the extracted water during project construction:</p> <ul style="list-style-type: none"> • The RWQCB could require compliance with certain provisions in the permit such as treatment of the flows prior to discharge. The project applicant shall discharge the extracted water to the sanitary sewer or storm drain system with authorization of and required permits from the applicable regulatory agencies, in this case the City of Alameda. • The project applicant shall comply with applicable permit conditions associated with the treatment of groundwater prior to discharge. • If necessary a dewatering collection and disposal method shall be prepared and implemented for the project. 	<p>Less than Significant</p>
<p>Impact 4.1-3: Development facilitated by the proposed project would potentially increase runoff and result in flooding on or offsite. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.1-4: Development facilitated by the proposed project would potentially result in intensified use of released use at the project site, including maintenance of new landscaping areas and open lawns, which would affect receiving water quality. (Significant)</p>	<p>Mitigation Measure 4.1-2: The City shall ensure that future project applicants implement Integrated Pest Management measures to reduce fertilizer and pesticide contamination of receiving waters, as follows:</p> <ul style="list-style-type: none"> • Prepare and Implement an Integrated Pest Management Plan (IPM) for all common landscaped areas. The IPM shall be prepared by a qualified professional and shall recommend methods of pest prevention and turf grass management that use pesticides as a last resort in pest control. Types and rates of fertilizer and pesticide application shall be specified. • The IPM shall specify methods of avoiding runoff of pesticides and nitrates into receiving storm drains and surface waters or leaching into the shallow groundwater table. Pesticides shall be used only in response to a persistent pest problem that cannot be resolved by non-pesticide measures. Preventative chemical use shall not be employed. • The IPM shall fully integrate considerations for cultural and biological resources into the IPM with an emphasis toward reducing pesticide application. 	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
I. Hydrology and Water Quality (cont.)		
Impact 4.I-5: Maintenance dredging to serve development facilitated by the proposed project would potentially affect water quality of the Bay. (Less than Significant)	None required.	Less than Significant
Impact 4.I-6: Development facilitated by the proposed project would potentially place housing and other structures in an area subject to 100-year flooding, however would not subject people or structures to a substantial risk of loss from a 100-year storm event. (Significant)	Mitigation Measure 4.I-6: The City will require that any new construction within the Adaptive Reuse areas, prior to the installation of the proposed storm drain system and flood protection measures, would be constructed at an elevation of 1 foot above the 100-year flood risk elevation.	Less than Significant
Impact 4.I-7: Development facilitated by the proposed project could expose people or structures to risk of loss, injury, or death from inundation by a tsunami. (Less than Significant)	None required.	Less than Significant
Impact 4.I-8: Development facilitated by proposed project would potentially be subjected to flooding as a result of sea level rise. (Significant)	<p>Mitigation Measure 4.I-8: The City shall implement the following steps prior to project implementation:</p> <ul style="list-style-type: none"> • Apply for membership in the National Flood Insurance Program (NFIP) Community Rating System (CRS), and as appropriate through revisions to the City Code, obtain reductions in flood insurance rates offered by the NFIP to community residents. • Cooperate with FEMA in its efforts to comply with recent congressional mandates to incorporate predictions of sea level rise into its Flood Insurance Studies and FIRM. • Implement climate adaptation strategies such as avoidance/planned retreat, enhance levees, setback levees to accommodate habitat transition zones, buffer zones and beaches, expanded tidal prisms for enhanced natural scouring of channel sediments, raising and flood-proofing structures, or provisions for additional floodwater pumping stations, and inland detention basins to reduce peak discharges. 	Less than Significant
Impact 4.I-9: Increased construction activity and new development facilitated by the proposed project, in conjunction with past, present, reasonably foreseeable future development in Alameda, could potentially impact hydrologic resources including water quality. (Less than Significant)	None required.	Less than Significant

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
J. Hazards and Hazardous Materials		
<p>Impact 4.J-1: Demolition of the existing structures on Alameda Point which contain hazardous building materials—such as lead-based paint, asbestos, and PCBs—could potentially expose workers, the public, or the environment from the transport, use, or disposal of these hazardous materials and waste. (Significant)</p>	<p>Mitigation Measure 4.J-1a: Prior to issuance of any demolition permit, the project applicant shall submit to the City a hazardous building material assessment prepared by qualified licensed contractors for each structure intended for demolition indicating whether LBP or lead-based coatings, ACMs, and/or PCB-containing equipment are present.</p> <p>Mitigation Measure 4.J-1b: If the assessment required by Mitigation Measure 4.J-1a indicates the presence of LBP, ACMs, and/or PCBs, the project applicant shall create and implement a health and safety plan to protect demolition and construction workers and the public from risks associated with such hazardous materials during demolition or renovation of affected structures.</p> <p>Mitigation Measure 4.J-1c: If the assessment required by Mitigation Measure 4.J-1a finds presence of LBP, the project applicant shall develop and implement a LBP removal plan. The plan shall specify, but not be limited to, the following elements for implementation:</p> <ul style="list-style-type: none"> • Develop a removal specification approved by a Certified Lead Project Designer. • Ensure that all removal workers are properly trained. • Contain all work areas to prohibit off-site migration of paint chip debris. • Remove all peeling and stratified LBP on building and non-building surfaces to the degree necessary to safely and properly complete demolition activities according to recommendations of the survey. The demolition contractor shall be responsible for the proper containment and disposal of intact LBP on all equipment to be cut and/or removed during the demolition. • Provide on-site personnel and area air monitoring during all removal activities to ensure that workers and the environment are adequately protected by the control measures used. • Clean up and/or vacuum paint chips with a high efficiency particulate air (HEPA) filter. • Collect, segregate, and profile waste for disposal determination. • Properly dispose of all waste. <p>Mitigation Measure 4.J-1d: If the assessment required by Mitigation Measure 4.J-1a finds asbestos, the project applicant shall prepare an asbestos abatement plan and shall ensure that asbestos abatement is conducted by a licensed contractor prior to building demolition. Abatement of known or suspected ACMs shall occur prior to demolition or construction activities that would disturb those materials. Pursuant to an asbestos abatement plan developed by a state-certified</p>	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
J. Hazards and Hazardous Materials (cont.)		
Impact 4.J-1 (cont.)	<p>asbestos consultant and approved by the City, all ACMs shall be removed and appropriately disposed of by a state certified asbestos contractor.</p> <p>Mitigation Measure 4.J-1e: If the assessment required by Mitigation Measure 4.J-1a finds PCBs, the project applicant shall ensure that PCB abatement is conducted prior to building demolition or renovation. PCBs shall be removed by a qualified contractor and transported in accordance with Caltrans requirements.</p>	
<p>Impact 4.J-2: Construction at Alameda Point could potentially disturb soil and groundwater impacted by historical hazardous material use, which could expose construction workers, the public, or the environment to adverse conditions related to the transport, use, or disposal of hazardous materials and waste. (Significant)</p>	<p>Mitigation Measure 4.J-2: Prior to issuance of a building or grading permit for any ground breaking activities within the project site, the City shall prepare a Site Management Plan (SMP) that is approved by US EPA, DTSC, and the Water Board for incorporation into construction specifications. Any additional or remaining remediation on identified parcels from the City's tracking system shall be completed as directed by the responsible agency, U.S. EPA, DTSC, or Water Board, in accordance with the deed restrictions and requirements as well as any Covenants(s) to Restrict Use of Property (CRUP), prior to commencement of construction activities. Where necessary, additional remediation shall be accomplished by the project applicant prior to issuance of any building or grading permits in accordance with all requirements set by the overseeing agency (i.e., U.S. EPA, DTSC, or Water Board). The SMP shall be present on site at all times and readily available to site workers. The SMP shall specify protocols and requirements for excavation, stockpiling, and transport of soil and for disturbance of groundwater as well as a contingency plan to respond to the discovery of previously unknown areas of contamination (e.g., discolored soils, strong petroleum odors, an underground storage tank unearthed during normal construction activities, etc.). At a minimum the SMP shall include the following components:</p> <ol style="list-style-type: none"> 1. <i>Soil management requirements.</i> Protocols for stockpiling, sampling, and transporting soil generated from onsite activities. The soil management requirements must include: <ul style="list-style-type: none"> • Soil stockpiling requirements such as placement of cover, application of moisture, erection of containment structures, and implementation of security measures. Additional measures related to BAAQMD dust control requirements as they apply to contamination shall also be included, as needed (see also Air Quality section). • Protocols for assessing suitability of soil for on-site reuse through representative laboratory analysis of soils as approved by U.S. EPA, DTSC, or Water Board, taking into account the site-specific health-based remediation goals, other applicable health-based standards, and the proposed location, circumstances, and conditions for the intended soil reuse. 	Less than Significant

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
<p>J. Hazards and Hazardous Materials (cont.)</p> <p>Impact 4.J-2 (cont.)</p>	<ul style="list-style-type: none"> • Requirements for offsite transportation and disposal of soil not determined to be suitable for onsite reuse. Any soil identified for offsite disposal must be packaged, handled, and transported in compliance with all applicable state, federal, and the disposal facility's requirements for waste handling, transportation and disposal. • Protocols for adherence to the City of Alameda's Marsh Crust Ordinance. • Measures to be taken for areas of IR Site 13 where refinery wastes and asphaltic residues known as tarry refinery waste might be encountered. Measures shall include requirements for the storage, handling and disposal/recycling of any suspected tarry refinery waste that may be encountered. • Radiological screening protocols for the radiological sites identified by the Navy as approved by the U.S. EPA, where necessary. <p>2. <i>Groundwater management requirements.</i> Protocols for conducting dewatering activities and sampling and analysis requirements for groundwater extracted during dewatering activities. The sampling and analysis requirements shall specify which groundwater contaminants must be analyzed or how they will be determined. The results of the groundwater sampling and analysis shall be used to determine which of the following reuse or disposal options is appropriate for such groundwater:</p> <ul style="list-style-type: none"> • Onsite reuse (e.g., as dust control); • Discharge under the general permit for stormwater discharge for construction sites; • Treatment (as necessary) before discharge to the sanitary sewer system under applicable East Bay MUD waste discharge criteria; • Treatment (as necessary) before discharge under a site-specific NPDES permit; • Offsite transport to an approved offsite facility. <p>For each of the options listed, the SMP shall specify the particular criteria or protocol that would be considered appropriate for reuse or disposal options. The thresholds used must, at a minimum, be consistent with the applicable requirements of the Water Board and East Bay MUD.</p> <p>3. <i>Unknown contaminant/hazard contingency plan.</i> Procedures for implementing a contingency plan, including appropriate notification, site worker protections, and site control procedures, in the event unanticipated potential subsurface hazards or hazardous material releases are discovered during construction. Control procedures shall include:</p>	

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
J. Hazards and Hazardous Materials (cont.)		
Impact 4.J-2 (cont.)	<ul style="list-style-type: none"> • Protocols for identifying potential contamination through visual or olfactory observation; • Protocols on what to do in the event an underground storage tank is encountered; • Emergency contact procedures; • Procedures for notifying regulatory agencies and other appropriate parties; • Site control and security procedures; • Sampling and analysis protocols; and • Interim removal work plan preparation and implementation procedures. 	Less than Significant
Impact 4.J-3: Hazardous materials used onsite during construction activities (e.g., oils, solvents, etc.) at Alameda Point could potentially be spilled through improper handling or storage, potentially increasing public health and/or safety risks to future residents, maintenance workers, visitors, and the surrounding area. (Less than Significant)	None required.	Less than Significant
Impact 4.J-4: Development facilitated by the proposed project could potentially involve the transportation, use, and storage of hazardous materials, which could present public health and/or safety risks to residents, visitors, and the surrounding area. (Less than Significant)	None required.	Less than Significant
Impact 4.J-5: Hazardous materials used at Alameda Point during the operational phase could potentially be spilled through upset or accidental conditions, potentially increasing public health and/or safety risks to future residents, workers, visitors, and the surrounding area. (Less than Significant)	None required.	Less than Significant
Impact 4.J-6: Hazardous materials use at Alameda Point could potentially emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school. (Less than Significant)	None required.	Less than Significant

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
J. Hazards and Hazardous Materials (cont.)		
<p>Impact 4.J-7: Development facilitated by the proposed project could potentially be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and could result in a safety hazard to the public or environment through exposure to previous contamination of soil or groundwater including vapor intrusion into buildings (Significant)</p>	<p>Mitigation Measure 4.J-7: The City shall include closed and open IR CERCLA sites that have land-use controls within its Land-use Restriction Tracking Program for identification and disclosure of any past cleanup efforts and current status of any remaining contamination, if any. Additional control measures such as vapor barriers and venting may be required as a condition of approval in areas where soil gas emissions have been identified. Prior to transfer of title for any parcel, the City shall require that the SMP as approved by US EPA, DTSC, and the Water Board be incorporated into intrusive site operations as required through deed restriction, enforceable Land Use Covenant, or any other applicable legal requirement.</p>	<p>With the continued remediation efforts currently being conducted by the Navy and any that would be assumed by the City⁴ as overseen by the DTSC or Water Board, combined with the City's tracking system, continued compliance with deed restrictions, SMP, and other permit requirements including adherence to the Marsh Crust Ordinance, the potential for residual contamination to significantly impact residents, employees or the general public would be minimized and is considered less than significant with mitigation.</p>
<p>Impact 4.J-8: Development facilitated by the proposed project could potentially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.J-9: Hazards at Alameda Point, in combination with past, present, and future projects could potentially contribute to cumulative hazards in the vicinity of the project site. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
K. Aesthetics		
<p>Impact 4.K-1: Development facilitated by the proposed project could potentially have an adverse effect on a scenic vista. (Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.K-2: Development facilitated by the proposed project could potentially damage scenic resources, including, but not limited to, trees, rocks, outcroppings, and historic buildings within a state scenic highway. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.K-3: Development facilitated by the proposed project could potentially degrade the existing visual character or quality of the site and its surroundings in a substantial manner. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>

⁴ In some instances there may be a change from the assumed future land use originally used in the risk analysis where additional remediation is necessary to maintain protection of human health. As with any other development associated with the project, occupancy of the subject site would still not occur until the risk analysis indicates no unacceptable health risks or hazards are present at the site.

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
K. Aesthetics (cont.)		
<p>Impact 4.K-4: Development facilitated by proposed project could potentially create a new source of substantial light or glare which could potentially adversely affect day or nighttime views in the project area. (Significant)</p>	<p>Mitigation Measure 4.K-4: All lighting installations shall be designed and installed to be fully shielded (full cutoff) and to minimize glare and obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary, unless expressly exempted below. The location and design of all exterior lighting shall be shown on any site plan submitted to the City of Alameda for approval. The following lighting is exempt from these requirements:</p> <ol style="list-style-type: none"> 1. Lighting in swimming pools and other water features. 2. Exit signs and other illumination required by building codes. 3. Lighting for stairs and ramps, as required by the building code. 4. Signs that are regulated by the City sign code. 5. Holiday and temporary lighting (less than thirty days use in any one year). 6. Low-voltage landscape lighting, but such lighting should be shielded in such a way as to eliminate glare and light trespass. 	<p>Less than Significant</p>
<p>Impact 4.K-5: Development facilitated by the proposed project, in combination with other past, present, existing, approved, pending, and reasonably foreseeable future projects, could potentially result in cumulatively considerable impacts to aesthetic resources. (Less than Significant)</p>	<p>None required.</p>	
L. Public Services and Recreation		
<p>Impact 4.L-1: Development facilitated by proposed project could potentially result in an increase in calls for fire protection and emergency medical response services, and could require new or physically altered fire protection facilities in order to maintain acceptable performance standards. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.L-2: Development facilitated by the proposed project could potentially result in an increase in calls for police services, but would not require new or physically altered police facilities in order to maintain acceptable performance objectives. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.L-3: Development facilitated by the proposed project could potentially result in new students for local schools, but would not and potentially require new or physically altered school facilities to maintain acceptable performance objectives. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
L. Public Services and Recreation (cont.)		
Impact 4.L-4: Development facilitated by the proposed project could potentially result in increased use of other governmental facilities, including libraries, but would not require new or physically altered government facilities to maintain acceptable performance objectives. (Less than Significant)	None required.	Less than Significant
Impact 4.L-5: Development facilitated by the proposed project could potentially increase the use of existing neighborhood and regional parks and recreation centers, but not to the extent that substantial physical deterioration of the facilities would occur or be accelerated, nor would it cause the necessity for new or expanded facilities. (Less than Significant)	None required.	Less than Significant
Impact 4.L-6: Development facilitated by the proposed project would include recreational facilities and the construction or expansion of recreational facilities which could potentially have an adverse physical effect on the environment. (Less than Significant)	None required.	Less than Significant
Impact 4.L-7: Development facilitated by the proposed project, in conjunction with other past, current, or foreseeable development in Alameda, could potentially result in impacts related to public services and recreation. (Less than Significant)	None required.	Less than Significant
M. Utilities and Service Systems		
Impact 4.M-1: Development facilitated by the proposed project could potentially result in an exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board. (Less than Significant)	None required.	Less than Significant
Impact 4.M-2: Development facilitated by the proposed project could potentially result in wastewater service demands that would result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve projected demand or result in the construction of new or expanded wastewater treatment facilities. (Less than Significant)	None required.	Less than Significant
Impact 4.M-3: Development facilitated by the proposed project would require and result in the need for new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)	None required.	Less than Significant

**TABLE 2-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROPOSED ALAMEDA POINT PROJECT**

Potential Impact	Mitigation Measures	Level of Significance after any recommended mitigation measures
M. Utilities and Service Systems (cont.)		
<p>Impact 4.M-4: Development facilitated by the proposed project could potentially have insufficient water supplies available to serve the development from existing entitlements and could require construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)</p>	<p>None required.</p>	<p>Less than Significant</p>
<p>Impact 4.M-5: Development facilitated by the proposed project could potentially be served by a landfill with insufficient permitted capacity to accommodate solid waste generated by the project, and would comply with federal, state, and local statutes and regulations related to solid waste. (Significant)</p>	<p>Mitigation Measure 4.M-5: The City shall develop a solid waste management plan for the Alameda Point project consistent with Alameda's demolition and debris ordinance. Plans for managing construction debris from specific reuse and development projects that require separation of waste types and recycling, and provide for reuse of materials onsite for the reuse and development areas, shall be developed by the project sponsor. The solid waste management plan shall be prepared in coordination with City staff, the project sponsor(s), and demolition subcontractors, and shall be approved by City staff prior to issuance of a demolition permit. The City and sponsors of projects shall work with organizations able to provide funding and technical assistance for managing and financing deconstruction, demolition, and recycling and reuse programs, should those programs exist at the time of site clearance.</p>	
<p>Impact 4.M-6: Development facilitated by the proposed project, in combination with other past, present, existing, approved, pending, and reasonably foreseeable future projects, could potentially result in cumulatively considerable impacts to utilities and service systems. (Less than Significant)</p>	<p>None required.</p>	

APPENDIX A

Freeway and Ramp Analysis

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MEMORANDUM

Date: June 30, 2013

Project #:
148190

To: Andrew Thomas/Virendra Patel
City of Alameda

From: Amy López / Pratyush Bhatia / Alice Chen

Project: Alameda Point EIR

Subject: Freeways and Ramps Analysis – Impacts and Mitigations

INTRODUCTION

This memo documents our analysis of freeway segments and ramp merge/diverge areas that would potentially be impacted by the changes in traffic due to the Alameda Point project. This information will be used to support the Alameda Point EIR.

STUDY LOCATIONS

Per our scope of work and in response to Caltrans requirements, the impacts were assessed for up to 6 freeway mainline locations and up to 10 freeway ramps that would be affected by the change in volumes due to the Alameda Point project. To determine which locations would be studied, a preliminary list of locations was proposed based on the proximity to the project and then refined based on a review of volume difference plots from the travel demand model.

Existing Conditions

The changes in traffic volumes on the freeway mainline and ramps under existing conditions are shown in Tables 1 and 2. While all of these locations have been carried forth for analysis for this memo, only those freeway mainline locations where the change in volumes due to the project represent a measureable change (more than 2 to 3 percent of total volumes) that is beyond normal daily fluctuations in volumes may be presented in the EIR.

Table 1: Change in Total Volume on Mainline Due to Project, Existing Conditions

FWY	DIR	SEGMENT	AM PEAK				PM PEAK			
			Total Volume w/o Project	Total Volume w/ Project	Volume Change	Percent Change	Total Volume w/o Project	Total Volume w/ Project	Volume Change	Change
580	EB	w/o 980	6,708	6,780	72	1.1%	10,074	10,056	-18	-0.2%
580	WB	w/o 980	14,214	14,208	-6	0.0%	8,160	8,244	84	1.0%
880	NB	e/o 980	7,605	7,565	-40	-0.5%	7,970	7,940	-30	-0.4%
880	SB	e/o 980	4,515	4,490	-25	-0.6%	4,830	4,840	10	0.2%
880	NB	w/o Adeline	7,360	7,384	24	0.3%	7,868	7,908	40	0.5%
880	SB	w/o Adeline	5,076	5,160	84	1.7%	5,348	5,360	12	0.2%
880	NB	e/o High	7,585	7,585	0	0.0%	8,015	7,980	-35	-0.4%
880	SB	e/o High	7,475	7,465	-10	-0.1%	7,780	7,745	-35	-0.4%
880	NB	w/o 23rd	10,048	10,080	32	0.3%	9,212	9,208	-4	0.0%
880	SB	w/o 23rd	8,396	8,376	-20	-0.2%	7,968	8,004	36	0.5%
980	EB	s/o 580	3,655	3,675	20	0.5%	6,630	6,850	220	3.3%
980	WB	s/o 580	8,050	8,290	240	3.0%	4,725	4,765	40	0.8%

Table 2: Total Volume Change Due to Project in Ramp Merge/Diverge Areas, Existing Conditions

FWY	DIR	RAMP	AM	PM
880	SB	5 th St. off (to Broadway)	99	24
880	NB	Broadway off	38	17
880	NB	Jackson St. on	31	33
880	NB	High St. off	3	11
880	SB	High St. on	-3	2
880	SB	Jackson St. off	19	2
880	SB	Oak St. on	4	3
980	EB	12 th St. off	5	2
980	EB	12 th St. on	-37	74
980	WB	18 th St. off	-29	-9

2035 Cumulative Conditions

The changes in traffic volume on the freeway mainline and ramps under future (2035 cumulative) conditions are shown in Tables 3 and 4. While all of these locations have been carried forth for analysis for this memo, only those mainline locations where the change in volumes due to the project represent a measureable change (more than 2 to 3 percent of total volumes) that is beyond normal daily fluctuations in volumes and where the project contribution may be considered cumulatively considerable may be presented in the EIR.

Table 3: Change in Total Volume on Mainline Due to Project, 2035 Cumulative Conditions

FWY	DIR	SEGMENT	AM PEAK				PM PEAK			
			Total Volume w/o Project	Total Volume w/ Project	Volume Change	Percent Change	Total Volume w/o Project	Total Volume w/ Project	Volume Change	Percent Change
580	EB	w/o 980	15,582	15,570	-12	-0.1%	9,888	9,876	-12	-0.1%
580	WB	w/o 980	8,244	8,298	54	0.7%	11,268	11,136	-132	-1.2%
880	NB	e/o 980	8,020	8,035	15	0.2%	9,200	9,210	10	0.1%
880	SB	e/o 980	5,990	6,095	105	1.8%	5,860	5,880	20	0.3%
880	NB	w/o Adeline	8,524	8,460	-64	-0.8%	8,984	8,984	0	0.0%
880	SB	w/o Adeline	6,216	6,276	60	1.0%	6,904	6,868	-36	-0.5%
880	NB	e/o High	7,885	7,830	-55	-0.7%	9,985	9,995	10	0.1%
880	SB	e/o High	9,365	9,245	-120	-1.3%	8,750	8,670	-80	-0.9%
880	NB	w/o 23rd	10,568	10,556	-12	-0.1%	10,916	11,012	96	0.9%
880	SB	w/o 23rd	10,016	10,052	36	0.4%	8,964	9,000	36	0.4%
980	EB	s/o 580	8,810	8,810	0	0.0%	5,590	5,575	-15	-0.3%
980	WB	s/o 580	4,200	4,300	100	2.4%	7,285	7,405	120	1.6%

Table 4: Total Volume Change Due to Project in Ramp Merge/Diverge Areas, 2035 Cumulative Condition

FWY	DIR	RAMP	AM	PM
880	SB	5 th St. off (to Broadway)	-3	-65
880	NB	Broadway off	24	35
880	NB	Jackson St. on	4	60
880	NB	High St. off	6	-68
880	SB	High St. on	-82	28
880	SB	Jackson St. off	-3	-47
880	SB	Oak St. on	6	-1
980	EB	12 th St. off	3	1
980	EB	12 th St. on	-10	-11
980	WB	18 th St. off	-30	-20

SIGNIFICANCE CRITERIA

Caltrans Measures of Effectiveness

Caltrans bases its LOS for operating State highway facilities upon certain measures of effectiveness (MOEs). For basic freeway segments and ramps operating at a free-flow speed of 65 MPH, the MOE is density with thresholds that mirror those of the HCM. (See Table 5.) LOS C or better is desirable on State highway facilities; however, Caltrans acknowledges that LOS C may not be feasible in some cases. In those instances, Caltrans expects local agencies to work with Caltrans to identify an appropriate LOS standard for those facilities. The Caltrans traffic impact study guidelines state that “if an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained.”¹

ACTC CMP LOS Standards for Monitoring

The Alameda County Transportation Commission (ACTC) Congestion Management Program (CMP) establishes LOS E as the standard for facilities under LOS monitoring in the CMP network.²

Grandfathered Segments

Certain segments are identified in the CMP as “grandfathered segments,” which were operating at LOS F during the PM peak in 1991 when existing LOSs were established for the CMP network. The following segments are included in the CMP Table 6—LOS F Freeways for Alameda County CMP-Designated Roadway System:

- Southbound I-580 during PM peak between I-80/580 and I-980/SR 24: This captures our one I-580 analysis segment for the southbound direction during the PM peak.
- Southbound I-880 during PM peak between Washington Street and Hegenberger Road: This captures all but one of our I-880 analysis segments for the southbound direction during the PM peak. I-880 west of Adeline Street is not within the grandfathered segment.
- Eastbound I-980 during the PM peak between I-880 and I-580: This captures our one I-980 analysis segment for the eastbound direction during the PM peak.

Local Agency Thresholds

Since the CMP does not define the threshold of significance for those locations that already exceed the LOS standard, local agencies can define the criteria. The City of Alameda has significance criteria for local roads and intersections but not for freeway facilities. The freeway facilities under analysis are located within Oakland, and the City of Oakland has analyzed traffic impacts on those facilities for

¹ Guide for the Preparation of Traffic Impact Studies, California Department of Transportation, December 2002.

² ACTC CMP, Table 4—Approach to LOS Monitoring

several recent EIRs. The City of Oakland's CEQA Thresholds of Significance Guidelines³ could be applied for analyzing the freeway mainline segments and ramp merge/diverge areas identified for the Alameda Point EIR analysis. The relevant criterion is:

7. For a roadway segment of the Congestion Management Program (CMP) Network, the project would cause (a) the LOS to degrade from LOS E or better to LOS F or (b) the V/C ratio to increase 0.03 or more for a roadway segment that would operate at LOS F without the project.⁴

As was applied for the Boatworks EIR, the roadway impacts of the project could be considered significant if the addition of project-related traffic would result in a service level worse than LOS E, except where the roadway link was already at LOS F under no project conditions. For those locations where this no-project condition is LOS F, the impacts of the project were considered significant if the contribution of project-related traffic is three percent or more of the total traffic. This criterion has been included to address impacts along roadway segments currently operating under unacceptable levels and was developed based on professional judgment using a "reasonableness test" of daily fluctuations of traffic. Also a change of volume-to-capacity (V/C) ratio of 0.03 has been found to be the threshold for which a perceived change in congestion is observed. The V/C ratio is calculated by comparing the peak-hour link volume to the peak-hour capacity of the road link. That change is equivalent to about one-half of the change from one level of service to the next.

METHODOLOGY

Freeway Mainline Segments

The 2000 *Highway Capacity Manual* (HCM) procedures, as applied by Highway Capacity Software (HCS+), were used to calculate average peak hour capacities for each freeway mainline segment. The LOS was determined using density, or passenger cars per mile per lane (pc/mi/ln), given an estimated free-flow speed. The estimated free-flow speed of 70 MPH was used for those freeway segments with posted speed limits of 65 MPH. Seventy miles per hour (70 MPH) is the base free-flow speed for urban areas from the HCM. An estimated free-flow speed of 60 MPH was used for two segments of I-880 (segment west of Adeline and segment west of 23rd Street) where the posted speed limit is 55 MPH. Table 5 contains the density thresholds for both free-flow conditions.

³ Adopted August 24, 2011

⁴ Refer to the Alameda County Transportation Commission's (ACTC) (formerly the Alameda County Congestion Management Agency) Congestion Management Program for a description of the CMP Network. In Oakland, the CMP Network includes all state highways plus the following streets: portions of Martin Luther King, Jr., Way, Webster/Posey Tubes, 23rd Ave., 29th Ave., and Hegenberger Rd.

Table 5: LOS and Density for Free-Flow Speed @ 60 MPH and 70 MPH

Level of Service	Maximum Density (pc/mi/ln)
A	11
B	18
C	26
D	35
E	45

Source: Highway Capacity Manual, Transportation Research Board, Washington D.C, 2000, 23-4.

Ramp Merge/Diverge Areas

Highway Capacity Software (HCS+) was used to analyze the ramp merge/diverge areas. Freeway ramp area operating conditions are dependent upon traffic volumes and the ramp characteristics. These characteristics include the length and type of acceleration/deceleration lanes, free-flow speed of the ramps, number of freeway and acceleration/deceleration lanes, grade along the facility, and types of facilities a ramp connects. Table 6 Table 5 contains the density thresholds from A to F for ramp merge/diverge areas.

Table 6: LOS and Density for Freeway Ramp Merge/Diverge Areas

Level of Service	Maximum Density (pc/mi/ln)
A	10
B	20
C	28
D	35
E	>35
F	Demand exceeds capacity

Source: Highway Capacity Manual, Transportation Research Board, Washington D.C, 2000, 25-5.

The 2000 *Highway Capacity Manual* requires that several criteria be considered in addition to density so that LOS F is automatically attained for a ramp if:

At an on-ramp, volume exceeds capacity ($V > C$) in:

- The segment of a freeway downstream, or
- The merge-area defined by the on-ramp and the two adjacent freeway lanes,

Or at an off-ramp volume exceeds capacity ($V > C$) in:

- The segment of a freeway upstream OR downstream,
- The off-ramp itself, or
- The diverge-area defined by the two adjacent freeway lanes approaching the ramp.

Data Sources

The California Department of Transportation (Caltrans) provided freeway mainline and ramp counts for I-580 from the westbound on-ramp from High Street to the westbound off-ramp to I-80E (2011), for I-880 from the northbound off-ramp to Coliseum Way/66th Avenue to the southbound on-ramp to 7th Street (2008 and 2011), and for I-980 from the westbound off-ramp to Jackson Street to the westbound off-ramp to 27th Street (2012), and 2010 truck counts for these same freeway sections.

Assumptions

- PHF: 0.92 (default in HCS+)
- BFFS: 5 MPH above posted speed limit (70 MPH for most segments; 60 MPH for I-880 west of Adeline and I-880 west of 23rd Street)
- Ramp free-flow speed (S_{FR}): 35 MPH for non-circuitous ramps
- Percent trucks/buses on ramp (E_T): 2%
- Driver population factor (f_p): 1
- Grade on freeways and ramps: 0%

Limitations of Analysis

The HCM 2000 methodology has certain limits for valid applications. It does not apply when the traffic along a segment is influenced by downstream blockages or queuing, nor does it apply when free-flow speeds are below 55 MPH.⁵ The ACTC CMP originally identified most of our segments as deficient (LOS F) in certain directions during the PM peak and grandfathered those segments into the CMP as deficient in 1991. The 2012 CMP Report identified I-580 west of I-980 as LOS F (average speeds less than 20 MPH) during the PM peak for both directions of travel as well as during the AM peak for the northbound direction. For some study segments, the traffic counts used in the analysis of those segments may represent saturated flows resulting from downstream queuing and not reflect the demand during the study periods. Collectively, these limitations need to be considered when reviewing the results of the HCS+ analysis.

FREEWAYS RESULTS

The results on the analysis for the freeway mainline are shown in Tables 7 and 8 for the existing and cumulative (2035) conditions, respectively. As shown, the change in traffic due to the project has minimal effect on the freeway operations with no change in LOS and minimal, if any, change in density under existing and cumulative conditions, with the exception of I-980 south of I-580 in the westbound direction during the AM peak hour.

⁵ *Highway Capacity Manual*, Transportation Research Board, Washington, D.C., 2000, 23-1.

Table 7: Existing Conditions – AM(PM)

FWY section	Direction	Without Project			With Project		
		Volume (pc/h/ln)	Density (pc/mi/ln)	LOS	Volume (pc/h/ln)	Density (pc/mi/ln)	LOS
880 w/o Adeline	NB	1840(1967)	32.9(35.6)	D(E)	1846(1977)	33.0(35.8)	D(E)
	SB	1269(1337)	22.7(23.9)	C(C)	1290(1340)	23.0(23.9)	C(C)
880 w/o 23rd	NB	2512(2303)	N/A*	F(F)	2520(2302)	N/A*	F(F)
	SB	2099(1992)	N/A*	F(F)	2094(2001)	N/A*	F(F)
880 e/o High	NB	1517(1603)	22.5(23.9)	C(C)	1517(1596)	22.5(23.7)	C(C)
	SB	1495(1556)	22.2(23.1)	C(C)	1493(1549)	22.1(23.0)	C(C)
980 s/o 580	WB	1610(945)	25.8(15.1)	C(B)	1658(953)	26.6(15.2)	D(B)
	EB	731(1326)	11.7(21.2)	B(C)	735(1370)	11.8(21.9)	B(C)
880 e/o 980	NB	1521(1594)	23.2(24.4)	C(C)	1513(1588)	23.1(24.3)	C(C)
	SB	903(966)	13.8(14.7)	B(B)	898(968)	13.7(14.8)	B(B)
580 w/o 980	WB	2369(1360)	44.7(20.1)	E(C)	2368(1374)	44.6(20.4)	E(C)
	EB	1118(1679)	16.6(25.1)	B(C)	1130(1676)	16.7(25.1)	B(C)

* Volume exceeds capacity, so HCM methodology does not apply, and density is not calculated; automatic LOS F.

Table 8: 2035 Cumulative Conditions – AM(PM)

FWY section	Direction	Without Project			With Project		
		Volume (pc/h/ln)	Density (pc/mi/ln)	LOS	Volume (pc/h/ln)	Density (pc/mi/ln)	LOS
880 w/o Adeline	NB	2131(2246)	40.1(44.4)	E(E)	2115(2246)	39.6(44.4)	E(E)
	SB	1554(1726)	27.8(30.8)	D(D)	1569(1717)	28.0(30.7)	D(D)
880 w/o 23rd	NB	2642(2729)	N/A*	F(F)	2639(2753)	N/A*	F(F)
	SB	2504(2241)	N/A*(N/A**)	F(F)	2513(2250)	N/A*(N/A**)	F(F)
880 e/o High	NB	1577(1997)	23.4(31.6)	C(D)	1566(1999)	23.3(31.6)	C(D)
	SB	1873(1750)	28.8(26.4)	D(D)	1849(1734)	28.3(26.1)	D(D)
980 s/o 580	WB	1762(1118)	28.4(17.9)	D(B)	1762(1115)	28.4(17.8)	D(B)
	EB	840(1457)	13.4(23.3)	B(C)	860(1481)	13.8(23.7)	B(C)
880 e/o 980	NB	1604(1840)	24.5(28.7)	C(D)	1607(1842)	24.6(28.8)	C(D)
	SB	1198(1172)	18.3(17.9)	C(B)	1219(1176)	18.6(17.9)	C(B)
580 w/o 980	WB	2597(1648)	N/A*(24.6)	F(C)	2595(1646)	N/A*(24.6)	F(C)
	EB	1374(1878)	20.4(28.9)	C(D)	1383(1856)	20.5(28.4)	C(D)

* Volume exceeds capacity, so HCM methodology does not apply, and density is not calculated; automatic LOS F.

** Adjusted free-flow speed is beyond extents of HCM methodology, so density is not calculated.

RAMPS RESULTS

The results on the analysis for the ramps are shown in Tables 9 and 10 for the existing and cumulative (2035) conditions, respectively. As shown, the change in traffic due to the project has minimal effect on the ramp operations with no change in LOS and minimal, if any, change in density under existing conditions.

Table 9: Existing Conditions – AM(PM)

Ramp	FWY	Without Project		With Project	
		Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS
Jackson St. on	880 NB	38.8(39.0)	F(F)	38.9(39.2)	F(F)
Broadway off	880 NB	32.7(29.8)	D(D)	33.0(29.9)	D(D)
18th St. off	980 WB	36.6(13.6)	F(B)	38.6(13.7)	F(B)
5th St. off (to Broadway)	880 SB	14.0(15.3)	B(B)	14.4(15.4)	B(B)
High St. on	880 SB	33.4(33.6)	D(D)	33.4(33.5)	D(D)
High St. off	880 NB	27.2(27.4)	C(C)	27.4(27.3)	C(C)
Jackson St. off	980 WB	19.8(16.3)	B(B)	20.0(16.5)	C(B)
Oak St. on	880 SB	24.1(26.4)	C(C)	24.1(26.5)	C(C)
12th St. on	980 EB	29.1(62.0)	D(F)	29.3(62.8)	D(F)
12th St. off	980 EB	19.1(26.3)	B(C)	18.8(26.3)	B(C)

Table 10: 2035 Cumulative Conditions – AM(PM)

Ramp	FWY	Without Project		With Project	
		Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS
Jackson St. on	880 NB	47.4(48.5)	F(F)	47.5(49.0)	F(F)
Broadway off	880 NB	34.5(35.5)	D(E)	34.8(35.9)	D(F)
18th St. off	980 WB	43.1(17.8)	F(B)	43.1(17.7)	F(B)
5th St. off (to Broadway)	880 SB	19.7(23.2)	B(F)	20.0(23.0)	C(F)
High St. on	880 SB	38.7(36.4)	F(F)	37.9(36.3)	F(E)
High St. off	880 NB	28.4(35.0)	D(F)	28.2(34.7)	D(F)
Jackson St. off	980 WB	29.9(27.8)	D(C)	30.5(26.8)	D(C)
Oak St. on	880 SB	30.2(32.0)	D(D)	30.6(32.1)	D(D)
12th St. on	980 EB	29.1(64.0)	D(F)	29.7(64.3)	D(F)
12th St. off	980 EB	18.2(27.9)	B(C)	18.2(28.3)	B(D)

Under cumulative conditions, the project would result in a change in LOS at the following ramps:

- Broadway off-ramp from I-880 northbound during the PM peak hour. The project-related traffic volumes increase by 35 vehicles on this ramp and by 46 vehicles along the contiguous portion of the mainline, which results in a change in LOS from E to F during the PM peak hour and a corresponding change in density of 0.4 passenger cars per mile per lane (pc/mi/ln) within the diverge area.
- High Street on-ramp from I-880 southbound during the PM peak hour. The project-related traffic volumes increase by 28 vehicles on the ramp, but the density at the merge actually decreases from 36.4 to 36.3 since the mainline freeway volume decreases by 102 vehicles. This decrease in mainline volumes drops below the capacity resulting in a change in LOS from F to E with the project-related traffic.
- 12th Street off-ramp from I-980 eastbound during the PM peak hour. The project-related traffic volumes increase by 1 vehicle on this ramp and by 44 vehicles along the contiguous portion of the mainline, affecting the density at the diverge area and resulting in a change in LOS from C to D during the PM peak hour.

While this discussion focuses on the change in LOS based on the significance thresholds, the change in project-related traffic is minimal compared to the total volume on the mainline as well as the total volume on the ramps and any resulting change in mainline and ramp operations would likely be imperceptible to the motorist.

APPENDIX B

MMLOS Output Data

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BICYCLE LOS for Existing and Plus Project Conditions

Segment	Peak Hour	Scenario	NB / WB		SB / EB	
			Bike Score	% Change in Bike Score	Bike Score	% Change in Bike Score
Webster St. (Buena Vista Ave./ Atlantic Ave.)	AM	Existing	4.2	D	3.9	D
		Existing Plus Project	4.1	D	3.9	D
	PM	Existing	4.0	D	4.2	D
Park St. (Alameda Ave./ Central Ave.)	AM	Existing	4.0	D	4.1	D
		Existing Plus Project	3.9	D	3.7	D
	PM	Existing	4.0	D	3.8	D
Otis Dr. (Broadway/ High St.)	AM	Existing	3.9	D	4.0	D
		Existing Plus Project	4.0	D	4.1	D
	PM	Existing	4.1	D	4.0	D
Willie Stargell Ave. (Main St./ Webster St.)	AM	Existing	4.0	D	4.1	D
		Existing Plus Project	4.0	D	4.1	D
	PM	Existing	4.0	D	4.1	D
Main St. (RAMP/ Pacific Ave.)	AM	Existing	2.3	B	2.8	C
		Existing Plus Project	3.6	D	3.3	C
	PM	Existing	2.6	C	2.7	C
Central Ave. (Main St./ 4th St.)	AM	Existing	3.4	C	3.7	D
		Existing Plus Project*	3.6	D	3.1	C
	PM	Existing	4.2	D	4.0	D
Pacific Ave. (Main St./ 3rd St.)	AM	Existing	2.9	C	3.3	C
		Existing Plus Project*	4.1	D	4.2	D
	PM	Existing	4.1	D	4.2	D
RAMP (W. Campus Dr./ Webster St.)	AM	Existing	2.9	C	2.8	C
		Existing Plus Project	3.9	D	3.8	D
	PM	Existing	2.2	B	2.4	B
Clement Ave. (Park St./ Broadway)	AM	Existing	3.8	D	3.9	D
		Existing Plus Project	2.2	B	1.1	A
	PM	Existing	2.4	B	1.2	A
Oak St. (Santa Clara Ave./ Central Ave.)	AM	Existing	0.9	A	1.5	B
		Existing Plus Project	1.1	A	1.8	B
	PM	Existing	4.0	D	4.0	D
Constitution Way (Marina Village Pkwy./ Atlantic Ave.)	AM	Existing	4.3	D	4.0	D
		Existing Plus Project	4.0	D	3.9	D
	PM	Existing	4.2	D	4.2	D
Constitution Way (Marina Village Pkwy./ Atlantic Ave.)	AM	Existing	3.8	D	-	-
		Existing Plus Project	3.8	D	-	-
	PM	Existing	2.4	B	1%	-
Oak St. (Santa Clara Ave./ Central Ave.)	AM	Existing	2.4	B	1.9	B
		Existing Plus Project	2.5	B	1.9	B
	PM	Existing	2.8	C	3.0	C
Constitution Way (Marina Village Pkwy./ Atlantic Ave.)	AM	Existing	2.8	C	3.0	C
		Existing Plus Project	4.0	D	3.5	D
	PM	Existing	4.0	D	3.5	D
Constitution Way (Marina Village Pkwy./ Atlantic Ave.)	AM	Existing	3.7	D	4.1	D
		Existing Plus Project	3.8	D	4.0	D
	PM	Existing	3.8	D	4.0	D

Table 2 - 1
Bicycle and Pedestrian LOS Categories

LOS	Score
A	≤ 1.5
B	> 1.5 and ≤ 2.5
C	> 2.5 and ≤ 3.5
D	> 3.5 and ≤ 4.5
E	> 4.5 and ≤ 5.5
F	> 5.5

Bicycle LOS Thresholds

LOS	Score
A	≤ 1.5
B	> 1.5 and ≤ 2.5
C	> 2.5 and ≤ 3.5
D	> 3.5 and ≤ 4.5
E	> 4.5 and ≤ 5.5
F	> 5.5

* LOS reflects Class II bicycle lane. Separated Class I bicycle path cannot be evaluated within the given methodology but would be expected to yield a better LOS than a Class II bicycle lane.

BICYCLE LOS for Cumulative NO Project and Plus Project Conditions

Segment	Peak Hour	Scenario	NB / WB		SB / EB	
			Bike Score	% Change in Bike Score	Bike Score	% Change in Bike Score
Webster St. (Buena Vista Ave./ Atlantic Ave.)	AM	Cumulative	4.2	D	4.0	D
		Cumulative Plus Project	4.2	D	4.0	D
	PM	Cumulative	4.1	D	4.2	D
Park St. (Alameda Ave./ Central Ave.)	AM	Cumulative	4.1	D	4.2	D
		Cumulative Plus Project	4.1	D	4.1	D
	PM	Cumulative	4.2	D	4.2	D
Otis Dr. (Broadway/ High St.)	AM	Cumulative	4.1	D	4.2	D
		Cumulative Plus Project	4.2	D	4.2	D
	PM	Cumulative	4.2	D	4.1	D
Willie Stargell Ave. (Main St./ Webster St.)	AM	Cumulative	2.7	C	3.6	D
		Cumulative Plus Project	3.6	D	3.7	D
	PM	Cumulative	3.6	D	3.1	C
Main St. (RAMP/ Pacific Ave.)	AM	Cumulative	3.7	D	3.7	D
		Cumulative Plus Project	4.1	D	4.2	D
	PM	Cumulative	3.6	D	3.5	D
Central Ave. (Main St./ 4th St.)	AM	Cumulative	2.9	C	3.5	C
		Cumulative Plus Project	3.8	D	3.9	D
	PM	Cumulative	3.0	C	2.5	B
Pacific Ave. (Main St./ 3rd St.)	AM	Cumulative	2.3	B	1.2	A
		Cumulative Plus Project	2.5	B	1.2	A
	PM	Cumulative	1.1	A	1.7	B
RAMP (W. Campus Dr./ Webster St.)	AM	Cumulative	4.2	D	4.1	D
		Cumulative Plus Project	4.4	D	4.2	D
	PM	Cumulative	4.1	D	4.1	D
Clement Ave. (Park St./ Broadway)	AM	Cumulative	3.8	D	-	-
		Cumulative Plus Project	3.8	D	-	-
	PM	Cumulative	2.5	B	-	-
Oak St. (Santa Clara Ave./ Central Ave.)	AM	Cumulative	2.5	C	2.3	B
		Cumulative Plus Project	2.6	C	2.8	C
	PM	Cumulative	3.0	C	3.5	C
Constitution Way (Marina Village Pkwy./ Atlantic Ave.)	AM	Cumulative	3.1	C	3.6	D
		Cumulative Plus Project	3.8	D	3.7	D
	PM	Cumulative	3.9	D	3.5	D
Webster St. (Buena Vista Ave./ Atlantic Ave.)	AM	Cumulative	3.8	D	4.0	D
		Cumulative Plus Project	3.8	D	4.0	D
	PM	Cumulative	3.8	D	4.0	D

Table 2 - 1
Bicycle and Pedestrian LOS Categories

LOS	Score
A	≤ 1.5
B	> 1.5 and ≤ 2.5
C	> 2.5 and ≤ 3.5
D	> 3.5 and ≤ 4.5
E	> 4.5 and ≤ 5.5
F	> 5.5

PEDESTRIAN LOS for Existing and Plus Project Conditions

Intersection	Peak Hour	Scenario	South Leg		North Leg		East Leg		West Leg		5th Leg	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Main St. & Navy Way	AM	Existing	20.1	D	-	-	21.6	D	21.6	D	-	-
		Existing Plus Project	20.1	D	-	-	21.6	D	21.6	D	-	-
	PM	Existing	20.1	D	-	-	21.6	D	21.6	D	-	-
		Existing Plus Project	20.1	D	-	-	21.6	D	21.6	D	-	-
Main St. & Ferry Terminal Way	AM	Existing	-	-	24.6	C	1.1	A	1.1	A	-	-
		Existing Plus Project	-	-	25.0	C	1.1	A	1.1	A	-	-
	PM	Existing	-	-	17.9	B	2.6	A	2.6	A	-	-
		Existing Plus Project	-	-	17.9	B	2.6	A	2.6	A	-	-
Main St. & Singleton Ave.	AM	Existing	21.7	C	21.7	C	1.9	A	-	-	-	-
		Existing Plus Project	21.6	C	21.6	C	1.9	A	-	-	-	-
	PM	Existing	21.7	C	21.7	C	1.9	A	-	-	-	-
		Existing Plus Project	21.8	C	21.8	C	1.9	A	-	-	-	-
Main St. & Midway Ave.	AM	Existing	13.7	B	13.7	B	5.9	A	5.9	A	-	-
		Existing Plus Project	13.7	B	13.7	B	5.9	A	5.9	A	-	-
	PM	Existing	13.6	B	13.6	B	6.0	A	6.0	A	-	-
		Existing Plus Project	13.6	B	13.6	B	6.0	A	6.0	A	-	-
Main St. & Atlantic Ave.	AM	Existing	9.4	A	9.4	A	9.3	A	9.1	A	-	-
		Existing Plus Project	11.0	B	11.0	B	14.1	B	12.7	B	-	-
	PM	Existing	7.9	A	7.9	A	12.3	B	9.5	A	-	-
		Existing Plus Project	11.4	B	11.4	B	15.3	B	8.6	A	-	-
Main St. & Pacific Ave.	AM	Existing	21.7	C	17.4	B	13.0	B	14.6	B	-	-
		Existing Plus Project	29.3	C	27.6	C	19.7	B	15.6	B	-	-
	PM	Existing	18.2	B	17.7	B	12.5	B	10.3	B	-	-
		Existing Plus Project	28.6	C	31.7	D	23.1	C	14.1	B	-	-
Webster St. & Atlantic Ave.	AM	Existing	20.9	C	29.2	C	21.8	C	24.4	C	-	-
		Existing Plus Project	20.6	C	29.5	C	23.0	C	25.7	C	-	-
	PM	Existing	23.7	C	27.9	C	22.9	C	20.6	C	-	-
		Existing Plus Project	22.8	C	30.5	D	23.3	C	25.0	C	-	-

Constitution Way & Lincoln Ave.	AM	Existing	19.5	B	19.5	B	16.1	B	17.8	B	-	-
		Existing Plus Project	18.7	B	18.7	B	17.0	B	18.7	B	-	-
	PM	Existing	24.1	C	24.1	C	23.1	C	14.3	B	-	-
		Existing Plus Project	22.8	C	22.8	C	22.3	C	14.7	B	-	-
8th St. & Central Ave.	AM	Existing	25.8	C	25.8	C	22.1	C	18.7	B	-	-
		Existing Plus Project	25.8	C	25.8	C	22.1	C	18.7	B	-	-
	PM	Existing	25.8	C	25.8	C	22.1	C	18.7	B	-	-
		Existing Plus Project	25.8	C	25.8	C	22.1	C	18.7	B	-	-
Oak St. & Lincoln Ave.	AM	Existing	5.9	A	5.9	A	13.7	B	13.7	B	-	-
		Existing Plus Project	5.9	A	5.9	A	13.7	B	13.7	B	-	-
	PM	Existing	7.3	A	7.3	A	11.7	B	11.7	B	-	-
		Existing Plus Project	7.3	A	7.3	A	11.7	B	11.7	B	-	-
Oak St. & Santa Clara Ave.	AM	Existing	6.3	A	6.3	A	13.0	B	13.0	B	-	-
		Existing Plus Project	6.3	A	6.3	A	13.0	B	13.0	B	-	-
	PM	Existing	10.5	B	10.5	B	8.3	A	8.3	A	-	-
		Existing Plus Project	10.5	B	10.5	B	8.3	A	8.3	A	-	-
Park St. & Clement Ave.	AM	Existing	14.4	B	14.4	B	11.7	B	5.4	A	-	-
		Existing Plus Project	14.4	B	14.4	B	11.7	B	5.4	A	-	-
	PM	Existing	14.4	B	14.4	B	11.7	B	5.4	A	-	-
		Existing Plus Project	14.4	B	14.4	B	11.7	B	5.4	A	-	-
Park St. & Central Ave.	AM	Existing	11.4	B	11.4	B	8.0	A	8.0	A	-	-
		Existing Plus Project	11.4	B	11.4	B	8.0	A	8.0	A	-	-
	PM	Existing	11.4	B	11.4	B	8.0	A	8.0	A	-	-
		Existing Plus Project	11.4	B	11.4	B	8.0	A	8.0	A	-	-
Park St. & Encinal Ave.	AM	Existing	14.8	B	15.6	B	17.0	B	16.8	B	-	-
		Existing Plus Project	12.9	B	15.8	B	18.3	B	17.9	B	-	-
	PM	Existing	16.8	B	17.3	B	16.6	B	14.4	B	-	-
		Existing Plus Project	16.4	B	17.0	B	16.7	B	14.6	B	-	-
Park St. & Otis Dr.	AM	Existing	17.0	B	17.4	B	19.9	B	14.6	B	-	-
		Existing Plus Project	16.2	B	16.6	B	21.5	C	16.1	B	-	-
	PM	Existing	23.2	C	24.1	C	24.4	C	19.7	B	-	-
		Existing Plus Project	22.3	C	23.2	C	24.3	C	20.3	C	-	-

Broadway & Tilden Way	AM	Existing Plus Project	23.5	C	21.9	C	12.2	B	12.2	B	-	-
		Existing Plus Project	29.5	C	22.3	C	16.0	B	16.0	B	-	-
Broadway & Encinal Ave.	PM	Existing Plus Project	21.9	C	17.5	B	14.4	B	14.4	B	-	-
		Existing Plus Project	26.7	C	21.1	C	23.7	C	23.7	C	-	-
Broadway & Otis Dr.	AM	Existing Plus Project	13.0	B	13.0	B	6.3	A	6.3	A	-	-
		Existing Plus Project	13.0	B	13.0	B	6.3	A	6.3	A	-	-
Broadway & Otis Dr.	PM	Existing Plus Project	13.0	B	13.0	B	6.3	A	6.3	A	-	-
		Existing Plus Project	13.0	B	13.0	B	6.3	A	6.3	A	-	-
Tilden Way & Blanding Ave.	AM	Existing Plus Project	11.9	B	10.6	B	19.5	B	19.5	B	-	-
		Existing Plus Project	11.8	B	10.5	B	19.6	B	19.6	B	-	-
High St. & Fernside Blvd.	PM	Existing Plus Project	15.2	B	15.4	B	20.2	C	20.2	C	-	-
		Existing Plus Project	16.0	B	16.1	B	19.3	B	19.3	B	-	-
High St. & Otis Dr.	AM	Existing Plus Project	9.2	A	9.2	A	14.1	B	9.9	A	-	-
		Existing Plus Project	11.3	B	11.3	B	13.8	B	9.1	A	-	-
High St. & Otis Dr.	PM	Existing Plus Project	13.7	B	13.7	B	17.3	B	9.1	A	-	-
		Existing Plus Project	16.2	B	16.2	B	14.2	B	8.5	A	-	-
High St. & Otis Dr.	AM	Existing Plus Project	40.0	E	25.6	C	24.9	C	12.9	B	25.6	C
		Existing Plus Project	41.3	E	26.8	C	26.5	C	12.7	B	26.8	C
High St. & Otis Dr.	PM	Existing Plus Project	36.2	D	19.4	B	24.7	C	13.4	B	19.4	B
		Existing Plus Project	42.4	E	25.1	C	28.8	C	12.0	B	25.1	C
Island Dr. & Otis Dr.	AM	Existing Plus Project	8.4	A	9.3	A	21.3	C	21.3	C	-	-
		Existing Plus Project	9.3	A	9.3	A	21.3	C	21.3	C	-	-
Island Dr. & Otis Dr.	PM	Existing Plus Project	9.2	A	11.0	B	24.5	C	24.5	C	-	-
		Existing Plus Project	9.4	A	10.4	B	25.4	C	25.4	C	-	-
Constitution Way & Marina Village Pkwy.	AM	Existing Plus Project	26.7	C	20.4	C	14.8	B	-	-	-	-
		Existing Plus Project	26.7	C	20.4	C	14.8	B	-	-	-	-
Constitution Way & Marina Village Pkwy.	PM	Existing Plus Project	18.1	B	8.9	A	16.9	B	-	-	-	-
		Existing Plus Project	17.4	B	8.6	A	18.5	B	-	-	-	-
Constitution Way & Marina Village Pkwy.	AM	Existing Plus Project	-	-	7.2	A	7.2	A	-	-	-	-
		Existing Plus Project	-	-	7.2	A	7.2	A	-	-	-	-
Constitution Way & Marina Village Pkwy.	PM	Existing Plus Project	-	-	25.1	C	19.2	B	-	-	-	-
		Existing Plus Project	-	-	26.4	C	18.8	B	-	-	-	-

Constitution Way & Atlantic Ave.	AM	Existing Existing Plus Project	25.5 26.0	C C	27.6 29.4	C C	18.2 19.9	B B	17.5 21.6	B C	- -
	PM	Existing Existing Plus Project	25.6 28.9	C C	27.2 32.8	C D	20.9 25.2	C C	17.6 21.2	B C	- -
Fernside Blvd. & Otis Dr.	AM	Existing Existing Plus Project	4.3 4.3	A A	9.2 9.2	A A	- -	- -	38.4 38.4	D D	- -
	PM	Existing Existing Plus Project	5.6 5.6	A A	9.5 9.5	A A	- -	- -	16.0 16.0	B B	- -
Park St. & Blanding Ave.	AM	Existing Existing Plus Project	15.8 15.8	B B	15.8 15.8	B B	8.3 8.3	A A	8.3 8.3	A A	25.7 25.7
	PM	Existing Existing Plus Project	15.8 15.8	B B	15.8 15.8	B B	8.3 8.3	A A	8.3 8.3	A A	25.7 25.7
Challenger Dr. & Atlantic Ave.	AM	Existing Existing Plus Project	2.2 2.1	A A	4.3 4.2	A A	19.4 20.0	B B	19.4 20.0	B B	- -
	PM	Existing Existing Plus Project	5.1 5.1	A A	9.0 8.9	A A	12.7 12.9	B B	12.7 12.9	B B	- -
Challenger Dr. & Marina Village Pkwy.	AM	Existing Existing Plus Project	17.4 17.2	B B	17.4 18.0	B B	9.1 9.8	A A	23.0 24.3	C C	- -
	PM	Existing Existing Plus Project	19.0 19.0	B B	19.0 19.0	B B	10.4 10.5	B B	17.1 17.1	B B	- -
Webster St. & Willie Stargell Ave.	AM	Existing Existing Plus Project	15.8 15.8	B B	- -	- -	4.7 4.7	A A	7.5 7.5	A A	- -
	PM	Existing Existing Plus Project	15.4 15.4	B B	- -	- -	5.6 5.6	A A	8.4 8.4	A A	- -
5th St. & Willie Stargell Ave.	AM	Existing Existing Plus Project	20.1 20.1	D D	- -	- -	14.4 14.4	C C	14.4 14.4	C C	- -
	PM	Existing Existing Plus Project	20.1 20.1	D D	- -	- -	14.4 14.4	C C	14.4 14.4	C C	- -

Constitution Way & Mariner Square Dr.	AM	Existing Existing Plus Project	-	-	-	-	2.3	A	12.9	B	-	-
	PM	Existing Existing Plus Project	-	-	-	-	6.6	A	9.2	A	-	-
Park St. & Lincoln Ave.	AM	Existing Existing Plus Project	8.7	A	8.7	A	13.8	B	13.8	B	-	-
	PM	Existing Existing Plus Project	8.7	A	8.7	A	13.8	B	13.8	B	-	-

PEDESTRIAN LOS for Cumulative NO Project and Plus Project Conditions

Intersection	Peak Hour	Scenario	South Leg		North Leg		East Leg		West Leg		5th Leg	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Main St. & Navy Way	AM	Cumulative	20.1	D	-	-	21.6	D	21.6	D	-	-
		Cumulative Plus Project	20.1	D	-	-	21.6	D	21.6	D	-	-
	PM	Cumulative	20.1	D	-	-	21.6	D	21.6	D	-	-
		Cumulative Plus Project	20.1	D	-	-	21.6	D	21.6	D	-	-
Main St. & Ferry Terminal Way	AM	Cumulative	-	-	26.2	C	1.0	A	1.0	A	-	-
		Cumulative Plus Project	-	-	26.2	C	1.0	A	1.0	A	-	-
	PM	Cumulative	-	-	21.0	C	1.9	A	1.9	A	-	-
		Cumulative Plus Project	-	-	21.0	C	1.9	A	1.9	A	-	-
Main St. & Singleton Ave.	AM	Cumulative	14.0	B	14.0	B	6.1	A	-	-	-	-
		Cumulative Plus Project	14.0	B	14.0	B	6.1	A	-	-	-	-
	PM	Cumulative	18.2	B	18.2	B	2.8	A	-	-	-	-
		Cumulative Plus Project	18.2	B	18.2	B	2.8	A	-	-	-	-
Main St. & W. Midway Ave.	AM	Cumulative	13.7	B	13.7	B	5.9	A	5.9	A	-	-
		Cumulative Plus Project	13.7	B	13.7	B	5.9	A	5.9	A	-	-
	PM	Cumulative	13.6	B	13.6	B	6.0	A	6.0	A	-	-
		Cumulative Plus Project	13.6	B	13.6	B	6.0	A	6.0	A	-	-
Main St. & Atlantic Ave.	AM	Cumulative	12.7	B	12.7	B	11.6	B	4.7	A	-	-
		Cumulative Plus Project	13.0	B	13.0	B	17.5	B	8.2	A	-	-
	PM	Cumulative	11.3	B	11.3	B	10.7	B	5.7	A	-	-
		Cumulative Plus Project	13.6	B	13.6	B	16.8	B	6.6	A	-	-
Main St. & Pacific Ave.	AM	Cumulative	27.3	C	23.9	C	17.3	B	15.1	B	-	-
		Cumulative Plus Project	31.9	D	28.5	C	23.7	C	15.4	B	-	-
	PM	Cumulative	20.5	C	22.2	C	13.6	B	14.8	B	-	-
		Cumulative Plus Project	28.5	C	31.5	D	21.3	C	15.4	B	-	-
Webster St. & Atlantic Ave.	AM	Cumulative	21.6	C	29.5	C	24.4	C	24.6	C	-	-
		Cumulative Plus Project	20.6	C	28.3	C	24.4	C	27.3	C	-	-
	PM	Cumulative	24.5	C	27.3	C	24.0	C	23.4	C	-	-

r ^(M)	Cumulative Plus Project	23.3	C	27.9	C	26.0	C	25.8	C	-	-
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Constitution Way & Lincoln Ave.	AM	Cumulative	22.4	C	22.4	C	21.6	C	17.3	B	-
		Cumulative Plus Project	19.6	B	19.6	B	19.4	B	18.5	B	-
	PM	Cumulative	22.6	C	22.6	C	22.3	C	15.5	B	-
		Cumulative Plus Project	21.2	C	21.2	C	22.3	C	15.2	B	-
8th St. & Central Ave.	AM	Cumulative	25.8	C	25.8	C	22.1	C	18.7	B	-
		Cumulative Plus Project	25.8	C	25.8	C	22.1	C	18.7	B	-
	PM	Cumulative	25.8	C	25.8	C	22.1	C	18.7	B	-
		Cumulative Plus Project	25.8	C	25.8	C	22.1	C	18.7	B	-
Oak St. & Lincoln Ave.	AM	Cumulative	5.9	A	5.9	A	13.7	B	13.7	B	-
		Cumulative Plus Project	5.9	A	5.9	A	13.7	B	13.7	B	-
	PM	Cumulative	7.3	A	7.3	A	11.7	B	11.7	B	-
		Cumulative Plus Project	7.3	A	7.3	A	11.7	B	11.7	B	-
Oak St. & Santa Clara Ave.	AM	Cumulative	6.3	A	6.3	A	13.0	B	13.0	B	-
		Cumulative Plus Project	6.3	A	6.3	A	13.0	B	13.0	B	-
	PM	Cumulative	10.5	B	10.5	B	8.3	A	8.3	A	-
		Cumulative Plus Project	10.5	B	10.5	B	8.3	A	8.3	A	-
Park St. & Clement Ave.	AM	Cumulative	14.4	B	14.4	B	11.7	B	5.4	A	-
		Cumulative Plus Project	14.4	B	14.4	B	11.7	B	5.4	A	-
	PM	Cumulative	14.4	B	14.4	B	11.7	B	5.4	A	-
		Cumulative Plus Project	14.4	B	14.4	B	11.7	B	5.4	A	-
Park St. & Central Ave.	AM	Cumulative	11.4	B	11.4	B	8.0	A	8.0	A	-
		Cumulative Plus Project	11.4	B	11.4	B	8.0	A	8.0	A	-
	PM	Cumulative	11.4	B	11.4	B	8.0	A	8.0	A	-
		Cumulative Plus Project	11.4	B	11.4	B	8.0	A	8.0	A	-
Park St. & Encinal Ave.	AM	Cumulative	14.0	B	15.9	B	17.1	B	16.7	B	-
		Cumulative Plus Project	13.9	B	15.7	B	17.1	B	16.9	B	-
	PM	Cumulative	16.7	B	22.2	C	37.4	D	32.3	D	-
		Cumulative Plus Project	15.4	B	15.4	B	15.6	B	14.1	B	-
Park St. & Otis Dr.	AM	Cumulative	19.1	B	20.3	C	27.0	C	17.0	B	-
		Cumulative Plus Project	19.4	B	21.0	C	27.9	C	17.0	B	-
	PM	Cumulative	24.0	C	25.8	C	25.5	C	20.2	C	-
		Cumulative Plus Project	22.0	C	23.7	C	23.5	C	20.9	C	-

Broadway & Tilden Way	AM	Cumulative Plus Project	24.2	C	30.2	D	22.8	C	22.8	C	-
	PM	Cumulative Plus Project	31.1	D	25.1	C	29.8	C	29.8	C	-
Broadway & Encinal Ave.	AM	Cumulative Plus Project	13.0	B	13.0	B	6.3	A	6.3	A	-
	PM	Cumulative Plus Project	13.0	B	13.0	B	6.3	A	6.3	A	-
Broadway & Otis Dr.	AM	Cumulative Plus Project	12.9	B	11.6	B	18.2	B	18.2	B	-
	PM	Cumulative Plus Project	16.0	B	16.2	B	19.3	B	19.3	B	-
Tilden Way & Blanding Ave.	AM	Cumulative Plus Project	24.4	C	24.4	C	12.8	B	6.1	A	-
	PM	Cumulative Plus Project	23.5	C	23.5	C	11.3	B	6.9	A	-
High St. & Fernside Blvd.	AM	Cumulative Plus Project	41.2	E	27.4	C	19.3	B	12.5	B	27.4
	PM	Cumulative Plus Project	46.6	E	33.2	D	24.7	C	11.5	B	33.2
High St. & Otis Dr.	AM	Cumulative Plus Project	11.4	B	12.9	B	18.2	B	18.2	B	-
	PM	Cumulative Plus Project	18.0	B	13.7	B	20.9	C	20.9	C	-
Island Dr. & Otis Dr.	AM	Cumulative Plus Project	26.7	C	20.4	C	14.8	B	-	-	-
	PM	Cumulative Plus Project	22.2	C	10.1	B	18.1	B	-	-	-
Constitution Way & Marina Village Pkwy.	AM	Cumulative Plus Project	-	-	6.7	A	6.1	A	-	-	-
	PM	Cumulative Plus Project	-	-	7.1	A	5.7	A	-	-	-
					6.7	A	5.6	A	-	-	-
					6.8	A	5.6	A	-	-	-

Constitution Way & RAMP	AM	Cumulative	25.3	C	26.1	C	20.2	C	19.4	B	-
		Cumulative Plus Project	26.8	C	25.1	C	24.7	C	25.8	C	-
	PM	Cumulative	29.7	C	34.0	D	29.5	C	26.0	C	-
		Cumulative Plus Project	27.8	C	35.6	D	35.6	D	30.1	D	-
Fernside Blvd. & Otis Dr.	AM	Cumulative	4.3	A	9.2	A	-	-	38.4	D	-
		Cumulative Plus Project	4.3	A	9.2	A	-	-	38.4	D	-
	PM	Cumulative	4.2	A	7.7	A	-	-	17.1	B	-
		Cumulative Plus Project	3.9	A	7.4	A	-	-	17.3	B	-
Park St. & Blanding Ave.	AM	Cumulative	15.8	B	15.8	B	8.3	A	8.3	A	25.7
		Cumulative Plus Project	15.8	B	15.8	B	8.3	A	8.3	A	25.7
	PM	Cumulative	15.8	B	15.8	B	8.3	A	8.3	A	25.7
		Cumulative Plus Project	15.8	B	15.8	B	8.3	A	8.3	A	25.7
Challenger Dr. & Atlantic Ave.	AM	Cumulative	4.5	A	7.7	A	21.9	C	21.9	C	-
		Cumulative Plus Project	4.0	A	7.0	A	22.7	C	22.7	C	-
	PM	Cumulative	5.8	A	9.4	A	20.3	C	20.3	C	-
		Cumulative Plus Project	5.8	A	9.4	A	20.3	C	20.3	C	-
Challenger Dr. & Marina Village Pkwy.	AM	Cumulative	20.7	C	23.4	C	10.8	B	28.4	C	-
		Cumulative Plus Project	20.5	C	21.7	C	9.8	A	28.0	C	-
	PM	Cumulative	25.9	C	25.1	C	10.2	B	22.2	C	-
		Cumulative Plus Project	24.9	C	24.1	C	10.4	B	21.1	C	-
Webster St. & Willie Stargell Ave.	AM	Cumulative	16.3	B	-	-	4.7	A	8.1	A	-
		Cumulative Plus Project	16.3	B	-	-	4.7	A	8.1	A	-
	PM	Cumulative	15.8	B	-	-	5.5	A	9.0	A	-
		Cumulative Plus Project	15.8	B	-	-	5.5	A	9.0	A	-
5th St. & Willie Stargell Ave.	AM	Cumulative	20.1	D	-	-	14.4	C	14.4	C	-
		Cumulative Plus Project	20.1	D	-	-	14.4	C	14.4	C	-
	PM	Cumulative	20.1	D	-	-	14.4	C	14.4	C	-
		Cumulative Plus Project	20.1	D	-	-	14.4	C	14.4	C	-

Constitution Way & Mariner Square Dr.	AM	Cumulative	-	-	-	2.3	A	12.9	B	-
		Cumulative Plus Project	-	-	-	2.3	A	12.9	B	-
Park St. & Lincoln Ave.	PM	Cumulative	-	-	-	6.6	A	9.2	A	-
		Cumulative Plus Project	-	-	-	6.6	A	9.2	A	-
Park St. & Lincoln Ave.	AM	Cumulative	8.7	A	8.7	13.8	B	13.8	B	-
		Cumulative Plus Project	8.7	A	8.7	13.8	B	13.8	B	-
Park St. & Lincoln Ave.	PM	Cumulative	8.7	A	8.7	13.8	B	13.8	B	-
		Cumulative Plus Project	8.7	A	8.7	13.8	B	13.8	B	-

TRANSIT LOS for Existing and Plus Project Conditions

Segment	Peak Hour	Scenario	NB / WB		SB / EB	
			Travel Speed (MPH)	% Change in Travel Speed	Travel Speed (MPH)	% Change in Travel Speed
Main St. at Willie Stargell Ave. to Pacific Ave. at Webster St.	AM	Existing	19.0	-4%	17.8	-3%
	PM	Existing Plus Project	18.2	-1%	17.2	-3%
Webster St.	AM	Existing	18.8	1%	17.9	-1%
	PM	Existing Plus Project	18.6	0%	17.3	-1%
Webster St. (Webster Tube to Central Ave.)	AM	Existing	9.8	0%	14.4	-1%
	PM	Existing Plus Project	9.9	0%	14.3	-1%
Park St. (Blanding Ave. to Otis Dr.)	AM	Existing	10.2	-7%	12.6	-2%
	PM	Existing Plus Project	10.2	-1%	12.3	-7%
Otis St. (Willow Dr. to Roberty Davey, Jr. Dr.)	AM	Existing	11.3	-8%	11.4	0%
	PM	Existing Plus Project	11.2	-6%	10.6	-3%

• Transit – If travel speed degrades by 10 percent or more along a street segment, a segment would be defined as the impacted bus stop location, plus the two previous stops and the two subsequent stops. A segment that crosses a City boundary shall also include five bus stops, but the last stop shall be the first bus stop outside the City of Alameda (Transit LOS for an arterial segment would be calculated using the Highway Capacity Manual’s methodology for Urban Street (arterial) Level of Service, or LOS).

EXHIBIT 15-2. URBAN STREET LOS BY CLASS

Urban Street Class	I	II	III	IV
Range of free-flow speeds (FFS)	55 to 45 mi/h	45 to 35 mi/h	35 to 30 mi/h	35 to 25 mi/h
Typical FFS	50 mi/h	40 mi/h	35 mi/h	30 mi/h
LOS	Average Travel Speed (mi/h)			
A	> 42	> 35	> 30	> 25
B	> 34-42	> 28-35	> 24-30	> 19-25
C	> 27-34	> 22-28	> 18-24	> 13-19
D	> 21-27	> 17-22	> 14-18	> 9-13
E	> 16-21	> 13-17	> 10-14	> 7-9
F	≤ 16	≤ 13	≤ 10	≤ 7

TRANSIT LOS for Cumulative No Project and Plus Project Conditions

Segment	Peak Hour	Scenario	NB / WB			SB / EB		
			Travel Speed (MPH)	LOS	% Change in Travel Speed	Travel Speed (MPH)	LOS	% Change in Travel Speed
Main St. at Willie Stargell Ave. to Pacific Ave. at Webster St.	AM	Cumulative	18.3	C	-7%	16.9	C	-10%
	PM	Cumulative Plus Project	17.1	C	-2%	15.2	C	-6%
Webster St. (Webster Tube to Central Ave.)	AM	Cumulative	18.0	C	0%	16.5	C	-2%
	PM	Cumulative Plus Project	17.7	C	1%	15.5	C	-1%
Park St. (Blanding Ave. to Otis Dr.)	AM	Cumulative	9.8	D	2%	13.9	C	-13%
	PM	Cumulative Plus Project	9.8	D	21%	13.6	C	-4%
RAMP (Main St. to Webster St.)	AM	Cumulative	9.6	D	-7%	13.4	C	-1%
	PM	Cumulative Plus Project	9.7	D	-4%	13.3	C	-3%
Willie Stargell Ave. (Main St. to Webster St.)	AM	Cumulative	8.5	E	-4%	8.4	E	2%
	PM	Cumulative Plus Project	8.7	E	-4%	7.3	E	-2%
Lincoln Ave. (Webster St. to Park St.)	AM	Cumulative	7.6	E	0%	8.5	E	-9%
	PM	Cumulative Plus Project	9.2	D	0%	8.2	E	-3%
Otis St. (Willow Dr. to Roberty Davey, Jr. Dr.)	AM	Cumulative	11.0	D	-6%	11.0	D	-9%
	PM	Cumulative Plus Project	10.2	D	-6%	10.9	D	-3%

• Transit – If travel speed degrades by 10 percent or more along a street segment, a segment would be defined as the impacted bus stop location, plus the two previous stops and the two subsequent stops. A segment that crosses a City boundary shall also include five bus stops, but the last stop shall be the first bus stop outside the City of Alameda (Transit LOS for an arterial segment would be calculated using the Highway Capacity Manual's methodology for Urban Street (arterial) Level of Service, or LOS).

EXHIBIT 15-2. URBAN STREET LOS BY CLASS

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Typical FFS	50 mi/h	40 mi/h	35 mi/h	30 mi/h
LOS	Average Travel Speed (mi/h)			
A	> 42	> 35	> 30	> 25
B	> 34-42	> 28-35	> 24-30	> 19-25
C	> 27-34	> 22-28	> 18-24	> 13-19
D	> 21-27	> 17-22	> 14-18	> 9-13
E	> 16-21	> 13-17	> 10-14	> 7-9
F	≤ 16	≤ 13	≤ 10	≤ 7