



City of Alameda • California

December 2, 2020

Ms. Lindsay Vivian, Chief
Office of Environmental Analysis
Caltrans District 4
111 Grand Avenue, MS-8B
Oakland, CA 94612
Sent via email to Oakland.Alameda.Access@dot.ca.gov

Subject: Comments on Oakland Alameda Access Project (OAAP) Draft Environmental Document

Dear Ms. Lindsay Vivian:

Thank you for this opportunity to comment on the Oakland Alameda Access Draft Environmental Impact Report/Environmental Assessment (DEIR/EA).

Bicycle and Pedestrian Access Analysis Inadequacies

The OAAP does not provide a permanent, long-term solution to the issue of bicycle and pedestrian connectivity between Oakland and Alameda. A bicycle and pedestrian bridge across the Estuary between Alameda and Oakland provides that permanent long-term solution to improve bicycle and pedestrian access, reduce traffic in Chinatown, and reduce greenhouse gas emissions regionally.

Throughout the DEIR, the new (sometimes called “widened” or “opened”) Webster Tube maintenance walkway is misleadingly solely described as a beneficial pedestrian/bicycle connectivity improvement across the estuary between Alameda and Oakland, and it is regularly touted as a key multi-modal and connectivity feature of this project. The sub-standard quality of the existing (Posey) and proposed (Webster) Tubes are not acknowledged. These facilities are not a long-term solution to the lack of connectivity for people walking and bicycling between Alameda’s west end and Oakland. Slightly improved connectivity is one small feature of the Webster Tube walkway, which will also provide safety access for motorists who break-down in the Tubes, and will allow Caltrans to maintain (minimal) bike/ped access across the estuary whenever one Tube is closed for maintenance. The DEIR should acknowledge all of these facets of the walkway, rather than simply defining it as a bicycle/pedestrian connectivity solution. It should also identify that a long-term, safe bicycle/pedestrian connection that meets current best practices is still urgently needed to cross the estuary, such as a bicycle/pedestrian bridge which Alameda CTC, Oakland and Alameda are all working on today.

Based upon work completed over the last year which was funded by Alameda CTC, we know that it is feasible to build a world-class bicycle and pedestrian bridge between the two cities that meets Coast Guard and Port of Oakland stated navigational clearance requirements. We also know that approximately 5,000 to 6,000 bicyclists and pedestrians will use the bridge each week day, resulting in over 40,000 fewer auto trips across the estuary per week. This bicycle and pedestrian bridge is

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recommended in the City of Oakland's Downtown Specific Plan and their Bicycle Plan, the Caltrans District 4 Bicycle Plan, and the City of Alameda's Transportation Choices Plan, Climate Action and Resiliency Plan, draft General Plan 2040 and draft Active Transportation Plan.

On Page 1-15. EXISTING PEDESTRIAN AND BICYCLE FACILITY CONDITIONS, the list of four impediments to bicycling and walking in the project area includes "Limited connectivity between the cities of Oakland and Alameda for bicycles and pedestrians." This is an under-statement; the complete lack of a safe, comfortable, standard bike/ped connection between Oakland and west Alameda is extreme. The section notes "To address these issues, new or enhanced bicycle and pedestrian connections between Oakland and Alameda, between downtown Oakland and the Jack London District, and across downtown Oakland would be added." This project is not substantively addressing the limited connectivity between the two cities, and this should be stated clearly in the document.

The DEIR should define a "bicycle/pedestrian walkway," as is proposed in the Webster Tube and exists in the Posey Tube. This term and others are used to describe this facility throughout the document. This is a non-standard term for a sub-standard facility. The widths of these walkways should be clearly stated, as well as their intended and expected (actual) use.

On Page 1-16, section 2.2.2. Social Demands or Economic Development, the DEIR states that "Proposed bike infrastructure in the Tubes was one program identified by the City to address this strategy." This is misleading. The City's Transportation Choices Plan (TCP) identified a long-term multi-modal project to completely redesign the existing Webster and Posey Tubes (Project #38), which would include "dedicated bikeways and walkways." Adding a substandard four-foot path is not what was envisioned in this project. And, in fact the TCP proposes a new West End Bicycle/Pedestrian Crossing (project #39), which should be mentioned as the long-term bicycle/pedestrian access needed in this area.

On Page 1-31, TRANSPORTATION SYSTEM MANAGEMENT AND TRANSPORTATION DEMAND MANAGEMENT states, "Bicycle facilities and ADA-compliant pedestrian facilities would be constructed on 5th Street, 6th Street, Oak Street, and **SR-260 through the Tubes to provide better connectivity within Oakland and to/from Alameda.**" As noted above, opening the new pathway in the Webster Tube only provides minimal improvements to connectivity within SR-260, connecting Alameda and Oakland, and is not a long term solution, nor is it a complete streets facility, with only a four-foot path which does not meet any standard for a combined, two-way bicycling and walking facility.

In Table 1-6, Summary of Effects (Compared to No-Build) the EIR assumes a safety benefit for bicyclists and pedestrians in the tubes. Assuming a **safety** benefit from one-way bike travel in the Tubes is hypothetical. If there is data on head-on bike collisions in the Posey Tube, it should be provided. The bigger benefit of one-way bike travel would be the reduced frequency of bicyclists heading in opposite directions, who have to stop and/or lift their bikes to pass each other, as is done now in the Posey Tube. However, the assumption that bicyclists will abide by the one-way signage is low. Furthermore, the bigger collision danger is likely collisions between bicyclists and pedestrians who are sharing a 3 or 4 foot pathway.

In the Mobility column of that same table, a qualifier should be added, as is done for other items in this table, that the "Webster Tube bicycle/pedestrian walkway" is only a "slight improvement" given its severe limitations as a complete streets facility.

Page 2-55. BICYCLE AND PEDESTRIAN FACILITIES. This section barely addresses the City of Alameda walking and bicycling facilities, does not refer to the City's current Bicycle and Pedestrian Plans, and Figure 2-10 does not include any existing or proposed bicycle or pedestrian facilities in Alameda. Most importantly, this section does not acknowledge the huge gap in safe and comfortable and accessible walking and biking across the Oakland estuary (while it does mention the "massive I-880 structure" impediment in Oakland). This evaluation and background should be added, as well the fact that the City of Oakland Bike Plan, which is summarized here, includes a proposed bike/pedestrian crossing, as do the City of Alameda's current and draft plans.

Page 2-89. Bicycle and Pedestrian Networks. This section, almost completely focused on Oakland streets, does not mention the substandard facility created by adding the Webster Tube pathway, except to say vaguely that "Improved pedestrian and bicycle facilities in the Tubes would provide more connectivity between Oakland and Alameda."

To improve biking and walking connectivity, and further encourage the one way traffic on the walkways in the Posey and Webster Tubes, the project should at least include a multi-use path through Neptune Park, connecting from Webster/Willie Stargell to Constitution/Marina Village Parkway. This project is included in the City's 2010 Bicycle Master Plan.

The project should also construct permanent signage directing people on foot and bike from existing bikeways and walking routes to the walkway entrances to the Posey and Webster Tubes, including the directional-flow suggestion. These efforts should be coordinated with signage programs in Oakland and Alameda. Although one-way bicycling may be encouraged, it should not be required.

Transit Access Analysis Inadequacies

Regarding transit access, the DEIR states on Page 8-90 (Public Transportation/Permanent Impacts section): "The ability to travel through the project study area with less congestion would benefit transit routes such as AC Transit..." What are these exact benefits, how have they been quantified and are they supported by AC Transit? The DEIR does not actually explain how this project improves transit.

While the project purpose includes "improve **mobility and accessibility** between I-880, SR-260 (the Posey and Webster tubes), the City of Oakland downtown neighborhoods and the City of Alameda," the project does not include improvements explicitly designed to facilitate and improve transit service between Oakland and Alameda.

We request that the next phase of design work include enhancements to transit access to and from the Webster and Posey Tubes both in Oakland and Alameda, to further improve the project's promised multi-modal and circulation improvements. Also, please take under consideration the addition of a carpool lane and/or transit queue jump lane at the Constitution Way entrance to the Posey Tube, as described in the City's Transportation Choices Plan (Project #15).

Construction Impact Analysis Inadequacies.

On Page 1-33. CONSTRUCTION SCHEDULE; and Page 2-90, which states "As part of the TMP, a shuttle may be needed to transport bicyclists and pedestrians between Alameda and Oakland. The schedule and frequency for the shuttle would be determined prior to construction." The project should maintain walking and bicycling access across the estuary at all times (24/7) during

construction of the project, either through an open walkway in one of the Tubes, or via a land or water shuttle. The City looks forward to working with Caltrans on the Transportation Management Plan (TMP).

On Page 2-91. PF-TRF-1 Transportation Management Plan (TMP). The TMP should explicitly state that messaging, announcements, detours and signage will be provided for non-auto modes, including transit, pedestrians and bicyclists.

During construction of all aspects of the project, provide and maintain construction signage with directional information for people walking and bicycling.

Climate Change and Sea Level Rise Analysis Inadequacies

The project Sea Level Rise (SLR) Memo: "Review and Assessment of Sea Level Rise at the Oakland Alameda Access Project" performed by Wreco includes a two-part analysis to determine and document whether to incorporate SLR measures into this project's programming and design.

The first screening phase clearly concluded that the portion of the project in Alameda has the potential to be impacted by SLR, meeting 6 of the 10 factors included in Caltrans' Guidance on Incorporating Sea Level Rise (Caltrans, 2011).

Adaptation measures were considered as part of the second phase but concluded infeasible due to cost, increased environmental impact and/or delay in project timing. There is nothing in the Caltrans Guidance on Incorporating Sea Level Rise that defines when incorporating a SLR adaptation is cost prohibitive. Is that 1% of the project? 10% of the project? This leaves quite a bit of discretion to conclude that adaptation measures are infeasible, and Wreco does so as low as 2.5% of the construction budget.

Caltrans' Guidance on Incorporating Sea Level Rise requires the attempts to incorporate SLR adaptation measures be documented, as this report has done; however the guidance also requires the report to indicate what can be achieved and to quantify that both in terms of cost as well as the degree of potential impact for target future years. This report fails to include anything achievable, which the City of Alameda disagrees with on a project with a construction budget of \$88 million dollars.

The Wreco report cites SLR adaptation measures that are currently being implemented for developers along the City of Alameda's northern waterfront area. Two of the measures make investments now for a future project: invest in design now to build later, as needed, or establish a funding mechanism now to construct later. Although construction of the SLR adaptation measures considered for this project may be infeasible as part of the project, an investment to advance definition and construction of the adaptive measures to prevent future flood scenarios is achievable. The City suggests this investment be in the Category 1 Measures considered since, as the report points out, they deal with the flooding at the source and therefore, reduce additional impacts due to inland flooding. The City acknowledges the SLR measures on the Oakland Estuary shoreline are beyond the footprint of the Oakland Alameda Access Project and are jurisdictionally complex; however an investment towards a future project versus incorporation into the Oakland Alameda Access Project removes any project delay considerations, Factor 6 in Caltrans Guidance.

Page 19 of the report accurately states that the City's Climate Action and Resiliency Plan (CARP) includes measures to flood-proof facilities, re-grade SR260, construct floodwalls and install salt-resistant pumps. The report falsely suggests that the City may implement some of these measures by 2027 when this Oakland Alameda Access Project commences construction. When presenting these short-term adaption measures for SR260 including the Webster and Posey Tubes, the CARP notes that these facilities are owned and maintained by Caltrans. The City has no jurisdiction over these facilities and the right of way, and the expectation is, therefore, that Caltrans would consider and implement the short-term measures.

Additional Comments on Analysis

Page vii and Table 2-1: The "Alameda Shipways Residential Project" is no not currently moving forward and should be deleted from the list. However, the Alameda Landing Waterfront housing development project is moving forward towards construction.

Table S-1: Community Character and Cohesion. Include working with the cities of Oakland and Alameda to support the unsheltered communities that will be displaced.

Table S-1: Environmental Justice. Displacing encampments of unsheltered people, as noted in the "Community Character and Cohesion" section, is an environmental justice issue and should be noted here.

Page 2-10. 2.1.2. Consistency with State, Regional, and Local Plans and Programs.

- All elements of the City of Alameda's draft General Plan 2040 are now drafted and posted on the City's web page, including the Mobility and Housing Elements.
- The City of Alameda's current Bicycle and Pedestrian Master Plans should also be included in this review.

Table 2-4. Consistency with Regional and Local Plans. An omitted policy from the City of Alameda's current General Plan is 4.1.6.3: "Minimize the cross-island portion of regional vehicular trips by providing alternative connections to Oakland, such as Water Taxis, shuttles, and a Bicycle Pedestrian Bridge and by encouraging Transportation Systems Management (TSM) and Transportation Demand Management (TDM) techniques." Our comments in this letter support this policy, including the need for further transit improvements, and the need to acknowledge that the Webster Tube walkway is not a long-term solution for people on foot and bike.

Thank you for your consideration of our concerns and requests.

Sincerely,



Andrew Thomas, Director
Planning, Building & Transportation Department