

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.

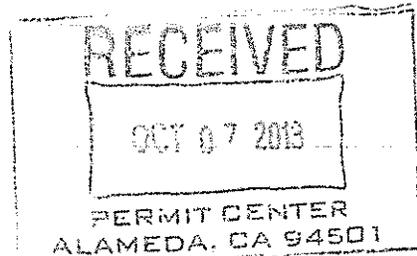
22-4

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@planeteria.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.

>>> <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 gunderbooms 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

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

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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

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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.

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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

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.

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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**

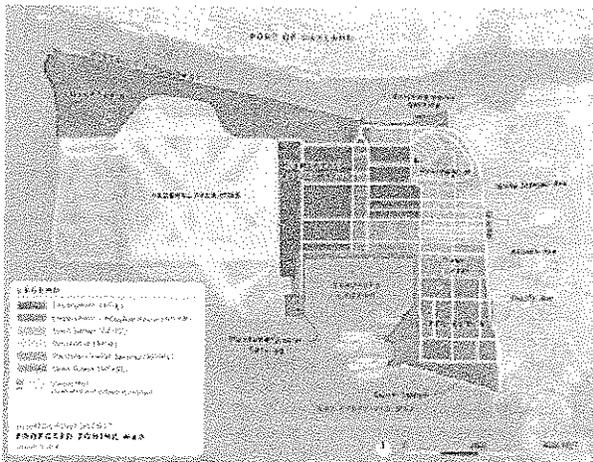
City, VA Must Act Together on Point

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.

Jon Spangler
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Alameda, CA 94501-4250

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

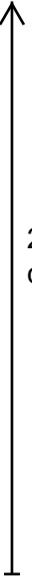
Similarly, I did not see much discussion of the following in the DEIR.

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.)

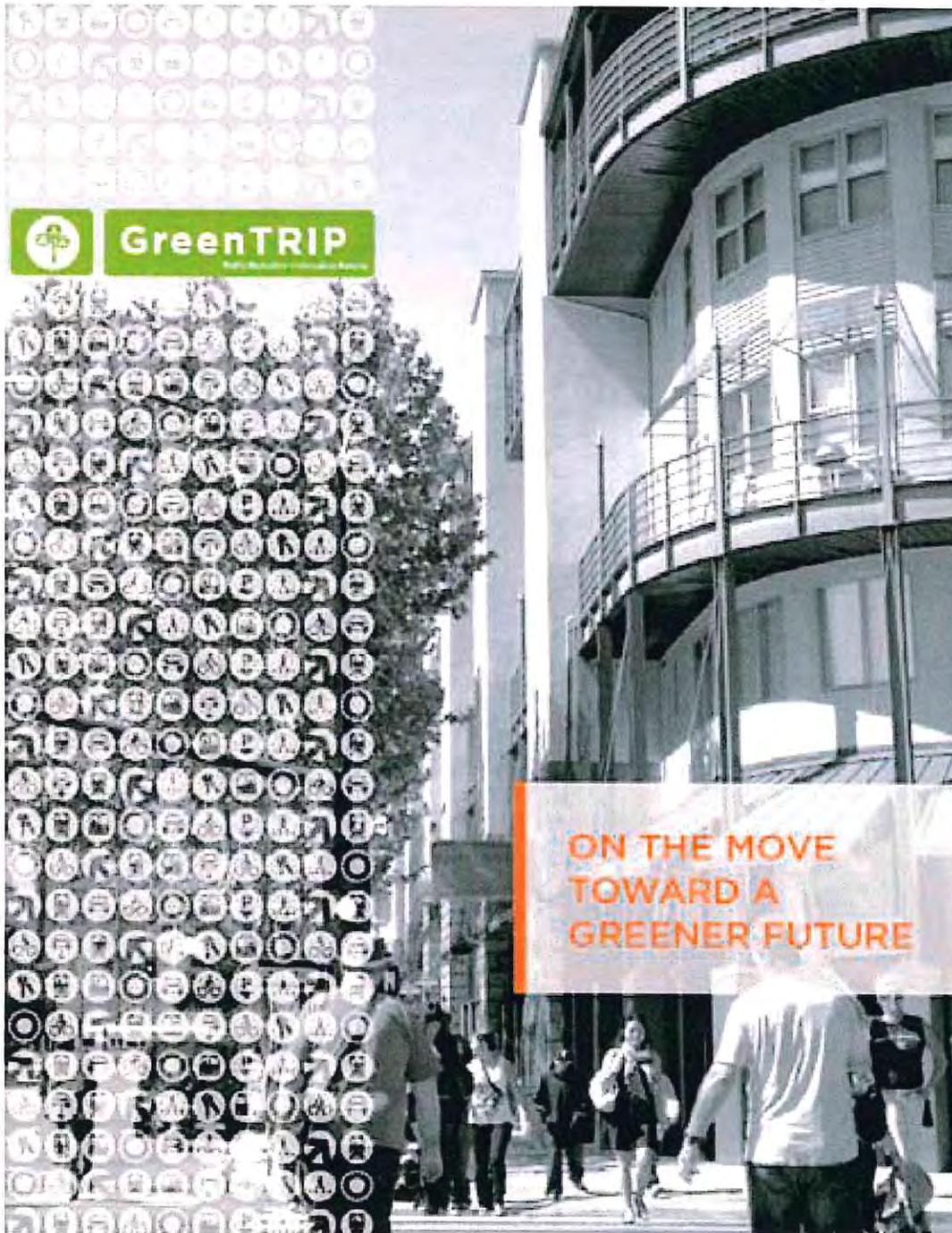
29-29

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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January 11, 2012

Stuart Cohen, Executive Director
&
Ann Cheng, Program Director

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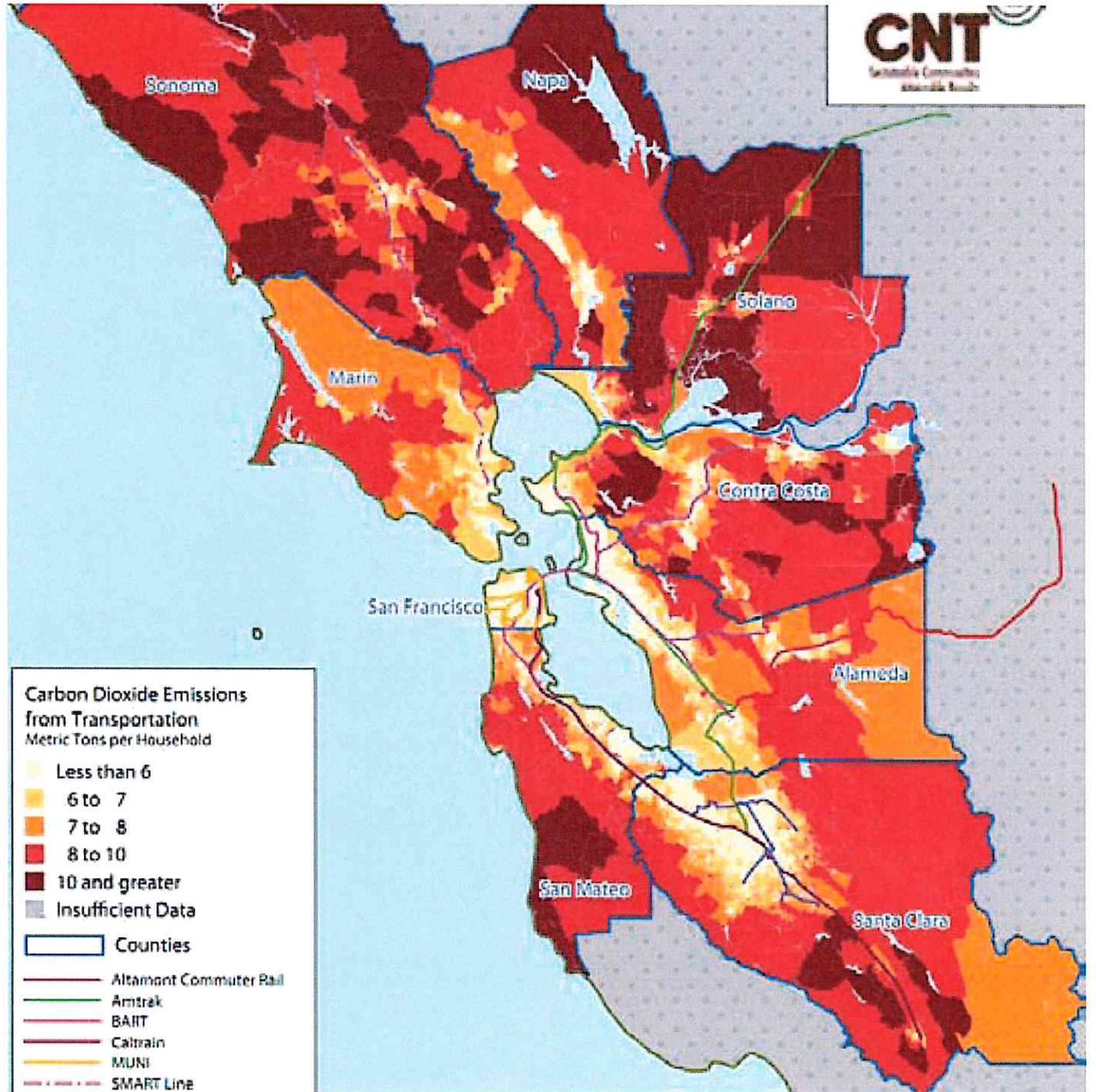
PROJECT EVALUATION REPORT

- 1) Problem
- 2) GreenTRIP Certification
- 3) Challenges
- 4) GreenTRIP 2.0

Self-fulfilling Prophecy of Sprawl



3-272



The New California Dream

**Preference:
walkable,
smaller,
convenient,
short
commutes
VS.
larger homes +
longer
commutes**

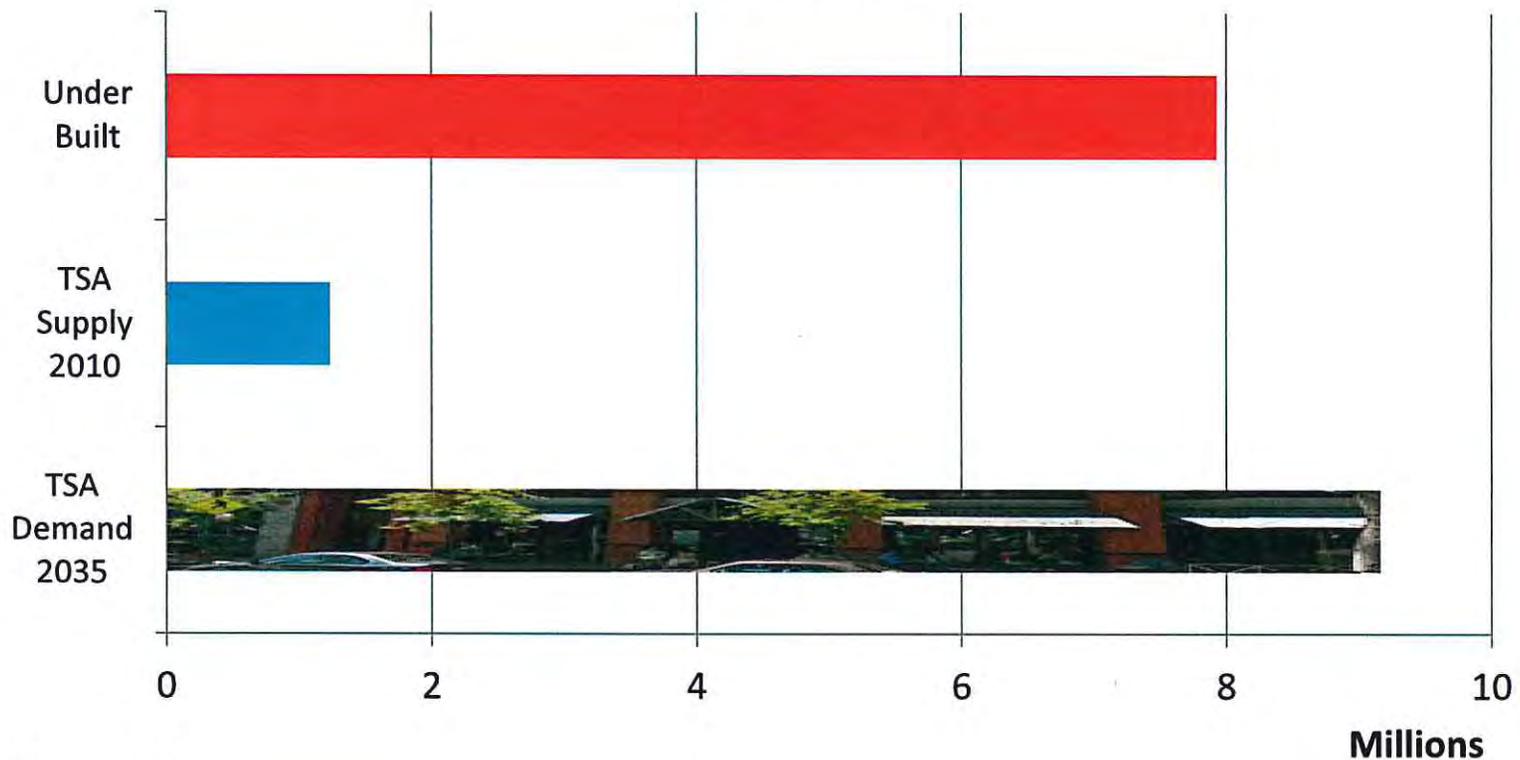


64%

Demand for 8 Million More Homes near Transit

2035 Demand Vs. Supply Homes in Transit Rich Neighborhoods

Millions of Units
TSA: Transit Station Area



3-275

In CA's Largest 4
Metropolitan Areas:
MTC, SCAG, SANDAG,
SACOG



The New California Dream:

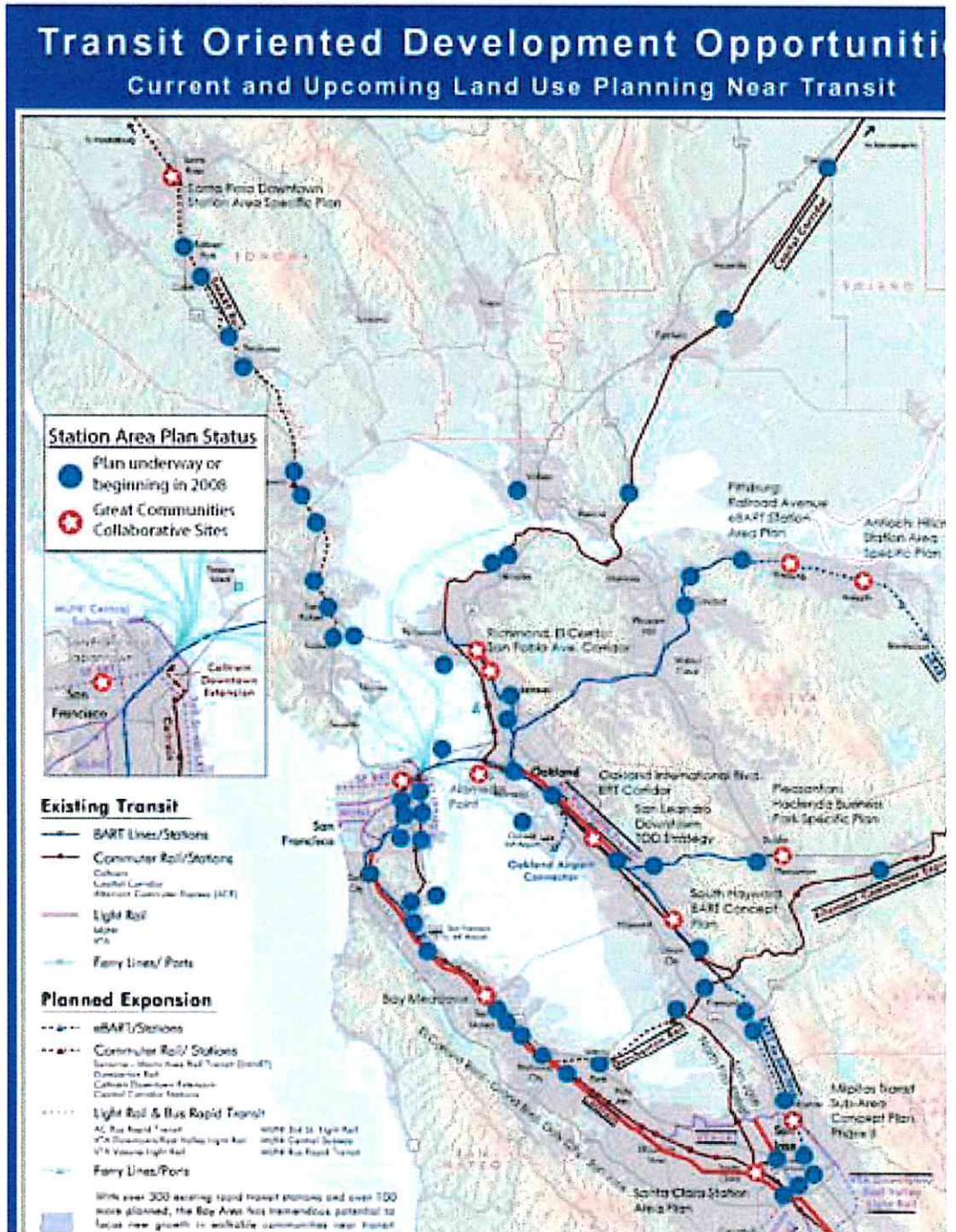
How Demographic and Economic Changes May Shape the Housing Market

Ideal equitable, sustainable TOD:



Great Communities Collaborative & Regional Policy

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