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## Letter 29. Individual (Jon Spangler)

- 29-1 The comment is noted.
- 29-2 The comment is expressing a preference for a particular alternative evaluated in the draft EIR. The comment is not a comment on the adequacy of the environmental analysis. As described on page 5-1 of the Draft EIR, pursuant to *CEQA Guidelines* §15126.6(a)-(c), the range of alternatives shall include alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project. The EIR must consider a reasonable range of alternatives in order to foster informed decision making and public participation, but need not consider every possible alternative.
- 29-3 The comment is expressing displeasure with the proposed project and expressing a preference for a particular alternative with more housing that was evaluated in the draft EIR. The comment is not a comment on the adequacy of the environmental analysis.
- 29-4 The comment is expressing a policy preference for more housing at Alameda Point than is currently planned in the proposed project. The comment is not a comment on the adequacy of the environmental analysis. An “adequate island-wide and regional transportation infrastructure to replace single occupancy vehicles” is not part of the project description and was therefore not analyzed in the Draft EIR. The recently released Final EIR prepared by MTC and ABAG for Plan Bay Area addresses the region’s plans for regional growth and regional transportation improvements to lessen but not replace the region’s reliance on the single occupancy vehicle.
- 29-5 The comment is expressing a preference for a particular type of housing. The comment is not a comment on the adequacy of the environmental analysis.
- 29-6 Comment noted.
- 29-7 The comment is expressing a preference for a particular alternative with more housing than was evaluated in the draft EIR. The comment is not a comment on the adequacy of the environmental analysis. The Multifamily Alternative and the High Density Alternative, like the proposed project, would be required to implement Mitigation Measure 4.C-2a on page 4.C-37 of the Draft EIR, which requires that a TDM program be developed and monitored specifically to reduce vehicular trips to and from Alameda Point.
- 29-8 The comment is noted. The comment is not a comment on the adequacy of the environmental analysis.
- 29-9 Comment noted.

- 29-10 Comment noted. As described on page 5-6 of the Draft EIR, from a regional environmental perspective, the High Density Alternative would perform better than the proposed project when considering the regional environmental issues of global climate change and regional greenhouse gas emissions. By allowing more development at Alameda Point and within the inner Bay Area, this alternative would perform better when considering project objectives related to climate change and greenhouse gas emissions. From a local perspective, however, the increased traffic from this alternative would cause increased local traffic and associated air quality and noise impacts, but from a regional and global perspective these local impacts would be off-set by a corresponding decrease in regional vehicular miles traveled (from shorter commutes) and the associated reductions in air quality and noise impacts associated with regional traffic. City of Alameda and CEQA thresholds in Appendix G, require an emphasis on environmental impacts in the vicinity of the proposed project.
- 29-11 Comment noted.
- 29-12 As stated on page 4.F-23 of the Draft EIR, in the analysis of Air Quality and Greenhouse Gases, the state's green building standards (adopted by the City as the Alameda Green Building Standards Code) contain standards for planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality, and these standards would apply to development at Alameda Point. The standards are revised every three years, and new provisions will take effect in January 2014. Among these are non-residential provisions applying stormwater pollution prevention best management practices and water efficiency requirements to building additions, not just new buildings; updated bicycle parking requirements for additions and alternations; and new requirements to reduce waste from construction demolition. For residential construction, new and updated provisions include application of green building requirements to building additions and alterations; revised energy efficiency requirements; new water conservation requirements; and a new provision requiring reduced generation of construction and demolition waste. Given recent trends, it can be anticipated that such building code provisions will continue to become more stringent with the passage of time, meaning that construction that begins at Alameda Point several years from now will likely be required to meet even higher standards.
- 29-13 The purpose of the draft EIR is to evaluate the environmental impacts of the proposed project. Whether the proposed project meets community objectives or the "highest and best sustainability practices available worldwide" is a policy evaluation that is appropriate for the public hearings on the proposed project, but it not required to be included in the Draft EIR by CEQA.
- 29-14 Comment noted.
- 29-15 Comment noted.

- 29-16 The role of the Draft EIR is to evaluate the environmental impacts of the proposed project. As described in Chapter 3, *Project Description*, individual decisions by the Planning Board and City Council over the 20 to 30 year build out of Alameda Point will determine many of the specific requirements, technologies, and improvements needed.
- 29-17 Please see response to Comment 29-4. The Draft EIR recommended a series of transportation improvements consistent with City of Alameda General Plan policy. The Final EIR is not required to and cannot “include plans for a robust transit and alternatives-based transportation system and address the funding of adequate alternatives (bus rapid transit, a second transbay BART Tube under Alameda). . . .” The City will continue to work with regional transit providers (WETA, BART, AC Transit) to explore regional improvements to improve transit access to Alameda Point, the City of Alameda and the region as a whole, but it is not the job of the Alameda Point Final EIR to develop these plans nor is it appropriate for the City of Alameda to unilaterally approve any such improvements without the cooperation and support of the regional transit agencies.
- 29-18 Higher density housing typically generates fewer automobile trips *per unit* than single family housing. However, if a project with multifamily housing has more units than a project with single-family housing, the multi-family project may in fact generate more automobile trips than the single-family project. The trip generation estimates provided in the Draft EIR were generated using common transportation forecasting technologies and methodologies typically used by regional transportation experts.
- 29-19 Pursuant to CEQA *Guidelines* §15130(b)(1)(A), a reasonable analysis of the cumulative impacts should include “a list of past, present, and *probable* future projects producing related or cumulative impacts” (emphases added). Non-qualitative analysis, such as the biological analysis included in this EIR analyzes the reasonably foreseeable impacts of the proposed project, which has a buildout period of 20 to 30 years, and cumulative growth in the region based on current projects; hence, the CEQA analysis focuses on projects and plans that are reasonably foreseeable. Attempting to predict the future past this reasonably foreseeable time period would be speculative.
- 29-20 The conveyance of the property from the Navy to the City was a separate action that has already occurred and is not part of the proposed project. The suggestion to renegotiate this transaction is noted.
- 29-21 The Draft EIR used thresholds of significance established by the City of Alameda for the purpose of CEQA. The City agrees that the comment raises a number of interesting policy tradeoffs and considerations for public discussion, but these questions are not required to be answered by the Draft EIR to ensure an adequate environmental analysis. Please see response to Comment 29-19.
- 29-22 Please see response to Comment 29-21. The transportation impacts of the proposed project are described in Section 4.C, *Transportation and Circulation* and the greenhouse gases emissions of the proposed project are described in Section 4.F, *Air Quality and*

- Greenhouse Gases*, of the Draft EIR. Energy consumption related to transportation modes is not specifically presented, although as presented on page 4.F-51 of the Draft EIR, the net GHG emissions associated with the project would be below BAAQMD's "efficiency threshold" of 4.6 metric tons of CO<sub>2</sub>e per service population per year. This would represent a cumulatively less-than-significant GHG impact. Although not assumed for purposes of the above-described analysis, implementation of Mitigation Measures 4.F-2a, 4.F- 4, and 4.F-9b would further reduce GHG emissions associated with construction and operations of the project.
- 29-23 The specific data being requested is not necessary to make the necessary determinations regarding the project's impact on the environment because the determinations of significance are based upon pre-determined thresholds of significance. The analysis of the energy use and greenhouse gas emissions of the proposed project is presented in Section 4.F, *Air Quality and Greenhouse Gases*, of the Draft EIR. Chapter 5, *Alternatives*, of the Draft EIR, presents multiple alternatives to the proposed project. Beginning on page 5-20, the Draft EIR presents the greenhouse gas emissions for each of the alternatives, which is a function of energy consumption. Specifically, the Transit Oriented Alternative found that the net GHG emissions associated with this alternative would be below BAAQMD's "efficiency threshold" of 4.6 metric tons of CO<sub>2</sub>e per service population per year. This would represent a cumulatively less-than-significant cumulative GHG impact. Although this alternative would result in greater overall emissions of GHGs than the project, the emissions per increase in service population would be less than the project since the alternative includes substantially more residential population.
- 29-24 See response to Comment 29-23.
- 29-25 See response to Comment 29-23. Chapter 5, *Alternatives*, of the Draft EIR, found that transportation impacts were roughly the same across for all the alternatives, with the Less Density Alternative having fewer transportation impacts on local intersections, as stated on page 5-14 of the Draft EIR. Vehicle miles traveled is not a approved significance threshold in the City of Alameda (see page 4.C-17 of the Draft EIR).
- 29-26 As stated on page 4.B-2 of the Draft EIR, the City of Alameda currently has more employed residents than jobs. It is estimated that the City has approximately 26,970 jobs and 37,799 employed persons, which indicates that many of Alameda's employed residents commute to work outside of the City. The ratio of jobs to employed residents within the City of Alameda is 0.71. The Draft EIR further found that the project's addition of approximately 2,779 residents and 7,900 job opportunities (8,900 jobs proposed minus 1,000 existing jobs) would provide balance to the City's jobs/housing ratio by providing more job opportunities that would not require Alameda's employed residents to commute out of the City to work. As a result, implementation of the proposed project or an alternative with more jobs and less housing would improve the citywide jobs/housing balance. Please see response to Comment 29-19.

- 29-27 As discussed in Chapter 6 of the Draft EIR, page 6-3, the proposed project is consistent with SB 375 and the *Plan Bay Area*. As a designated Priority Development Area (PDA), the proposed project is part of the regional sustainability strategy to encourage infill development, both employment and housing, in the core of the Bay Area, rather than the outskirts. The *Plan Bay Area* is specifically designed to place housing near jobs to reduce vehicle miles travelled regionally.
- 29-28 As discussed in Chapter 6 of the Draft EIR, page 6-3, the proposed project is consistent with SB 375 and the *Plan Bay Area*. Please see response to Comment 29-27.
- 29-29 Please see responses to Comments 29-12, 29-13 and 29-21.
- 29-30 Chapter 5, *Alternatives*, of the Draft EIR, presents an analysis of alternatives to the proposed project, including a comparative environmental assessment, beginning on page 5-11 of the Draft EIR. This comparison of the significant environmental effects of the alternatives to the impacts of the proposed project is summarized in Table 5-7 of the Draft EIR. Please see responses to Comments 29-12, 29-13 and 29-21.

Eugenie Thomson P.E.

October 21, 2013

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

**Subject:** Comments to the Alameda Point Draft Environmental Impact Report

Dear Mr. Thomas:

I am dismayed that my request in my comments to the Notice to the Preparation (NOP), were largely ignored. My request was that the traffic impact analysis include an evaluation of much longer it will take residents to leave the island and secondly to provide the increase in daily traffic volumes in front of the residents' homes. These two main traffic concerns have been raised by many residents and could have been addressed in the DEIR.

30-1

In addition, I had pointed out that the earlier traffic analysis in the 2009 General Plan Amendment EIR and then the Traffic Election Report for the SunCal Measure B in September of 2009, both had incorrectly ignored the congestion at the west end of Alameda. And the Traffic Election Report had also stated that the SunCal plan with 5000 more homes would only result in minuscule increases in traffic volumes outbound in the AM peak hour at the Posey Tube. These same points were repeated in my letter to the City dated June 24<sup>th</sup>, 2013 regarding the Scoping for the Neptune Point Project for its cumulative analysis and in my scoping comments for this project NOP.

30-2

Rather than correcting the obvious errors illustrated before with the City traffic model and methodology, instead we receive another – an unintelligible very large techno-speak document - containing numerous critical flaws and omissions. The Draft Environmental Impact Report for the Alameda Point Project states the “unimaginable” traffic conclusion.

30-3

According to the DEIR the Alameda Point Project with 1425 new homes and approximately 9000 more jobs, will **increase** traffic into the Posey Tube by only **ONE car per hour** for the existing plus project condition and increase by **eight cars per hour** for the cumulative plus project condition, for the AM peak hour. That and **NO** traffic congestion in the west end of Alameda, are unrealistic conclusions in the DEIR.

(See the excel summary tables provided at the end of this letter and see Appendix G summary from this DEIR in <https://www.dropbox.com/sh/19tfzo5v68reev2/ESla1H-RA.1>)

30-4

October 21, 2013

The Alameda Point Project will dramatically affect traffic flow and quality of life on Alameda Island and Bay Farm and we deserve to judge this very large project based on clear, concise, accurate traffic information. 30-5

Because of my background and professional credentials, members of the Alameda community again have asked me to review and interpret the report. In doing so, I found it to be a long, complex, techno-speak document that took a significant amount of time to understand, despite my 35 years' training and experience in civil and transportation engineering including the Alameda tubes and immediate areas and having lived in Alameda since 1980. There simply is no way a layperson could fully comprehend the data and projections contained it, or judge their veracity. The lack of a summary and the techno speak document have mislead the public. 30-6

Specifically, the Traffic Impact Analysis in the DEIR concludes the project increase would only be 1 (one) additional vehicle per hour for outbound traffic into the Posey Tube during the AM peak hour if project were built today (see existing plus project as per Appendix G of the DEIR). And a mere 1 (one) vehicle per hour, due to the project at the all estuary crossings, for the cumulative plus project (year 2035) condition and traffic volumes dropping with the project at some of the island crossings. See below.

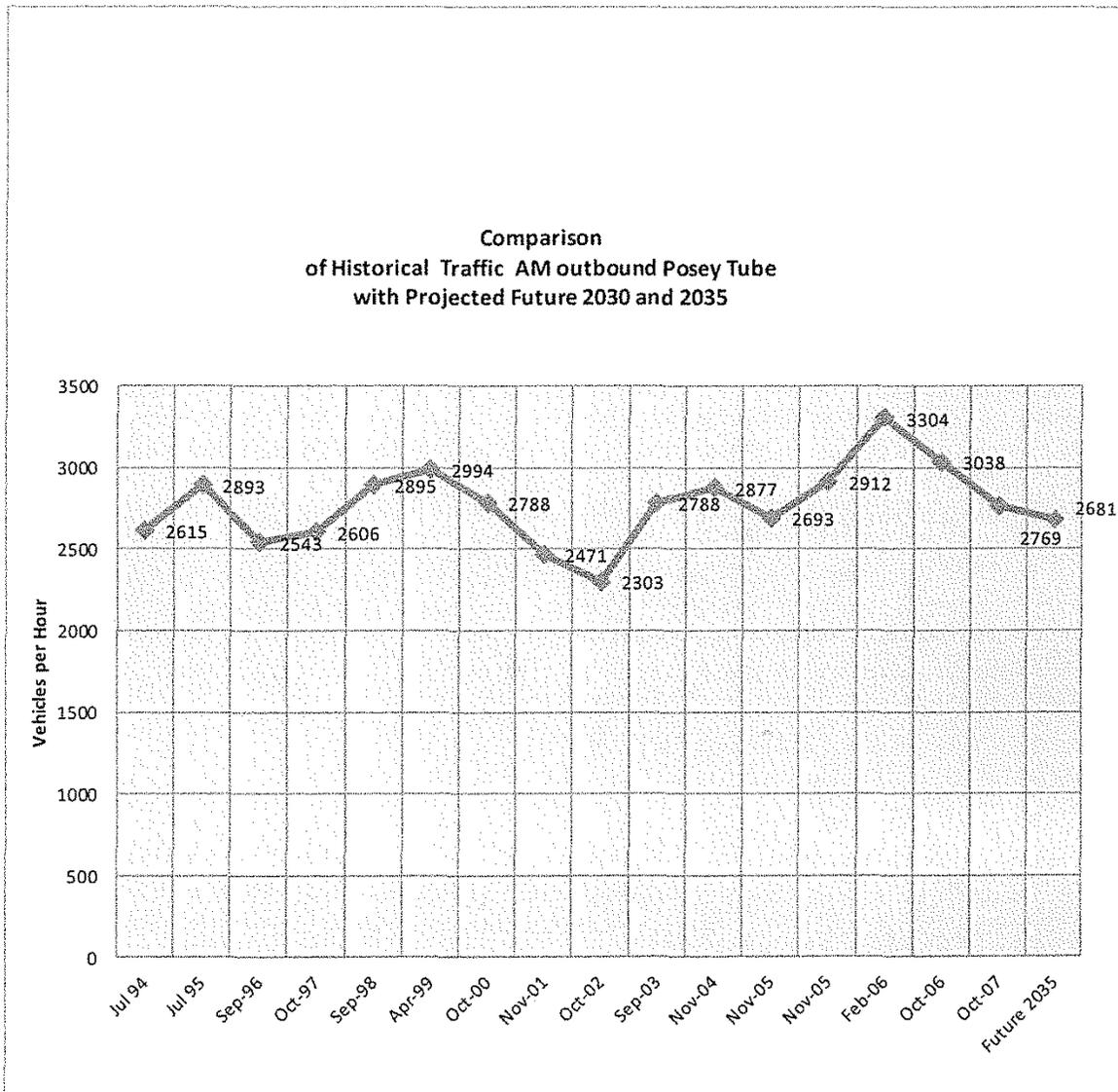
**Traffic Volume Summary at Island Gateways for Existing and Cumulative Peak Hour Conditions without and with Project**

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

30-7

October 21, 2013

Another example of a flaw is the outbound traffic into the Posey tube will be 2681 vehicles per hour in the AM Peak hour after the Alameda Point Project in the year 2035 which would be lower than existing recorded traffic counts at the Posey tube since the Base closure. That too is illogical and not explained in the DEIR.



30-8

Source: Historical volumes as per Capacity Management Memo to City Council, by Matt Naclerio, past Public Works Director, October 1<sup>st</sup>, 2008. Caltrans counts show similar historical counts. The 2035 Forecast was provided in the Appendix G of the Alameda Point DEIR for Cumulative (2035) plus project condition. (see the northbound approach at the 7<sup>th</sup> and Harrison Intersection, intersection number 38 Figure G- 8C in Appendix G of the DEIR.)

# Comment Letter 30

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It is possible the future forecasts are low because it is based upon existing count data base which could have been diminished due to an unusual number of vacancies the South Shore Shopping Center and other commercial properties as a result of the recession. But the DEIR does not include what existing count data was used, nor is the traffic model technical documentation included in the DEIR. Certainly, a drop in existing traffic in the future, with the Alameda Point Project, is highly unlikely, considering the already entitled and approved development plus project is included in this future 2035 forecast for the Posey Tube.

30-9

Approving or disapproving this Project is a decision that is critically important to the future of our city. If approved, this project will have a direct personal effect on every citizen, impacting the traffic they must navigate daily, that wind through our neighborhoods.

30-10

And I cannot stress it enough we Alamedans want to know how much more time it will take to leave or enter the island, and how many more cars will be passing by in front of our homes. Those questions have not been addressed; instead, we have been provided a techno-speak document that is overwhelming, complex and misleading, and our attempts to simplify and clarify the document are being quashed. It is difficult to understand why this is happening, in light of the fact that most of the work had already been performed and the data is so readily available.

30-11

It could have been presented very simply in the form of (a) a table showing increases in commute travel times, from today to after the Alameda Point plan, from different residential locations to the freeway; and (b) a figure showing the current daily traffic volumes and the increases generated by the Alameda Point plan. That is what the voters have asked for in every public workshop.

30-12

Traffic does not impact our roadways; it impacts our quality of life. It is well known that high traffic volumes on neighborhood streets break down the social fabric of a neighborhood, and our island is comprised primarily of neighborhood streets. The traffic impacts generated by the plan will increase the time it takes to leave and return to the island, leaving less time to spend with our families. These issues are vitally important to Alamedans. We deserve to know the answers to our questions. Why are the questions not being answered for the citizens of our community? Shouldn't traffic neighborhoods impacts be addressed? And corridor delay (like the travel time delay leaving the island) is an acceptable practise for traffic impact assessment and is appropriate because Alameda is an island.

30-13

I sincerely hope that, on reflection, you will consider a summary memorandum and correction of the key traffic facts. The attached comments present the key ommisions and further explain why I believe this Traffic Impact Section of the DEIR is misleading and needs correction. At a minimum the DEIR should be recirculated as the changes will results in major modifications to the impact analyses.

30-14

# Comment Letter 30

October 21, 2013

Sincerely,



Eugenie P. Thomson, P.E.  
Professional Civil and Traffic Engineer

ept/ept

cc: Mayor Gilmore and Councilmembers

October 21, 2013

**Detailed Comments**

The DEIR does NOT address the concerns of the majority of Alameda voters.

The DEIR's scope of the impact assessment omitted the impacts of the plan on Bay Farm Island residents leaving the island. For example, how much extra time would it take to leave the island in the morning? The two basic traffic questions asked by the public repeatedly at public hearings have not been addressed.

The DEIR does not include the impacts to the island neighborhoods.

If the Project is built:

- a) How much more travel time will be involved when leaving or entering Alameda Island?
- b) How many more cars will travel through our neighborhoods? (a criteria used to evaluate neighborhood impacts)

30-15

Suggestion:

a) Develop a table showing the travel times during the commute periods, today and in the future, with the Sun Cal plan and other background already entitled by City Council or approved. These data should encompass travel times to and from several residential areas, such as the West End, middle of the island, East End and Bay Farm. (This should be fairly easy to accomplish by updating and expanding the effort done for the Traffic Election Report prepared for the Sun Cal measure.)

b) Put together a map showing daily volumes on major streets for today and for the future. <sup>1</sup>

c) Include the above results in a two- or three-page summary memorandum.

Sources of Major Assumptions and other technical procedures were not provided.

The tables and assumptions in the report provided could not be checked or tracked. For example, no documentation was provided to substantiate the vehicle trip rate and to be able to compare this to the Trip Generation Manual published by the Institute of Transportation Engineers (ITE). It appears lower trip rates than the Average ITE trip rates were employed in the analysis and which were further reduced for the project forecast volumes included in the cumulative analysis.

30-16

What is the source of this major assumption? The technical backup was not provided and should be explained. Clearly, these assumptions should be validated based on facts, yet the DEIR lacks accountability. One should be able to track how the final traffic forecasts were developed from the existing counts.

The documentation should be provided to make adequate and complete comments to the DEIR.

<sup>1</sup> This data exists, the model plots from Kittelson Associates (previously Dowling Associates who did the City Traffic Model and recent reports) should be available for the No Project alternative and would take less than a day to rerun, only a few input factors need to be updated for the Alameda Point project.

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The traffic forecasts associated with the project are small considering its size.

The project traffic was summarized for all the island gateways because no summary was provided in the DEIR. Had this been provided the public would have an understanding of the overall island traffic impacts. The four tables at the end of this section, are the AM and PM peak hour traffic forecasts used for the basis of the traffic impacts and conclude the following:

- In the AM peak hour, the Project adds only one car per hour to the Posey Tube in existing plus project condition and only 8 vph in the cumulative plus project condition. This minuscule project volume increases were not reflected to be diverted to the other crossings.
- The Incoming project traffic drops dramatically to a small amount of 144 vph in the cumulative condition into the Webster Tube and that results in grossly under estimating the inbound traffic impacts with the project.
- In the PM peak hour for the cumulative plus project conditions, the project volumes are 102 vph for the Posey Tube and 104 vph for the Webster Tube. These small project volumes in the PM peak hour analysis grossly reduces the actual traffic impacts at the west end of Alameda and Oakland.

30-17

No explanation of the above results nor a summary was not provided in the DEIR and this should be fully explained.

Table 2-2 the traffic impact summary table indicates NO traffic congestion at the west end of Alameda

The lack of congestion at the approaches to the Posey Tube is inconsistent with the diversion to the other crossings. Diversion will only occur if there is a significant travel time advantage. It is difficult to believe the DEIR's finding of no congestion today and none whatsoever in the future upon the roadways approaching the Posey tube.

As pointed out in my letter to the City June 24, 2013, I explained that the City Traffic Model in the Traffic Election Report for the SunCAI plan had indicated major gridlock in the west end but it was hidden in the report. The Alameda Point project DEIR once again omits what the Traffic Model has concluded. See my discussion below from my June 24<sup>th</sup>, 2013 letter to the City.

30-18

*"In January of 2013, in rereading the September 14, 2009 Traffic Election report for the SunCal Measure, I focused on its discussion of travel time. I discovered this report quietly documented that major delays in the morning peak, would be expected using the Posey Tube in the future with the Land Use assumed in the 09GPA EIR. (Note: this report used the 09GPA EIR as the base condition upon which the SunCAI plan was evaluated). And this very significant characteristic of future traffic patterns that was **never** even touched on in the 2009 GPA EIR. (This EIR only discussed delays at individual intersections, all but one of which (8<sup>th</sup> and Central) are on the east end of the island would experience significant congestion after all the growth is built at the west.) Specifically, Table 20 (Travel Times – AM Peak Hour of the Traffic Election Report, see Exhibit G for copy) indicated the travel time from Alameda Point to I-880 would increase from 6.5 minutes (existing year) to 16.0 minutes in 2035 with the existing GPA (i.e., the housing and jobs assumptions in the 2009 GPA EIR).<sup>2</sup>*

<sup>2</sup> Existing General Plan 2035, Table 20, Travel Model Performance Travel Times AM Peak Hour, page 25. Copy of report included in Exhibit G in my June 24<sup>th</sup> letter to the City.

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This 9.5 minute-per-vehicle delay translates into increased queue lengths from 7<sup>th</sup> and Harrison back through the tube, and significantly lengthened queues on each of the roadways approaching the mouth of the tube (Webster, Constitution, Stargell and Mariner Square Drive). This situation can only be described as **gridlock, and it would affect many more trips than just the ones going into the Posey Tube.**

Furthermore, the 2009 GPA EIR concluded no impacts for the roads approaching the Alameda Tubes, even though primarily all future development would occur on the West End. I believe this surprisingly unrealistic conclusion was reached because:

- In the 2030 model runs, the analyst and city staff used a capacity for the Posey Tube of 2,900 vph (vehicles per hour)<sup>3</sup>, which is significantly lower than the capacity for a two-lane expressway.
- The analyst and city staff only used the 2030 model runs to identify differences in volumes, compared to calibrating runs of the model for existing conditions.
- The analyst and city staff ignored the information in the 2030 model run that indicated significant future delays to traffic using the Posey Tube in the AM
- Because they had trouble calibrating the model for Alameda local streets, the analyst and city staff decided to simply add the difference in model volumes (2007 and 2030 model volume difference) to the existing counts. Because the 2030 model calculations assumed significant congestion at the tubes, significant amounts of incremental traffic were routed away from the tubes to the bridges. (As a result, only small incremental volumes were added to already relatively low existing volumes at the tubes, yielding unrealistically low 2030 volumes to be used for analysis.)
- The analyst and city staff performed only intersection impact analysis. There was no documentation in the 2009 GPA EIR of how the tubes themselves were expected to operate, even though a major underlying hidden assumption was that there would be significant delays at the tubes.

This likely west-end traffic gridlock has never been clearly characterized as a problem in any city document of which I am aware.

To the contrary, the 2009 GPA EIR incorrectly comes to the opposite conclusion of no congestion on the roads outbound approaching the Posey Tube in the AM Peak.

And this happens once again with the Alameda Point DEIR.

At a minimum the City should review the traffic model used in the DEIR and fully explain why the delay at the west end concluded in the Traffic Model has been eliminated in this DEIR and other previous reports.

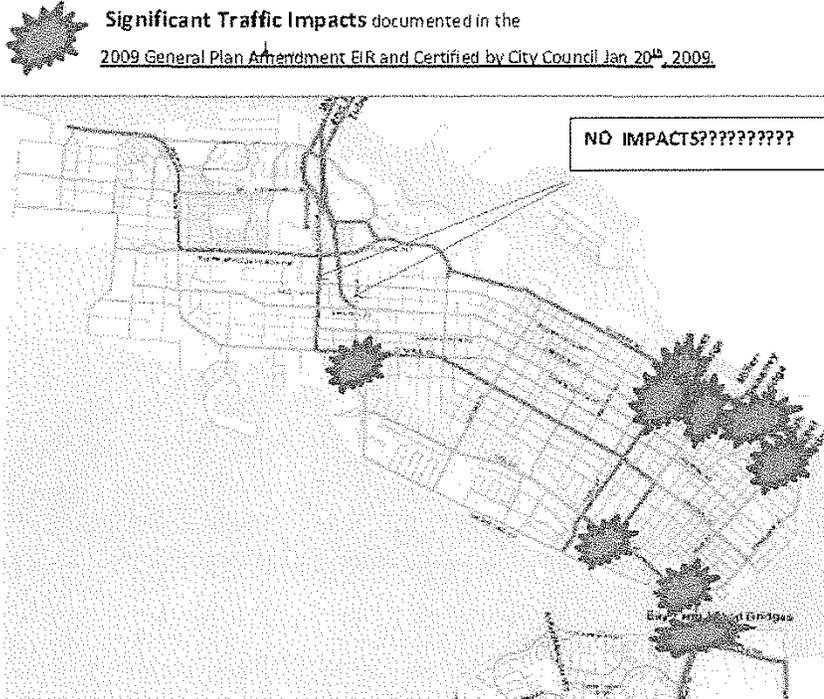
The following graphic included in my June 24<sup>th</sup>, 2013 letter, illustrate the no impacts from the 09 GPA DEIR

<sup>3</sup> Technical Studies for the EIR, 2007 citywide Traffic Model by Dowling Associates; Figure 22 Year 2030 City Network (See Exhibit C-6) which shows the codes defined in Figure 6, which includes a table: Model Roadway Network Facility Type Capacities and Speeds.

30-18  
cont.

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repeated again this DEIR for Alameda Point, i.e. no impacts at the west end of Alameda.



30-18  
cont.

The above highlighted Intersections were identified with major congestion with levels of service E or F for the Year 2030 during either the AM or PM peak hours in the 09GPA EIR: 8<sup>th</sup>/Central, Otis/Broadway, Otis/Fernside, Otis/Island, Fernside/High, Fernside/Tilden Way, Tilden Way/Broadway, Clement/Park and Blanding/Park. Source: Table 4.2-3 09GPA DEIR.

The city adopted a Statement of Economic Overriding Considerations on Jan 20th, 2009 because there were no improvements to mitigate these major impacts at the east end of the island. What was not considered was how much additional time for example it would take to leave the island and Bay Farm.

The lack of congestion analysis ignored data that the traffic analysts had in their files regarding expected major increases in delay expected at the approaches to the tubes (as evidenced by the subsequent Traffic Election Report). This west end delay should be the predominant traffic impact in the future, as to be expected before more significant problems develop in the east end.

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The existing delays at the intersections stated in the DEIR are significantly lower than what Alamedans have stated to occur.

It is difficult to believe there is only a 30 second delay at Doolittle and Island Drive when leaving Bay Farm Island. The Bay Farm residents have stated many times their congestion is very bad and any more development will be too much.

Similarly the delays at other intersection like at the 6<sup>th</sup> and Jackson for the southbound right turn movement today in the morning are shown to be only 1.3 seconds (LOS A) in Appendix G (Synchro output for existing no project AM peak)

Is it possible that the intersection operations analyses results were not validated via field surveys ?

The intersection impact analysis omits the operations effects due to roadway downstream constraints. As a result the operations do not accurately reflect the delay.

For example, the freeway weave and ramp merge at the 6th Street northbound on ramp to I 880 & I 980, today causes backup all the way to the 7th and Harrison intersection, but the intersection analysis states the southbound right turn movement has only 1.3 seconds of delay (Level of Service A) for the future plus project conditions. ( Appendix G, Sychro Analysis, 2035 AM with Project, ). This is illogical considering the problems at the I880 ramp and weave, today. This constraint currently overwhelms the current roadway system and will only become rapidly more significant with any growth in traffic.

Similarly other intersections like Blanding and Park Streets are affected by downstream roadway constraints which result in back up through the intersection.

All intersections should be re-evaluated if downstream constraints affect the intersections' operations. (i.e. without consideration of downstream constraints, the existing intersection analysis is not an engineering analysis, it is only a data processing analysis).

The Broadway Jackson Interchange or other major mitigation was not included in the DEIR.

The Broadway Jackson Interchange or other freeway type of mitigation was not included likely due to the lack of funding at this time. And this interchange project or other form of Chinatown mitigation introduces major changes in travel patterns in Chinatown and to/ from the Alameda Point Project in and around Chinatown. It is reasonably foreseeable that the new County Transportation Sales Tax Measure will pass in the next year because this Measure in the last election failed with such a small percentage. And reasonable foreseeable events should be considered in an EIR, therefore an assessment of the traffic impacts with and without Broadway Jackson Interchange or other mitigations acceptable to Chinatown should be done.

Seismic Analysis is suggested

Seismic Analysis for the Posey and Webster Tube was not included in the DEIR. According to Caltrans letters dated from Caltrans to the City of Alameda in 2002, the tubes have a seismic rating of minimum performance level. A professional engineering report " Retrofit Strategy Report" for the Alameda Tubes dated September 30, 1996

30-19

30-20

30-21

30-22

October 21, 2013

prepared by Parsons Brinckerhoff Quade and Douglas Inc. and approved and adopted by Caltrans states that minimum performance levels after an earthquake in Table 10-2 would result in:

**"Delays to motorists due to tube closure requiring long term (more than a year) diversion of traffic to the bridge crossings between Oakland and Alameda"**

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

30-22  
cont.

Furthermore this Seismic Strategy Report mentioned the steel re -enforcement was corroded and the field test indicated this condition to be a problem. The report is unclear if this was planned to be fixed.

Per the report the primary damage to the tubes (retrofitted to minimum performance levels) is expected to be cracks and significant leakage; the tubes may be flooded within a day but that no loss of life would be expected. The report also indicates that repairs may not be possible, thus requiring replacement of the tube(s).

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

Induced Growth Analysis was not included.

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

30-23

The report preparers are listed as licensed Professional Engineers while they do not have licenses.

Mr. Jack Hutchinson of ESA is not licensed as a Professional Engineer in California stated in Chapter 7. Neither is Robert Haun, Acting Public Works Director a licensed Professional Engineer. Please make these corrections.

30-24

October 21, 2013

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

Vehicles Per Hour

**AM Peak Hour (vph)**

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

**AM Peak Hour**

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

October 21, 2013

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

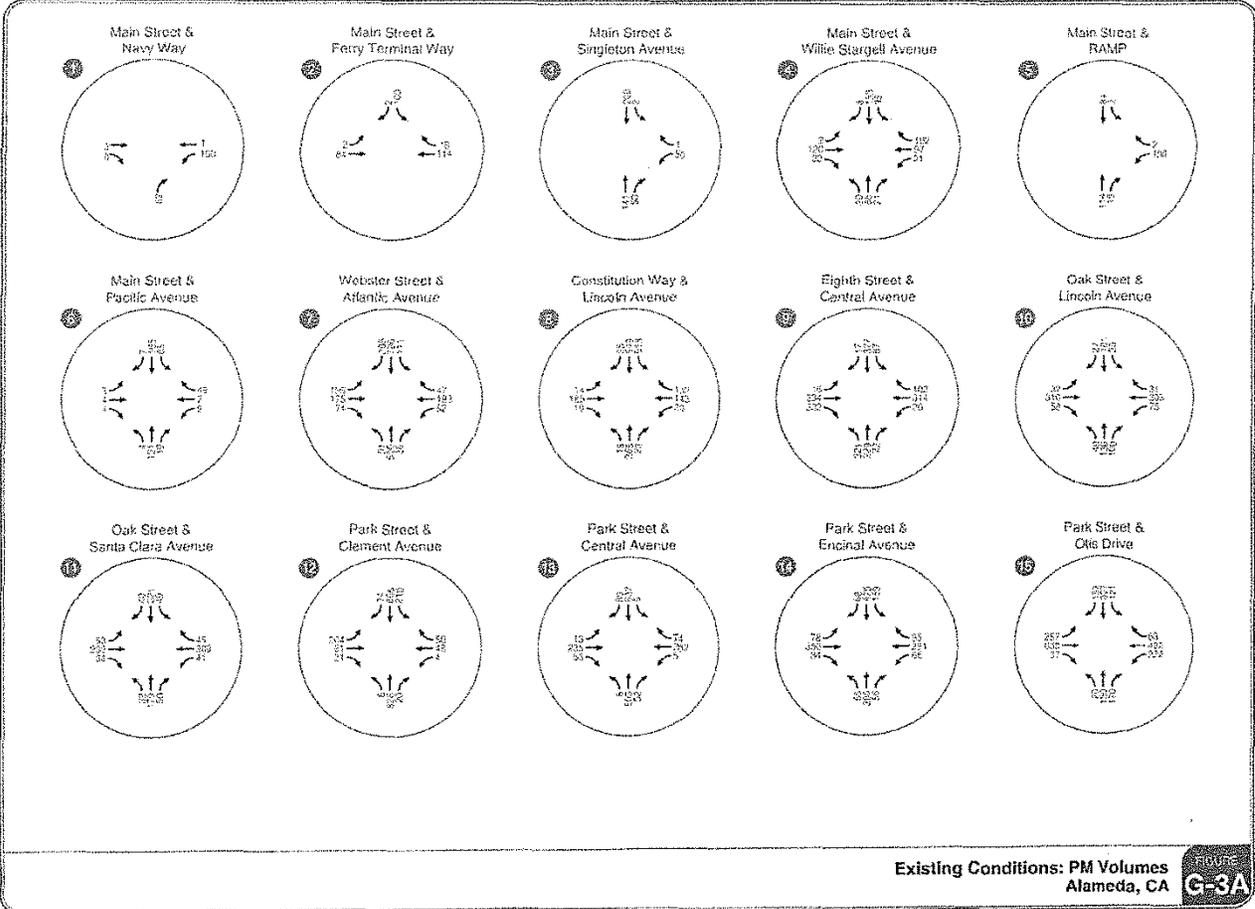
PM Peak Hour							
Island Gateway	Direction	Exist No Project	Exist with Project	Project Volume	2035 No Project	2035 with Project/Ala Point	Project Volume
<b>Posey Tube</b>	Outbound	2125	2737	<b>612</b>	3331	3433	<b>102</b>
<b>Park St Bridge</b>	Outbound	1437	1487	<b>50</b>	2228	2307	<b>79</b>
<b>Miller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

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

Exist. PM Peak Hr. Traffic Summary /ra Al. Pt. DEIR App. G  
 by G. Thomas KE.  
 10/12/2013

Alameda Point EIR - Administrative Draft

August 2013



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Existing Conditions: PM Volumes  
 Alameda, CA

WIRE  
**G-3A**

**KITTELSON & ASSOCIATES, INC.**  
 TRANSPORTATION ENGINEERING / PLANNING

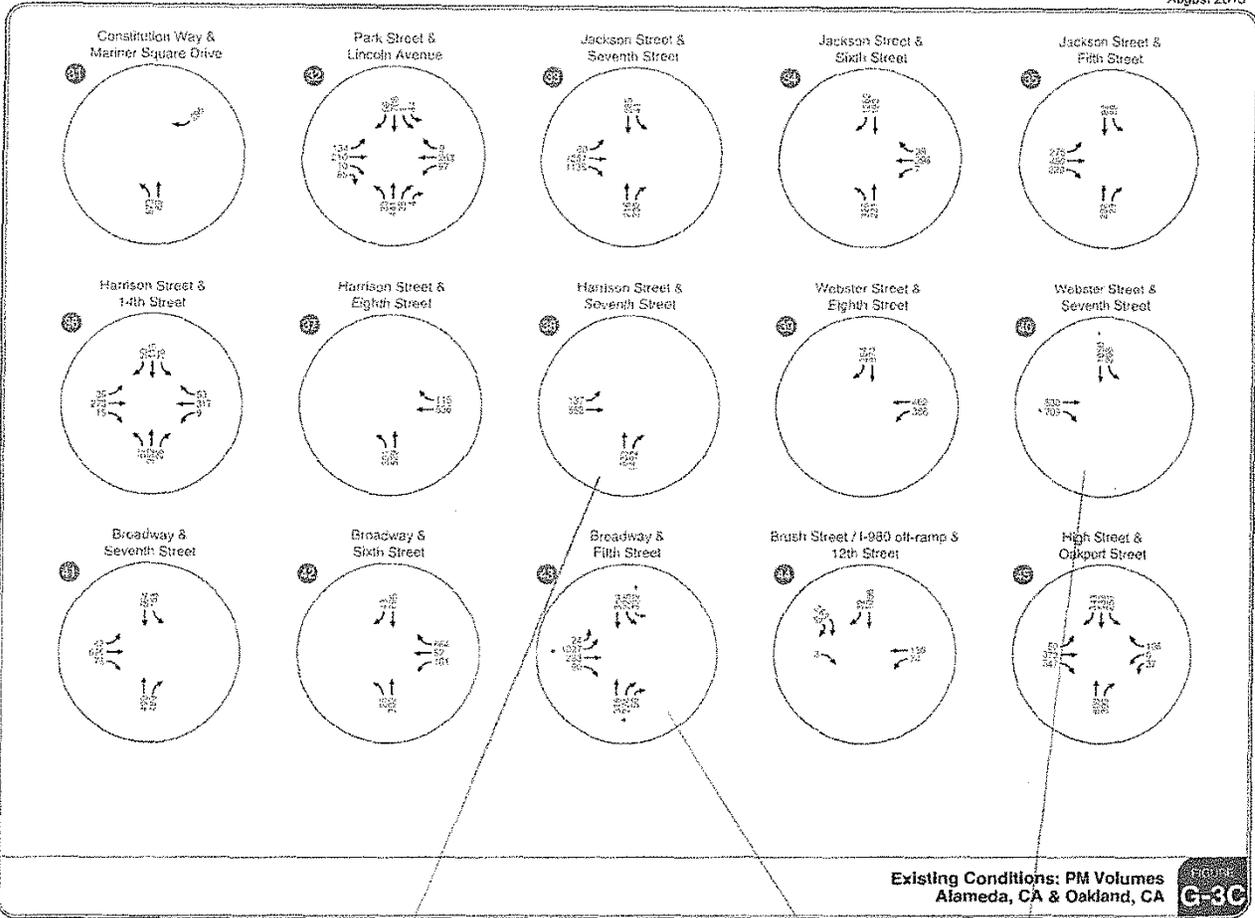
EXISTING PM PEAK HOUR

<u>ISLAND GATEWAYS</u>	<u>INBOUND</u>	<u>OUTBOUND</u>	<u>SOURCE (Figure #)</u>
Posey Tube		2125 vph	G-3C
Webster Tube	3392 vph		G-3C
Park St. Bridge	1451 vph	1437 vph	G-3B
Fruitvale Av Bridge	1103 vph	641 vph	G-3B
High St. Bridge	715 vph	550 vph	G-3B
Bay Farm Island Bridge	1783 vph	1987 vph	G-3B
<b>TOTAL =</b>	<b>8444 vph</b>	<b>6740 vph</b>	



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August 2013



Hydrolid 14818 (copy) fig 14-810\_FIGURE.dwg Aug 07 2013 9:29am j.konopinski Layout Tab: DOC

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TRANSPORTATION ENGINEERING / PLANNING

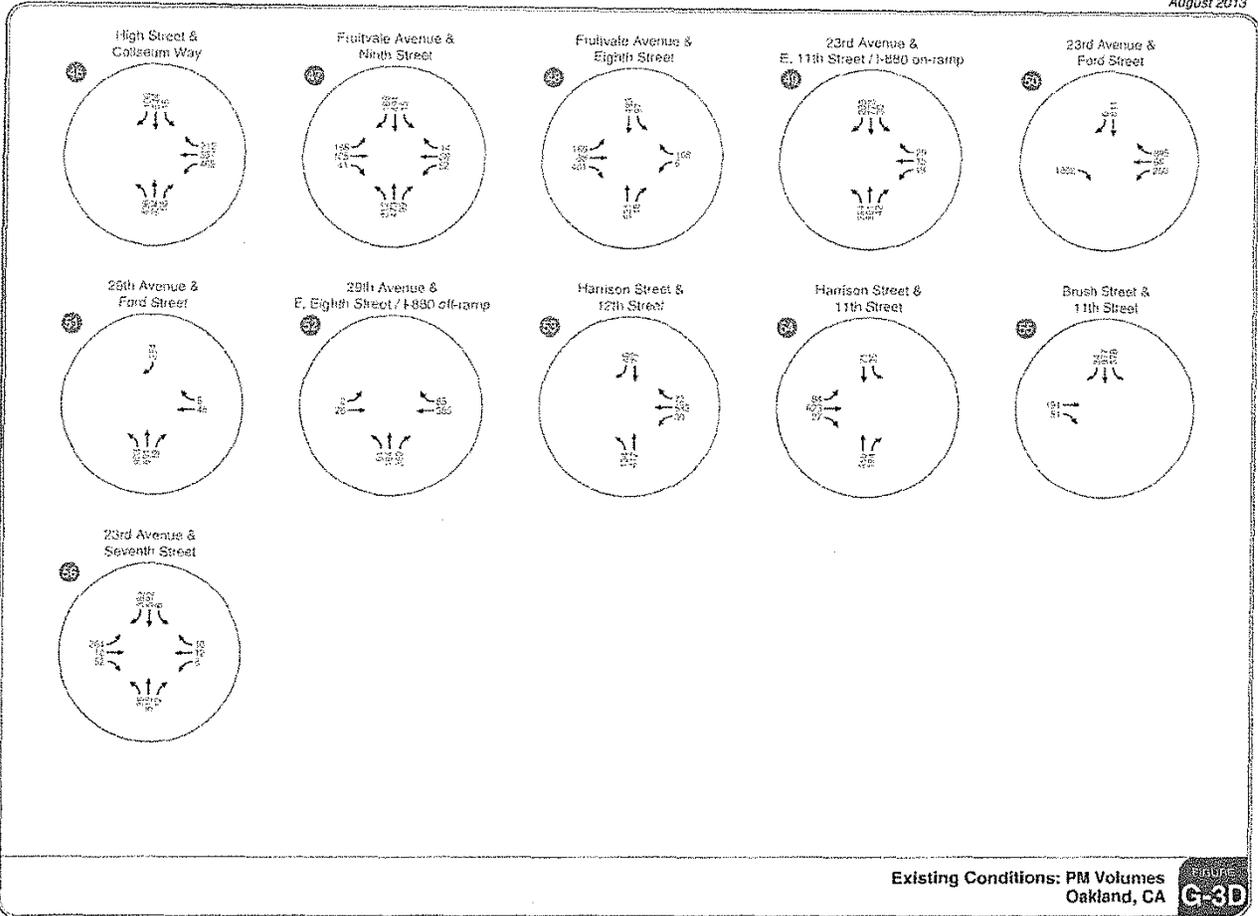
Posey Tube Outbound =  $633 + 1492 = 2125$  vph

Webster Tube Inbound =  
 $1027 + 274 + 332 + 709 + 1050$   
 $= 3392$  vph

Summary by E. Tranter 10/10/13

Alameda Point EIR - Administrative Draft

August 2013



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TRANSPORTATION ENGINEERING / PLANNING

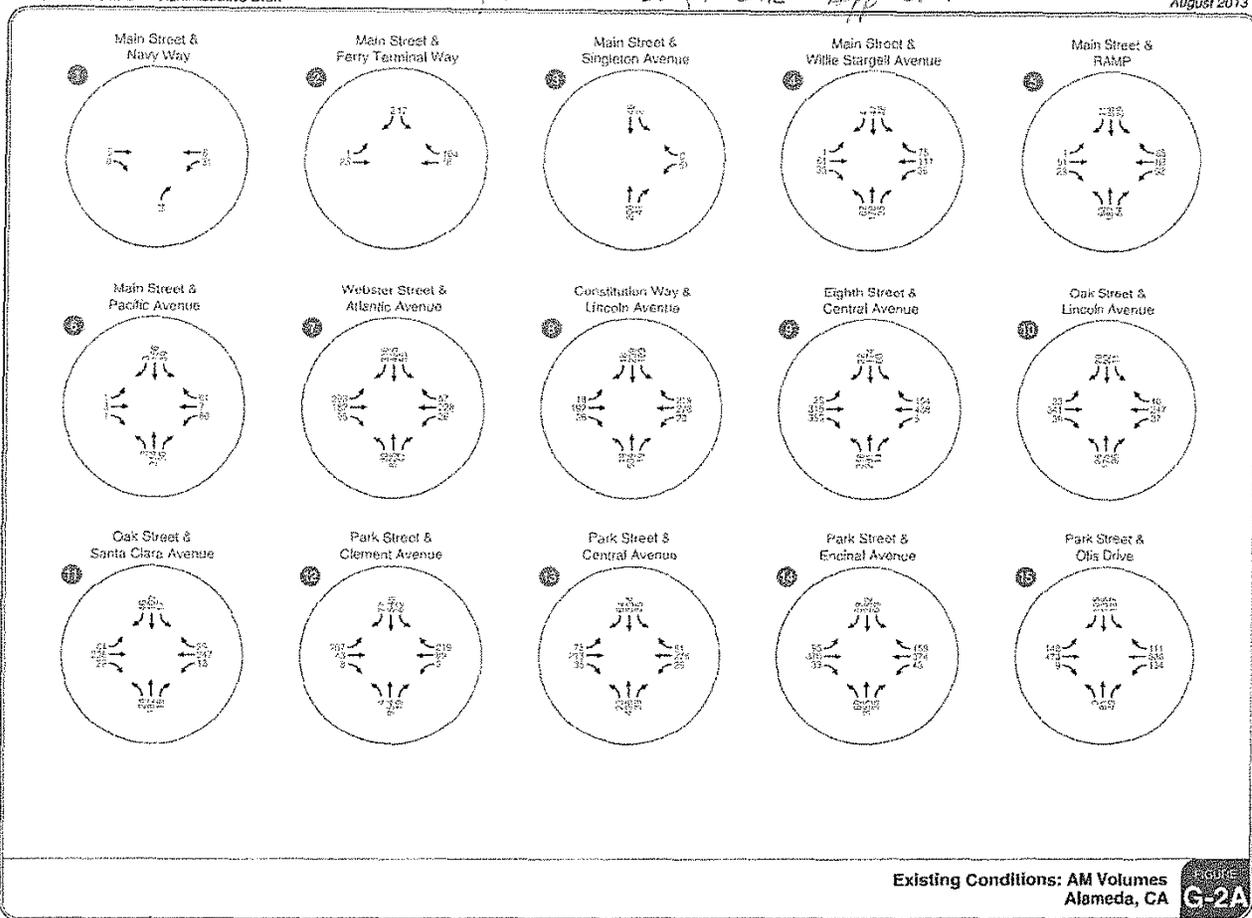
**G-3D**

Existing AM Peak Hr Traffic Summary of Ala Pt. DEIR  
 (Appendix G)  
 by E. Thomson P.E. 10/12/13

Alameda Point EIR - Administrative Draft

see G4 Website - Draft EIR App G.

August 2013



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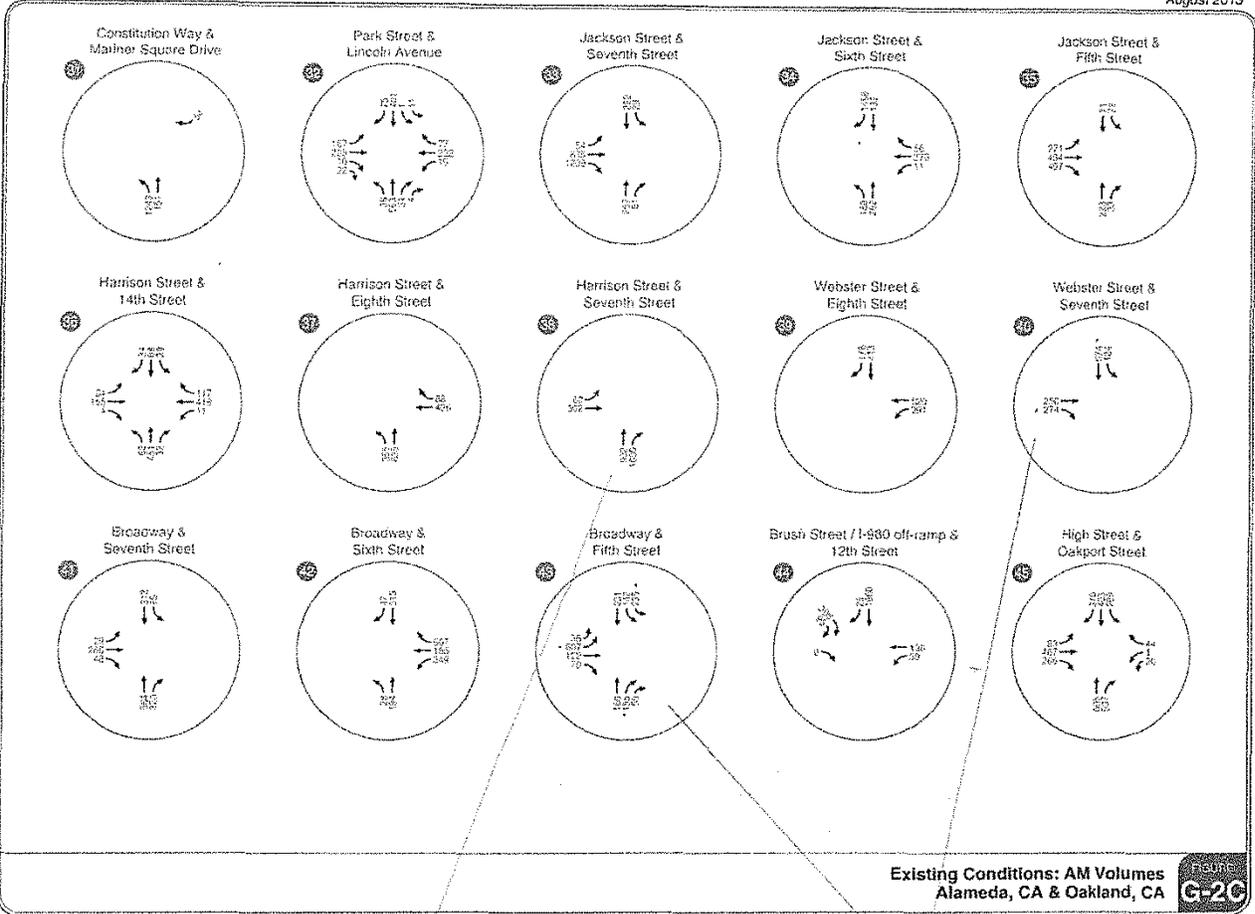
**KITTELSON & ASSOCIATES, INC.**  
 TRANSPORTATION ENGINEERING / PLANNING

EXISTING	AM	PEAK	HOVR	@ ISLAND GATEWAYS
		INBOUND	OUTBOUND	SOURCE
Island Gateways				FIGURE
Possey Tube			2588 vph	see G-2C
Webster Tube		1905 vph		
Park St. Bridge		864 vph	1937 vph	see G-2B
Fruitvale Bridge		777 vph	814 vph	see G-2B
High St. Bridge		656 vph	783 vph	see G-2B
Bay Farm Bridge		2292 vph	1738 vph	see G-2B
Total		6494 vph	7860 vph	



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August 2013



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Existing Conditions: AM Volumes  
 Alameda, CA & Oakland, CA



Brush Tube Outbound =  $902 + 1686 = 2588 \text{ vph}$

Webster Tube Inbound

=  $607 + 295 + 155 + 574 + 274 =$   
 =  $1905 \text{ vph}$

Summarized by E. Thomson P.E. 10/12



EXISTING AM PK HR TRAFFIC  
w/ PROJECT

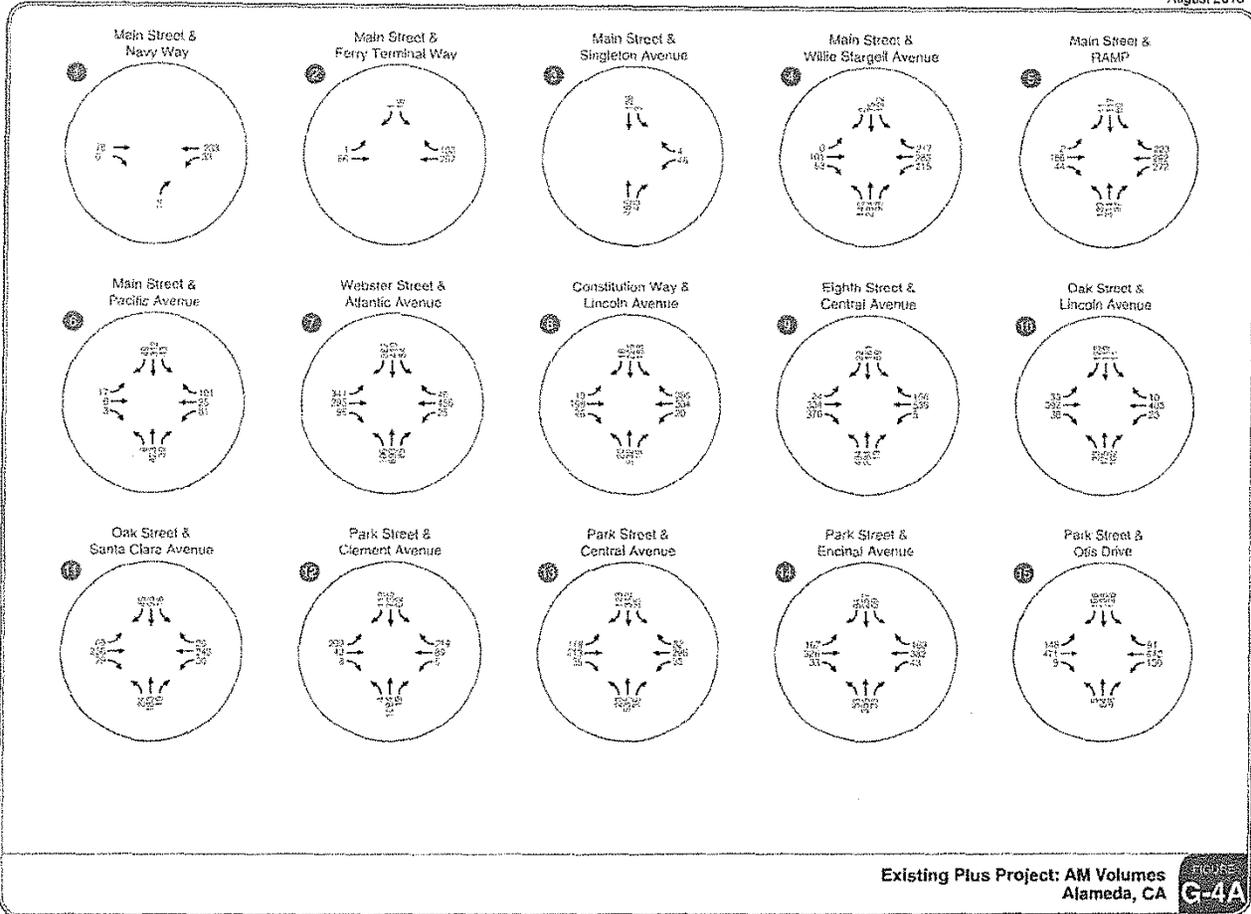
SUMMARY

From DEIR Appendix G

by E. Thomson P.E.  
10/12/13

Alameda Point EIR - Administrative Draft

August 2013



Existing Plus Project: AM Volumes  
Alameda, CA

G-4A

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TRANSPORTATION ENGINEERING / PLANNING

EXISTING AM PK HR PLUS PROJECT

@ ISLAND GATEWAYS

Island Gateways	INBOUND	OUTBOUND	SOURCE (FIG. #)
Posey Tube		2589 vph	G-4C
Webster Tube	2561 vph		G-4C
Park St. Bridge	1058 vph	2004 vph	G-4B
Fruitvale Ave Bridge	1075 vph	878 vph	G-4B
Hijl St Bridge	759 vph	802 vph	G-4B
Bay Farm Island Bridge	2442 vph	1725 vph	G-4B
T. I. I.	7895 vph	7998 vph	

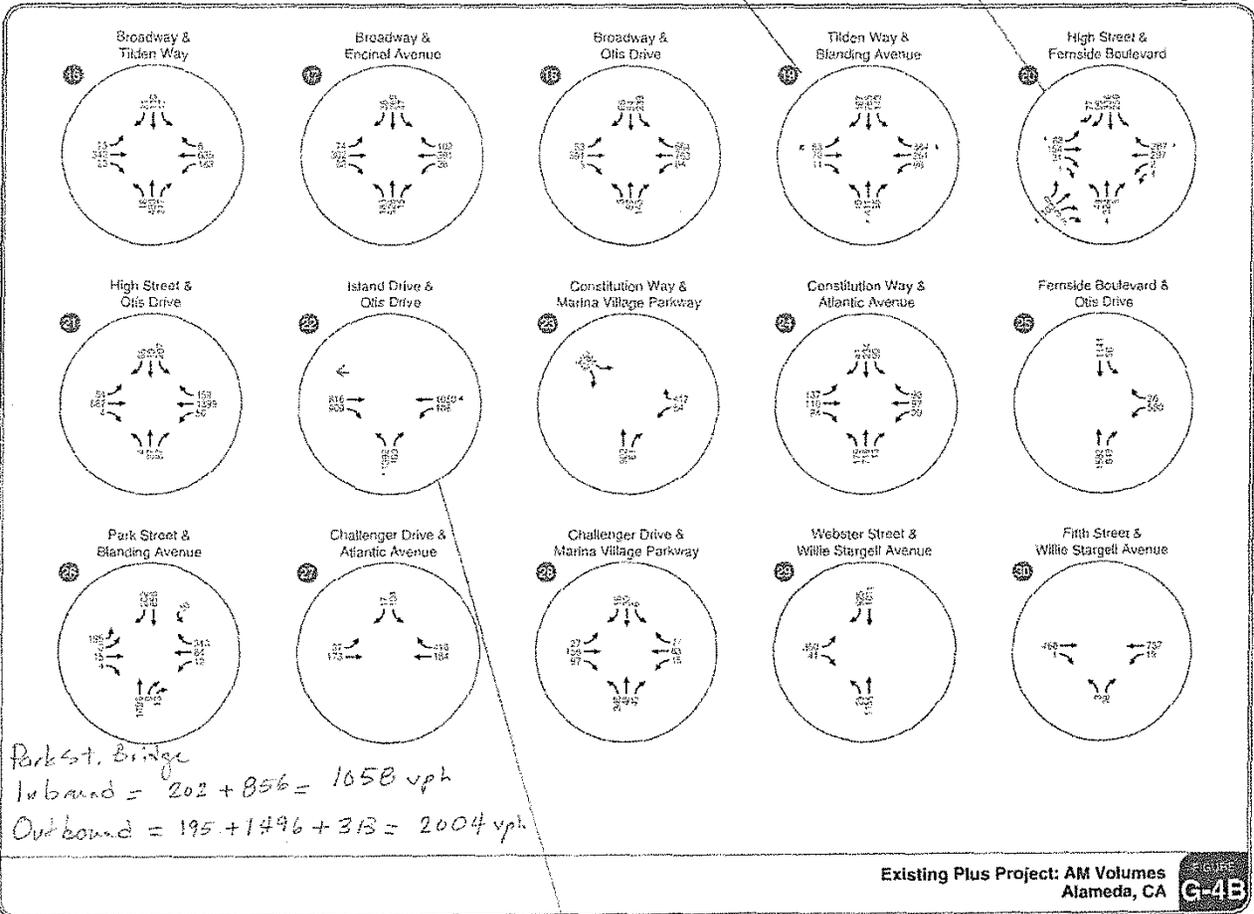
Miller Sweeney (Fruitvale) Bridge  
 Inbound = 167 + 765 + 143 = 1075 vph  
 Outbound = 83 + 411 + 384 = 878 vph

High St. Bridge  
 Inbound = 77 + 96 + 336 + 250 = 759 vph  
 Outbound = 88 + 103 + 324 + 207 = 802 vph

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August 2013

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Park St. Bridge  
 Inbound = 202 + 856 = 1058 vph  
 Outbound = 195 + 1496 + 313 = 2004 vph

Existing Plus Project: AM Volumes  
 Alameda, CA

G-4B

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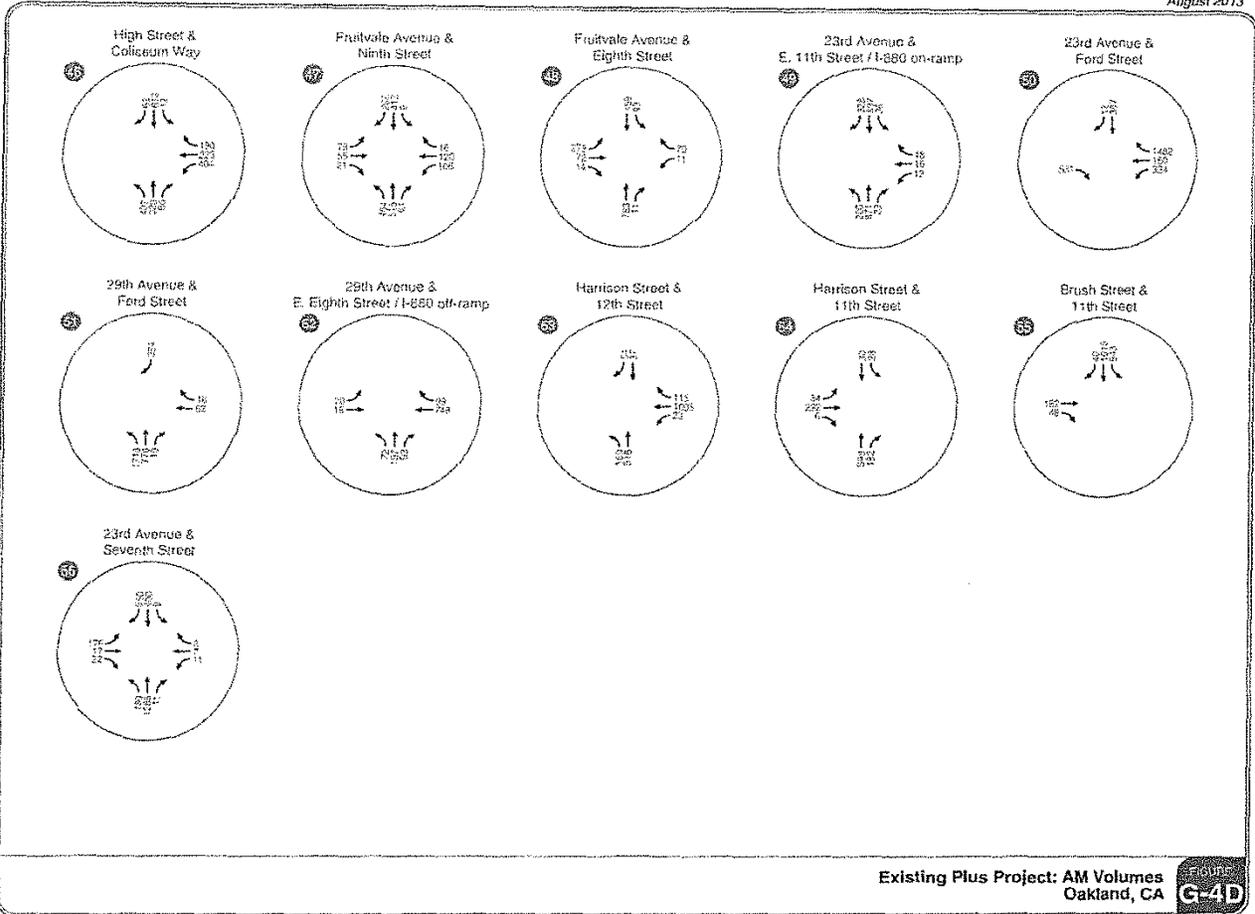
Bay Farm Bridge  
 Inbound = 1392 vph + 1050 = 2442 vph  
 Outbound = 816 + 909 = 1725 vph



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Highway 101 Project: I-880 / I-880 off-ramp - August 2013 - 02/20/13 - 02/20/13 - 02/20/13 - 02/20/13 - 02/20/13



Existing Plus Project: AM Volumes  
Oakland, CA **G-4D**

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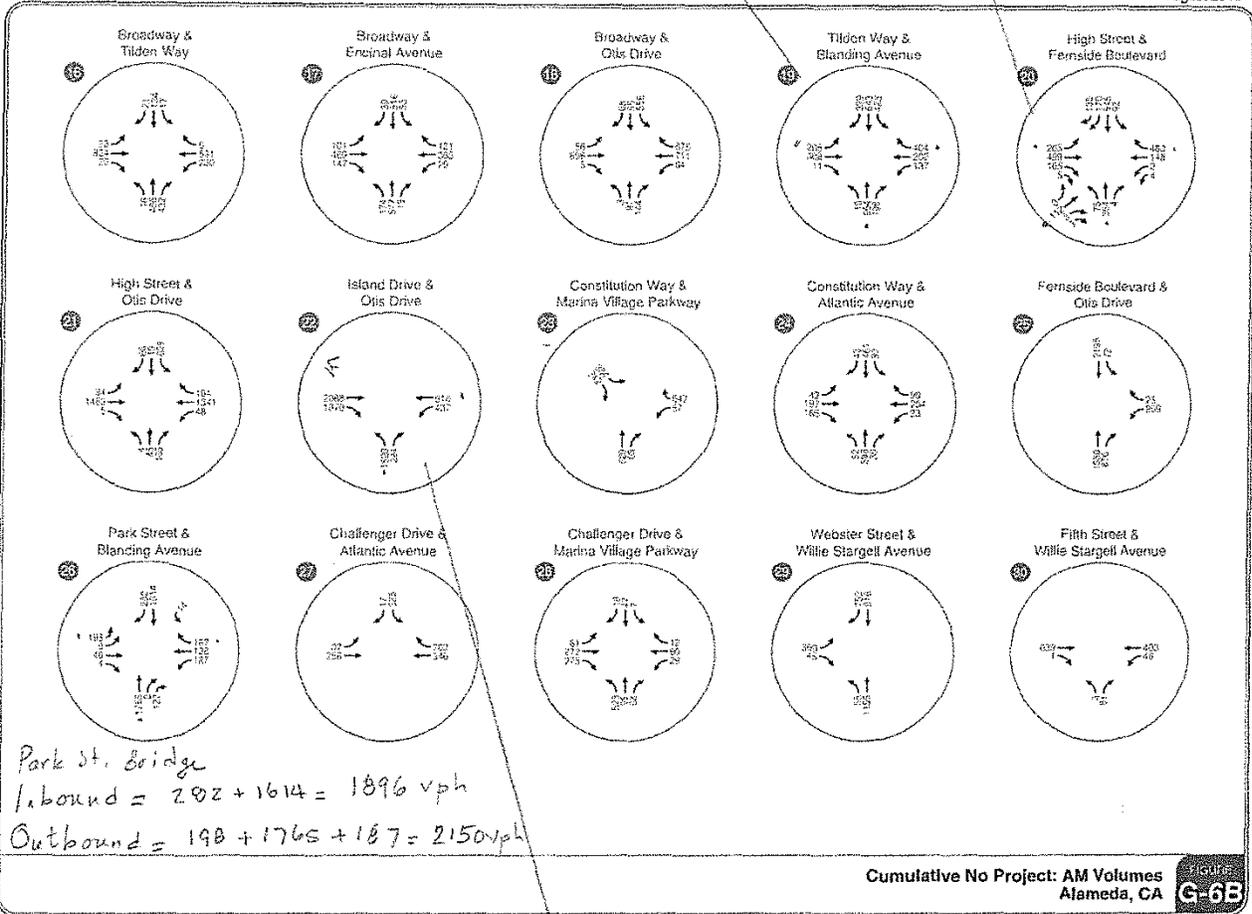
# Comment Letter 30

Miller Sweeney Bridge (Fruitvale)  
 Inbound =  $329 + 643 + 423 = 1395$  vph  
 Outbound =  $205 + 964 + 404 = 1573$  vph

High Street Bridge  
 Inbound =  $135 + 170 + 545 + 92 = 942$  vph  
 Outbound =  $263 + 112 + 354 + 403 = 1212$  vph

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Park St. Bridge  
 Inbound =  $202 + 1614 = 1816$  vph  
 Outbound =  $198 + 1765 + 187 = 2150$  vph

Bay Farm Bridge  
 Inbound =  $1520 + 916 = 2436$  vph  
 Outbound =  $2088 + 1070 = 3158$  vph

Cumulative No Project: AM Volumes  
 Alameda, CA

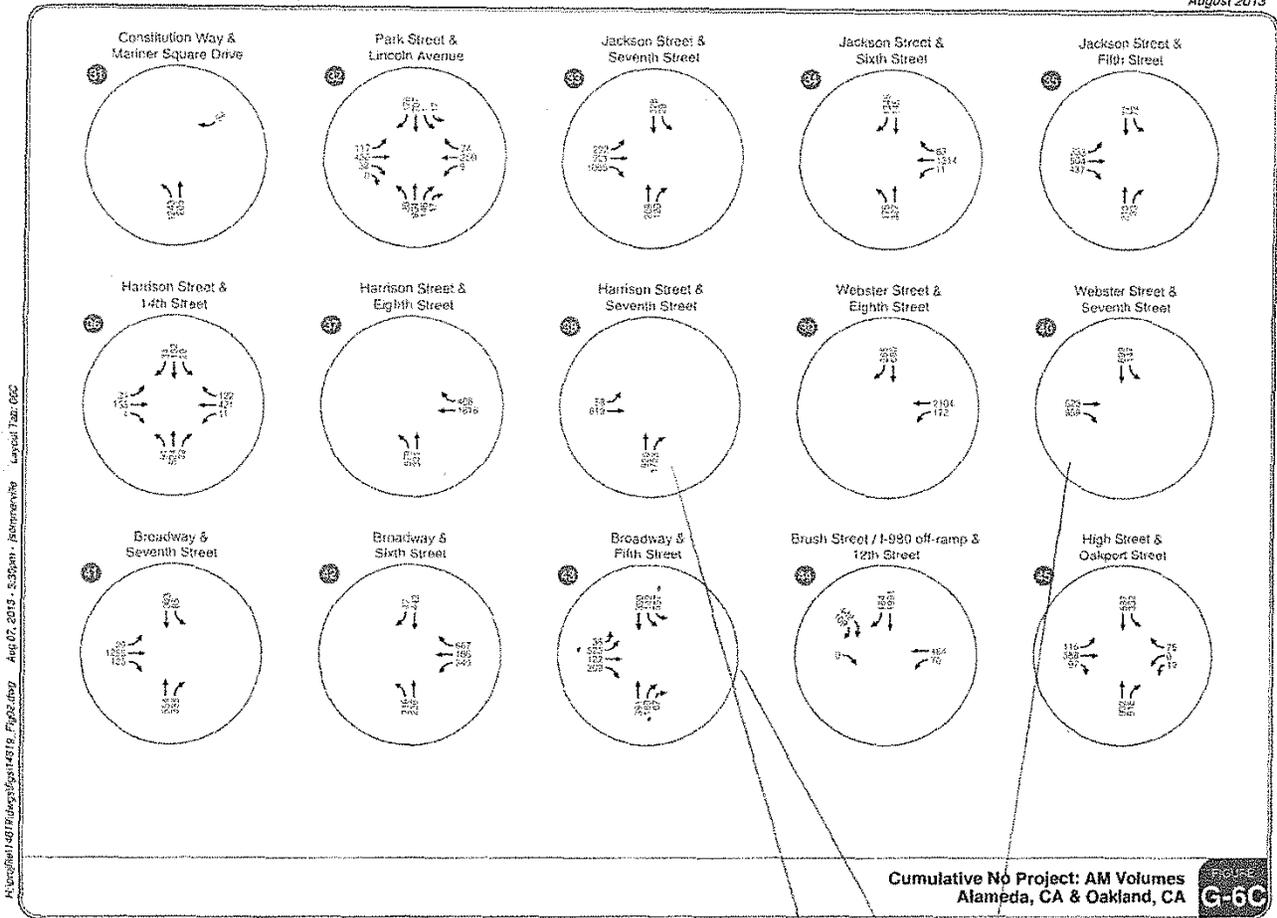
G-6B

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Summary by E. Thomson PE 10/12/13

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Posey Tube Outbound  
 $920 + 1753 = 2673$  vph

Webster St. Inbound  
 $525 + 557 + 189 + 959 + 699$   
 $= 2929$  vph

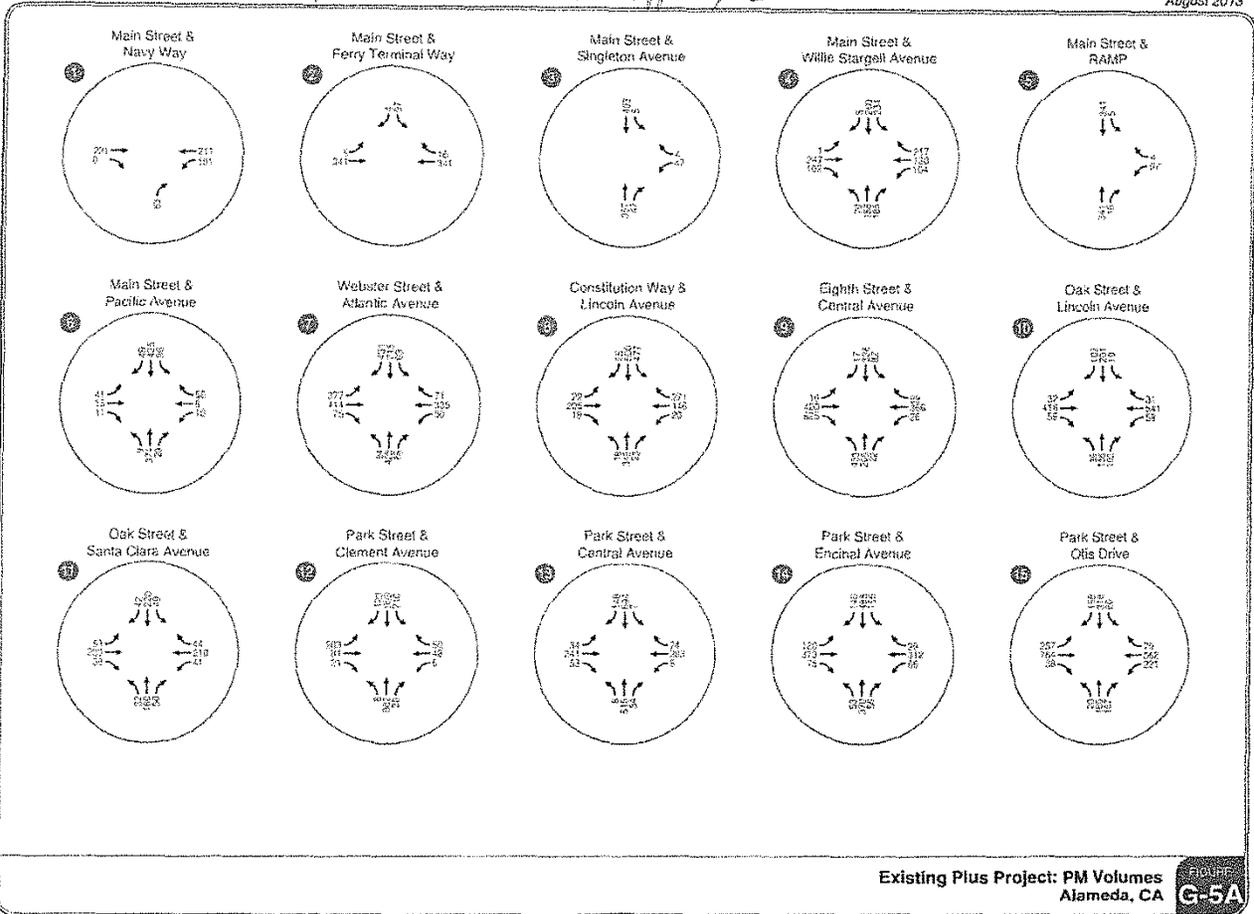
Summanbi E. Thomas P.E. 10/12/13



Existing PM PK Plus Project  
 Traffic Summary of Alameda Point DEIR  
 by E. Thomson 10/12/13

Alameda Point EIR - Administrative Draft - provided in Draft EIR Appendix G

August 2013



Existing Plus Project: PM Volumes Alameda, CA G-5A

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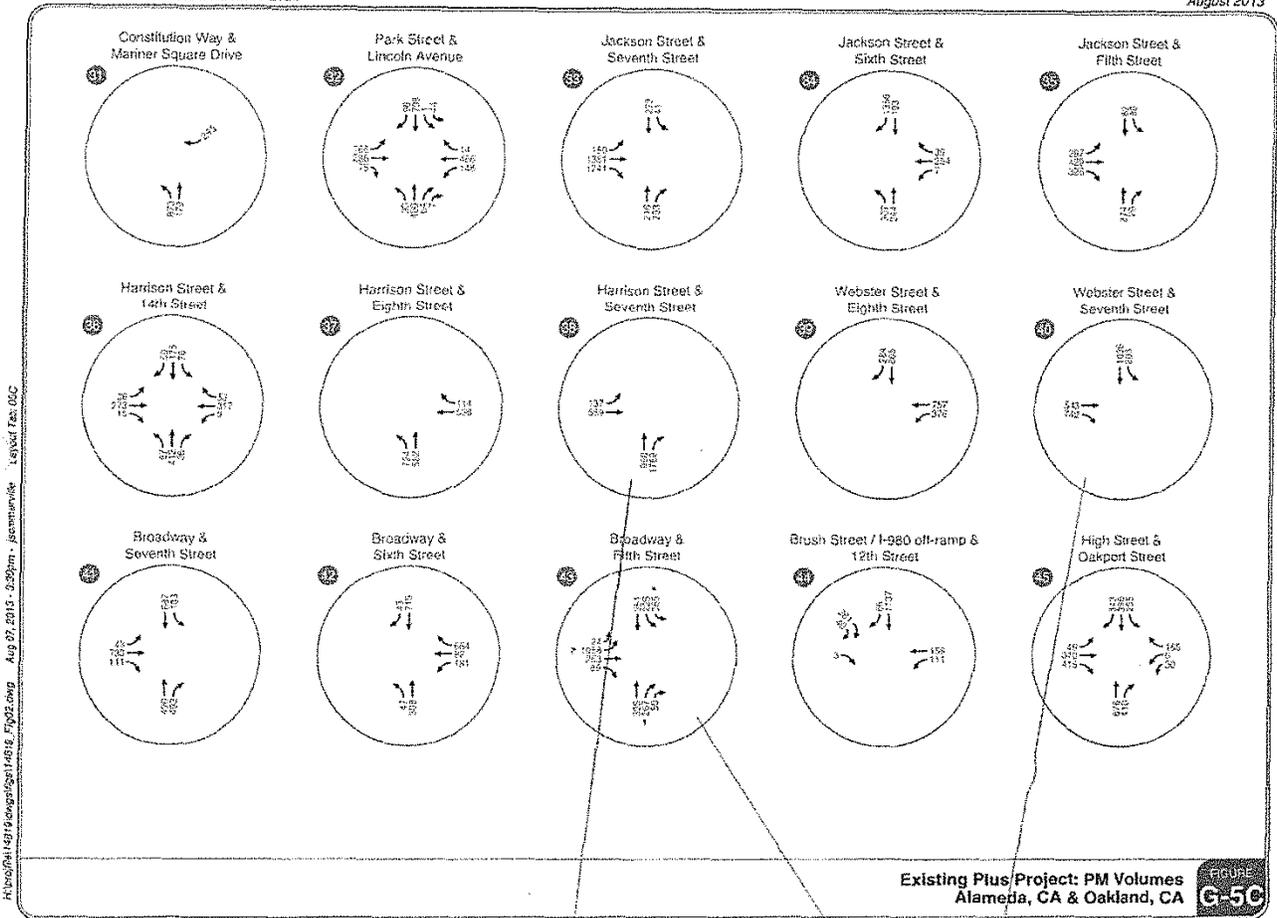
EXISTING PM PK UR PLUS PROJECT @ ISLAND GATEWAYS

ISLAND GATEWAYS	INBOUND	OUTBOUND	SOURCE (Fig #)
Possey Tube		2737 vph	G-5C
Webster Tube	3488 vph		G-5C
Park St. Bridge	1566 vph	1487 vph	G-5B
Fruitvale Ave Bridge	1228 vph	930 vph	G-5B
High St. Bridge	847 vph	686 vph	G-5B
Bay Farm Island Bridge	1887 vph	2128 vph	G-5B
<b>TOTAL</b>	<b>9016 vph</b>	<b>7968 vph</b>	



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Posey Tube Outbound  
 $= 968 + 1769 = 2737 \text{ vph}$

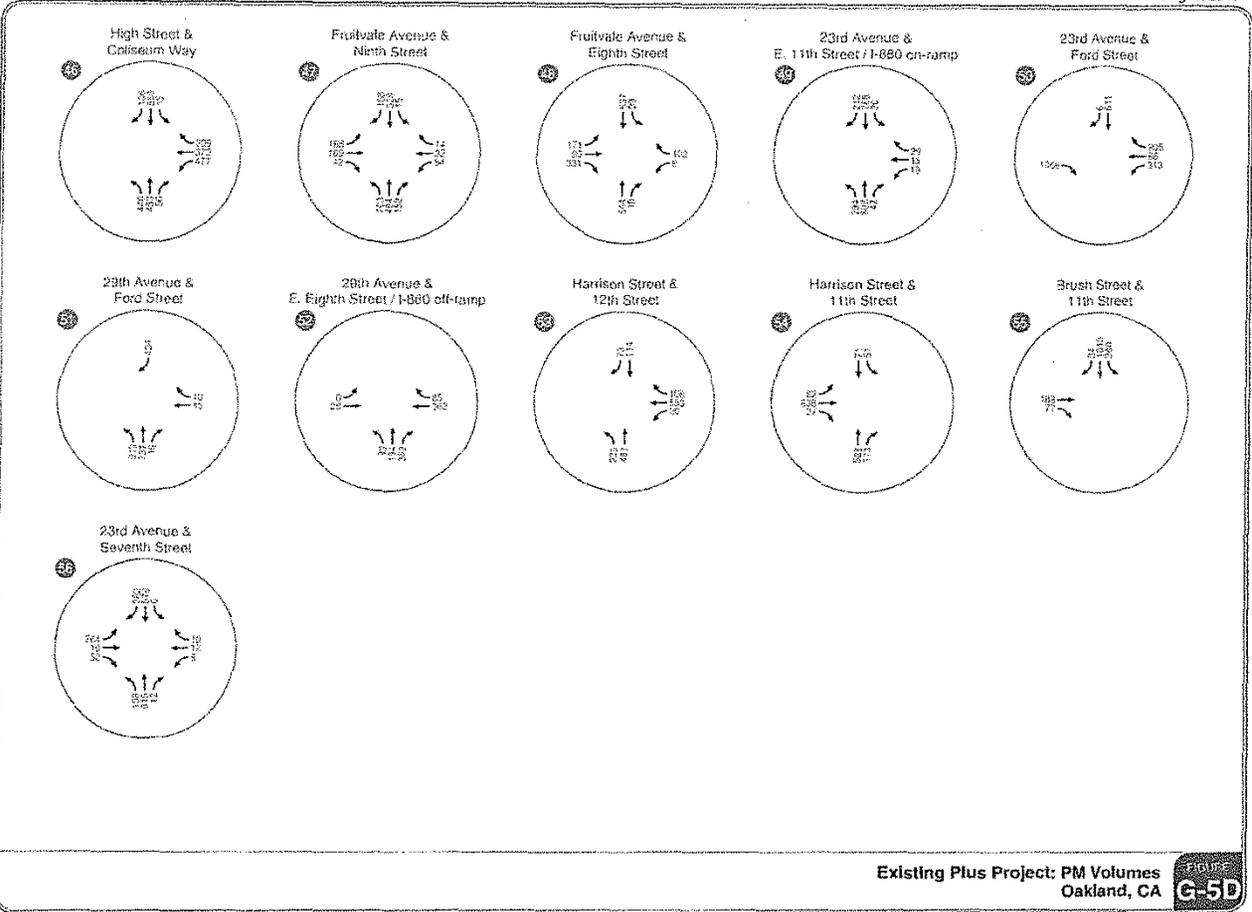
Webster Tube Inbound  
 $1058 + 385 + 267 + 742 + 1036 = 3488 \text{ vph}$

by E. Thomson P.E. 10/12/13

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Existing Plus Project: PM Volumes  
Oakland, CA

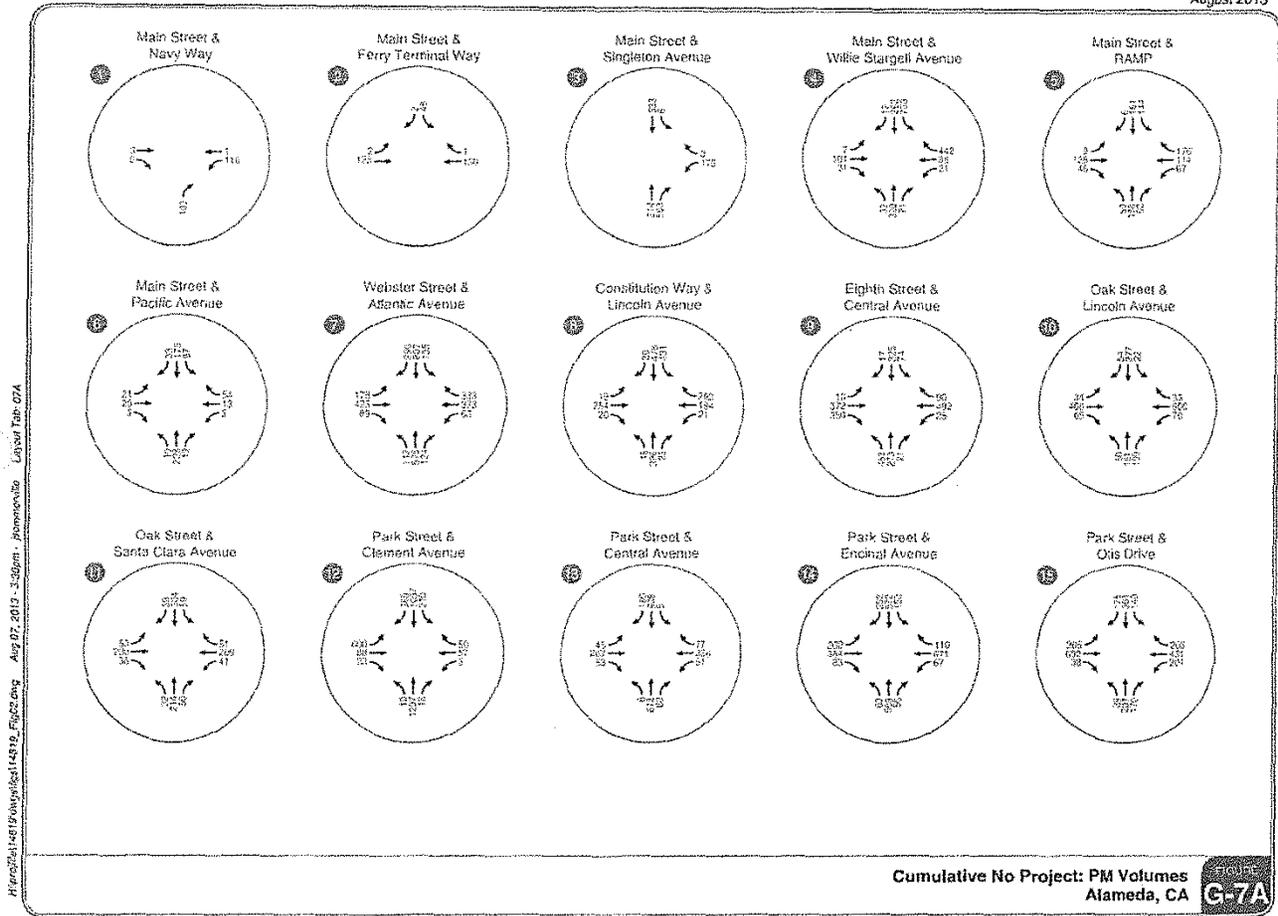


**KITTELSON & ASSOCIATES, INC.**  
TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE NO PROJECT (PN ALHR) TRAFFIC SUMMARY  
 of ALAMEDA POINT b) E. Thomson P.E. 10/12/13  
 DRAFT ENV. IMPACT REPORT Source: Appendix G

Alameda Point EIR - Administrative Draft

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Cumulative No Project: PM Volumes Alameda, CA

G-7A

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CUMULATIVE NO PROJECT PM PEAK HOUR TRAFFIC VOLUMES @ ISLAND GATEWAYS

ISLAND GATEWAY	IN BOUND	OUTBOUND	SOURCE
Posey Webster Tube	3882 vph	3331 vph	G-7C
Park St. Bridge	2027 vph	2228 vph	G-7B
Fruitvale Bridge	1559 vph	1375 vph	G-7B
High St. Bridge	883 vph	919 vph	G-7B
Bay Farm Island Bridge	2849 vph	1899 vph	G-7B
<b>TOTAL</b>	<b>11,200 vph</b>	<b>9752 vph</b>	

Miller Sweeney Bridge (Fruitvale)

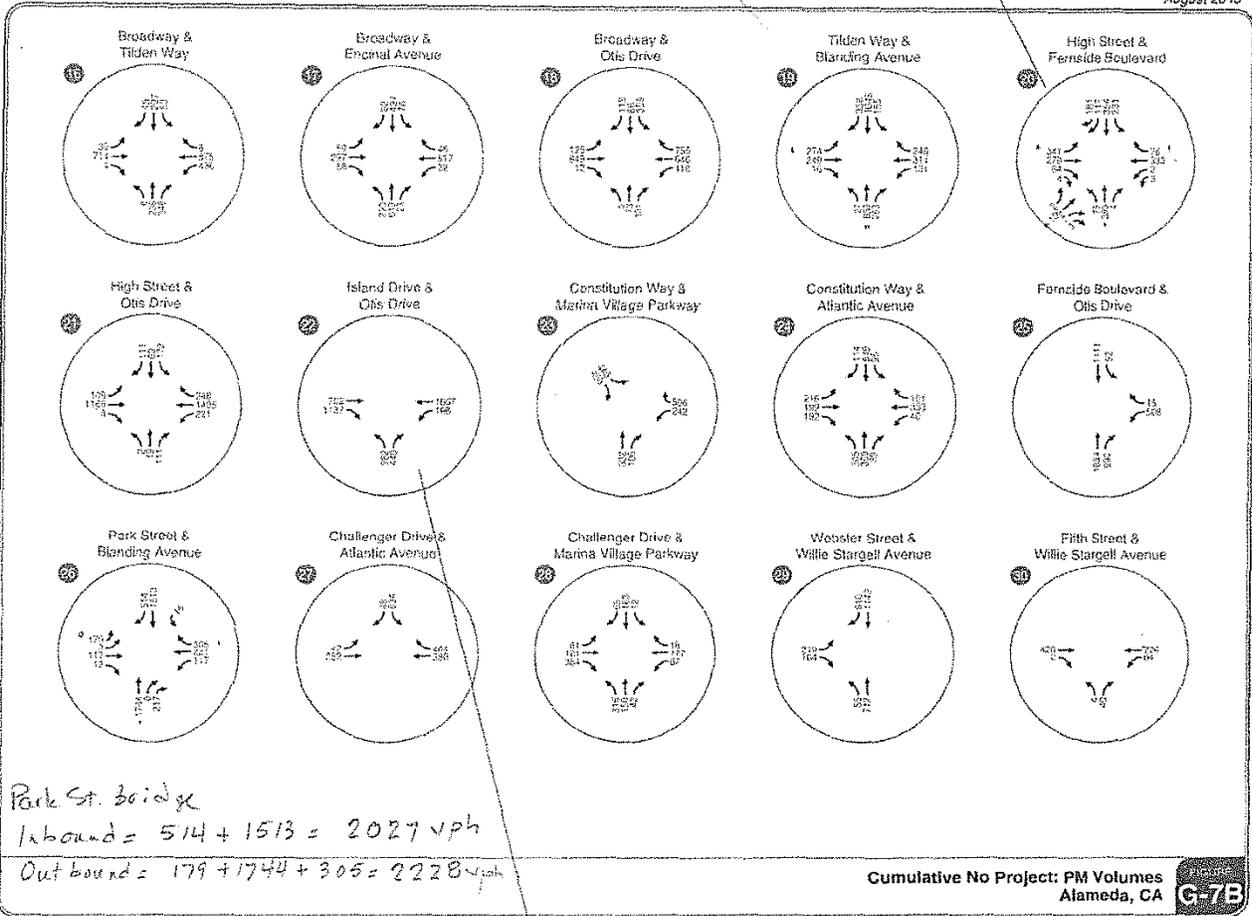
Inbound =  $358 + 1046 + 155 = 1559$  vph  
 Outbound =  $274 + 853 + 248 = 1375$  vph

High St. Bridge

Inbound =  $181 + 117 + 354 + 231 = 883$  vph  
 Outbound =  $341 + 109 + 76 + 393 = 919$  vph

Alameda Point EIR - Administrative Draft

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Park St. bridge

Inbound =  $514 + 1513 = 2027$  vph  
 Outbound =  $179 + 1744 + 305 = 2228$  vph

Cumulative No Project: PM Volumes  
 Alameda, CA

G-7B

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Bay Farm Island Bridge

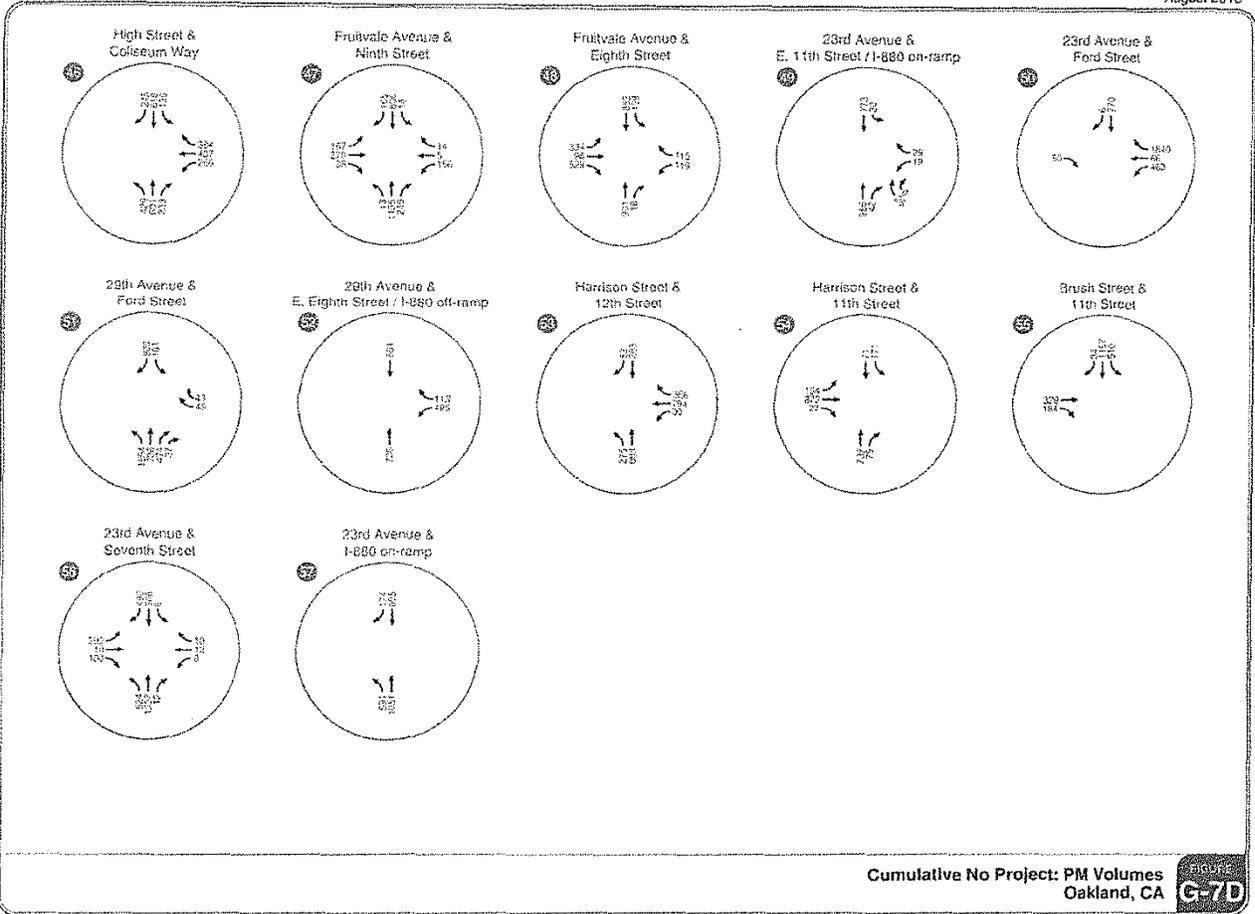
Inbound =  $982 + 1867 = 2849$  vph  
 Outbound =  $762 + 1137 = 1899$  vph

Summary by E. Thomas P.E. 10/17/13



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August 2013



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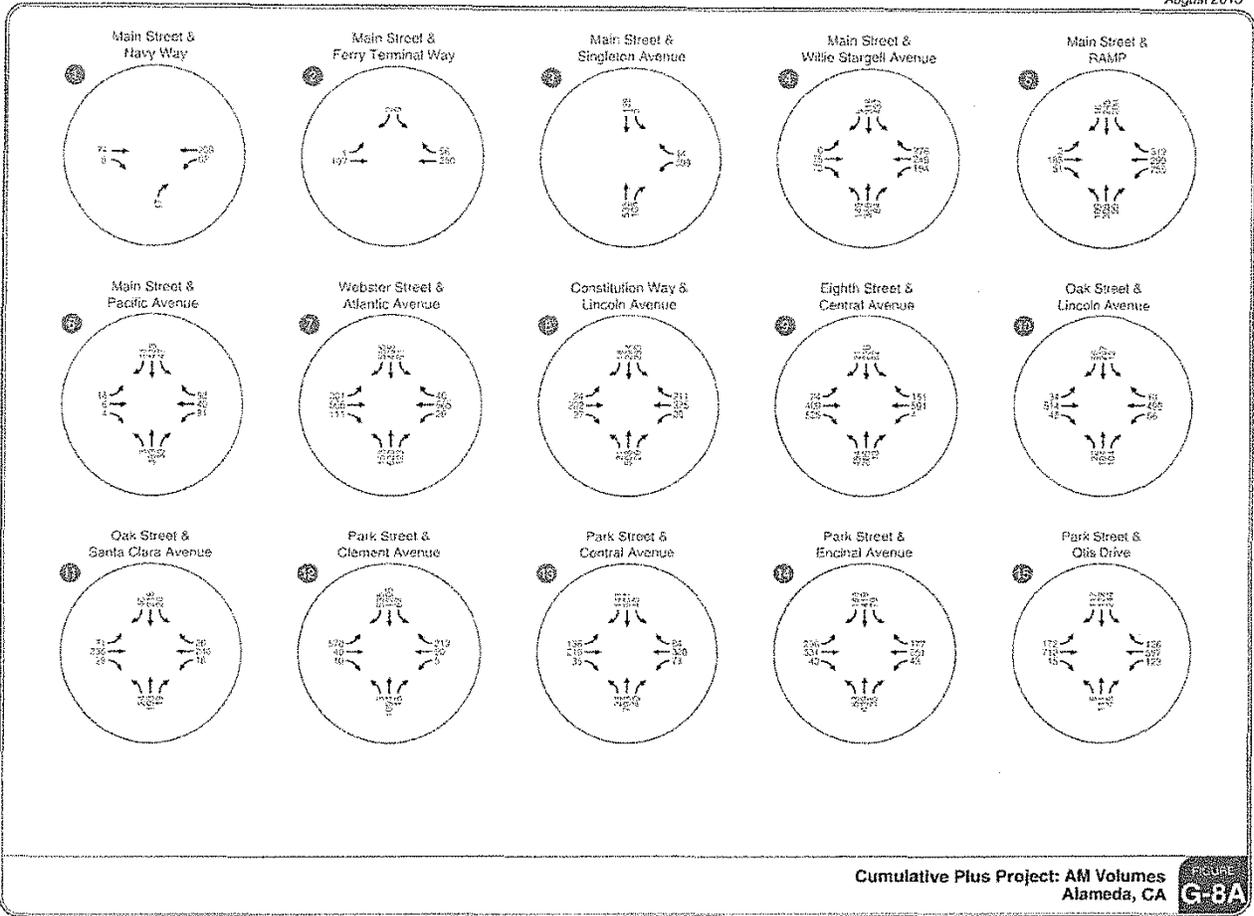
KITTELSON & ASSOCIATES, INC.  
TRANSPORTATION ENGINEERING / PLANNING

CUMULATIVE w/ PROJECT (AM PK) HOURLY VOLUME  
Summary

by E. Thomson P.E. 10/12/13

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August 2013



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CUMULATIVE w/ PROJECT AM PK HOUR TRAFFIC VOLUMES

ISLAND GATEWAYS	INBOUND	OUTBOUND	SOURCE (Fig #)
Pasey Webster Tube	3073 vph	2681 vph	G-8C
Park St. Bridge	2177 vph	2147 vph	G-8B
Fruitvale Bridge	1479 vph	1561 vph	G-8B
High St. Bridge	1074 vph	1210 vph	G-8B
Bay Farm Island Bridge	2637 vph	3168 vph	G-8B
<b>TOTAL</b>	<b>10,440 vph</b>	<b>10,767 vph</b>	

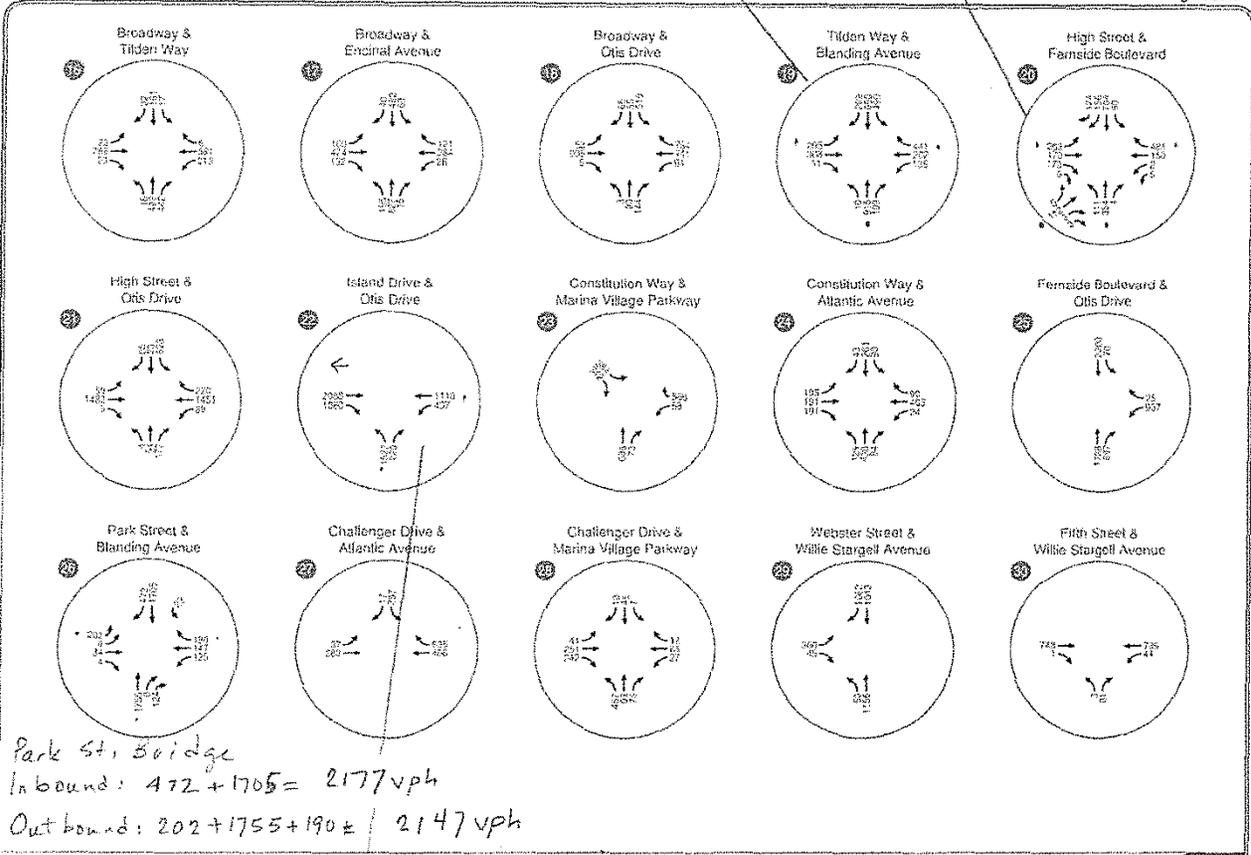
Miller Sweeney (Fruitvale) Bridge  
 Inbound =  $299 + 690 + 490 = 1479$  vph  
 Outbound =  $205 + 915 + 441 = 1561$  vph

High Street Bridge  
 Inbound =  $124 + 156 + 704 + 90 = 1074$  vph  
 Outbound =  $263 + 112 + 354 + 481 = 1210$  vph

Alameda Point EIR - Administrative Draft

August 2013

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Park St. Bridge  
 Inbound:  $472 + 1705 = 2177$  vph  
 Outbound:  $202 + 1755 + 190 = 2147$  vph

Cumulative Plus Project: AM Volumes Alameda, CA **G-8B**

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 TRANSPORTATION ENGINEERING / PLANNING

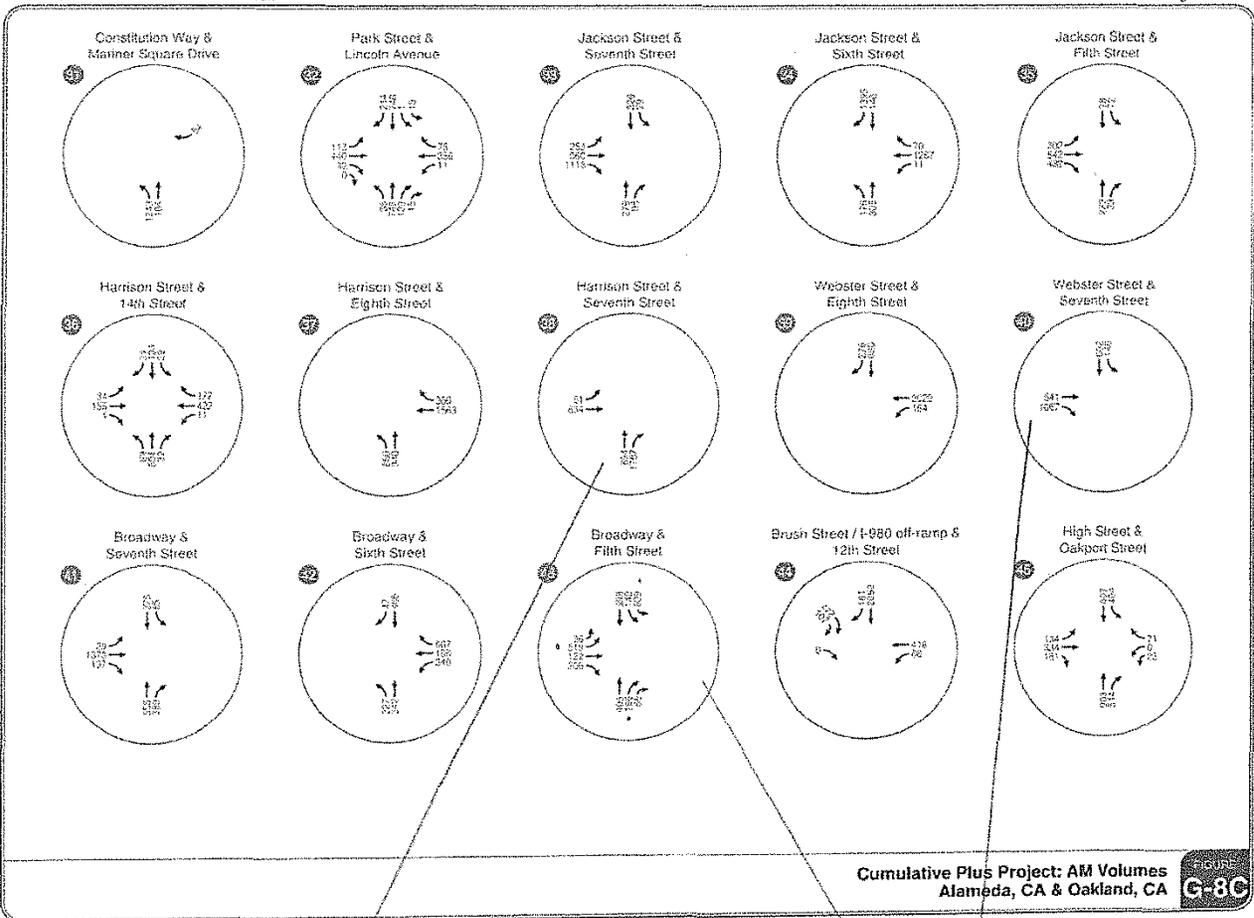
Bay Farm Island Bridge  
 Inbound:  $1527 + 1110 = 2637$  vph  
 Outbound:  $2088 + 1080 = 3168$  vph

Summary by E. Thomson PE.  
 10/12/13

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Posey Tube Outbound =  $894 + 1787 = 2681 \text{ vph}$

Webster Tube Inbound =  $519 + 609 + 186 + 1067 + 692 = 3073 \text{ vph}$

Summary by E. Trautman P.E.  
10/17/12

Alameda Point EIR - Administrative Draft

August 2013

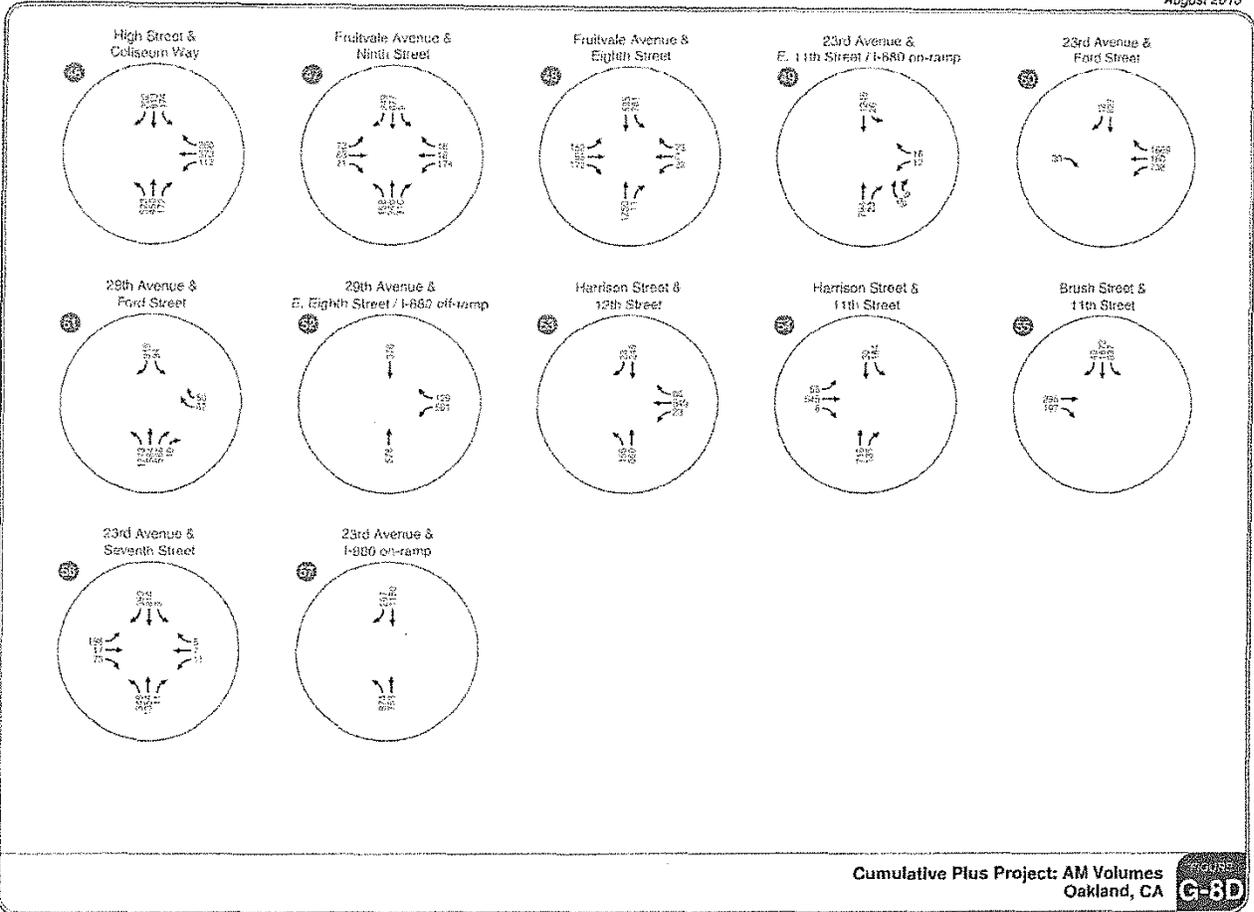


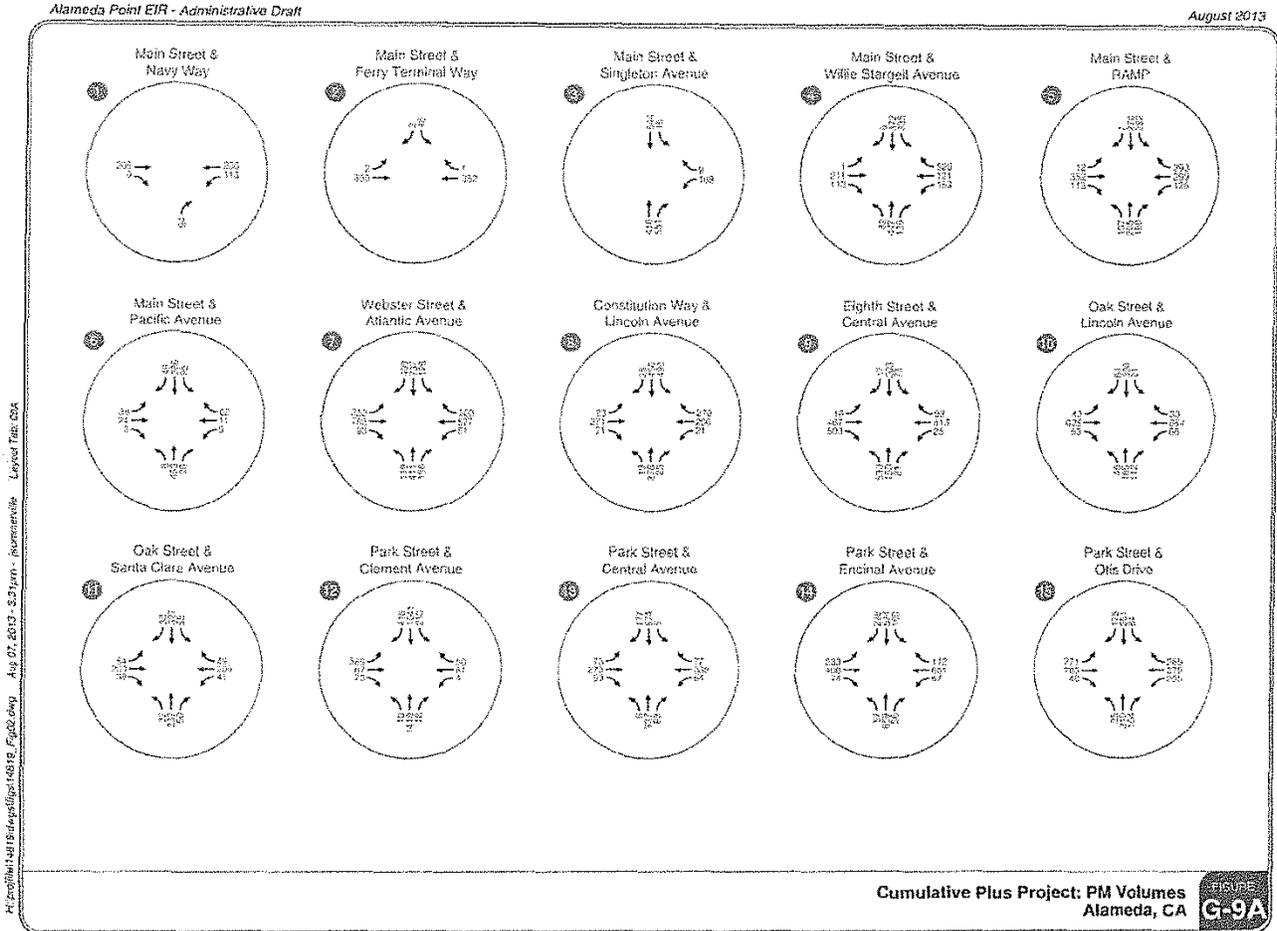
Figure 501-101: Proposed Signal 4819, Figure 2, Aug 07, 2013 - 3:31 pm - Alameda Point

**KITTELSON & ASSOCIATES, INC.**  
TRANSPORTATION ENGINEERING / PLANNING

**C-8D**

CUMULATIVE WITH PROJECT (PM PK HR) TRAFFIC SUMMARY  
 } ALAMEDA POINT DEIR

by E. Thomson PE. 10/12/13  
 Source: Appendix G



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CUMULATIVE WITH PROJECT PM PEAK HOUR TRAFFIC  
 VOLUMES @ ISLAND GATEWAYS

ISLAND GATEWAYS	INBOUND	OUTBOUND	SOURCE
POSEY TUBE WEBSTER TUBE	3986 vph	3433 vph	G-9A
PARK ST. BRIDGE	2167 vph	2307 vph	G-9B
FRUITVALE BRIDGE	1639 vph	1487 vph	G-9B
HIGH ST BRIDGE	1103 vph	1030 vph	G-9B
BAY FARM ISLAND BRIDGE	2819 vph	1976 vph	G-9B
<b>TOTAL</b>	<b>11,714 vph</b>	<b>10,233 vph</b>	

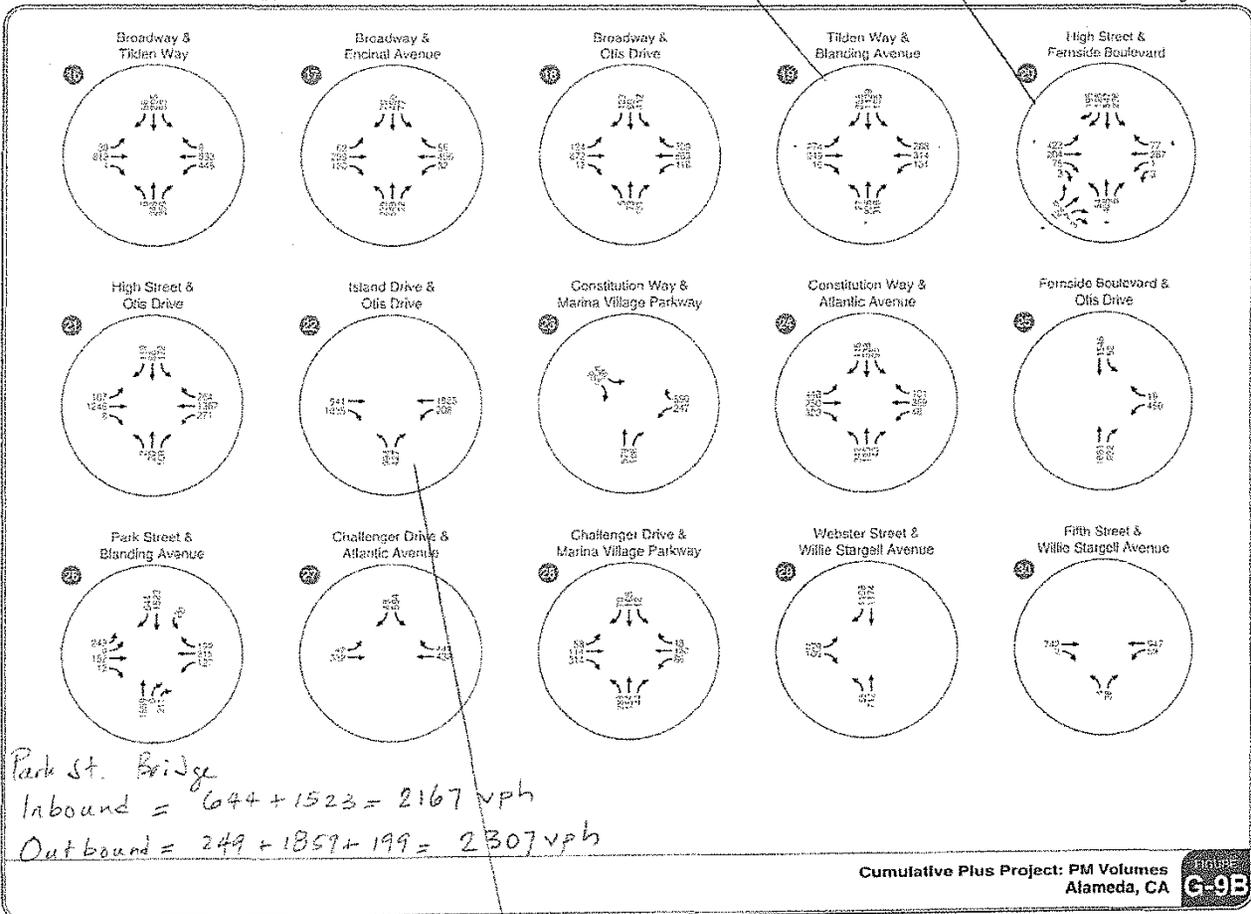
Willen Sweeney (Fruitvale) Bridge  
 Inbound =  $355 + 1129 + 155 = 1639$  vph  
 Outbound =  $274 + 925 + 288 = 1487$  vph

High St. Bridge  
 Inbound =  $195 + 125 + 547 + 236 = 1103$  vph  
 Outbound =  $423 + 124 + 406 + 77 = 1030$  vph

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August 2013

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Park St. Bridge  
 Inbound =  $644 + 1523 = 2167$  vph  
 Outbound =  $249 + 1857 + 199 = 2307$  vph

Cumulative Plus Project: PM Volumes  
 Alameda, CA

**G-9B**

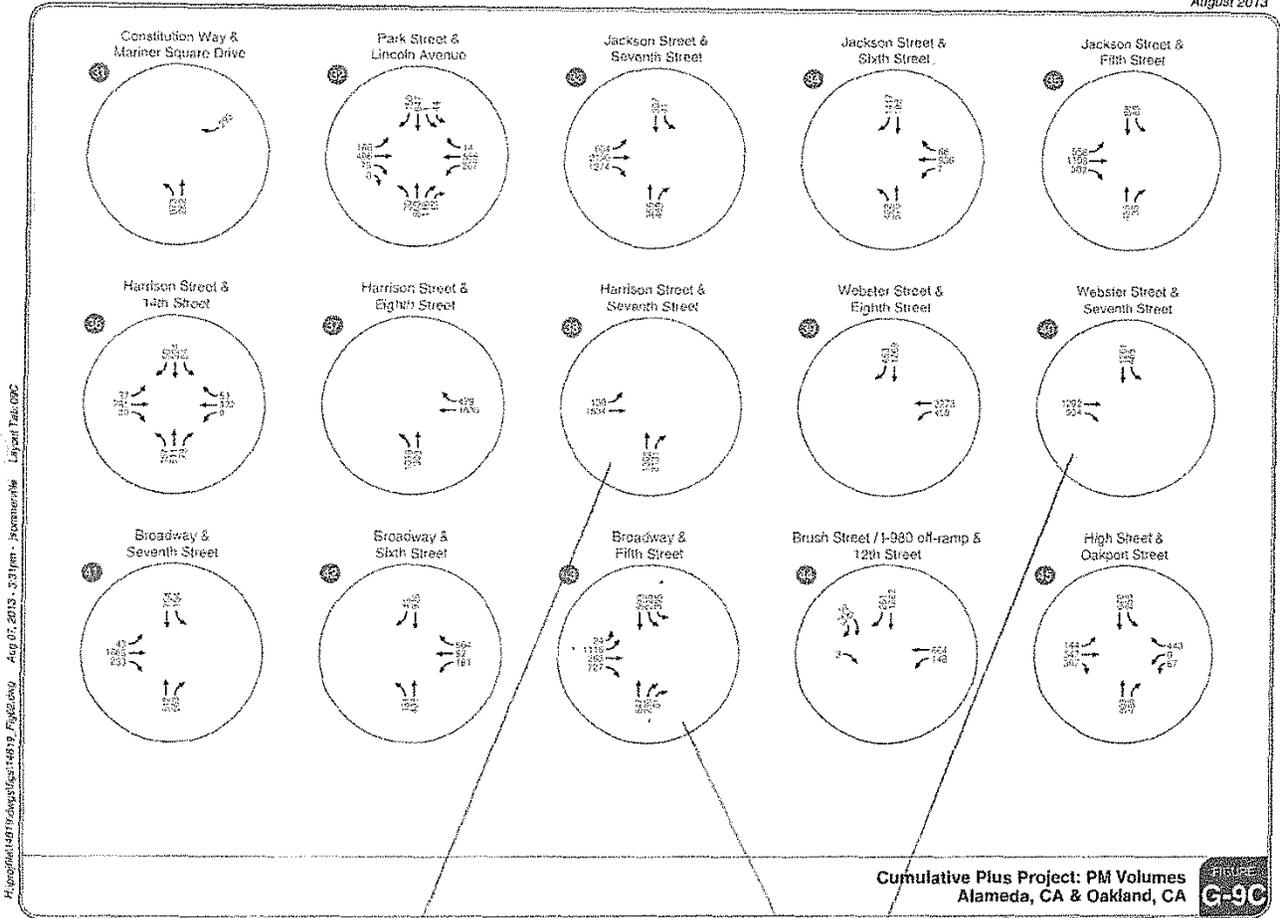
**KITTELSON & ASSOCIATES, INC.**  
 TRANSPORTATION ENGINEERING / PLANNING

Bay Farm Island Bridge  
 Inbound =  $994 + 1825 = 2819$  vph  
 Outbound =  $941 + 1035 = 1976$  vph

Summary by E. Thawson P.E. 10/12/13

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Poser Tube  
Outbound =  $1302 + 2131 = 3433$  vph

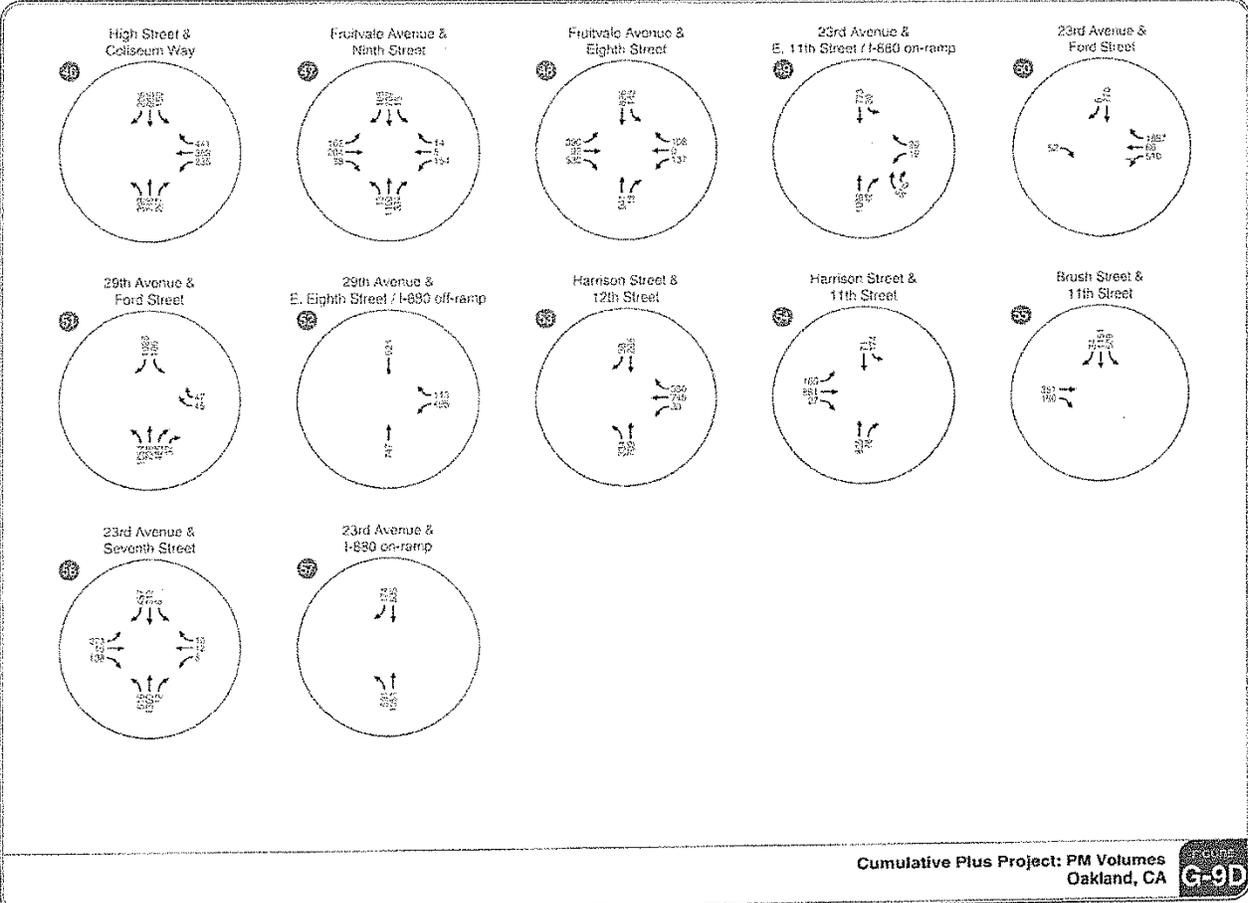
Webster Tube  
Inbound  
=  $1116 + 280 + 395 + 934 + 1261$   
3986 vph

Summary by E. Thamin 10/12/13

Alameda Point EIR - Administrative Draft

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Cumulative Plus Project: PM Volumes  
Oakland, CA

G-9D

**KITTELSON & ASSOCIATES, INC.**  
TRANSPORTATION ENGINEERING / PLANNING

## Letter 30. Individual (Eugenie Thomson)

- 30-1 Traffic impacts are analyzed in Section 4.C of the Draft EIR. The analysis was performed using the City's adopted thresholds of significance and methodologies, as explained beginning on page 4.C-17 under Significance Criteria. The significance thresholds are used to measure whether intersections and roadways are operating at an acceptable level of service (LOS) for four (4) different travel modes, including automobiles, transit, bicycling, and walking. The adopted thresholds do not call for an analysis of "daily traffic volumes in front of resident's homes" or "how much longer it will take to leave the island." Any attempt to measure these factors would require a great deal of speculation and assumptions about personal driving behavior, commute choices, and which resident's homes to study. The increase in average delay is reported for each study intersection; it would be speculative to calculate travel time for any individual driver.
- 30-2 As discussed starting on page 4.C-22, under the heading Travel Demand Modeling Approach, the Draft EIR explains the use the countywide travel demand model recommended by the Alameda County Transportation Commission (CTC) to determine how the existing transportation network would be impacted by the proposed project. The Model and the methodology used to determine the impacts of the Alameda Point development are the same models and methodologies used by the City of Oakland and other Bay Area local agencies and regional transportation agencies to evaluate transportation impacts.

Under Cumulative plus Project conditions, the Model projected that in 2035 project trip generation would add about 350 and 870 vehicles destined for the northbound Posey Tube during the AM and PM peak hours, respectively. However, due to the capacity constraint during the AM peak hour, the Model's traffic assignment function diverted project traffic away from the northbound Posey Tube during the AM peak hour. Outbound traffic using the Posey Tube is currently and historically has been operating at capacity, ranging from about 2,300 to 2,900 vehicles on a workday in the a.m. peak hour. Recognizing this capacity constraint, the Model did not simply add more traffic to the Posey Tube, but instead assigned trips to other travel flow paths. This capacity constraint is reflected in the change in peak hour volumes at the analysis intersections throughout the City of Alameda and into Oakland. For example, the Model assigned trips that would use the Tubes, if capacity were available, to alternate routes, such as Lincoln Avenue, Central Avenue, Otis Drive, and Clement Avenue. As disclosed in the Draft EIR Section 4.C, *Transportation and Circulation*, the impacts of the proposed project are experienced at locations adjacent to these crossings.

Thus, the overall combined change in volumes at the island gateways (tunnels and bridges) that is described and analyzed in the Draft EIR is a combination of the newly

- added project traffic as well as the secondary effect of some of this project traffic displacing and diverting non-project traffic to other gateways.
- 30-3 As discussed on page 4.C-22 of the Draft EIR, the traffic model used was the Alameda CTC countywide model as it better capture growth outside the city and the proposed project is considered a regionally significant project. Draft EIR Chapter 4, Section 4.C, *Transportation and Circulation*, found eight significant and unavoidable impacts related to transportation and presents mitigation measures as feasible to reduce the impacts of project generated traffic, as required by CEQA.
- 30-4 The comment is incorrect. The transportation analysis prepared for the Draft EIR found that the project would generate a significant number of new trips and that the result of these new trips would result in a variety of impacts to all four modes of transportation (automobile, bicycle, transit, and pedestrian.) Also, please see responses to Comments 30-2, 30-3, 30-5 through 30-9.
- 30-5 The analysis of traffic impacts was prepared using the Alameda CTC travel demand model, which is the accepted countywide for travel demand forecasting. The City's adopted methodologies for analyzing vehicle, bicycle, pedestrian, and transit level of service were employed to identify potential impacts to each mode. The traffic impact analysis was performed using the adopted City thresholds of significance and methodologies, as explained beginning on page 4.C-17 under Significance Criteria. Please also see responses to Comments 7-7 and 30-2 for additional details on the travel model.
- 30-6 The methodology and outline of Section 4.C, *Transportation and Circulation*, of the Draft EIR, like all the other sections in the EIR, is presented in the same fashion as other EIRs prepared by the City of Alameda and other jurisdiction in the Bay Area and statewide. The thresholds used for the transportation analysis were developed by the City of Alameda Transportation Commission at a series of public hearings with City staff, professional transportation consultants, and the public. Using these thresholds, the Draft EIR provides a complete multi-modal analysis of the project as required by General Plan Transportation Element policy. The City does not agree that the transportation analysis in the EIR is unusually difficult to follow. Ample subheadings of sections, concise descriptions, and explanations are provided in addition to more technical tables and diagrams. Additionally, Chapter 2 provides an executive summary of the project impacts.
- 30-7 The comment is incorrect. The Draft EIR did not "conclude" that the project would result in one (1) single trip in the tubes. The Draft EIR concluded that the proposed project would generate a variety of significant unavoidable impacts (see Chapter 2, *Executive Summary*, provides a convenient and easy to understand summary of the impacts). As documented in the Final EIR for the Alameda Point General Plan Amendment in 2003, the Alameda Landing Supplemental EIR in 2006, and a variety of other City of Alameda traffic studies over the last 10 years, the capacity of the Webster and Posey Tubes is a fixed to a specific number of automobiles that can cross between the two cities during the

- AM or PM peak commute periods. The City of Alameda conducts an annual count of automobiles using the tubes in the AM and PM period and reports those counts annually. It is well documented that the existing tubes have been at or near capacity for the last six to seven years. Therefore, the Draft EIR found that regional growth and other development that is planned in Alameda over the next 20 to 30 years will exceed the capacity of the Webster and Posey Tubes. The Draft EIR finds that limited capacity of the tube causes many automobile trips to divert to other crossings during the AM and PM peak period. It should also be expected that the peak hours of congestion will “spread” as more commuters choose to leave earlier or delay their commute to later in the morning to avoid the peak hours of congestion. Also see response to Comment 17-5.
- 30-8 As shown in the figure, historical traffic counts range between a low of 2,300 to a high of 3,304. Recent counts from 2012 for the Posey tubes in the AM range from 2,368 to 2,888 for the mid-week (Tuesday through Thursday) workday. These volumes for the AM peak hour are fairly consistent despite the changes in activity at Alameda Point since its height of activity as the naval air station. See response to Comment 17-6.
- 30-9 See response to Comment 30-8. New traffic counts were collected for most Alameda intersections in 2012 and some Oakland intersections in 2013. Other counts were provided from recent studies performed for the Marina Cove II project, the VA Center Draft EA, and the Central Estuary study in Oakland.
- 30-10 Comment noted.
- 30-11 Please see responses to Comments 30-1 and 30-6. The Draft EIR included the information required to be included to determine whether significant transportation impacts would occur. The thresholds used were those recommended by the City of Alameda Transportation Commission.
- 30-12 Please see response to Comment 30-1 and comment 30-11.
- 30-13 See comment 30-12. As discussed in the Draft EIR on pages 4.C-8, 4.C-13-4.C-16, and illustrated in Figure 4.C-2, the transportation analysis examined 32 study intersections in the City of Alameda. The effects of increased traffic on air quality and noise are addressed in the discussions of Impact 4.F-2, Impact 4.F-3, 4.G-1, and 4.G-3, respectively. In addition, the General Plan identifies the “quality of life” issues that must be considered and the Transportation Commission developed thresholds to measure the potential impacts and limits on mitigations that would be detrimental to quality of life.
- 30-14 Chapter 2 of the Draft EIR is an Executive Summary, and includes a summary of all of the transportation impacts and mitigation measures identified in the Draft EIR. No modification to the transportation impact analysis is necessary.
- 30-15 Please see responses to Comments 30-1, 30-7, and 30-12. The traffic impact analysis was using the adopted City thresholds of significance and methodologies, which are listed in

- the Draft EIR beginning on page 4.C-17 under Significance Criteria. Travel times are not an adopted City threshold. The study intersections used in the transportation analysis are those that are operating poorly or would be directly impacted by the proposed project. Two intersections, that provide access to Bay Farm Island are included in the LOS analysis: Island Drive at Otis Drive and Fernside Boulevard at Otis Drive.
- 30-16 Appendix G of the Draft EIR includes 786 pages of transportation background data and is cited throughout Section 4.C, *Transportation and Circulation*, of the Draft EIR. The traffic appendix includes LOS output sheets, volume data, and the CMP analysis data. The traffic appendix was included in the materials that were made available during the public review period for the Draft EIR.
- 30-17 Please see responses to comments 30-7, 2-1, 7-9, and 17-4. An Executive Summary was presented as Chapter 2 of the Draft EIR and included a summary of all the identified transportation impacts and mitigation measures. Please also see responses to Comments 30-3 and 30-14.
- 30-18 Please see responses to Comments 30-7, 2-1, 7-9, and 17-4. The Draft EIR disclosed significant and unavoidable impacts to automobile, bicycle, transit and pedestrian levels of service from the proposed project. The Webster and Posey Tubes are limited in their capacity to accommodate additional traffic during the already congested AM and PM peak periods. Finally, every EIR and traffic study prepared by the City of Alameda over the last 10 years has acknowledged and disclosed the Webster and Posey Tubes constraints and the fact that these tubes cannot accommodate a significant increase in additional cars during the AM and PM commute period. This “finding” is of course, not a surprise to the many commuters who currently use the Webster and Posey Tubes to access their off-island jobs. For these reasons, the City of Alameda General Plan Transportation Element adopted in 2008 includes a number of policies to focus City actions on reducing automobile trips from future developments through transportation demand management strategies (TDM) and ensuring that the City of Alameda severely restricts actions to enlarge the roadway system to accommodate more cars. To address future transportation congestion, the City of Alameda Transportation Element includes policies emphasizing the need to implement policies to make alternatives to the automobile (transit, bicycling, walking) more cost effective and efficient alternatives for Alameda commuters. Please see responses to Comments 30-2 and 30-3.
- 30-19 The delay represents the average delay for all vehicles at the intersection during the peak hour, which is reported per the Highway Capacity Manual methodology. During the peak hour, a specific approach or movement, such as the traffic leaving Bay Farm Island, may experience more than the average delay. At the intersection of 6<sup>th</sup> and Jackson streets, the 1.5 seconds of delay for the southbound right applies the uncontrolled movement based on the Highway Capacity Manual methodology.
- 30-20 The intersection analysis is consistent with the methodology and approach applied by the City of Oakland in its own impact analysis for environmental documents. See responses

- to Comments 2-1, 17-9, and 30-2 regarding the capacity constraint the affects the projected peak hour volumes at the Posey Tube as well as on the freeways.
- 30-21 See response to Comment 17-15. It would not be appropriate for the Draft EIR to expect a regional transportation sales tax measure to pass after a similar measure recently failed. Furthermore, after 12 years of efforts by Alameda CTC and City of Alameda to identify improvements for the Broadway Jackson Interchanges, the Chinatown community and the City of Oakland have been unable to agree to a proposed improvement plan. For these two reasons, it would not be appropriate for the Draft EIR to state that these improvements are “reasonably foreseeable.” Additionally, these proposed improvements are neither programmed nor funded. If the Draft EIR had assumed that the sales tax measure had passed and the improvements were constructed, the Draft EIR would have also concluded that the impacts in Chinatown would be lessened and the Draft EIR would have understated the impacts of the project.
- 30-22 See response to Comment 17-16. As also presented in response to Comment 17-19, the City of Alameda disagrees with the comment. It would not be appropriate for the Draft EIR to expect a regional transportation sales tax measure to pass after a similar measure recently failed. Furthermore, over 10 years of efforts by Alameda CTC and City of Alameda to identify improvements for the Broadway Jackson Interchanges, the Chinatown community and the City of Oakland have been unable to agree to a proposed improvement plan. For these two reasons, it would not be appropriate for the Draft EIR to state that these improvements are “reasonably foreseeable” because they are neither programmed nor funded. Furthermore, if the Draft EIR had assumed that the sales tax measure had passed and the improvements were constructed, the Draft EIR would have also concluded that the impacts in Chinatown would be lessened and the Draft EIR would have understated the impacts of the project.
- As stated on page 4.C-22 of the Draft EIR, “for consistency with recent model forecasts for other studies in Alameda, the recently updated Alameda Countywide travel demand model, which is based on ABAG *Projections '09* and includes network changes and regional improvements outside the City of Alameda, was used. The zonal detail, street network and land use from the City of Alameda travel model developed as part of the Transportation Element were merged into the Alameda Countywide travel model. The updated 2035 street network includes improvements such as the improvements at the 23rd Avenue/29th Avenue interchanges on I-880.” Proposed street network projects that have received limited to zero funding or that are yet to receive substantive community and municipal support were not included in the model.
- 30-23 As presented in Chapter 5, *Alternatives*, of the Draft EIR, three of the six evaluated alternatives to the proposed project evaluated included more residential uses than what is proposed under the project.
- 30-24 John (Jack) Hutchison is a California Licensed Professional Engineer, P.E. No. 1411.

**Lesley Lowe**

---

**From:** PHILIP TRIBUZIO <tribuzio@sbcglobal.net>  
**Sent:** Sunday, September 15, 2013 11:37 PM  
**To:** Jott@alamedaca.gov  
**Subject:** Alameda Point Transportation

**ennifer Ott, Chief Operating Officer Alameda Point**

Jott@alamedaca.gov

**Andrew Thomas, City Planer**

2363 Santa Clara Avenue **Alameda, CA 94501**

Regarding transportation at Alameda Point as applied in DEIR.

With bay area public transit limited, and congested vehicle traffic becoming more time consuming and congested,

I submit for your consideration an inclusion of facilities for a growing use of fast efficient and flexible air transport.

The FAA wont allow fixed wing aircraft to operate off Alameda, but presently allow helicopters to normally use Alameda air space.

The present control tower west of the lagoon is a perfect location with room for two or more concrete landing areas.

A helicopter operation would be consistent with EIR requirements.

A helicopter operation would conform with historic, existing land use. Very low construction activity as most facilities presently exist. A helicopter operation would limit noise and air pollution and be an addition to the transit hub in the population center of the bay area.

All the above can be managed by the city planing department as franchised real estate.

As an Alameda home owner, I believe such a transport hub would add to Alameda property values.

Respectfully submitted as input proposal to Alameda Point development in regard to DEIR and ferry and water taxi hub.

Philip Tribuzio.

416 Shell Gate Road, Alameda 94501 E<tribuzio@sbcglobal.net>

31-1

## **Letter 31. Individual (Philip Tribuzio)**

- 31-1 Helicopter service to Alameda Point is not part of the proposed project; however, the commenter's suggestion will be forwarded to the Planning Board and City Council for consideration.

>>> PHILIP TRIBUZIO <tribuzio@sbcglobal.net> 10/6/2013 4:56 PM >>>

Jennifer Ott; [jott@alamedaca.gov](mailto:jott@alamedaca.gov) October 6, 2013.

In reference to my input on planning commission DEIR.

An addendum to my suggestion of a helicopter operation at alameda point that would be Multi- passenger long distant helicopters of the ``Osprey” design that would increase value of the transport hub with air transport to distant towns without air ports.

TAKE NOTE; President Obama made use of a military Osprey to transport his dog to their vacation area.

It was safefor his dog, so it would be safe for people.

32-1

Philip Tribuzio.

## **Letter 32. Individual (Philip Tribuzio)**

32-1 Please see response to Comment 31-1.

Andrew THOMAS - Response to DEIR

From: Ewart Wetherill <redwetherill@sbcglobal.net>  
To: <athomas@alamedaca.gov>  
Date: 10/21/2013 3:44 PM  
Subject: Response to DEIR

28 Cove Road

Alameda, California 94502

21 October 2013

Andrew Thomas, Planning Department, City of Alameda

Re: Draft Environmental Impact Report (EIR)

Dear Mr. Thomas:

This memo is in response to your call for comments on the proposed Draft EIR for development of Alameda Point.

The EIR format, typically compiled by competent and well-practiced professionals, has evolved into a detailed and intimidating compilation with a very limited review period. This makes it difficult to absorb for anyone not intimately acquainted with the method of analysis, the need for constant reference sources and the bewildering use of acronyms. However, if one uses the CEQA "rule of reason" noted in Section 5, Alternatives it becomes apparent that the report is very narrowly focused and includes some underlying assumptions that should be questioned. Several items of particular concern are noted below.

33-1

Vehicular traffic

We do not know the criteria used in computer modeling of projected changes in traffic levels but some items do not appear to be consistent with county or regional studies. We question seriously whether the criteria used are really applicable to an island community with few points of access and egress.

33-2

The tables in Appendix G suggest that adding 1400+ houses will not increase outbound morning traffic; this is certainly not consistent with the change in traffic flow after closing of the naval base or with the cumulative effect of total traffic that should reasonably be anticipated by including housing projects already approved under the auspices of ABAG.

33-3

Potential hazards

We have found no serious reference to the condition of the Posey and Webster tubes. Past experience has shown that they will be the obvious route of choice for traffic approaching or leaving Alameda

33-4

Point, and expecting drivers to fight already-crowded street traffic to use any of the bridges is unrealistic. And yet we have been unable to get any response from the Planning Board to questions submitted on two recent occasions concerning the safety of commuters in either tube in the event of a major earthquake on the Hayward Fault less than four miles away. One engineering report received by the City from Caltrans in 2003 stated that strengthening of the tubes had been intended in 2002 but was set aside because of lack of funds. Consequently, this belated upgrading should be an integral part of any further development that would increase traffic to/from Alameda.

33-4  
cont.

Rise in sea level

Ways to accommodate rising sea level are well documented in the study proposing a new "town centre" at Alameda Point. This proposal is clearly geared to sell the view of San Francisco bay and to find a way to utilize left-over hangars etc. However, it does not explain why Alameda, which already struggles with two retail centres, would benefit from a third. Further, we have a shining example in Jack London Square to demonstrate that a bayside location, a ferry terminal and better accessibility do not ensure a successful retail centre. However, these considerations are secondary to the question of who pays the cost of the extremely expensive remedial site work that would be required to make this proposal even remotely sensible. We are also told on good authority that at very high tides one end of the Webster tube is already close to flooding.

33-5

33-6

33-7

Environmental concerns

So far the city of Alameda has escaped the worst of the steadily-deteriorating urban sprawl of the East Bay because of its separation by water. However, having still more vehicles - and particularly heavy diesel trucks - traversing the island, using both residential and main shopping streets - can only inflict still more air and noise pollution on the unfortunate residents.

33-8

Alternatives

One alternative to this proposed development has been obvious since the closing of the naval base and airfield - do little or nothing and let the site return to nature in the same way that former salt ponds have been successfully removed in the South Bay. With the rise in sea level, the remaining land area could in time become a place of recreation with significant value to the city. This would have some costs but on a very small scale and with less hidden costs than what is being proposed. We recommend that this alternative be given at least a small fraction of the time and effort that has obviously been invested in this Environmental Impact Report.

33-9

Sincerely,

Ewart A. Wetherill, AIA emeritus

## Letter 33. Individual (Ewart Wetherill)

- 33-1 As explained in Chapter 4, page 4-1 of the Draft EIR, the Draft EIR has been prepared in accordance with CEQA, as amended (Public Resources Code § 21000, et seq.), and the CEQA *Guidelines* (California Code of Regulations § 15000 through 15378) and includes a discussion of all the resources areas of Appendix G with the exception of Agricultural and Forestry and Mineral Resources, which are not found in the project area as discussed in Chapter 6, Section E. The format of the document is presented in Chapter 1, *Introduction*, and further described in the introduction to Chapter 4, *Environmental Analysis*. The public review and comment period for the Draft EIR was from September 3, 2013 to October 21, 2013, which is longer than the 45-days required by CEQA *Guidelines* § 15105(a).
- 33-2 As explained on page 4.C-23 of the Draft EIR, for consistency with recent model forecasts for other studies in Alameda, the recently updated Alameda Countywide travel demand model, which is based on ABAG *Projections '09* and includes network changes and regional improvements outside the City of Alameda, was used. Alameda-specific zonal detail, street network and land use from the City of Alameda travel model developed as part of the Transportation Element were merged into the Alameda Countywide travel model. The updated 2035 street network includes improvements such as the improvements at the 23rd Avenue/29th Avenue interchanges on I-880.
- 33-3 The Draft EIR found that the proposed project would generate a variety of significant unavoidable impacts (see Chapter 2, *Executive Summary* for a summary of the impacts.) As documented in the Final EIR for the Alameda Point General Plan Amendment in 2003, the Alameda Landing Supplemental EIR in 2006, and a variety of other City of Alameda traffic studies over the last 10 years, the capacity of the Webster and Posey Tubes is a fixed to a specific number of automobiles that can cross between the two cities during the AM or PM peak commute periods. The City of Alameda conducts an annual count of automobiles using the tubes in the AM and PM period and reports those counts annually. It is well documented that the existing tubes have been at or near capacity for the last six to seven years. Therefore, the Draft EIR found that regional growth and other development that is planned in Alameda over the next 20 to 30 years will exceed the capacity of the Webster and Posey Tubes. The Draft EIR finds that limited capacity of the tube causes many automobile trips to divert to other crossings during the AM and PM peak period. In addition to diversion of commute hour traffic, it should also be expected that the peak hours of congestion will “spread” as more commuters choose to leave earlier or delay their commute to later in the morning to avoid the peak hours of congestion. Also see response to Comment 30-7.
- 33-4 Originally constructed in 1928, the Posey tube is the older of the two subterranean roadways, with the Webster Street tube completed much later in 1963. Both had similar designs and were later found to be vulnerable to earthquakes largely due to the presence of potentially liquefiable materials immediately surrounding the tubes. Beginning in April

2000, Caltrans performed major seismic upgrades through jet grouting methods to stabilize and strengthen surrounding soils by injecting a cement slurry mixture into the subsurface materials around the tubes. Work was completed on October 31, 2003, and is now considered by Caltrans in a 2011 report to meet current seismic standards.<sup>24</sup> Nevertheless, the potential for the tubes to incur some level of damage following a substantial earthquake cannot be fully ruled out and that could require temporary closure of one or both tubes. If such circumstances occur, traffic would likely be routed to one of the other bridges that provide access to the island and expanded ferry service would be provided by the Water Emergency Transit Authority as mandated by Senate Bills 976 and 1093. However, considering the more recent seismic upgrades that the tubes have received, catastrophic failure of the tubes is not considered likely.

- 33-5 The comment concerns the economic feasibility of the amount of retail use proposed for the project site, which does not address the environmental adequacy of the EIR. The comment is noted.
- 33-6 Please see response to Comment 33-5. As described in Chapter 3, *Project Description*, private investment at Alameda Point would be necessary to fund the public and private improvements envisioned by the plan. In addition, as discussed in the on page 4.J-36 of the Draft EIR the Navy has completed a substantial amount of cleanup work and prepared a Finding of Suitability for Transfer (FOST) for a large portion of the project area. The Navy is also committed to “continue to complete cleanup requirements and prepare FOST(s) for the remaining portions of Alameda Point that are to be transferred to the City, including sites that are still active prior to commencement of construction for proposed development.”
- 33-7 Sea-level rise occurring from global warming is a worldwide issue of concern. The Draft EIR analyzed the impacts of sea level rise on the project site (see Impact 4.I-8). The Draft EIR is not required to analyze the impacts of sea level rise at other off-site locations or on the regional transportation network.
- 33-8 The impacts of the proposed project related to *Air Quality* and *Noise* are discussed in Sections 4.F and 4. G of the Draft EIR, respectively.
- 33-9 The comment is noted and will be forwarded to the Planning Board and City Council for consideration. Under CEQA *Guidelines* §15126.6, the Draft EIR is not required to study the suggested alternative in which the site would be entirely vacated and eventually inundated by San Francisco Bay.

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<sup>24</sup> Caltrans, State Route 260 Transportation Concept Report, [http://www.dot.ca.gov/dist4/systemplanning/docs/tcr/sr\\_260\\_tcr\\_final.pdf](http://www.dot.ca.gov/dist4/systemplanning/docs/tcr/sr_260_tcr_final.pdf), June 2011.

Andrew,

I appreciate all of the hard work that City Staff has put into providing such a wealth of information on the impacts of the proposed development at Alameda Point. Please accept the following, hastily written comments on the EIR. If there are questions about them, please feel free to contact me.

**Transportation:**

- The EIR repeatedly states that Transportation Demand Management (TDM) is “speculative.” This is true of any future planning, including the modeling that all EIR’s rely on. This fact does not make TDM ineffective or unworthy of analysis. At the joint Planning Board/Transportation Commission meeting, both bodies recommended that the city continue to pursue the 10/30 reduction strategies for TDM at Alameda Point. 34-1
- The City of Alameda is committing to implement TDM, in accordance with the General Plan. General Plan policy 4.4.2.a requires that “Transportation related mitigations for future development should first implement TDM measures.” Therefore, once the city’s analysis has determined where impacts may occur, the city should apply the TDM reductions to the projections and determine which of those impacts are mitigated. If impacts continue to exist, then a second set of mitigations, consistent with the General Plan, should be proposed. These should include looking at what level of TDM would be required to entirely mitigate the impacts. The city can then decide whether TDM, on its own, will be enough. I appreciate that the city identified the level of impact in the DEIR, I encourage you to do so when proposing second-level mitigations in the FEIR. 34-2
- The EIR currently proposes mitigations that are forbidden by the General Plan. As the city has not begun the process to amend these general plan policies, the EIR should not be proposing mitigations (and the fees that will be charged to implement them) that are not permitted. Additionally, the EIR appears to misinterpret the General Plan policy 4.4.2.a. I was the chair of the Transportation Commission when this policy was written. “Roadways will not be widened to create additional automobile travel lanes” should not be interpreted to mean that adding lanes via removing parking. The intent of this policy was to continue to use the existing capacity of city street network and reduce traffic rather than adding through- and turn-lanes which create significant livability issues in neighborhoods, and degrade the pedestrian and cycling environment. 34-3
- In the instances where staff proposes to add turn lanes as a second mitigation, the impacts on additional pedestrian exposure to vehicle traffic and to the on-street bicycle environment should be analyzed and disclosed. 34-4
- Bicycle Network is not well evaluated. This network evaluation should be as extensive as the Auto network and should not be limited to priority bicycle streets, but also high attractions locations like Webster streets. Key West/East streets, like Santa Clara, Otis, etc. are not included. 34-5
- Pedestrian LOS should be measured at all Alameda intersections that Auto LOS is measured. 34-6

- Transit LOS needs to include Santa Clara, The city’s main transit corridor, as well as Lincoln, and any other transit priority street. | 34-7
- Transit LOS on corridors that lead off island are incorrect. As stated in the EIR “A segment that crosses a City boundary shall also include five bus stops, but the last stop shall be the first bus stop outside the City of Alameda.” Currently no segments cross the estuary, though transit on Fruitvale, Park and Webster all do. | 34-8
- Table 4.C-10 presents “existing” and “existing plus project” pedestrian LOS data. This table does not present all of the data for all intersections. All modes should be treated similarly. If the EIR is going to present the Auto Intersection LOS regardless of impact, then the same should be done for all modes. (same comment for transit and bicycle LOS). | 34-9
- The Pedestrian LOS numbers for Existing Webster/Atlantic do not seem correct. Could you confirm the calculations are using the appropriate assumptions, including that “Green Time” does not include flashing red, when pedestrians are not legal suppose to enter the intersection. It’s hard to believe that pedestrians on all four legs of the intersection only wait an average of 30 seconds for a light. | 34-10
- Analysis of the Alternatives should be presented side by side with the other analysis so that decision-makers and the public have the opportunity to decide whether there is an environmentally superior alternative and what the impacts of the alternatives are. | 34-11

Addition EIR comments:

- The amended General Plan Table 2-7 (Page 3-33) reverts to previous names (Civic Core, Inner Harbor, Marina, West Neighborhoods) that do not match current planning labels. This will likely cause confusion. Additionally, General Plan Table 2.7 does not match the development assumption numbers presented in Table 3-1. | 34-12
- Page 3-37 lists the “Bay Plan” as projecting seal level rise for 2050 at 16 inches. Isn’t the projections 18-inches? | 34-13
- Page 4.a-20 – General plan overriding policy for over 20 years has been “De-emphasis of the SOV.” This should be listed as it’s one of the major planning guidelines of the entire General Plan. | 34-14
- Climate Change/Sea Level rise sections should be update to include data from IPCC V.5. | 34-15
- There should be analysis of how this plan helps to meet AB32 state mandates for reaching 1990 levels of GHG by 2020. | 34-16
- Page 4.F-14 is missing General Plan policy 4.2.3.d:  
 “Support and prioritize trip reduction strategies that maximize air quality benefits and reduce greenhouse gas emissions.
  1. Support the use of alternative fuel vehicles for all transportation modes.
  2. Encourage shift of trips to alternative transportation modes. This includes short trips, as these will have a disproportionate impact on air quality.” | 34-17
- Page 4.F-41: Table 4.f-8. Under “street sources” it seems unlikely that Main Street will have twice the PM2.5 concentration as Atlantic and Stargell combined. | 34-18

Page 4.G-9 does not include Objective 4.2.3.a “Street projects should be designed to minimize the requirements for sound mitigation measures. Do not implement street projects that necessitate a soundwall.” 4.2.3.b “Ensure that transportation system improvements comply with accepted noise standards in residential areas. Monitor the noise impacts of the existing transportation system. Identify strategies to mitigate excessive noise conditions.”

↑  
34-18  
cont.

- Analysis of 4.g-3 makes the mistake of assuming that TDM impacts are hard to quantify. Additionally, the mitigation appears to assume that there is nothing that can be done about traffic related noise. This is not correct. Slowing the speed on RAMP would drop the auto related noise significantly. This is a simple, easy to implement solution that could be recommended. The same could happen on Main Street. Additionally, analysis of the impacts of various roadway materials, windows for residences along truck routes, etc. should be done.

34-19

- Page 4.I-29: Can you confirm that the area proposed for projection from sea level rise will be able to protect above 55” if needed at some point?

34-20

- The alternatives selected do not reflect those that were requested by the community. For some reason, increases in the amounts of retail were included in alternatives that looked at the impacts of housing increases. These should be separated into their own analysis to provide a more accurate picture of the impacts that the community requested be studied.

34-21

- I have attached scans of Table 5-6 with hand-written adjustments to some of the analysis. On page 5-31, the analysis of the Multifamily alternative appears to assume that all infrastructure needed to build the base project would be built, and therefore, not enough funding would be raised to build it. In this scenario, much of the infrastructure for the main street neighborhood would not need to be provided. This savings would likely offset any reductions in funding from selling multi family units instead of SFH. The rest of my comments are noted.

34-22

A quick non-EIR related comment: As the city in the Bay Area that is likely to see the largest impact from sea level rise, it is odd that we should develop Climate Change policies for the General Plan. I hope that in the coming year we can rectify that.

Thank you again for the opportunity to comment.

John Knox White

Page 5-31: Row 5, Multifamily:

There is no reason that this would be less likely to reinvest in infrastructure. This rating appears to assume that 100% of the infrastructure must be replaced, which is contrary to Alameda staff's statements that this is not a requirement or goal of this project.

Rating should be: **0**

Page 5-31: Row 6, Multifamily:

As with top, this presupposes the requirement that the non-reuse area of the point project will need to subsidize the reuse area, which is not consistent with staff's presentation of the requirements of this project

Rating should be: **0**

Page 5-31: Row 7, Multifamily:

The Multifamily proposal builds proposed housing in a configuration that has been shown to better meet this sustainability criteria than the "project" therefore it should not be rated equal to the project's rating

Rating should be: **1**

Page 5-31: Row 9, Multifamily:

How does the Multifamily alternative reduce views of the water and public access more than the "project"? Access and views will be the same in both options

Rating should be: **0**

Page 5-32: Row 3, Multifamily:

This alternative would not limit or reduce the orderliness of phasing, sizing or financing of site infrastructure any more than the "project"

Rating should be: **0**

Page 5-32: Row 4, Multifamily:

There is no reason to suspect that the Multifamily alternative would have a negative impact on the fiscal neutrality policy.

Rating should be: **0**

Page 5-32: Row 10, Multifamily:

20% of the housing in the multifamily alternative (268 existing units) are single family homes, therefore this alternative provides "a diversity of housing types" and should receive the same rating as the "project."

Rating should be: **0**

Page 5-32: Row 13, Multifamily:

APC can relocate in numerous areas of the point and could fit into any of the alternatives in this document (except no-project). There is no reason to assume that APC's relocation could only occur in the "project" or something bigger.

Rating should be: **0**

Page 5-34: Rows 2-8, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **LS**

Page 5-34: Row 9, TOD and High Density:

How would these alternatives create less safety than the project, via simply the land use decisions in the alternatives.

Rating should be: **LS**

Page 5-35: Row 1, Multifamily, TOD and High Density:

All three of these alternatives are more consistent with city policies, plans and programs,

Rating should be: **LS (less)**

Page 5-35: Rows 2-7, TOD and High Density:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM. Additionally, all three of these alternatives are more consistent with city policies, plans and programs. Some of these items (rows 4-7) have greater impact, but it's a good thing (like higher transit use, which makes better service possible).

Rating should be: **LS**

Page 5-36: Row 3, Preservation:

This should take into account whether the proposal can actually support the preservation

Rating should be: **possibly SU**

Page 5-37: Row 6, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **SU**

Page 5-38: Row 4, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **SU**

Page 5-38: Row 6, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM .

Rating should be: **LS (possibly LS (down) if impacts of increased Open Space are taken into account)**

Page 5-38: Rows 8-9, TOD:

Why will these impacts be greater than the “project?”

Page 5-39: Row 1, TOD:

Why will these impacts be greater than the “project?”

Page 5-39: Row 4, TOD:

The WRT study found that there would not be an increased impact, these need to be reanalyzed appropriately with the proposed TDM

Rating should be: **SU**

Page 5-44: Row 4, TOD:

Why will these impacts be greater than the “project?”

Page 5-44: Row 5, TOD:

Why would this have larger foreseeable negative impacts on Public Service and recreation? Additional units would cover the additional costs, using the same financial assumptions in the “project.”

Rating should be: **LS**

## Letter 34. Individual (John Knox White)

34-1 The City of Alameda agrees with the comment. Transportation Demand Management (TDM) is a well-documented, proven, and effective program to reduce automobile use and the resulting transportation impacts from single occupancy vehicles, which were identified in the Draft EIR. General Plan Policy 4.4.2.a establishes TDM as the primary strategy that the City of Alameda should utilize to reduce or eliminate transportation impacts caused by project generated increases in automobile trips. The Draft EIR recommends that TDM be the primary mitigation imposed to reduce transportation impacts caused by the project. The Draft EIR describes the TDM program as part of the proposed project starting on page 3-22, under the Circulation Framework. The Draft EIR further identifies the TDM program in Chapter 4.C, *Transportation and Circulation* as Mitigation Measure 4.C-2a under Impact 4.C-2, related to impacts of the proposed project on the local roadway network. In addition, Mitigation Measure 4.C-2b, which is a monitoring program, would be established to regularly assess the success of the TDM program. The text on page 4.C-37 of the Draft EIR is amended as follows:

~~“Accordingly, it would be speculative to assume that the TDM mitigation measure would reduce the impact to less than significant. Therefore, if determined by the Monitoring and Improvement Program to be needed, Mitigation Measure 4.C-2.c is recommended if the monitoring reveals that the TDM measures have not successfully reduce the project automobile volumes as the impacted location.~~

34-2 As explained in Section 4.C, *Transportation and Circulation* of the Draft EIR, Mitigation Measure 4.C-2a would be the first mitigation measure applied to address transportation impacts of the proposed project. Mitigation Measure 4.C-2b, a monitoring program, would be established to regularly assess the success of the TDM program. Depending on the success of the TDM program, the City would determine which of the intersection improvements identified in the EIR and incorporated into the Mitigation Monitoring and Report Program would be required to address residual transportation impacts.

The mitigation measures identified in the Draft EIR are consistent with Policy 4.4.2.a. These measures are specifically designed to ensure that TDM is the primary mitigation measure to reduce the vehicle trips and, therefore, reduce or eliminate transportation impacts. The mitigation measures require the City to monitor the impacted locations throughout the project buildout period to confirm that the TDM program has successfully reduced any project impact to a less than significant level. In the event, and only in the event, that the City monitoring shows that the TDM programs are not avoiding or sufficiently reducing an impact, the “second level” mitigations, calling for physical improvements, could be implemented to mitigate the level of service impact at a particular location. This structure of first and second level mitigation is consistent with Policy 4.4.2.

- 34-3 Please see Chapter 5, under *Revisions to the Draft EIR*, for revisions to text for proposed revisions to certain mitigation measures to further ensure compliance with Policy 4.4.2.a.
- 34-4 The Impact Analysis in Section 4.C, *Transportation and Circulation* of the Draft EIR, contains an assessment of secondary pedestrian, bicycle, and transit level of service impacts at every location where a mitigation measure would require signal modifications or restriping to accommodate an additional turn lane. Following the description of each mitigation measure, the impact finding describes the resulting level of impact to each of the four modes of transportation (auto, transit, pedestrian, bicycle) that are designated for analysis in the City's multi-modal evaluation scheme.
- 34-5 The citywide bicycle network was evaluated in the Draft EIR (see pages 4.C-4, 4.C-17, and 4.C-45). The City's bicycle thresholds, presented on page 4.C-17 of the Draft EIR and adopted by the Transportation Commission, establish the following three factors that can impact bicycle level of service: an increase in traffic speed, an increase in traffic volume, and a decrease in street/lane width (space for bicycles). To do the analysis, the City's transportation consultants reviewed the projected increase in traffic volumes and traffic speeds resulting from the project across the entire city roadway network. This analysis identified locations of potential bicycle impacts. For those segments where the volume or speed increased significantly, an analysis of bicycle impacts occurred, as presented starting on page 4.C-45 of the Draft EIR. The bicycle impacts analysis concluded that bicycle impacts would occur at the following locations and that the following mitigation measures should be implemented to maintain bicycle level of service:

- Stargell Avenue Bikeway Improvements (Mitigation Measure 4.C-2m)
- Main Street Bikeway Improvements (Mitigation Measure 4.C-2n)
- Central Avenue Bikeway Improvements (Mitigation Measure 4.C-2o)
- Oak Street Bikeway Improvements (Mitigation Measure 4.C-5ziv)

Similar to the automobile impacts, the first level mitigation measure would be Mitigation Measure 4.C-2a (TDM Program). Pursuant to Mitigation Measure 4.C-2b, the City would monitor these roadway segments. If, and only if, the TDM program is unsuccessful, will the second level mitigation (the physical improvements to improve bicycle level of service) be required.

- 34-6 Section 4.C, *Transportation and Circulation*, of the Draft EIR contains an analysis of the potential impacts of the project on all four (4) modes of transportation (automobile, transit, bicycle, and walking). However the analysis for each mode is different, because the thresholds of significance are different and the methods for measuring impacts are different for each mode, as explained beginning on page 4.C-17 of the Draft EIR.

As described on Draft EIR page 4.C-17, the threshold for a pedestrian impact is determined by either of the following two factors: an increase in signal timing delay for pedestrians or the increase in the curb to curb width of the street. Accordingly, the analysis in the Draft

EIR examined the pedestrian level of service on intersections where the Draft EIR was proposing either a change to signal timing or a widening of the right of way.

- 34-7 The study segments for transit LOS were selected by identifying all transit priority streets in Alameda, and then focusing on those streets for which the model projected substantial changes in auto volumes. For example, while Santa Clara Avenue is a transit priority street the Model did not project substantial changes in auto volumes on Santa Clara Avenue, and, as a result, it was not included in the transit LOS analysis. In accordance with the adopted Threshold of Significance for transit, if the project is not generating enough traffic on the street to slow the speed of the traffic on that street, then there would not be an impact to transit speed.
- 34-8 As described on page 4.C-17 of the Draft EIR in the explanation of Alameda’s multi-modal significance criteria, a segment, for the purposes of analysis, is defined as the impacted bus stop location plus the two previous stops and the two subsequent stops. When a segment crosses a City boundary the last stop shall be the first bus stop outside the City of Alameda. None of the segments analyzed in the Draft EIR crossed a City boundary; however, because the segments internal to Alameda were long enough to capture any potential impacts of the proposed project on transit on roadways experiencing a large increase in automobile trips.
- 34-9 Please see response to Comment 34-6. The thresholds for each mode are different. For example, if the project does not cause an increase of automobile traffic at a particular intersection, there is no need to change the configuration of the intersection or the timing of the signal, and therefore, there is no possibility of a pedestrian impact. The pedestrian, transit, and bike LOS results tables were inadvertently left out of the Draft EIR appendix, but have been included in **Appendix B** of the Final EIR.
- 34-10 Pursuant to the HCM 2000<sup>25</sup> methodology for calculating pedestrian delay along a crosswalk at a signalized intersection, the calculation considers the amount of “effective green time” allowed for a pedestrians to cross, which includes the green and yellow portions of the cycle allocated to that movement. The comment refers to “flashing red,” which is understood to refer to the “Flashing Don’t Walk” pedestrian indicator. Pedestrians are permitted to be in the intersection during this interval, but they are advised not to begin crossing the intersection during the “Flashing Don’t Walk” interval because the remaining effective green time would not be adequate for traversing the crosswalk at an average walking speed. The calculations presented in the Draft EIR are correct.
- 34-11 The Draft EIR provided an extensive analysis of alternatives as required by and consistent with the requirements of the California Environmental Quality Act, in Chapter 5, *Alternatives*. The descriptive analysis is followed by Table 5-6, beginning on page 5-31 of the Draft EIR, which summarizes the analysis in the side-by-side format suggested by the comment.

<sup>25</sup> Transportation Research Board. 2000. *Highway Capacity Manual 2000*.

- 34-12 The General Plan land use designations and names were approved by the City Council in 2003. As described on page 3-33 of the Draft EIR, the proposed project includes a General Plan Amendment to revise Table 2-7 and the street classifications at Alameda Point.
- 34-13 The San Francisco Bay Conservation Development Commission's (BCDC) conducted a vulnerability assessment, in which the two selected sea level rise projections were 16 inches by 2050 and 55 inches by 2100.
- 34-14 General Plan Policy 4.2.4.c: "Encourage mixed use development that utilizes non-single occupancy vehicle transportation modes" is reproduced on page 4.C-14 of the Draft EIR and is acknowledged as an applicable policy. Policy 4.2.4.c is also discussed under Impact 4.C-10, related to *Consistency with Adopted Policies, Plans or Programs Supporting Alternative Transportation*.
- 34-15 The June 7, 2013, Final Draft of the IPCC report has been accepted but not approved in detail, and the report is not to be cited, quoted, or distributed.<sup>26</sup> The flood protection system for the proposed project would be designed for an 18-inch sea level rise above the 100-year flood protection level; this design level accounts for the recent information available in the CO-CAT document released in March 2013 and IPCC report in September 2013. Please see response to Comment 34-13.
- 34-16 As described on page 1-7 of the Draft EIR, the proposed project is included in *Plan Bay Area* as a Priority Development Area (PDA). Through incentives, *Plan Bay Area* encourages future development within PDAs. According to ABAG, "this allows the region to reduce the emission of GHGs, house our population in a wide range of neighborhoods, preserve our natural resources, and support the creation of and greater access to new employment opportunities."<sup>27</sup> As such, the development of the proposed project is part of the region's strategy for reducing GHG pursuant to the requirements of SB 375 and AB 32. Further, as discussed in Impacts 4.F-7 and 4.F-10, the proposed project would not have a significant impact on GHGs. As stated in the analysis the net GHG emissions associated with the project would be below BAAQMD's "efficiency threshold" of 4.6 metric tons of CO<sub>2</sub>e per service population per year. This would represent a cumulatively less-than-significant GHG impact. Although not relied on in the above analysis, implementation of Mitigation Measures 4.F-2a, 4.F- 4, and 4.F-9b would further reduce GHG emissions associated with construction and operations of the project.
- 34-17 General Plan Policy 4.2.3.d is added to page 4.F-14 of the Draft EIR:

**4.2.3.d Support and prioritize trip reduction strategies that maximize air quality benefits and reduce greenhouse gas emissions.**

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<sup>26</sup> Please note that the recent June 7, 2013 Final Draft of the IPCC report has been accepted but not approved in detail and as stated in the report it is not to be cited, quoted, or distributed.

<sup>27</sup> ABAG and MTC, 2013. Plan Bay Area. *Strategy for a Sustainable Region*. July 2013

1. Support the use of alternative fuel vehicles for all transportation modes.
2. Encourage shift of trips to alternative transportation modes. This includes short trips, as these will have a disproportionate impact on air quality.

34-18 The BAAQMD Roadway TAC Screening tables were used to predict emissions along the specified roads. The estimated PM<sub>2.5</sub> emissions on Main Street would have twice the PM<sub>2.5</sub> concentration as Atlantic or Stargell avenues due to the inherent differences in concentrations for North-South and East-West roads included in the BAAQMD Roadway TAC Screening tables, as well as the distance of sensitive receptors from the roadways.

Regarding the General Plan Objective 4.2.3a and 4.2.3b, and Policies 4.2.3a and 4.2.3b are added to page 4.G-9 of the Draft EIR.

**4.2.3.a** Street projects should be designed to minimize the requirements for sound mitigation measures. Do not implement street projects that necessitate a soundwall.

**4.2.3.b** Ensure that transportation system improvements comply with accepted noise standards in residential areas. Monitor the noise impacts of the existing transportation system. Identify strategies to mitigate excessive noise conditions.

34-19 Using rubberized asphalt for the noise-impacted streets where appropriate could reduce noise levels. One noise study showed that rubberized asphalt resulted in an average of a 4 dBA reduction in traffic noise levels compared to conventional overlays (Sacramento County, 1999), which represents a 60 percent reduction in traffic noise energy and a clearly perceptible decrease in traffic noise. Achieved noise reductions from fences or barriers can vary, but typically range from approximately 5 to 10 dBA, depending on construction characteristics, height, and location. Sound barriers are not permitted per General Plan policy, but it is noted that sound barriers currently exist along portions of Appezato Parkway (Atlantic Avenue) and Willie Stargell Avenue. However, for existing uses along other impacted street segments, there are many locations where soundwalls or fences would not be feasible due to space constraints or driveways (e.g., Main Street). Also, rubberized asphalt repaving could improve the impacted streets, but areas that are not completely repaved may still experience significant noise impacts.

While these measures could substantially reduce the impact of increased traffic noise on the exterior and interior environment of existing and proposed noise-sensitive uses, as required by City policy and would be implemented by Mitigation Measure 4.C-2a, identified in the Draft EIR, the preferred approach would be to reduce vehicle trips through a TDM program. The TDM program will be designed to be enforceable and successful. As a result, noise from project generated traffic would be reduced in proportion to the reduction in overall trips.

- Regarding reduced speed limits, the citywide speed limit is 25 miles per hour. The City could evaluate lower speed limits as a matter of policy. However, the EIR does not identify reducing speed limits as a potential mitigation measure because if a street is designed for a particular speed, posting a sign to lower the speed does not necessarily cause drivers to slow down.
- 34-20 As discussed under Impact 4.I-8, the flood protection measures would be designed with the ability to adapt to 55 inches (approximately 1.4 meters) of sea level rise. Additionally, the MIP plans for flood protection, including seal-level rise, beyond 55 inches.
- 34-21 As stated on page 5-1 of the Draft EIR, the range of alternatives shall include alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project (*CEQA Guidelines* § 15126.6(a)-(c)). CEQA requires that an EIR describe and evaluate a range of reasonable alternatives to the proposed project, or to the location of the proposed project, and evaluate the comparative merits of the alternatives (*CEQA Guidelines* § 15126.6(a), (d)). The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (§ 15126.6(a), (f)). CEQA does not require an analysis of every conceivable alternative. Further, as stated on page 5-2 of the Draft EIR, the selection of alternatives was designed to create a range of alternatives that would achieve at least some of the project objectives. In addition, the Draft EIR did present alternatives with more housing and retail (High Density Alternative) and with less housing and retail (the Preservation/Less Development Alternative) for a reasonable range of Alternatives.
- 34-22 In general, the alternatives that would result in more development were found to have greater impacts. Although higher density at Alameda Point could conceivably result in less development elsewhere in the Bay Area that might be less accessible to transit, it would be speculative to make this determination in the EIR for this project, given that the City of Alameda has no jurisdiction over development elsewhere in the region. Moreover, reducing or avoiding regional impacts does not necessarily translate into a reduction in the local impacts.

The comment is correct that if additional areas of Alameda Point are identified as areas where no new development would be approved, these decisions could result in a lower cost for some elements of the infrastructure plan, which could in turn reduce construction related impacts to air quality, transportation, and noise. However, there are implications of not developing certain areas, such as the Main Street Neighborhood, that could result in the inability to serve the long-term needs of the Supportive Housing Units due to the failure of deteriorating existing infrastructure.

**Comments- Alameda Point Draft EIR Planning Board October 28, 2013  
Brian Schumacher [bdschumacher@gmail.com](mailto:bdschumacher@gmail.com)**

After looking through the whole paper copy of the Alameda Point Draft EIR to decide what I had to skip, I was going to focus on the Transportation section for traffic issues and Hydrology for sea level rise. But I never got to the sea level issues.

The more I looked at Transportation the more time I spent.

Alameda Point is quiet today, compared to the stated plans for adding 1400 homes, 3200 residents, 8900 jobs, and 5 million sqft of businesses.

Yet the intersections, across the Island, that are crowded today (showing the worst Level of Service Level F) are much the same ones as in the year 2035.

The report should explain why they dont differ more, and why the analysis and traffic model of development at the Point is accurate and complete, and not in error.

The F Level of Service Level means that the average wait is at least 2 minutes but it could be longer, and a few intersections show over 2000 or 3000 seconds average waiting time during peak commute hour, but this doesn't make sense either because drivers will just do something else.

The reason given in several places is background growth, as if this outcome is inevitable.

But because of an EIRs complexity the contractor specialist should clearly present all findings conclusions and recommendations, with clear summaries of important points.

Simply adding a summary to the Final EIR would be too little too late. Many residents could say something like 'Well why didn't they say so, because I would have said they need a different plan.'

**Instead, for a project that will take over two decades, the Draft EIR Comments should be used during another 2 months, to guide more analysis and writing of a Supplemental Draft EIR, before the City approves a Final EIR.**

35-1

35-2

## Letter 35. Individual (Schumacher)

35-1 The Draft EIR concluded that the proposed project would generate significant and unavoidable impacts (see Chapter 2, *Executive Summary* for a summary of the impacts.) As documented in the EIR for the Alameda Point General Plan Amendment in 2003, the Alameda Landing Supplemental EIR in 2006, and a variety of other City of Alameda traffic studies over the last 10 years, the capacity of the Webster and Posey Tubes is fixed to a specific number of automobiles that can cross between the two cities during the AM or PM peak commute periods. The City of Alameda conducts an annual count of automobiles using the tubes in the AM and PM periods and reports those counts annually. It is well documented that the existing tubes have been at or near capacity for the last six to seven years. Therefore, the Draft EIR found that regional growth and other development that is planned in Alameda over the next 20 to 30 years will exceed the capacity of the Webster and Posey Tubes. The Draft EIR finds that the limited capacity of the tubes causes many automobile trips to divert to other crossings during the AM and PM peak periods. In addition to diversion of commute hour traffic, it should be expected that the peak hours of congestion will “spread” as more commuters choose to leave earlier or delay their commute to later in the morning to avoid the peak hours of congestion. Also see response to Comment 30-7.

35-2 As set forth in CEQA *Guidelines* § § 15126.2 and 15126.4, before deciding whether to approve a project, public agencies must consider the significant environmental impacts of the project and must identify feasible measures to minimize those impacts. Pursuant to CEQA *Guidelines* §15063(b), if any aspect of the proposed project, either individually or cumulatively, may cause a significant effect on the environment, the lead agency must prepare an Environmental Impact Report (EIR) unless the project can be modified to mitigate all of the significant adverse environmental effects before an EIR is prepared (CEQA *Guidelines* §15063(c)(2)). The City of Alameda has determined that the size, scale, and potential impacts resulting from the proposed project require the preparation of an EIR and presented a full transportation impact analysis in Section 4.C, *Transportation and Circulation* of the Draft EIR.

The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving the proposed project and must reflect the Lead Agency’s independent judgment and analysis of the significant environmental effects of the proposed project on the environment (California Environmental Quality Act (CEQA) *Guidelines*, §15090).