CITY OF ALAMEDA
TRANSPORTATION ELEMENT UPDATE
FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2007072075

Prepared for:
CITY OF ALAMEDA
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NOVEMBER 2008
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City of Alameda  
November 2008  
Transportation Element Update  
Final Environmental Impact Report
1.0 INTRODUCTION
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This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Alameda is the lead agency for the environmental review of the proposed Transportation Element Update and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from adoption and implementation of the Transportation Element, as well as responds to comments received on the Draft EIR.

1.1 BACKGROUND AND PURPOSE OF THE EIR

OVERVIEW OF CEQA REQUIREMENTS FOR PREPARATION OF AN EIR

The City of Alameda (City), serving as the lead agency, has prepared this EIR to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed Transportation Element Update. As set forth in the provisions of CEQA and implementing regulations, public agencies are charged with the duty to consider the environmental impacts of proposed transportation improvements and to minimize these impacts where feasible while carrying out an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

State CEQA Guidelines Section 15121(a) states that an EIR is an informational document for decision-makers and the general public that analyzes the significant environmental effects of a project, identifies possible ways to minimize significant effects, and describes reasonable alternatives to the project that could reduce or avoid its adverse environmental impacts. Public agencies with discretionary authority are required to consider the information in the EIR, along with any other relevant information, in making decisions on the project.

CEQA requires the preparation of an environmental impact report prior to approving any project, which may have a significant effect on the environment. For the purposes of CEQA, the term “project” refers to the whole of an action which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). With respect to the proposed City of Alameda Transportation Element, the City has determined that the proposed development is a “project” within the definition of CEQA.

BACKGROUND OF ENVIRONMENTAL REVIEW PROCESS OF THE PROJECT

The following is an overview of the environmental review process for the City of Alameda Transportation Element that has led to the preparation of this FEIR.

Notice of Preparation and Initial Study

In accordance with Section 15082 of the State CEQA Guidelines, the City prepared a Notice of Preparation (NOP) of an EIR for the project on July 18, 2007. The City was identified as the lead agency for the proposed project. The notice was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the proposed project. A scoping meeting was held on August 13, 2007, to receive additional comments. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The NOP and responses by interested parties are presented in Appendix A of the Draft EIR. An Initial Study for the project was prepared and released for public review along with the NOP. Its conclusions supported preparation of an EIR for the project. The Initial Study is also included in Appendix A of the Draft EIR.
Draft EIR

The Draft EIR (DEIR) was released for public and agency review on August 6, 2008, with the review period set to end on September 22, 2008. The DEIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. The Draft EIR was provided to interested public agencies and the public and was made available for review at Alameda City Hall and at Alameda’s website.

Final EIR

The City received 9 comment letters from agencies, interest groups, and the public regarding the Draft EIR. This document responds to the written comments received as required by CEQA. This document also contains minor edits to the Draft EIR, which are included in Section 4.0, Minor Revisions to the Draft EIR. This document constitutes the FEIR.

Certification of the Final EIR/Project Consideration

The City will review and consider the FEIR. If the City finds that the FEIR is “adequate and complete,” the City may certify the FEIR. The rule of adequacy generally holds that the EIR can be certified if: (1) it shows a good faith effort at full disclosure of environmental information; and (2) it provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may take action to adopt, amend, or reject the proposed City of Alameda Transportation Element Update. A decision to adopt the General Plan Amendment would be accompanied by written findings in accordance with State CEQA Guidelines Section 15091 and Section 15093. Public Resources Code Section 21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

1.2 Type of Document

The State CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. According to Section 15168:

A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

(1) Geographically,

(2) As logical parts in the chain of contemplated actions,

(3) In connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or

(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.
The program-level analysis considers the broad environmental effects of the overall proposed Transportation Element. This EIR will be used to evaluate subsequent projects and activities under the proposed Transportation Element. Additional environmental review under CEQA will be required and would be generally based on the subsequent project’s consistency with the Transportation Element and the analysis in this EIR, as required under CEQA. When individual projects or activities under the Transportation Element are proposed, the City would be required to examine the projects or activities to determine whether their effects were adequately analyzed in the program EIR (State CEQA Guidelines Section 15168). If the projects or activities would have no effects beyond those analyzed in this EIR, no further CEQA compliance would be required.

1.3 **INTENDED USES OF THE EIR**

This EIR is intended to evaluate the environmental impacts of the project to the greatest extent possible. This EIR should be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with projects in the City that are consistent with or implement the Transportation Element Update. Subsequent actions that may be associated with the proposed Transportation Element are identified in Section 3.0, Project Description, of the Draft EIR.

1.4 **ORGANIZATION AND SCOPE OF THE FINAL EIR**

This document is organized in the following manner:

**SECTION 1.0 – INTRODUCTION**

Section 1.0 provides an overview of the EIR process to date and what the FEIR is required to contain.

**SECTION 2.0 – EXECUTIVE SUMMARY**

Section 2.0 includes an updated Executive Summary that provides a brief project description and presents a summary table of probable environmental effects edited as a result of comments received on the DEIR and minor staff edits.

**SECTION 3.0 – COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR**

Section 3.0 provides a list of commenters, copies of written comments (coded for reference), and the responses to those written comments made on the Draft EIR.

**SECTION 4.0 – ERRATA TO THE DRAFT EIR**

Section 4.0 consists of revisions to the Draft EIR that are a result of responses to comments, as well as minor staff edits that do not change the intent or content of the analysis or mitigation measures.

**SECTION 5.0 – FINAL MITIGATION MONITORING AND REPORTING PROGRAM**

Section 5.0 consists of the Final Mitigation Monitoring and Reporting Program for the project.
2.0 Executive Summary
2.0 EXECUTIVE SUMMARY

This section provides an overview of the proposed City of Alameda Transportation Element Update (the “proposed project”) and the environmental analysis of the proposed project. For additional detail regarding specific issues, please consult the appropriate chapter of Draft EIR Sections 4.1 through 4.4 (Environmental Setting, Impacts, and Mitigation Measures).

2.1 PURPOSE AND SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

This Environmental Impact Report (EIR) will provide, to the greatest extent possible, an analysis of the potential environmental effects associated with the implementation of the Transportation Element Update, pursuant to the California Environmental Quality Act (CEQA).

This EIR analysis focuses upon potential environmental impacts that could arise from implementation of the Transportation Element Update through transportation improvements within the Planning Area, as regulated and guided by Transportation Element Update policies and action items. The EIR adopts this approach in order to provide a credible worst-case scenario of the impacts resulting from project implementation.

2.2 PROJECT CHARACTERISTICS

The proposed project is the update and adoption of the City of Alameda Transportation Element. The 1991 City of Alameda General Plan replaced the City’s 1979 Combined Land Use Plan. The proposed City of Alameda General Plan Transportation Element Update is intended to provide policy direction to guide transportation decision-making within the City.

The Transportation Element Update comprises newly proposed goals, policies, and implementation actions which will be used to shape future preservation, enhancement, and development-related decisions. The primary objective of this project is to:

- Update the citywide transportation policies, goals, and objectives contained in the 1991 City of Alameda General Plan Transportation Element to reflect current community goals, priorities, and transportation needs.
- Ensure consistency between the City’s various transportation-related policies and plans;
- Set the policy direction for the City’s transportation decision making;
- Ensure that planned developments and improvements meet the City’s current and future transportation needs for all modes; and
- Establish transportation project priorities.

2.3 SUMMARY OF ENVIRONMENTAL IMPACTS

Table 2.0-1 displays a summary of impacts for the proposed Transportation Element Update, City of Alameda Transportation Element Policies, and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance is indicated both before and after the implementation of each mitigation measure.

For detailed discussions of all mitigation measures and of proposed Transportation Element policies and action items that would provide mitigation for each type of environmental impact addressed in this EIR, refer to the appropriate environmental topic section in the Draft EIR (i.e., Sections 4.1 through 4.4).
## Table 2.0-1
### PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

<table>
<thead>
<tr>
<th>Impact</th>
<th>Transportation Plan Policies and Action Items</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 Land Use</td>
<td></td>
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<tr>
<td><strong>Impact 4.1.1</strong></td>
<td>Implementation of the proposed Transportation Element Update would not physically divide established communities within the City of Alameda.</td>
<td>Policies: TE-4.1.1.b, TE-4.1.1.d, TE-4.1.1.e, TE-4.1.1.h, TE-4.1.1.k, TE-4.1.6.d, TE-4.2.2.a, TE-4.2.2.e, TE-4.3.2.c, TE-4.3.2.d, TE-4.3.6.b</td>
<td>LS</td>
<td>None required</td>
</tr>
<tr>
<td><strong>Impact 4.1.2</strong></td>
<td>Implementation of the proposed Transportation Element Update would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</td>
<td>Policies: TE-4.1.7.d, TE-2.3..b, TE-4.2.4.a, TE-4.2.4.c, TE-4.3.1a., TE-4.3.1.d, TE-4.3.1.e, TE-4.3.1.h, TE-4.3.2.d</td>
<td>LS</td>
<td>None required</td>
</tr>
<tr>
<td><strong>Impact 4.1.3</strong></td>
<td>Implementation of the proposed Transportation Element Update would not significantly impact land use plans or study areas within the Planning Area under cumulative conditions.</td>
<td>No applicable policy provisions</td>
<td>LCC</td>
<td>None required</td>
</tr>
</tbody>
</table>

**Note:**
- **LS** – Less Than Significant
- **LCC** – Less Than Cumulatively Considerable
- **PS** – Potentially Significant
- **CC** – Cumulatively Considerable
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- **SU** – Significant and Unavoidable
<table>
<thead>
<tr>
<th>Impact</th>
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</tr>
</thead>
<tbody>
<tr>
<td>4.2 Transportation and Circulation</td>
<td></td>
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<tr>
<td><strong>Impact 4.2.1</strong> Implementation of the proposed Transportation Element Update would allow an increase in traffic delay and a decrease in LOS on area intersections during the AM and PM peak hours.</td>
<td>Policies: TE-EIR-1, TE-EIR-2, TE-EIR-6, TE-EIR-7</td>
<td>PS</td>
<td>None available</td>
<td>SU</td>
</tr>
<tr>
<td><strong>Impact 4.2.2</strong> The proposed Transportation Element Update would support continued and expanded transit use, bicycling, and walking throughout the city.</td>
<td>Policies: TE-4.1.1.a, TE-4.1.1.b, TE-4.1.1.d, TE-4.1.1.e, TE-4.1.1.g, TE-4.1.1.m, TE-4.1.1.o, TE-4.1.2.a, TE-4.1.2.b, TE-4.1.2.c, TE-4.1.2.e, TE-4.1.5.a, TE-4.1.5.b, TE-4.1.5.c, 4.1.6.a, 4.1.6.d, 4.1.6.g, TE-4.1.8.d, TE-4.2.3.c, TE-4.2.4.b, TE-4.2.4.c, TE-4.3.1.a, TE-4.3.1.b, TE-4.3.1.c, TE-4.3.1.e, TE-4.3.1.j, TE-4.3.2.a, TE-4.3.2.b, TE-4.3.2.c, TE-4.3.3.a, TE-4.3.3.b, TE-4.3.3.c, TE-4.3.6.a, TE-4.3.6.b, TE-EIR-4</td>
<td>LTS</td>
<td>None required</td>
<td>LTS</td>
</tr>
<tr>
<td><strong>Impact 4.2.3</strong> The proposed Transportation Element Update would result in changes to the City’s circulation system and increased use of alternative</td>
<td>No applicable policy provisions</td>
<td>LTS</td>
<td>None required</td>
<td>LTS</td>
</tr>
</tbody>
</table>

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## Impact 4.2.4
The Transportation Element Update would support the City’s emergency response access and evacuation plans, but would also result in increased traffic delays.

**Policies**: TE-EIR-1, TE-EIR-2, TE-EIR-6, TE-EIR-7

**Mitigation Measure**: None available

**Resulting Level of Significance**: SU

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## Impact 4.3.1
The Transportation Element Update proposes policies that may result in future transportation improvement projects which could generate construction period exhaust emissions and fugitive dust that would affect local air quality.

**Policies**: No applicable policy provisions

**Mitigation Measure**: MM 4.3.1a

1. **The City shall require the following dust emission control measures be applied to transportation projects as appropriate and feasible. These measures are consistent with those recommended for use by BAAQMD.**
   1. Apply water on all active construction areas at least twice daily and more often when conditions warrant.
   2. Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.

**Resulting Level of Significance**: LTS (with mitigation)
## Impact

### Transportation Plan Policies and Action Items

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
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</tr>
</thead>
<tbody>
<tr>
<td>• Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites daily as needed to control dust.</td>
<td>• Sweep all paved access roads, parking areas, and staging areas at construction sites and sweep streets daily if visible soil materials are carried onto adjacent public streets.</td>
<td>2) For sites greater than 4 acres in size:</td>
<td>2) For sites greater than 4 acres in size:</td>
</tr>
<tr>
<td>• Sweep all paved access roads, parking areas, and staging areas at construction sites and sweep streets daily if visible soil materials are carried onto adjacent public streets.</td>
<td>2) For sites greater than 4 acres in size:</td>
<td>• Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).</td>
<td>• Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).</td>
</tr>
<tr>
<td>• Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.).</td>
<td>• Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.).</td>
<td>• Limit traffic speeds on unpaved roads to 15 miles per hour.</td>
<td>• Limit traffic speeds on unpaved roads to 15 miles per hour.</td>
</tr>
<tr>
<td>• Install appropriate erosion control measures to prevent silt runoff to public roadways.</td>
<td>• Install appropriate erosion control measures to prevent silt runoff to public roadways.</td>
<td>• Replant soil stabilizing vegetation in disturbed areas as quickly as possible.</td>
<td>• Replant soil stabilizing vegetation in disturbed areas as quickly as possible.</td>
</tr>
<tr>
<td>• Replant soil stabilizing vegetation in disturbed areas as quickly as possible.</td>
<td>2) For sites greater than 4 acres in size:</td>
<td>3) For sites that are located adjacent to sensitive receptors or warrant additional controls:</td>
<td>3) For sites that are located adjacent to sensitive receptors or warrant additional controls:</td>
</tr>
<tr>
<td>3) For sites that are located adjacent to sensitive receptors or warrant additional controls:</td>
<td>3) For sites that are located adjacent to sensitive receptors or warrant additional controls:</td>
<td>• Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the site.</td>
<td>• Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the site.</td>
</tr>
<tr>
<td>• Suspend grading activities when...</td>
<td>• Suspend grading activities when...</td>
<td>3) For sites that are located adjacent to sensitive receptors or warrant additional controls:</td>
<td>3) For sites that are located adjacent to sensitive receptors or warrant additional controls:</td>
</tr>
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<p>| Impact 4.3.2 | Implementation of the Transportation Element Update may expose sensitive receptors to odors or toxic air contaminants. | TE-4.1.1.c, TE-4.1.6.b, TE-4.2.1.a, TE-4.2.3.d, TE-4.2.4.a, TE-EIR-1 | LTS | None required | LTS |
| Impact 4.3.3 | Future growth in traffic could cause increases to carbon monoxide levels | No applicable policy provisions | LTS | None required | LTS |</p>
<table>
<thead>
<tr>
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<tr>
<td>along City roadways. However, projected concentrations would remain below health-based ambient air quality standards.</td>
<td>No applicable policy provisions</td>
<td>LTCC</td>
<td>None required</td>
<td>LTCC</td>
</tr>
<tr>
<td>Impact 4.3.4</td>
<td>Implementation of the proposed Transportation Element Update would result in potential traffic growth that outpaces population growth. This could exacerbate existing regional problems with ozone and particulate matter and conflict with BAAQMD air quality improvement efforts.</td>
<td>TE-4.1.1.d, TE-4.1.1.e, TE-4.1.6.a, TE-4.1.6.e, TE-4.2.3.d, TE-4.2.4.a, TE-4.2.4.b, TE-4.2.4.c, TE-4.3.1.e, TE-4.3.1.f, TE-4.3.1.j, TE-4.3.1.h, TE-4.3.2.d, TE-4.3.3.a, TE-4.3.3.b, TE-4.3.3.c, TE-4.3.4.a, TE-4.3.6.a, TE-4.3.6.d, TE-4.4.4.a, TE-4.4.4.d, TE-4.4.4.e, TE-4.6.6.1, TE-4.4.7.a, TE-4.4.7.b, TE-EIR-6, TE-</td>
<td>LTCC</td>
<td>None required</td>
</tr>
<tr>
<td>Impact 4.3.5</td>
<td>Implementation of the proposed Transportation Element Update would implement initiatives of the Local Climate Action Plan, result in a reduction in VMT and greenhouse gas emissions, and promote alternative modes of transportation.</td>
<td>TE-4.1.1.d, TE-4.1.1.e, TE-4.1.6.a, TE-4.1.6.e, TE-4.2.3.d, TE-4.2.4.a, TE-4.2.4.b, TE-4.2.4.c, TE-4.3.1.e, TE-4.3.1.f, TE-4.3.1.j, TE-4.3.1.h, TE-4.3.2.d, TE-4.3.3.a, TE-4.3.3.b, TE-4.3.3.c, TE-4.3.4.a, TE-4.3.6.a, TE-4.3.6.d, TE-4.4.4.a, TE-4.4.4.d, TE-4.4.4.e, TE-4.6.6.1, TE-4.4.7.a, TE-4.4.7.b, TE-EIR-6, TE-</td>
<td>LTCC</td>
<td>None required</td>
</tr>
</tbody>
</table>

4.4 Noise

<table>
<thead>
<tr>
<th>Impact 4.4.1</th>
<th>Short-term construction-generated noise levels could result in a substantial</th>
<th>No applicable policy provisions</th>
<th>PS</th>
<th>MM 4.4.1</th>
<th>LTS (with</th>
</tr>
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<tr>
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<tbody>
<tr>
<td>Increase in ambient noise levels depending on the respective proximity of land uses to the affected road segments from Transportation Element Update road improvements and other nearby noise-sensitive land uses.</td>
<td>Policies: TE-4.2.1. TE-4.2.2.a, TE-4.2.3.a, TE-4.2.3.b</td>
<td>LTS</td>
<td>on all transportation construction projects to reduce construction noise impacts to residential uses and other sensitive receptors. • Provision of noise-reduction intake and exhaust mufflers and engine shrouds on construction equipment, in accordance with manufacturers’ recommendations. • Construction of temporary barriers sufficient to the extent feasible to interrupt line of sight between onsite construction areas and the nearest noise-sensitive use(s).</td>
<td>LS - Less Than Significant</td>
</tr>
<tr>
<td>Impact 4.4.2</td>
<td>Implementation of the Transportation Element Update may result in increases in operational ambient noise levels, exceeding the City’s traffic noise standards, resulting in potential noise impacts to sensitive receptors.</td>
<td>LTS</td>
<td>None required</td>
<td>LS</td>
</tr>
<tr>
<td>Impact 4.4.3</td>
<td>Implementation of the Transportation Element Update may result in cumulative increases in operational ambient noise levels.</td>
<td>LTCC</td>
<td>None required</td>
<td>LTCC</td>
</tr>
</tbody>
</table>
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR
3.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) (Cal. Pub. Res. Code Section 21000, et seq.) and State CEQA Guidelines (Cal. Code Regs. Section 15000, et seq.). Alameda is the lead agency for the environmental review of the proposed Alameda Transportation Element and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from the adoption and implementation of the proposed Transportation Element and responds to comments received on the Draft EIR.

3.2 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft EIR.

<table>
<thead>
<tr>
<th>Letter</th>
<th>Individual or Signatory</th>
<th>Affiliation</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Lisa Carboni</td>
<td>California Department of Transportation</td>
<td>09/19/2008</td>
</tr>
<tr>
<td>B</td>
<td>William R. Kirkpatrick</td>
<td>East Bay Municipal Utility District</td>
<td>09/15/2008</td>
</tr>
<tr>
<td>C</td>
<td>Nancy Skowbo</td>
<td>AC Transit</td>
<td>09/22/2008</td>
</tr>
<tr>
<td>1</td>
<td>Michael J. Kreuger</td>
<td>Resident</td>
<td>09/19/2008</td>
</tr>
<tr>
<td>2</td>
<td>Ani Dimushiva</td>
<td>Resident</td>
<td>08/25/2008</td>
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<tr>
<td>3</td>
<td>Jean Sweeney</td>
<td>Resident</td>
<td>09/23/2008</td>
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<tr>
<td>4</td>
<td>C. James</td>
<td>Resident</td>
<td>09/19/2008</td>
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<td>5</td>
<td>Selina Faulhaber</td>
<td>Resident</td>
<td>09/20/08</td>
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<td>6</td>
<td>Robert Deutsch</td>
<td>Resident</td>
<td>09/21/08</td>
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<td>7</td>
<td>David Kirwin</td>
<td>Resident</td>
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<tr>
<td>8</td>
<td>Various</td>
<td>Joint Transportation Commission and Planning Board Meeting</td>
<td>08/25/2008</td>
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3.3 COMMENTS AND RESPONSES

3.3.1 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

State CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by Commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines 15204).
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

State CEQA Guidelines Section 15088 also recommends that where a response to comments results in revisions to the Draft EIR, that those revisions be incorporated as a revision to the Draft EIR, or as a separate section of the Final EIR.

3.3.2 RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Public agency comment letters are coded by letters and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1 is referred to as: A-1).
- Individual and interest group comment letters are coded by numbers and each issue raised in the comment letter is assigned a number (e.g., Comment Letter 1, comment 1: 1-1).

Where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, strike-out for deleted text). Comment-initiated text revisions to the Draft EIR and minor staff initiated changes are also provided and are demarcated with revision marks in Section 4.0 (Errata) of this Final EIR.

Where comments are directed to the merits of the Transportation Element policies and not to the adequacy of the environmental analysis, the comment is referred to the Planning Board and City Council for their consideration during deliberations on the merits of the project.
Letter A

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23360
OAKLAND, CA 94628-0560
PHONE (510) 652-5491
FAX (510) 595-5559
TTY 711

September 19, 2008

ALAGEN224
SCH # 2007072075

Mr. Andrew Thomas
Planning and Building Department
City of Alameda
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501-4477

Dear Mr. Thomas:

City of Alameda Transportation Element General Plan Amendment – Draft Environmental Impact Report

Thank you for including the California Department of Transportation (Department) in the environmental review process for the City of Alameda Transportation Element General Plan Amendment. The following comments are based on the Draft Environmental Impact Report (DEIR).

Signal Operations

All signalized intersections within the State Right-of-Way (ROW) should be upgraded to fully actuated control. The upgrade will maximize the efficiency of the signalized intersections that cannot be widened or significantly altered and reduce delay during non-peak hours.

To improve pedestrian safety and operations, signalized intersections within the State ROW should be modified such that permitted left turning movements operate as protected. High Street/Otis Drive, Broadway/Otis Drive and Central/Encinal/Sherman are intersections that may benefit the most from such modification.

Highway Operations

The DEIR states that the vehicle circulation impacts at the Eighth Street/Central Avenue, Broadway/Otis Drive, High Street/Otis Drive and Island Drive/Doolittle Drive intersections are significant and unavoidable. From the operational perspective, we concur with the assessment.

As the area is still experiencing growth, widening to add a shared through/left-turn lane at the signalized intersections could facilitate traffic movement at intersection approaches and departures. While we support policies that encourage transit and non-motorized modes, we are

“Caltrans improves mobility across California”
Mr. Andrew Thomas/City of Alameda  
September 19, 2008  
Page 2

concerned that, with adoption of Policy DEIR-1 and 2, the creation of additional automobile travel lanes would not be permissible.

Based on Caltrans Guide for Preparation of Traffic Impact Studies, "... Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities...", which is in conflict with this proposal.

**Advanced Planning**

1. Please provide the Department with the Mitigation Monitoring and Reporting Plan (MMRP) for our review.

2. On page 3.0-9, point number 5, in addition to State Route 61, the Department is also the responsible agency and reviews projects along State Route 260.

3. On page 4.2-15, paragraph 3, Interstate 880 and State Route 185 are also State facilities within the project study area.

4. On page 4.2.17, paragraph 3, please provide more details for the City's Traffic Impact Fees, e.g., criteria for applying fees to projects, fees should be quantified, do fees keep pace with inflation, etc.

5. On page 4.2.19, transportation improvements should not be assumed for the purpose of forecasting future traffic volumes unless they are funded. When do transitional designations become effective? To satisfy California Environmental Quality Act (CEQA) requirements for a reasonable worst-case analysis, please include a scenario with only funded improvements.

6. CEQA analysis requires analyzing existing conditions against the proposed Transportation Element Update (TEU) rather than assuming less congested conditions based on future street designations.

7. On page 4.2-21, Section EIR-6, the TEU should not limit mitigation strategies.

8. On page 4.2-22, Section EIR-7, congestion is always possible to mitigate. At the very least, project approval should be conditioned to allow phases to go forward only when impacts will be less than significant.

9. On page 4.2-22, Section EIR-7, please provide details of the proposed Transportation Demand Management measures.

**Encroachment Permit**

Any work or traffic control within the State ROW requires an encroachment permit that is issued by the Department. Traffic-related mitigation measures will be incorporated into the construction plans during the encroachment permit process. See the following website link for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits/

*Caltrans improves mobility across California*
Letter A Continued

Mr. Andrew Thomas/City of Alameda
September 19, 2008
Page 3

To apply for an encroachment permit, submit a completed encroachment permit application, environmental documentation, and five (5) sets of plans which clearly indicate State ROW to the address at the top of this letterhead, marked ATTN: Michael Condle, Mail Stop #5E.

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

Sincerely,

[Signature]
LISA CARBONI
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

"Caltrans improves mobility across California"
Letter A  Lisa Carboni, Department of Transportation

Response A-1: The commenter notes that all signalized intersections within the State Right-of-Way (ROW) should be upgraded to fully actuated control. Two of the signalized intersections within the State Right-of-Way (ROW) – High Street/Otis Drive and Broadway/Otis Drive – are currently fully actuated. The intersection of Central/Encinal/Sherman will be upgraded to fully actuated control as funds become available and should the intersection operations degrade to below the LOS standard.

Along the State ROW, protected left turns have been provided at High Street/Otis Drive and Broadway Otis Drive.

Response A-2: The commenter notes their concern that with the adoption of Policy DEIR-1 and 2, the creation of additional automobile travel lanes would not be permissible and not in compliance with Caltrans Traffic Study Guidelines. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element. The project, as proposed, would be in conflict with Caltrans Guidelines for the Preparation of Traffic Studies. The Environmentally Superior” alternative described in Chapter 6 of the DEIR would avoid this conflict.

Response A-3: The commenter requests the Mitigation Monitoring and Reporting Plan for review. The Mitigation Monitoring and Reporting Plan (MMRP) will be provided when available.

Response A-4: The commenter notes that Caltrans is also the responsible agency for projects along State Route 260 and 185 within the project study area. The following text revision to Draft EIR page 3.0-9 address the commenter’s comment:

The California Department of Transportation (Caltrans), which is responsible for interregional transportation services, including highways. Highways 261 260 and 61, which bisects Alameda, is subject to Caltrans approval for projects. Land use changes along the Highway 61 corridor are subject to review by Caltrans.

Response A-5: The commenter requests more details for the City’s Traffic Impact Fees. The commenter is referring to the Citywide Development Fees which are further described in the City Municipal Code, Chapter 27-3. The chapter is divided into several sections covering the intent and purpose of the fees and the findings of the nexus report. The amount of the fee is set forth by City Council resolution. Specifically, 27-3.14 describes the fee escalators so that the fees keep pace with inflation.

Response A-6: The commenter asks when transitional designations will become effective. Transitional designations will become effective when the proposed Transportation Element is approved. Any physical changes would occur as resources become available. The Base Case scenario represents a
reasonable worst-case analysis without the transportation improvements that are proposed as part of the Transportation Element.

Response A-7: The commenter notes that CEQA analysis requires analyzing existing conditions against the proposed Transportation Element Update (TEU). The project analysis assumes the future street designations and additional transportation improvements as described under the Methodology and Assumptions of the DEIR. The impacts of the proposed Transportation Element are compared to the 2030 Base condition, which assumes future growth and transportation improvements under the existing General Plan policies.

Response A-8: The commenter notes that the TEU should not limit mitigation strategies. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response A-9: The commenter argues that congestion is always possible to mitigate. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response A-10: The commenter requests details of the proposed Transportation Demand Management strategies. Transportation Demand Management measures are project-specific measures that are imposed at the time of project development to reflect the project characteristics. The City of Alameda has imposed TDM measures on development projects for many years.

Response A-11: The commenter notes that any work within the State ROW requires an encroachment permit from Caltrans. Subsequent implementation of the Transportation Element General Plan Amendment may require the need for an encroachment permit where project-specific environmental effects would be addressed under CEQA.
Letter B

East Bay Municipal Utility District

September 15, 2008

Andrew Thomas, Planning Services Manager
City of Alameda
Planning and Building Department
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501-4477


Dear Mr. Thomas:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Transportation Element Update of the General Plan located in the City of Alameda (City). EBMUD commented on the Notice of Preparation of a Draft EIR in August 2007 and the City addressed those comments in the Draft EIR. EBMUD has no further comments regarding environmental issues for this project.

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

Sincerely,

William R. Kirkpatrick
Manager of Water Distribution Planning

WRK:NJR:sb
sb08_238.doc
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter B  William R. Kirkpatrick, East Bay Municipal Utility District (EBMUD)

Response B-1: The commenter notes that EBMUD has no further comments regarding environmental issues for this project. The City thanks the District for their comment.
Letter C

Alameda Transportation Element Update
City of Alameda
Final Environmental Impact Report
November 2008

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Nancy Skowbo
Deputy General Manager - Service Development

September 22, 2008

Andrew Thomas
Planning Manager
Planning and Building Department
City of Alameda
2263 Santa Clara Ave.
Alameda, Ca. 94501

Subject: City of Alameda Transportation Element Update and Draft Environmental Impact Report

Dear Mr. Thomas:

Thank you for the opportunity to comment on the City of Alameda’s Transportation Element Update and the Draft Environmental Impact Report (EIR) on that update.

Overall Comment: AC Transit has a productive working relationship with the City of Alameda. AC Transit and the City have worked together for many years to maintain and improve bus service and bus operations in Alameda. We believe that the draft Transportation Element will help facilitate and strengthen this ongoing process. The Plan’s approach to network development supports AC Transit’s approach in Designing With Transit. By developing a transit-friendly approach that seeks to move away from auto dominance, the Plan avoids and reduces the environmental impacts which must be analyzed in the EIR.

AC Transit has some specific concerns, particularly about how various designations and uses of a street interact. The District proposes some policy language to strengthen the transit-supportive character of Transit Priority Streets with regard to key issues. AC Transit believes that it is important for Alameda to develop specific standards to guide the implementation of these policies.

Project Description - The Transportation Element: California planning law requires that cities prepare and update a “circulation” or “transportation” element in their General Plan, which defines policies concerning transportation within each city’s borders. At a minimum, the element must define the city’s system of streets and roads, and the purposes of different roadways.

The Transportation Element proposed by the City of Alameda represents a significant change in its approach to classifying roadways. Typically, cities classify roadways by expected/intended volume of use. The standard structure is arterial/collector/local street, with arterials expected to have the heaviest use and local streets the least.
Letter C Continued

Andrew Thomas, City of Alameda
September 22, 2008
Page 2 of 5

However, this approach usually does not adequately consider the needs of non-
automotive uses, such as transit and bicycles. Nor does it consider the land use
character of areas which streets and roads pass through.

To address these deficiencies, Alameda proposes to create three overlapping systems
of street designation. There would continue to be a volume driven Street Type
Classification System, with three types of arterials, two types of collectors, and local
streets. There would also be a Land Use Overlay, with each block classified by its
current principal type of land use. Finally, there would be a Modal Overlay - with some
(but not all) streets classified as Transit Priority, Bicycle Priority, or Truck Route. The
Transit Priority Streets are further subdivided into Primary Transit Streets, Secondary
Transit Streets and Exclusive Rights of Way.

On a policy level, the Transportation Element establishes four broad goals; safe and
efficient circulation, balancing mobility with livability, providing a choice of modes
beyond the single occupant automobile, and implementing the planned transportation
system in a coordinated and cost effective manner. There are objectives further
detailing each of these goals, and policies to implement them.

Transit Priority Streets Network: The Transportation Element proposes an extensive
network of Transit Priority Streets as Primary, Secondary, and Exclusive Right of Way
streets. The Transit Priority network includes the great bulk of existing AC Transit
routes serving Alameda; therefore, AC Transit supports the network as a whole. The
District believes the designations will be useful in guiding the city's subsequent
treatment of Transit Priority Streets. AC Transit encourages cities throughout the AC
Transit district to identify and implement a network of transit streets, as noted in AC
Transit's handbook, Designing With Transit.

AC Transit's most frequent and heavily used routes in Alameda are routes 50, 51, and
O. The streets these routes operate on have appropriately been designated as Primary
Transit Streets. There are only two significant trunk line segments designated as
Secondary rather than Primary Transit Streets:

- Broadway between Santa Clara Avenue and Blanding Avenue
- Mecartney Road between the Harbor Bay Ferry Terminal and Harbor Bay
  Parkway

The designations should remain appropriate over the long term because AC Transit has
no current plans to change the routes of Lines 50, 51, or O. The District notes that the
City has expressed interest in getting additional service to Fruitvale BART, which could
require operation of frequent service on streets not currently designated as Primary
Transit Streets. If this occurs, it may be appropriate to designate additional Primary
Transit Streets.

Bike Routes and Transit Priority Streets: AC Transit is pleased that the Element
generally designates bike routes on streets which are not designated as Primary Transit
Letter C Continued

Andrew Thomas, City of Alameda
September 22, 2008
Page 3 of 5

streets. Bike routes and Primary Transit Routes are designated together on six segments:

- Santa Clara Avenue between Webster Street and Grand Avenue. (where there is an existing bike lane)
- Apezatto/Atlantic west of Webster (where there is the potential for a transit right of way)
- Central Avenue between Main Street and Encinal Avenue (a segment which generally has little or no bus service now)
- Otis Street between Park Street and Broadway (a short segment)
- Harbor Bay Parkway from the Ferry Terminal to Ron Cowan Parkway
- Island Drive from the "Route 61" Bridge to Mecartney Road

In general, AC Transit believes that bike routes should be on alternative parallel routes rather than on Primary Transit Streets. Roadways that generate bus-bike conflicts could create an environmental impact by increasing hazards from design features. However, the District recognizes that the draft Element strives to minimize these conflicts. It should also be noted that the lane width policy for Primary Transit Streets appropriately calls for wider lane widths to minimize conflicts with bicyclists. Therefore, the District recommends that the dual designated segments be recognized as areas of potential conflict, and that no bike projects go forward in these areas without extensive consultation with AC Transit.

Additional Comments about the Transit Priority Streets Network: Streets served by routes 19, 63, OX and W (as well as some streets with no current service) have been designated as Secondary Transit Streets. AC Transit believes this is an appropriate designation. However, the District has some concerns about the limitations of potential treatments on secondary transit streets, as are discussed below.

One block which was not designated as a Transit Priority Street is Blanding Avenue between Broadway and Tilden Way, where lines 51 and W terminate, and lines 63 and W operate through. This block should be included as a Primary Transit Street.

The City should also confirm that the Transit Streets network proposed for Alameda Point in this Element are consistent with the transit routes being developed for Alameda Point.

AC Transit does not currently operate on the streets designated for Exclusive Rights of Way, with the exception of Ralph Apezatto Parkway/Atlantic Avenue. The District does not have any current plans to shift service to Clement Street or Lincoln Avenue from Santa Clara Avenue or Buena Vista Avenue. Santa Clara Avenue and Buena Vista Avenue are well located to serve the population and businesses on the main island of Alameda. In the long term, AC Transit is always willing to discuss how bus routes can best meet the City's and AC Transit's objectives.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter C Continued

Andrew Thomas, City of Alameda
September 22, 2008
Page 4 of 5

Transit Street Definition and Improvements: The proposed features for Primary, Secondary, and Exclusive Right of Way Transit Streets are listed on pp. 35-37. In general, Primary Transit Streets are eligible for a wider range of physical improvements. Secondary Transit Streets are defined on p.36 as providing for "local and neighborhood transit service without physical priority treatment." "Local and neighborhood" service does not accurately describe the service on all of the secondary streets - routes on Buena Vista and Shoreline operate a relatively long distance along the main island. This description should be revised. To AC Transit, the Secondary Transit Streets are more appropriately characterized by lower frequency service and service over fewer hours of the day.

Improvements and Congestion on Secondary Transit Streets: AC Transit is also concerned about the potential for physical improvements on Secondary Transit Streets. The District agrees that these physical improvements should be concentrated on Primary Transit Streets. In fact, Alameda has been a leader in implementing improvements to Primary Transit Streets such as Webster Street and Park Street. However, The District is concerned with the potential for congestion on both Primary and Secondary Transit Streets. The Draft EIR, on p. 4.2.22, identifies 9 intersections where congestion could occur because the revised Transportation Element makes it difficult, if not impossible, to widen streets. Three of those intersections involve Primary Transit Streets, and six involve Secondary Transit Streets.

Given the potential for congestion on Secondary Transit Streets, AC Transit believes that queue jump lanes at congested intersections should be a potential treatment on Secondary as well as Primary Transit Streets. If queue jumps and other appropriate treatments for congestion are not available on Secondary Transit Streets, there is the potential for impacts which are more negative for bus traffic than other traffic. This type of impact - on either a Primary or a Secondary Transit Street - could be a significant negative environmental impact that should be identified in the EIR. The potential increase in travel time and loss of reliability would also undermine Plan Policy 4.3.1.e "Provide amenities or support programs to make using alternative modes a more attractive option."

Lane Widths: AC Transit is concerned that the policy direction of the Plan could create pressure for inappropriately narrow travel lanes. The description of a Priority Transit Street indicates that it should have "wider lane widths or wider curb lanes to minimize conflicts with bicycles." No such statement is made for Secondary Transit Streets. In addition, land use overlay policies contradict the Primary Transit Street policy for Residential Corridor Streets and Commercial Main Streets, which are the land use types on the great bulk of transit priority streets. Both of these land use overlays call for "narrower travel lane width (or perceived width) through striping." Unduly narrow lanes can cause collisions between other vehicles and bus mirrors or buses. They can also lead to slowing of bus travel speeds and the types of potential environmental impacts described under congestion.
Letter C Continued

Andrew Thomas, City of Alameda  
September 22, 2008  
Page 5 of 5

As stated in Designing With Transit, AC Transit prefers to operate in travel lanes that are at least 12 feet wide. However, AC Transit buses can operate safely and efficiently in lanes as narrow as 11 feet. Therefore, we propose that the following item be added to the description of both Primary and Secondary Transit Streets:

"Travel lanes on Transit Priority Streets shall not be narrowed to less than eleven (11) feet, regardless of the land use overlay classification of the street."

Traffic Controls: The policy for Primary Transit Streets supports transit signal priority, on longer corridors. The transit priority streets policies are otherwise silent on traffic controls. It is also important that inappropriate traffic controls - especially stop signs - not be installed on transit priority streets. Stop signs disrupt bus operations and result in negative air quality impacts as the bus stops and starts. Bus operations would be improved if existing stop signs were removed or replaced by traffic signals. Removal of stop signs would benefit bicyclists as well. Therefore, the District proposes that the following item be added to the description of Primary and Secondary Transit Streets:

"No additional stop signs shall be added on transit priority streets. The City will use its best efforts to remove or replace existing stop signs on transit priority streets."

Policies Other than Street Network: Without commenting on every Goal, Objective, and Policy in the Plan, AC Transit strongly supports the overall direction of the Plan’s policies, which seek to redirect Alameda towards a more environmentally friendly, multimodal transportation system.

Alameda’s Transportation Element represents a significant step forward, which AC Transit applauds. The District will recommend that other cities in the AC Transit District review Alameda’s approach as they develop their own policies. The District believes there is ample opportunity for Alameda, working with AC Transit and other partners, to refine, improve, and implement the Plan. Please contact me if you have questions or comments about this letter.

Yours Truly,

Nancy Skowbo  
Deputy General Manager for Service Development

Cc: Tina Spencer, Long Range Planning Manager  
Cory Lavigne, Transportation Planning Manager  
Ajay Martin, Service & Operations Planning
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter C  Nancy Skowbo, AC Transit

Response C-1: The commenter notes that Alameda should develop specific standards to guide implementation of the policies to strengthen the transit-supportive character of Transit Priority Streets. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-2: The commenter notes that the Transportation Element Update represents a significant change to the approach to classifying roadways. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-3: The commenter states that the designations for Transit Priority Street Network should remain appropriate over the long term because AC Transit has not current plans to change the routes of Lines 50, 51, or O. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-4: The commenter notes that bike routes should be on alternative parallel routes rather than on Primary Transit Routes. Any projects along segments designated as both transit and bicycle priority streets will be designed in consultation with AC Transit. In terms of the specific segments identified, Island Drive and Harbor Bay Parkway are currently served by off-street bicycle paths. An off-street path is proposed for Appezzato Memorial Parkway. Currently on-street bicycle facilities are not proposed for these corridors; if this remains the case, bicycle/transit conflicts should not be a concern. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-5: The commenter states that other streets should be designated as Transit Priority Streets and that the City of Alameda should confirm that the Transit Streets network proposed for Alameda Point are consistent with the transit routes being developed for Alameda Point. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-6: The commenter notes that the description for Secondary Transit Streets as "local and neighborhood" service does not accurately describe the
service on secondary streets and should be revised. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-7: The commenter notes that the queue jump lanes at congested intersections should be a potential treatment on Secondary as well as Primary Transit Streets. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-8: The commenter is concerned that the policy direction of the Plan could create pressure for inappropriately narrow travel lanes. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-9: The commenter proposes that the following item be added to the description of Primary and Secondary Transit Streets:

"No additional stop signs shall be added on transit priority streets. The City will use its best efforts to remove or replace existing stop signs on transit priority streets."

Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response C-10: The commenter hopes that Alameda will work further with AC Transit to refine, improve, and implement the Plan. The City appreciates AC Transit's support. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 1

Barry,

I realized I forgot to send you my references on my TMP Draft EIR comments on induced traffic that I presented at the August 25 joint Transportation Commission and Planning Board meeting. I have attached them below. I hope I'm not too late to get them into the record. Thanks!

Michael

Michael J. Krueger
1204 Regent St.
Alameda, CA 94501-5333
home: 510-864-8539
mobile: 510-387-6974
mjk@kruegermd.com

1.3.7 The effect of any additional demand when a network is improved is threefold:

* there will be more people to take advantage of the scheme, which will increase the total benefit, but

* on congested roads, the improvement in speed will be less than if demand had remained constant, so the time saved by everyone will be less, reducing the total benefit.

* The extra traffic may also have adverse impacts on noise, local air quality, global emissions, severance etc.

1.3.8 If there is appreciable congestion, the second effect is likely to outweigh the first, so that the increase in demand reduces the time saving benefits.

An Introduction to Variable Demand Modelling
TAG Unit 2.9.2
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 1 Continued

(9/22/2006) Andrew THOMAS - Fwd: Documentation for TMP Draft EIR comments at August 25 joint TC/PB meeting  Page 2

June 2006

Department for Transport
Transport Analysis Guidance (TAG)

http://www.webtag.org.uk/webdocuments/2_Project_Manager/9_Variable_Demand_Modeling/pdf/2.5.2.pdf

"If road capacity increases, peak-period trips also increase. In the short term this consists primarily of travel diverted from other times, modes, routes and destinations. Over the long run an increasing portion consists of induced vehicle travel, resulting in a total increase in regional VMT...."

"Ignoring generated traffic results in self-fulfilling predict and provide planning: Planners extrapolate traffic growth rates to predict that congestion will reach gridlock unless capacity expands. Adding capacity generates more traffic, which leads to renewed congestion with higher traffic volumes, and more automobile oriented transport and land use patterns. This cycle continues until road capacity expansion costs become unacceptable.

"Generated traffic does not mean that road capacity projects provide no benefits and should never be implemented. However, current planning practices that ignore some or all generated traffic impacts result in inaccurate forecasts of impacts and benefits. Road projects considered cost effective by conventional models may actually provide little long-term benefit to motorists and make society worse off overall, due to generated traffic. Other strategies may provide greater net benefits when all impacts are considered." (p. 22)

Generated Traffic and Induced Travel Implications for Transport Planning
by Todd Litman
Victoria Transport Policy Institute
17 September 2007

http://www.vtpi.org/centraf.pdf

"After accounting for other important determinants of travel and for potential simultaneity bias, the estimated elasticity between VMT and lane-miles is estimated at 0.2 to 0.6. This implies that a 10% increase in lane-mileage can result in anywhere from a 2 to 6% increase in total VMT." (p. 12)

"These results add to a growing literature that appears unable to reject the induced travel hypothesis. The implications for those who advocate increased mobility should be reassuring, since the estimated relationship implies that adding roadway capacity reduces the cost of travel and encourages greater overall travel and, therefore, mobility. On the other hand, if congestion reduction is of paramount concern, then induced travel implies that some or even most of the congestion reduction benefits of capacity expansion will be lost over time. Given a desire to both increase mobility and reduce congestion, the key question is..."
whether individual demand for mobility is best
served by increases in highway capacity or by alternative
means, such as provision of alternative
modes of travel, demand management policies, or
urban design changes. Environmental costs may
also be more significant when induced travel
impacts are accounted for, resulting in major differences
in the relative social costs and benefits of
alternative mobility enhancing projects." [pp. 13-14]

A Statistical Analysis of Induced Travel Effects
in the U.S. Mid-Atlantic Region
LEWIS M. FULTON
International Energy Agency
ROBERT B. NOLAND
Centre for Transport Studies, Imperial College
DANIEL J. MESSERER
Energy and Environmental Analysis, Inc.
JOHN V. THOMAS
University of California
JOURNAL OF TRANSPORTATION AND STATISTICS APRIL 2000


============================================================================
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 1  Michael J. Kreuger, Resident

Response 1-1: The commenter presented comments on induced traffic at the August 25 Joint Transportation Commission and Planning Board meeting and provides references. The additional references are in support of draft Transportation Element policies. The commenter is referred to Response 8-23.
Letter 2

Planning Board/Transportation Commission meeting
August 25, 2008

Re: Revised Transportation Element Draft EIR
Comment by Ani Dimisheva, 2911 Calhoun Street, Alameda

Dear Planning Board, Transportation Commission and Staff,

What strikes me the most about the proposed revised TE and D-EIR is that it seems to be designed with a city other than Alameda in mind. I question some of the underlying assumptions of the document, specifically the assumption that Alameda’s streets need to be redesigned for multi-modal use, and point out some contradictions in the document that I hope you will address.

The D-EIR states that the goal of the TE is to preserve "livability" and "walkability." It also acknowledges that the vast majority of streets in Alameda are fronted by residential property. At the same time, it proposes a street classification system that runs contrary to that fact. For example, it classifies some 6 to 11 types of streets with recommended physical modification for each type. Streets in Alameda right now are fairly uniform in their design, and while some of them are more used than others, nothing prevents a driver, pedestrian, or a bicyclist from choosing any route depending on their desire or the traffic conditions.

Reclassifying streets and especially changing their physical make-up will result in regimentation of traffic that is not desirable and conflicts with the now open and accessible grid in Alameda. To use an example, many streets will be classified as local, allowing every measure to be employed to divert traffic onto "arterials" and "collectors." Those arterials and collectors, however, are just as residential as the "local" streets, for example, Broadway, or Lincoln Avenue. How these other residential streets will be affected by such forced diversion is illustrated by Broadway. A couple years ago, a dedicated right turn lane onto Broadway from Otis, undoubtedly in keeping with the idea that Broadway is a marked regional arterial,
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 2 Continued

created a flow of unimpeded traffic which has made crossing Broadway difficult. How has that increased the livability of the residents on both sides of Broadway? By creating similar changes in traffic flow, other streets lined with residences and classified as arterials—Otis, Encinal, High, Grand, etc.—will be similarly affected.

Such enforced preference for impacting one residential street more than another will result in deterioration of livability. Alameda is unique in that there is hardly a neighborhood which is not residential. Requiring some streets (High, Encinal, Otis, etc.) to become much more heavily used than others will essentially segment now connected neighborhoods. Studies show that when streets exceed a certain amount of traffic (as would be the case with the proposed changes) they become less crossed and act as dividers of the community. Mission Street in Hayward or Shattuck Avenue in Berkeley are examples. While Alamedans currently show preference for using some streets more than others, they also have the local street options if they choose.

Uniform street usage and should be encouraged rather than discouraged, as it distributed traffic more equally in a city designed with uniformly residential character in mind. Only very heavy traffic, such as trucks, warrants designation, as is currently the case.

Another stated goal of the TE is to maintain a 25 mph limit in Alameda. But this is contradicted by the idea that some streets should carry more traffic than others, and especially by the measures proposed for enforcing the limit. Measures already implemented show clearly they not only do not work but may even make speeding worse, yet they are offered again and again as the solution to fast driving. The main idea is to reduce speed by narrowing street width, both physically and visually. Careful observation and common sense tells you that this is the wrong approach. Drivers increase speed not because streets are wide but because there are no reasons to stop over a long distance. Examples are Fernside, Broadway, Tilden Way, Atlantic and others. All of these streets have been deliberately narrowed in some way, clearly without the desired result. The reasons drivers speed on these streets is because they have a right of way over many blocks, and/or some sort of
Letter 2 Continued

divider in the middle that provides drivers with the security that they are not going to meet oncoming traffic head on. However, the EIR bravely recommends more narrowing, more medians, pedestrian "refuge" islands, and generally everything that would provide each mode of transportation with its own dedicated "groove" on which to behave undisturbed. It does not recommend, and through the proposed measures even prevents, frequent cross traffic or stopping, the measures most proven to slow drivers down. Since the Fernside project was completed, I have spent a fair amount of time watching drivers on Fernside zoom just as fast as before over the newly narrowed single lane. Fernside is essentially a chute in its portion closer to the Harbor Bay Bridge, carrying HBI traffic to the High Street Bridge as fast as possible. Reducing it to a single narrow lane without removing the very features that make speeding safe in the minds of the driver, namely the dividing median and the lack of cross traffic, seems absolutely pointless. Why is the EIR recommending more of the same?

What's most troublesome about this plan is that it's chockfull of solutions to problems that would only come to pass if its recommendations are followed. After it designates corridors to carry the heavy auto traffic through the residential neighborhoods, the plan then dives into such fancy improvements for pedestrians as bulb-outs, "refuge" islands, sidewalk buffers, and the full paraphernalia of blinking, flashing, and beeping warnings to keep the pedestrians safe.

Instead of bringing in a hyped-up safety environment to fix a problem of its own making, the EIR should take into account what currently works, and replicate it. Grand and Central Street are some of the most calm without having had any "traffic calming" measures applied to them. Why? One reason is, there are no center dividers, which alerts drivers to the fact that someone might in fact be diving close to the middle, and induces natural caution. As one person put it to me, "I drive slowly on Grand because I have the feeling that someone might run out onto the street." You do not get that feeling on Fernside, for example, where the raised median and lack of streets opening onto Fernside indicate no pedestrian is likely to cross, or on
Letter 2 Continued

Atlantic, where there is not only a median but a wall indicating that virtually no one is likely to walk out suddenly. Will you, as a driver, have the feeling that someone is about to run out onto the street when you have sidewalk buffers to keep pedestrians safely away, are separated from the oncoming traffic by a raised or a wide painted median, and know that no local traffic is likely to cross your way by virtue of being diverted onto some kind of collector. The answer is, no, you will feel that the pedestrians are well protected and you will drive as fast as conscience lets you.

Psychological factors like these are not really given consideration in the plan, and they should be. There are ample studies from Europe that prove that naturally induced caution through minimal signage is more effective in slowing drivers down than abundance of signage and artificial barriers. Please google "shared space" and "naked streets" to find out more about this concept.

The assumption most wrong with the proposed TE is that Alameda is NOT bike and pedestrian friendly but needs to be made so. While there is certainly room for improvement in certain places, bridge approaches specifically, the TE needs to acknowledge that Alameda is one of the MOST bike- and pedestrian-friendly places in the Bay Area, and it needs to understand WHY that is. One reason is because for the most part, there is unregulated access for these modes virtually everywhere. Creating regulated access is not likely to improve that. "Bicycle boulevards," painted sharrows, and the like are currently unnecessary in Alameda. Designated bike routes become a necessity only if you deteriorate circulation, by directing auto traffic to use some streets more than others, to such degree that those streets become too dangerous to ride on. This should not be the goal. The goal should be to maintain the access that exists, and increase it with less ambition and more intelligence. Simple bike lanes, like the ones on Central or Broadway work best.

Probably the best thing that can be done to maintain quality for bicyclists in Alameda (of which I am one) is to keep street design simple, maintain uninhibited street width so bikes, cars and busses all have room to share, maintain open grid, design new streets with wide sidewalks that can be shared between bikes and pedestrians, and not force us into special corridors, or
Letter 2 Continued

designate which routes we should follow. The well-intended $3 mil dollar Fernside bicycle "improvement" project, while improving access for a specific group (students riding to school from Bayfarm over the bike bridge) did not improve bike access in general. You still cannot cross Fernside if on a bike except at San Jose and below. This is untypical of Alameda, and should not be the model to follow. Bicyclists (and pedestrians) would have been served much better if Fernside was opened to cross traffic, the median removed, and a few stop signs placed along the way. Generally, the simplest solution is the best.

The same general notes above apply to transit and the proposed accommodations for it. While bus routes are currently what they are, they may change in the future—hopefully in the direction of more and smaller shuttle buses combined with a denser transit network. This means that we should not preclude streets currently not served by transit from becoming so (by designating them local or transitional), and we should not modify the ones that now have buses running to be exclusively bus-friendly pushing other modes away from them. (The only place where exclusive treatment may be justified is preserving a corridor for light rail in the future along the Beltline route.) In this respect, it would be helpful to state in the TE document what level of transit service must be achieved for a proposed street alteration—for example, bus stop bulkout—to take place.

Finally, the D-EIR does not state any aesthetic impacts, but street striping can often clash with the character of a neighborhood and create a busy, hectic feel. I believe the TE requires a set of visual aesthetic standards for signage that would ensure striping is not overly big and overly bright and is consistent from place to place. This is a particular concern with crosswalks, which differ greatly in design across town. While the difference in designs and colors may make sense to someone micro-classifying them on paper, it is entirely irrelevant to the average user and does nothing more than visually clutter the city. Two crosswalk designs (school zone and regular) should be quite enough; the rest is superfluous. Painted sharrows, which
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 2 Continued

appear unpredictably and shabbily along Oak St. do not fulfill a function either, and
should be removed to restore aesthetics and not recommended further. Again, when
driver’s attention is required, less is more. Please consult an urban visual
designer rather than a traffic engineer on that issue.

I urge the Planning Board and Transportation Commission members, as well as Public
Works staff, to carefully re-examine the proposed plan from a perspective of what
Alameda is right now—a largely uniform community with mixed use neighborhoods
and great existing multi-modal transportation opportunities. A super-ambitious
street classification plan and the forced regulation is aims to impose on how we
choose our routes will hurt Alameda. Please do not forfeit the opportunities that
exist here, and send back the street classification portion of the TE to staff to
scale back with these points in mind.
Letter 2  Ani Dimusheva, Resident

Response 2-1: The commenter notes that reclassifying streets and changing their physical make-up will result in regimentation of traffic that is not desirable and conflicts with the now open and accessible grid in Alameda. The commenter is commenting on the merits of the Transportation Element, not on the adequacy of the EIR analysis. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 2-2: The commenter notes that the Draft EIR does not state any aesthetic impacts particularly for street striping. The significance threshold for visual impacts in CEQA or for the City of Alameda would not be triggered by street striping. However, the comment is noted and will be considered by the decision-makers. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 2-3: The commenter requests that the Planning Board and Transportation Commission re-examine the proposed street classification portion of the TEU. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
(9/23/2008) Andrew THOMAS - The ethereal TDM wishful thinking

From: Jean Sweeney <jean_sweeney@juno.com>
To: <sithomas@ci.alameda.ca.us>
Date: 8/23/2008 12:06 AM
Subject: The ethereal TDM wishful thinking

Re Transportation Element Impact Report
Section 4.2 Transportation Circulation
Policy EIR-7 seems to say that we have to tolerate unmitigated congestion because TDM measures are forthcoming.
I will sell you the Brooklyn Bridge if you believe that statement.
The whole 876 page Element is a bunch of over worded grovel and if the transportation solution is not in place before the building starts then tell the greedy developers NO DICE.
Jim and Jean Sweeney

Start providing for your family by becoming a paralegal. Click Now,
http://thirdpartyoffers.juno.com/TGL2141/fofjowy63nffOry77nDq4GArEDsXEItcKg4pOp6hRfPVyU70kaauxQ1q2/
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 3  Jean Sweeney, Resident

Response 3-1: The commenter is concerned that Policy EIR-7 might suggest the need for unmitigated congestion as TDM measures are forthcoming. Policy EIR-7 requires TDM measures as the primary means of mitigating increased traffic volume. The City of Alameda has imposed TDM measures on projects for many years, and the imposition of TDM measures on projects in Alameda is a fairly standard practice. The commenter is referred to the Alternatives Chapter of the DEIR for additional information on policy EIR-7.

Response 3-2: The commenter notes that transportation solutions should be required to be in place before development occurs. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
Letter 4

Comment to the City of Alameda Transportation Element Update — DEIR
September 19, 2008

By:  C. James
Central Avenue
Alameda, CA  94501

Re: Street classification of Central Avenue

The street classification of Central Avenue between Fernside Boulevard and High Street should be changed to “island collector.”

There are only two streets, Encinal and Central, that offer cross-mid-island access from Fernside. Utilizing only one street (Encinal) to its fullest potential from Fernside, when two are available, creates significant cumulative impacts for this area of the city. The city should allow for another cross-island street to handle increased traffic flow. Most importantly, the current street designation that fails to include a portion of Central Avenue in the “grid” falls short as a guide to our transportation decision-making.

Based on the criteria expressed in the DEIR, classifying Central Avenue between Fernside and High Street as an island collector would:

1. Provide for a seamless connection cross-island, allowing more direct land access for vehicles traveling cross-island to/from Fernside;
2. Diminish the impacts of cumulative growth in overall traffic volume on Encinal;
3. Aid congestion reduction measures by funneling local traffic to/from High Street, an arterial;
4. Balance mobility and land access by providing another viable route from Fernside for traffic flow; and
5. Expand opportunities to access local attractions (e.g., theater) and schools (Lincoln Middle School).

Leaving out one block of Central hinders the ability to accommodate projected growth patterns on the island. Central Avenue, starting at Fernside, should be designated island collector.
Letter 4  C. James, Resident

Response 4-1: The commenter requests that street classification of Central Avenue between Fernside Boulevard and High Street be changed to “island collector.” Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
Letter 5

(9/22/2008) Andrew THOMAS - Transportation Element Update

From: "Sally Faulhaber" <sfaulhaber@alamedanet.net>
To: <althomas@ci.alameda.ca.us>
Date: 9/22/2008 8:28 PM
Subject: Transportation Element Update

To: City of Alameda Planning Department

Re Transportation Plan Update

I am writing to put in a word for a proposal that I believe has been set aside, since I have not heard it mentioned in several recent meetings. That is a BART station under the Estuary between Alameda and Jack London Square.

While it would be extremely expensive and would take a long time, it would have several advantages that other proposals lack.

It would allow cyclists and pedestrians to cross with out waiting or paying. Had such a crossing been in place while I was commuting daily to Berkeley, I would surely have used it in all but the worst weather. I liked BART and hated the bus. On BART I could read and enjoy the view over the Bay.

It would be more effective in getting people out of their cars. It would be in reasonable cycling distance for residents of Alameda Point and in walking distance for Alameda Landing. At a League of Women Voters of the Bay Area forum last winter, we were told that while rail transit is more expensive to build, it reduces vehicle miles travel by cars by a much greater factor than improvements in bus transit. And trips not involving transfers are much preferred by passengers.

I hope that this idea will be included as an alternative.

Selina Faulhaber

1817 Nason Street, Alameda
Letter 5  Selina Faulhaber, Resident

Response 5-1: The commenter would like to see a BART station under the Estuary between Alameda and Jack London Square. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
A water taxi to shuttle passengers and bikes from Marina Square to Jack London Square is needed.

Thanks,

Robert Deutsch
Letter 6  Robert Deutsch, Resident

Response 6-1: The commenter notes that a water taxi to shuttle passengers and bikes from Mariner Square to Jack London Square is needed. A water shuttle to Jack London Square is proposed as part of the required TDM measures for the Alameda Landing project. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
Letter 7

David Kiwin
9-22-08

To Oahu Kaba
City Clerk, Lara Weitiger,
Deputy City Clerk is Liana Stoker

Response to: Proposed Transportation Element and Draft EIR

The project of putting together a new Traffic Element for our City’s General Plan is a huge undertaking and I respect the many, many hours of gathering and assembling documents, studies etc. Some parts of the proposed TE I am sure enjoy widespread support, and would be appreciated by most Alamedans. This however is the opportunity to bring up concerns and questions that do not fall in that category.

First, discussion on this proposal should stipulate with agreement the basic premise that “Anything that causes a problem is a problem.”

While much of the proposed Traffic Element attempts a progressive step for Alamedans, there are many problems with the proposed changes to our city’s Transportation Element. Some are terribly obvious others less so. I will list just a few concerns.

There are also what appear to be technical misrepresentations such as the section on LAND USE and ‘Recreational and Open Space’. I am unclear if the estuary and marinas can be included as “open space and recreation”, and this section lists Harbor Bay Isle Club as offering 10 acres of indoor and outdoor recreational facilities for members. I think the gross lot size is overestimated and it appears by aerial maps that nearly 1/4 of the lot is parking, which I don’t believe is considered recreational activity. While this is minor, it does lead to questions about the accuracy of what is offered as fact in the rest of the documents.

Simply by reviewing the DEIR, there are numerous problems outlined which by themselves should stop approval of the TE as currently presented.

Page 190-192 (of my electronic edition) of the Transportation Element Draft EIR: Projected long term effects of new change in Transportation Element of City’s General Plan makes clear the like y negative impact of accepting this new TE. While members of the TC have stated this Traffic Element does not really address mass development in Alameda. If approved the TE will help to pave the road for an increased level of development and establishing the rules for traffic considerations... but the DEIR clearly shows Island traffic is predicted to become so bad with the proposed TE that it gets the worst constrained ratings that can be given in the EIR process.

Shouldn’t the proposed TE either allow consideration to improve traffic flow, or by policies restrict or limit development or our island to protect and insure our roadway...
traffic LOS? I think it must. This proposed TE does the opposite, while prohibiting standard methods of improving roadway LOS, it allows, one might even say "encourages" development sufficient to be awarded a worse traffic rating the EIR can award.

This DEIR early states (pg 192) that if this TE is approved then the "Intersection Operations" will have an increase in volume and delay, and a loss of level of service to such a severe unmitigable level that it is "Significant and Unavoidable." This affect is predicted at major intersections affecting all of our island's gateways. (See the nine intersections listed.)

FURTHERMORE... This DEIR clearly states that if this TE is approved that the "Cumulative Traffic Impacts" will be "Cumulatively Consderable" and "Significant and Unavoidable." Together this is as bad a rating as the EIR process can give. See page 20 for this definition of its rating.

Isn’t a significant reason the traffic would become so bad that the TE’s proposal to first allow development by use of proposed adjustments to level of service, and also to include a policy to admit as the traffic as a byproduct of development?

This should be a decision of the affected public — Do we want to have a policy to just accept worse traffic and allow increased levels of development within the city? It should be very openly and publicly be a decision of Alamedans citizens. Shouldn’t these "permanent" and irreversible decisions require full approval? I think it obviously should.

LOS standards should not be altered or redefined. A loss of LOS would change the rating, not that standard. We must maintain an honest portrayal of real impacts of proposed growth of development. If travel delays are increased at intersections or sections of roadway, a new grade should be assigned even if label does not change b/c the change is constant, not that in inherently worse than that saying the Bay Bridge Toll Plaza is still a "D." We are not forced to assume a policy to this which has relative significance, or the ability to see how perceptions change over time, and who? It may be the we-the-public will want to get our intersections back to more original levels of "acceptable" and higher levels of "acceptable change" may also be a socially motivating factor as opposed to increasing the city's time associated with a given "letter."

Obviously increased development will bring more cars in significant numbers, in fact the # of cars per household is increasing even without any new development, so we will always have more cars on our island. A 20% increase in homes (as suggested in TE and EIR as likely for Alameda if such deve opment is allowed) may yield a 25% - 30% increase in automobiles. The TE solution as voiced and approved by our Transportation Commission is to help development along by allowing such traffic snarls and traffic delays in the hopes that the added inconvenience will get people out of the car and onto transit. Allowing such disruptions to the flow of traffic is of course terribly damaging to the environment of Alameda.

Also this strategy has always been proven ineffective all over the Bay Area where a hour-long traffic delays are everyday routines. It happens every work day. It is undeniable that the daily jams at the Bay Bridge toll plazas have been unsuccessful at getting those people out of their cars to avoid the hours-long jam and the social and environmental damage that goes with those delays. While a percentage of people may have been "forced" out of their cars by the increases in traffic, the environmental and social...
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 7 Continued

damage of the traffic created by unchecked development has made the damage of much of our land "un-repairable." The DEIR suggests our island would similarly have "significant and unavoidable" delays growing at our bridges and nearby intersections with this TE. Isn't this what we want to avoid in Alameda?

It is a bad plan to allow or to bring such traffic to Alameda as the DEIR states this TE would allow.

The changes in the "Traffic Element" of the City General Plan are certainly a powerful guideline to development. The TC is recommending or has approved changes to what is considered a "reasonable delay." Changing a D-rated LOS (considered poor but acceptable level of service) from 30 to 55 seconds for a traffic light does in fact make a difference to how development will be considered. Such changes permit more development, or with less cost to developers to mitigate the traffic problems caused by increased development. When the corridor from west Alameda to I-880 is already at LOS "F," it is no longer able to burden residents with increased delays with the attitude that increased traffic should simply be considered a by-product of development and accepted. That is not healthy for citizens or the environment.

The vast majority of citizens for which the TC, city staff, and our elected officials serve should be polled for consent before such an adverse set of policies is accepted.

If approving the proposed TE our trusted public servants would be saying that traffic conditions in Alameda that today are considered "unacceptable" should be considered acceptable. Alameda traffic should be allowed to dramatically increase. It is agreed that there will be "significant, unavoidable" traffic impacts, but the TE DEIR supporter say it is because of the development, not the TE; but really it is saying "The proposed changes to the TE will allow excessive development."

Reading page 86 is reason enough to reject the TE as "Unacceptable and avoidable." It clearly predicts "significant and unavoidable impacts at major intersections affecting all of our island's gateways. This is the antithesis of the desire of citizens.

It must be required that before significant development be allowed which is likely to degrade our roadway LOS, our city staff wait before approving such development until we can realize the "Policies" listed as part of the proposed changes of this TE update.

(Starting on page 95)

The Policies include:

"Support a convenient, cost effective transit system to serve the mobility needs of all segments of the population, including those with disabilities, to and from major destinations in Alameda and throughout the region."

And there are others, and if we are to accept what some may consider un-obtainable policies then shouldn't we have a practical policy to balance those?
The TE policies should include a policy that traffic, defined as number of cars on the road, should not be increased by approval of future development until the TE policies for traffic reduction or mitigation are realized, or rephrased, approval of development which will cause an increase of such traffic must remain parallel, or in balance, to the level, or the degree of achieving the TE’s traffic-mitigating policies.

I also opposed the new street overlay. Every Street in Alameda is a residential street. It is hard to find blocks that are strictly non-residential. It is impossible to navigate anywhere on the island without using residential streets. Isn’t it “unacceptable” to sacrifice some neighborhood to a high degree of traffic and noise, particulate and air pollution? It is not justifiable to condemn streets by label as less worthy of protection from vehicular traffic effects. This includes much more than increased chances of vehicle to vehicle or vehicle to pedestrian accidents, and it is noise, pollution and even structural damage due to increased and prolonged vibration. It is already not uncommon to hear of these complaints. Furthermore, don’t you realize drivers take the path of least resistance regardless of how streets are labeled? If the intent is to protect our residential streets from excesses of traffic, (as section 4.1.1.d suggests) can’t the new TE contain language that more clearly maintains levels of traffic with policies to restrict development to maintain specified vehicles per day. In that regard have studies been done to study how that can be achieved island-wide? If the intent is to have streets protected from vehicular traffic, why does section 4.1.1.e seek to minimize the physical protection of barriers, dividers, and cul-de-sacs? In essence this protes the ability of drivers to ignore the plans and goals of the proposed street overlay so what is the point of approving something preemptors seem to not really believe in either?

Section 4.1.6.d seems to conflict with the desire to prevent “slopes, takes, age.” Don’t we want residents to drive across the island to shop rather than connecting to I-800? And isn’t again suggesting alternate connections to I-800 likely “beating a dead horse?” How many times do studies need to be repeated, always with the same outcome?

As a suggestion to support Sect on 4.3.6.b wouldn’t it make more sense to move bus stops to the center of blocks, with crosswalks, to get them away from intersections, especially signalized intersections where vehicles caught behind buses will not be also blocking cross-traffic?

It seems to me that this TE is giving too much authority and opportunity to agencies outside of our city. I respectfully request that our city not relinquish authority to outside agencies.

Shouldn’t the TE proposal absolutely avoid encouraging violations of our city’s Municipal Code? For example as suggested by 4.2.4.c and 4.3.1.b.

Impact 4.1.3 – Since the TE does not promote and use change or development, yet in the same paragraph it states that it does encourage an I promote development (as equates to high density). The policy is worded to circulate the phrase “Non-Measure A, High density, but that is what is suggested.” strongly object to the TE becoming a.
political puppet, a tool, of those with an agenda for a particular type of development, especially a style currently not even legal in this city. This is an affront to law abiding citizens, and those of us who voted for and support our law.

Section 4.1.2 Concerns Funding. Because of recent regional, State and federal economic conditions, the Funding stated as “Guaranteed” is no longer guaranteed. When considering governmental budgets, the word guaranteed should be replaced.

This section also cites “City-wide development fees” In the last 10 years of Alameda development how much in dollars of collected development fees have been used to offset costs of traffic mitigation outside the development area or zone?

4.2.1 Impacts and Mitigation:
Only a very few specific LOS rated changes are required to be considered. Why? Aren’t all of our roadways and intersections important to consider for those who use them. I am very suspicious that 3 extremely narrow range changes will be considered. Again Why such stringent limits on what is considered significant?

If EIR -1, -2, & -6 are adopted, shouldn’t another TE sister policy be the approval of development only which will cause an increase of such traffic that remains parallel, or is in balance, to the level, or the degree of achieving the TE’s traffic mitigating policies? This is especially true since our estuary gateways are currently operating at, near, or above capacity. Further policy 4.1.2.a must be utilized where it will create a LOS to the most utilized mode of transportation for a given right of way. Such respect must be given to the highest best purpose and most people served, and fewest harmed.

Finally, concerning EIR 7. It is clear that the absolute best way to solve traffic problems is to avoid them. For all this proposed TE does to try to mitigate the problems of traffic congestion, it is startlingly void of any policy or considerations to avoid the kind of development which creates the problems and social burdens the TE is attempting to address.
7 David Kirwin, Resident

Response 7-1: The commenter notes that the proposed TEU appears to contain technical misrepresentations such as the section on Land Use and "Recreational and Open Space". Areas of the Estuary and Marinas are designated Recreation and Open Space in the General Plan. Parking lots associated with, or that support, recreational facilities are typically included in the acreage calculations for a recreational facility.

Response 7-2: The commenter notes that the proposed Transportation Element Update appears to project long term negative effects. Island traffic is projected to increase with both the proposed Transportation Element and the current General Plan, which is presented as the Base condition. The proposed Transportation Element does not assume additional growth to that in the Base condition, but compares the impact of the policies and transportation improvements in the proposed Transportation Element with that of the Base condition.

Response 7-3: The commenter notes that the proposed TEU should either allow considerations to improve traffic flow or include policies to restrict or limit development. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 7-4: The commenter is concerned about the cumulative impacts and redefinition of the level of service. The commenter is commenting on the merits of the Transportation Element and not on the adequacy of the EIR analysis. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 7-5: The commenter asks why only certain LOS (level of service) rated changes are required to be considered significant. The City of Alameda establishes a consistent threshold of significance for environmental documentation. The LOS change represents the threshold at which the impacts would be considered significant per CEQA. Under the California Environmental Quality Act, the determination of significance for most issues, including traffic and transportation, is a local decision.

Response 7-6: The commenter notes that the best way to solve traffic problems and avoid congestion is the limit development, which the Transportation Element Update does not address. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
9. REGULAR AGENDA ITEMS:

9-A. Draft Transportation Element General Plan Amendment and Draft Environmental Impact Report. A public hearing to take public comment on a Draft Environmental Impact Report and draft amendments to the City of Alameda General Plan. No final action or decision will be made at this meeting by either body.

Mr. Thomas summarized the staff report.

Mr. Obaid Khan, Public Works, displayed a PowerPoint presentation describing the Draft Transportation Element in detail.

President Kohlstrand suggested that the public hearing be opened, and noted that five speaker slips had been received. She suggested that the speakers’ time not be limited in this matter.

The public hearing was opened.

Mr. Bill Smith noted that land use and transportation issues were closely connected. As a bicycle commuter, he supported additional bicycle capacity along the Fruitvale Bridge. He believed bicycle lanes worked well as a traffic calming measure. He was encouraged by the direction of the Draft Transportation Element.

Ms. Susan Decker, Alameda Transit Advocates, believed the analysis of the impact considering alternative modes like bicycles, pedestrians and transit were very important. She noted that some mitigations that were good for public transit, such as widening roads, were not good for pedestrians and bicyclists to gain access to the buses.

Mr. Richard Bargett noted that he had read Transportation Commission Chair John Knox-White’s comments in the newspaper. He wished to discuss some unintended consequences on traffic flow near his home, near Callhoun and Broadway close to Otis. He noted that changes to the traffic flow on Broadway between Otis and Encinal, and that there was no strong language in the new Transportation Element that could lead to it being corrected. He believed that most of the focus was on addressing problems that might arise with a new development, and that the unintended consequences should be corrected.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 8 Continued

Mr. Eric Scheuerman believed that Alameda’s current major and minor street classifications were uncomplicated, and that the new Transportation Element was essentially redevelopment of Alameda’s street system. He cited the recent reworking of Webster and Park Streets as good examples of refinement. He believed the new Transportation Element would be a major change for Alameda, and urged the City to see the excellence of Alameda’s existing safety measure design, as well as the downsides. He urged the City to consider a policy of refinement.

Mr. Bert Libby noted that he was pleased to see the EIR statements and the livability goals in the TMP. He believed there was too little attention given to quality of life impacts and increased traffic in development issues. He believed the TMP was missing two important sections, and that it was geared towards Alameda residents and their vehicle usage, but did not address non-Alameda traffic originating from off-island. He believed strongly that mitigations for future development should be solely directed at reducing traffic in order to reduce the negative environmental effects of development, rather than trying to accommodate them.

Ms. Ani Dimusheva expressed concern about the street classification system. She believed that Alameda had a very residential character, and was concerned that the street classification system defined some streets as more residential than others. She suggested a trial period to determine whether the solutions cause any unintended consequences elsewhere. She would like to see more solutions for bike safety, and believed that every street should be a bike street. She suggested implementing “bicycle preferred lanes” on streets like Park Streets.

Ms. Corinne Lamden expressed concern about pedestrians trying to cross two-lane roads safety, particularly when the drivers did not look for pedestrians.

The public hearing was closed for Board and Commission discussion.

President Kohlstrand suggested taking comments on the plan first, followed by the environmental document.

Board member Lynch believed there were a number of overlaps because one document was technical in nature, while the other was more qualitative in nature. He did not have any arguments with the technical document. He suggested a discussion addressing the present street uses versus traditional past uses of streets, and to share that information with the public. He believed the EIR was very sound and thorough, and appreciated staff’s work in that regard. He noted that the plan itself was very comprehensive.

President Kohlstrand noted that the Transportation Commissioners’ intent was trying to draft these documents so they would be more in sync regarding the movement of vehicles, as well as recognizing the need for buses circulating in the City and the need for every street to be pedestrian- and bicycle-friendly.
Letter 8 Continued

Board member Lynch noted that on his street, parking was allowed right up to the intersection. He noted that children walking across the street from Lydecker Park are not visible because of that parking arrangement, and that it was a quality of life issue. He inquired whether such issues should be included in the plan.

Board member Ezzy Ashcraft commented the authors of this report, as well as the public for their comments. She noted that the roads did not belong to one particular transportation mode. She had some concerns about significant decreasing levels of service at some intersections. She noted that when an accident occurred in the tube heading out of town, the traffic throughout Alameda backed up. She noted that on page 4 of the Transportation Element Update, Objective 4.1.4 addressed proactive citizen involvement, particularly maintaining a public forum such as the Transportation Commission to facilitate public involvement. She suggested creating a citizen input website so they would not have to wait for the next public meeting. She noted that more off-street bicycle parking was needed, and parking lots should be striped to allow that.

Commissioner Krueger expressed concern with page 2.0-3 of the EIR summary, regarding Impact 4.2.1, which discussed traffic delay and the level of service. It stated that there was no feasible mitigation available, thus the resulting level of significance was significant and unavoidable. The Transportation Commission discussed using transportation systems management and transportation demand management to reduce the number of trips generated and mitigated in that way. He was surprised that was not considered as a mitigation, and would like that to be addressed in the EIR. Similarly, page 2.0-4, for Impact 4.2.5, the claim was that it was significant and unavoidable because there was no mitigation available for the intersection impacts in a cumulative sense. He did not see why TDM/TSM was considered, which he could understand if it concluded the mitigation was not sufficient, however, it seemed to him that it was not considered at all. He noted that pages 4.2-20 through 4.2-22 indicated mitigation measures TDM/TSM were mentioned, but the conclusion was that the impact would be significant and unavoidable. He did not see how it could be known in advance that the mitigation would fail, and that it could be potentially significant. He inquired what would happen if the traffic on Park Street were given priority, which would preserve the level of service for traffic on Park Street and using the Park Street Bridge, which he believed was the primary objective. He believed that some of the analysis was somewhat simplistic in examining the LOS for the entire intersection, rather than prioritizing one direction over another.

Commissioner Krueger noted that with respect to the intersections discussed on pages 4.2-27-4.2-30, most of the proposed mitigations discussed adjusting signal timing or changing signal actuation, in conjunction with adding lanes. He would like to see the analysis of what could be achieved with the signal timing by itself. He noted there was considerable public concern about the effect of widening roads on pedestrians, bicyclists and transit. He noted that 4.2-28 through 4.2-29 used Tilden Landing/Fernside as an example; the text pointed out that the project alternative had a reduced delay in the intersection, yet the conclusion was that it was significant. He noted that also happened on High and Fernside on page 4.2-29, and for High Street and Otis on page 4.2-29-4.2-30. He would like to see further explanation of that, and the effects of implementing the TMP to the baseline.
Letter 8 Continued

President Kohlstrand noted that she had the same questions, and added Island Drive and Doolittle, Park Street and Blanding, and Broadway and Tilden and Eagle. She noted that it was not clear what was analyzed, and that if the delays were less, why it was a significant impact. She believed confusion had been created over what was being analyzed, and that it changed the picture from dealing with traffic and travel in Alameda that was not solely focused on the auto, and that the project should be given its due credit.

Commissioner Krueger noted that it was important to get a quantitative number out, as well as to obtain a qualitative look as well. He would like the TDM to be taken into account.

Board member Cunningham noted that one of the fundamental issues addressing the need was based on the supply or demand for transportation within the community. Under the assumptions in the EIR, there was an assumed growth of jobs in the community from 31,000 to 49,000, which represented a 65% increase in jobs on the Island, relative to an increase in housing from 31,000 to 36,000, a 17% increase. He noted that it would be important to identify where the supply and demand would be. He anticipated more growth in the Alameda Point area. He believed that mitigations should address getting people from areas where the housing was concentrated to where the jobs are. He would like to see other plans within the Transportation Element such as water taxis that would mitigate people using roads; he suggested that a water taxi from Harbor Bay to Alameda Point may be workable.

Board member Cunningham noted that he had raised the definition of LOS in the Town Centre matters, and would like to add further clarification. He noted that a delay over 60 seconds at Santa Clara would be a LOS-F, and intersections such as Constitution and Atlantic at 53 seconds would qualify for LOS-E.

Board member Cunningham believed that study should be done before adoption of the plan. He inquired whether alternate LOSs would be considered based on the classification of the route. Mr. Thomas replied that would be a possibility, and noted that in Oakland, they had changed the threshold of what was significant.

Board member Cunningham inquired whether a safety factor was linked into the LOS, and noted that most of what they had seen was based on timing.

President Kohlstrand noted that it was based on average seconds of delay.

Commissioner Krueger wished to clarify that he did not want two different definitions of LOS, and that they should stick to the standard definition. He added that the City should determine what they were willing to accept on certain circumstances, given the standards. He inquired whether it would be possible to analyze the levels of service of two different legs of an intersection, or whether CEQA required treating the whole intersection as one.

Mr. Thomas noted that staff could provide information about each leg of the intersection.

Commissioner McFarland had no comment.
Letter 8 Continued

Commissioner Lee had no comment.

Board member Moehring thanked the public for their comments. She noted that safety while crossing intersections was a major issue, and recommended that drivers use both hand and directional signals. She appreciated the comment on the ability to correct things that did not work as well as anticipated. She agreed with the concept of starting simply and moving forward in smaller steps. She would like to see more traffic on Webster Street to patronize the businesses, and did not want the alternate routes to be so fast that they completely avoid Webster Street.

Commissioner Knox-White noted that he did not have a comment on the plan itself, and that while page 4.2-2 of the EIR discussed a light rail corridor, the TMP did not mention a light rail corridor. The TMP did mention an exclusive transit street. He believed bike parking could be highlighted, and noted that the design factor of the retail streets should receive more focus. He complimented Mr. Bergmann on the effectiveness of public transit surveys. He agreed with Board member Moehring regarding the street classification, and added that a random survey to up to 2,000 homes had been conducted. As a result of that survey, people believed that all streets should be used fairly equitably, but there should also be streets that would take people across the Island. He noted that the City tried to balance those needs. He noted that the EIR mentioned that there would be less than significant impact on air quality (4.3-8). He also noted that with respect to levels of service at intersections, he would like to take the long view and be sure that pedestrian and bicycle levels of service were addressed. With respect to the EIR, he noted that it was odd that there were two or three intersections that were found to be significant and unavoidable in the document that had already been declared significant and unavoidable for the traffic generated. He noted that the Alameda Landing EIR stated the traffic was significant and unavoidable, and he believed that every following project was identified as the source of the traffic being significant and unavoidable. He believed that it should be stipulated that it was significant and unavoidable, and that it may not make it worse, or may make it better. He expressed frustration that proposed mitigations were identified, but that the effects of those mitigations were not examined.
Chair Knox White added that the City Council has already accepted the idea of reducing trips instead of accommodating them, but that the EIR did not address that option at all. He believed that while flexibility was good, cities should be able to identify their priorities such as reducing traffic. He noted that Mariner Square Drive was listed as a four-lane road, even though it was supposed to be reduced when it came to the Transportation Commission. He cautioned against the unintended consequences of mitigation. He expressed concern about the residents of Fernside getting out of their driveways because the platoons of cars being released from traffic lights travel down the street at even intervals that never break. He suggested that the City become more aware of those consequences. He would like the FEIR to discuss the length of the LOS-D at intersections.

Chair Knox White noted that Eighth Street has more traffic under the Project than under the No Project use of Eighth Street, even though the project was meant to decrease its use. Under the Environmentally Superior Alternative. He would like further clarification of the purpose of 500 pages of turn diagrams, which he believed was off-putting to the average citizen. He added that there was a lot of technical data that would have been useful to have, that was not included in the document.

Chair Knox White believed the City was moving in the right direction regarding a mode shift; he added that the City would have the appropriate infrastructure and the accompanying planning process in place for the time when that shift occurs.

Commissioner Knueger requested that the technical appendices be separated into another document and printed separately. He emphasized that it should be available, but believed that it would be more convenient and less intimidating for the residents.

President Kohlstrand believed that the direction of the Transportation Element was very positive, and that it tried to reflect the values of the residents of Alameda. She did not believe Alameda wanted to have seven-lane intersections such as those found in Pleasanton or Livermore, and did not believe they enhanced the pedestrian atmosphere of those cities. She believed that everyone was a potential pedestrian, and that they should be respected. She believed the essence of the plan did not appear in the document, such as the goal of restricting the future amount of roadway capacity.

President Kohlstrand believed the thresholds of significance will be very critical, and that the City was in the awkward position of analyzing and Transportation Element using old significance criteria. She believed it was a goal worth pursuing, and that there was public support of changing the focus of transportation within the City. She believed the design standards for the streets and pedestrian improvements were also critical. She believed it was very important for the public to have an opportunity to provide input into that process. She believed it was important for the runoff and drainage to be improved, and for them to be more friendly to people who live and work in those areas.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 8 Continued

Board member Ezzy-Ashcraft noted that she had supported green landscaping ordinances to accompany the green building ordinances. She noted that Ms. Elison had stated that the time was not yet right for that, and that the positive aspect was that she would be able to work with Planning staff to incorporate these recommendations into a future green landscaping ordinance to meet legal requirements. She added that it was more economical as well.

President Kohlstrand emphasized that Planning and Public Works must work together on this issue, and that the standards should respect both safety issues and improving upon current standards. Regarding the environmental document, she was surprised to find that no intersections in the Alameda Point were listed as problematical.

Commissioner Kraeger wished to discuss Section 6 with the No Project Alternative and the Environmentally Superior Alternatives, which were meant to distinguish them from the proposed TMP. He could not see any evidence that the phenomenon of induced traffic was taken into effect. He added that occurred when capacity was added in an attempt to mitigate congestion, an increase in traffic may also be caused because of new trips or shifted modes. He believed the impacts in 4.1.1. which stated that road widening can divide communities, and 4.2.2, Alternative Transportation, which documented negative outcomes of a mode shift, should be checked. He added that 4.1.2 should be checked as well, regarding land use and the increase of auto-oriented land use. He noted that 4.2.3 (page 6.0-10) should be checked with respect to safety, and that widening roads would allow for more free-flowing traffic, and that the speed limits may be compromised. He requested that 4.3.2-5 regarding air quality be checked, as well as 4.4.2 and 4.4.3, regarding increasing noise impacts and induced traffic. He believed that some of the analysis was too simplistic, allowing people to believe that road widening was environmentally superior. He believed there was considerable evidence to suggest that was not the case.

President Kohlstrand noted that a one-page summary of proposed thresholds of significance had been distributed. She recalled an experiment in New York City where several streets were closed to all traffic on a Saturday morning, and noted that would be tried in San Francisco by early September.

Chair Knox White discussed the summary, and explained the issue of multiple levels of service and their impacts on all modes of transportation. He noted that the solutions to the impacts must be prioritized, and added that the Transportation Commission will continue to have conversations about those issues.

Board member Lynch noted that one of the difficulties in land use planning was thinking in the abstract. He noted that issues such as the width of the sidewalks, whether there would be parking lanes, whether there would be one or two lanes of traffic, and what the width should be. He noted that commercial sectors also need loading docks and the capacity to bring in larger vehicles. He added that the intersection of these kinds of traffic must also coexist with pedestrians and bicycles. He noted that in order to develop thresholds of significance, it was helpful to have a context of the qualitative discussions.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Letter 8 Continued

With respect to specific benchmarks, there must be a quantitative examination in order to create the findings. He added that the legal thresholds must be met to provide drawings, and he did not wish to see the issue become a slippery slope resulting in litigation.

President Kohlstrand believed this was a good start, and that the Transportation Commission would take it up in detail. She noted that many communities were struggling with the transition away from the traditional approach of looking at an intersection, and figure out what was happening with the automobile level of service. She noted that it was important to address what was happening as people moved around the city.

In response to an inquiry by Board member Cunningham whether any community had successfully looked at multimodal integration, Mr. Khan replied that Public Works had started examining that question and requested that Dowling Associates do research on that question. He had not seen a community that had multimodal thresholds of significance for different modes. He noted that the City of San Jose had gone through an EIR process in advance, and stated that the eight or nine intersections were considered to be protected and would not be touched. The intersections would be accepted at LOS-F, but that the impacts would be disclosed. He noted that addressing one impact may trigger another impact for another mode.

Mr. Khan continued to state that other cities had taken a similar approach where certain networks had been set aside, and that the impacts would be addressed in related locations. He noted that the consultants had stated that would take additional analysis and the related costs. He noted that TSM and TDM plan would be on the horizon as funding is found.

Commissioner Moring noted that conceptually, she loved this plan, and that it was very clear. She believed there was a huge challenge ahead, and that it would take about a generation to extract people from their cars onto bicycles and other non-auto modes of transportation. She noted that it would be important to educate the next generations to do that, and believe it would be a difficult transition for many people.

Board member Lynch agreed with Commissioner Moring’s comments, and a group should be formed to examine those questions. He agreed that it would be very controversial, and commercial leases are in part dependent on the number of parking spaces.

Board member Autorino noted that he had a countervailing view, and discovered through his involvement on the Climate Task Force that people were ready to change. He believed there were some NIMBY issues with respect to retail and industrial uses. He believed that people were ready to get out of their cars, and believed it would happen more easily if the alternatives were made safer and easier. He was sure there would be discussions, and resistance by some people. He believed that living and parking were to be made convenient and attractive, and that people would accept the new concepts.

President Kohlstrand agreed with Board member Autorino’s comments.
Board member Ezzy-Ashcraft noted that she saw more people on their bikes around town. She noted that Alameda was a safe town, and that people should be walking and using their bikes to help the environment, traffic and their health. She believed it was patriotic to do that, and hoped that schools would educate the children to motivate their parents.

In response to an inquiry by Chair Knox White regarding whether staff would revisit the numbers in the TMP versus the historical counts, Mr. Khan replied that his staff used a three-day count for Average Daily Traffic counts, versus one day used in other jurisdictions. (Tuesday through Thursday, with the three days averaged). Staff has used the CMA model, using ABAG and MTC values. He noted that in comparing number to number, staff was comfortable with the numbers for 2030, and that they used a peak-hour model. He noted that they had not seen a very good average daily traffic model that can project very well into the future for average daily traffic, and that most of the jurisdictions used peak-hour models for travel demand forecasting. Staff did not put them in the EIR because they were forecast, although the turning movement counts that were projected for this year and 2030 were included in the Appendix.

No action was taken.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR


Response 8-1: Commenter Bill Smith supports additional bicycle capacity along the Fruitvale Bridge and was encouraged by the direction of the Draft TEU. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-2: Commenter Susan Decker, Alameda Transit Advocates, believes the analysis of impacts considering alternative modes was very important. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-3: Commenter Richard Bangert noted unintended consequences on traffic flow near Calhoun and Broadway and the need for correction through strong language in the new TE. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-4: Commenter Eric Scheuerman urged the City to consider a policy of refinement, citing the recent reworking of Webster and Park Streets, rather than the “redevelopment of the City’s street system” in the new TE. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-5: Commenter Bert Libby noted that he was pleased to see the EIR statements and the livability goals in the TMP, but felt that TMP was missing two sections and did not address non-Alameda traffic originating from off-island. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-6: Commenter Ani Dimusheva expressed concern about the street classification system, specifically residential streets, and suggested a trial period. She also suggested implementing “bicycle preferred lanes” on streets like Park Street. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-7: Commenter Corinne Lamden expressed concern about pedestrians trying to cross two-lane roads safely. Safety is addressed in Section 4.2.3 and 4.2.4 of the DEIR.

Response 8-8: Board member Lynch believed there were a number of overlaps as one document was technical, which the other was more qualitative. Comment noted.

Response 8-9: President Kohlstrand noted that the Transportation Commissioner's intent was to try to draft the documents to be more in sync with the movement of vehicles as well as recognizing the need for buses and pedestrian/bicycle friendly streets. Comment noted.

Response 8-10: Board member Lynch inquired whether the issue of parking at intersections reducing visibility of children crossing, specifically at Lydecker Park, should be included in the Plan. The commenter is referred to Response A-2.

Response 8-11: Board member Ezzy Ashcraft expressed concerns about significant decreasing levels of service at some intersections and suggested changes to the proposed TEU. The commenter is referred to Chapter Project Alternatives in the DEIR.

Response 8-12: Commissioner Krueger expressed concern with significant and unavoidable impacts where no feasible mitigation was available and requested that transportation demand management (TDM) measures be considered as mitigation.

The DEIR found significant and unavoidable impacts at nine (9) intersections under the 2030 Project condition. By concluding that the intersections would operate at an unacceptable Level of Service of E or F, the DEIR is also concluding that the levels of service anticipated at these intersections could not be returned to an acceptable level of service solely by the imposition of Transportation Demand Management measures on all new development in Alameda.

As described below for each of the nine (9) intersections, imposition of TDM measures on new development not be sufficient to return the projected levels of service at these intersections in 2030 to a level of service or D or better. This finding is based upon the following considerations:

1. Most of the intersections are already operating at or near capacity, so even relatively small amounts of additional automobile volumes cause the intersection to operate at LOS E or F.

2. Most of the impacted intersections are located at “gateway” locations throughout the City through which many trips must
pass to access the bridges and tubes to adjacent cities or major destinations in Alameda.

3. With aggressive TDM measures, it may be expected that approximately 25% of the anticipated trips from a project on average might be eliminated. Reducing the additional traffic volume that is to be projected generated by all future local development by 25% is not enough to maintain the acceptable level of service at these intersections.

4. For TDM measures to effectively maintain an LOS of D or better at these “gateway” intersections, the TDM measures and other transit improvements resulting from the Transportation Element would need to attract people to ride transit who are currently driving. In other words, a large number of people who are currently driving and are not part of a future development would need to voluntarily stop driving and start using transit. The DEIR did not assume that such a shift would occur in great enough numbers to offset the new traffic from new development. One reason that the DEIR did not make this assumption is that congestion is often one of the factors that causes people to shift to transit. So if the “gateway” intersections are operating at LOS D or better, then there is less incentive for people to voluntarily make the shift to transit.

As described under the Methodology and Assumptions in the DEIR, a Citywide Travel Demand Model was developed for the 2030 forecasts. This citywide model projects AM and PM peak hour traffic volumes for a future 2030 condition based on the projected growth and development forecasts. The forecasts may overstate the peak hour volumes used for the analysis since the peak hour forecasts are unconstrained (exceed the roadway capacity), and do not account for peak spreading (shifts in traffic to earlier or later times to avoid the peak hour). The EIR analysis covers a one-hour peak based on existing traffic counts. In the future with peak spreading, the duration of congestion may extend beyond the one-hour analysis period.

The following information provides additional specifics regarding each impacted intersection. This information does not change the conclusions or the intensity of the impact described in the Draft EIR.

Eighth Street/Central Avenue

The intersection of Eighth Street/Central Avenue would operate at LOS E during the AM peak hour and LOS F during the PM peak hour under 2030 Project conditions. During the AM peak hour, the delays to traffic on the westbound, northbound, and southbound approaches result in LOS E and F conditions with average vehicle queues exceeding the capacity of the intersection. These queues are the result of an anticipated change to the turning movements at the intersection for the purpose of redirecting thru traffic away from 8th Street which is designated as a transitional collector.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

in the draft Transportation Element. Therefore the increased delays are the trade-off for a higher quality of life for the residents on 8th Street as the result of the street re-classification. The increase of 774 vehicles during the AM peak hour and 904 vehicles during the PM peak hour represents increases of 32% and 44% over existing volumes at this intersection. This intersection has been identified in previous EIRs for previous projects as an intersection that would be significantly impacted

Park Street/Clement Avenue

The intersection of Park Street/Clement Avenue would operate at LOS F during the AM and PM peak hours under 2030 Project conditions. The single-lane eastbound approach on Clement and the northbound approach on Park Street are the critical movements that experience excessive delays during the AM and PM peak hours. The increase of 1,226 vehicles during the AM peak hour and 1,176 vehicles during the PM peak hour represents increases of 52% and 44% over existing volumes at this intersection. Most of these increases are experienced by the eastbound approach and the southbound left-turn as a result of the Clement Street extension. The additional traffic volume and associated congestion at this intersection is a trade-off for a higher quality of life for residents on parallel routes such as Buena Vista which benefit from the extension of Clement Street. This intersection has been identified in previous EIRs for previous projects as an intersection that would be significantly impacted and mitigations to widen the intersection are infeasible due to the location of existing buildings.

Broadway/Tilden Way/Eagle Drive

The intersection of Broadway/Tilden Way/Eagle Drive would operate at LOS F during the AM peak hour under 2030 Project conditions. During the PM peak hour, the intersection would operate at LOS D. During the AM peak hour, the delays to traffic on Tilden Way eastbound and westbound as well as northbound on Broadway result in LOS F conditions. The increase of 1,331 vehicles during the AM peak hour represents an increase of 76% over existing AM peak hour volumes at this intersection. The increases are most dramatic on Tilden Way.

However, it should be noted that the level of service at this intersection is actually improved by the proposed Transportation Element relative to the existing Transportation Element.

Broadway/Otis Drive

The intersection of Broadway/Otis Drive would operate at LOS E during the AM peak hour and LOS F during the PM peak hours under 2030 Project conditions. The permitted southbound left-turn from Broadway is the critical movement that experiences excessive delays during the AM and PM peak hours. The increase of 848 vehicles during the AM peak hour and 865 vehicles during the PM peak hour represents increases of 35% and 33% over existing volumes at this intersection.
3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Tilden/Blanding/Fernside Blvd.

The intersection of Tilden/Blanding/Fernside Boulevard would operate at LOS F during the AM and PM peak hours under 2030 Project conditions. The westbound through traffic on Fernside Boulevard, northbound through traffic on Tilden Way, and southbound left-turn on Tilden Way are the critical movements that experience excessive delays during the AM and PM peak hours. The increase of 2,127 vehicles during the AM peak hour and 1,868 vehicles during the PM peak hour represents increases of 83% and 90% over existing volumes at this intersection. Most of these increases are on Tilden Way accessing the Fruitvale Bridge. However, it should be noted that the level of service at this intersection is actually improved by the Transportation Element’s proposed Clement Avenue extension to Tilden.

High Street/Fernside Blvd.

The intersection of High Street/Fernside Boulevard would operate at LOS F during the AM and PM peak hours under 2030 Project conditions. The eastbound left-turns from Fernside to High Street and the northbound traffic on High Street are the critical movements that experience excessive delays during the AM and PM peak hours. The increase of 1,351 vehicles during the AM peak hour and 1,035 vehicles during the PM peak hour represents increases of 55% and 41% over existing volumes at this intersection. However, it should be noted that the level of service at this intersection is actually improved by the proposed Transportation Element.

High Street/Otis Drive

The intersection of High Street/Otis Drive would operate at LOS F during the AM peak hour under 2030 Project conditions. This intersection would operate at LOS D during the PM peak hour. The westbound approach on Otis Drive and the single-lane southbound approach on High Street are the critical movements that experience excessive delays during the AM peak hour. The increase of 1,197 vehicles during the AM peak hour and 1,194 vehicles during the PM peak hour represents increases of 45% and 44% over existing volumes at this intersection. However, it should be noted that the level of service at this intersection is actually improved by the proposed Transportation Element.

Island Drive/Doolittle Drive

The intersection of Island Drive/Doolittle Drive would operate at LOS E during the AM peak hour under 2030 Project conditions. This intersection would operate at LOS C during the PM peak hour. The westbound left-turns from Doolittle to Island Drive and the northbound left-turns on Island Drive are the critical movements that experience excessive delays during the AM peak hour. The increase of 1,424 vehicles during the AM peak hour and 1,334 vehicles during the PM peak hour represents increases of 36% and 32% over existing volumes at this intersection. However, it should
be noted that the level of service at this intersection is actually improved by the proposed Transportation Element.

Park Street/Blanding Ave

The intersection of Park Street/Blanding Avenue would operate at LOS F during the AM and PM peak hours under 2030 Project conditions. Under existing conditions, this intersection operates at LOS F during the AM peak hour. The single-lane approach eastbound on Blanding and the northbound traffic on Park Street are the critical movements that experience excessive delays during the AM and PM peak hours. The increase of 995 vehicles during the AM peak hour and 926 vehicles during the PM peak hour represents increases of 34% and 31% over existing volumes at this intersection. However, it should be noted that the level of service at this intersection is actually improved by the proposed Transportation Element.

Response 8-13:

Commissioner Krueger requested an analysis of impacts with adjusted signal timing and requested further explanation of the reduced delay with the project alternative and the effects of implementing the TMP to the baseline. The LOS shown in the impact analysis assumes signal optimization for both the baseline and project condition. The mitigation measures include re-optimizing the signal timings with the proposed change in lane configuration. The Commenter is correct that the Draft EIR found that of the nine intersections that would operate at an unacceptable level of service, six of the nine would actually operate better with the proposed transportation element than under the existing transportation element. Using a strict interpretation of the City of Alameda's thresholds of significance, the Draft EIR could have determined that these seven intersections were technically not significantly impacted by the draft Transportation Element Update, because the unacceptable level of service at these intersections would be better than under the current Transportation Element. The projected improvements in level of service are attributed to certain roadway improvements that were incorporated into the model run for the Project that were not incorporated in the Base Case model run, such as the extension of Clement at Tilden for example.

However, the Draft EIR also disclosed to the public on pages 4.2-20 and 4.2-21that the proposed new policies to prohibit certain road widening to mitigate traffic impacts could result in significant impacts at any number of intersections in the future. Given the limitations of the traffic modeling and the inability to predict the exact location, intensity, and characteristics of all future development projects, it would be speculative to try to identify each and every intersection where this situation may occur. Therefore, the Draft EIR disclosed that if the policies restricting road widening was adopted, the public should be aware that the policy would limit the City's ability to mitigate future impacts associated with future projects (See page 4.2.21). The disclosure was further discussed in the Alternatives Chapter 6. Consistent with this approach and the desire to fully disclose all potential transportation impacts that might be associated
with the draft Transportation Element Update or future actions to implement the Element, such as the future adoption of new thresholds of significance, the DEIR identified the six intersections that could not be mitigated by increasing roadway widths as locations that would be significantly impacted, even though the level of service would be slightly better than under the existing transportation element. The determination was based upon the conclusions that under the existing Transportation Element the unacceptable level of service might be mitigated through road widening, while under the new Transportation Element, the ability to bring the intersection to City's current threshold of acceptability (LOS D) would not be possible because road widening is not possible and TDM mitigations would not be adequate to ensure that the intersections operated at LOS D or better. Please also see Response 8-12.

Response 8-14: President Kohlstrand noted it was not clear what was analyzed, and if delays were less, why was it a significant impact. The commenter is referred to Response 8-13.

Response 8-15: Board member Cunningham noted the need to better understand the growth assumptions. This Citywide Travel Demand Model projects AM and PM peak hour traffic volumes for a future 2030 condition based on the projected growth and development forecasts for the City and the region. The land use assumptions are consistent between the Base and Project conditions. No additional growth or change in land use assumptions was assumed when assessing the impacts of the proposed TE.

The job and housing projections used in the traffic analysis are based upon projections established by the Association of Bay Area Governments, the Alameda Congestion Management Agency, and City of Alameda General Plan development projections. It is important to note that the traffic model considers not only the traffic generated by development within Alameda, but also the traffic generated by development in the surrounding cities that will affect traffic conditions in Alameda. The development projections established by ABAG and CMA consider Census information, local general plans, current and future market projections, and regional, state and federal growth assumptions. For Alameda, the growth in jobs over the next 25 years is located primarily within the Harbor Bay Business Park, Alameda Point and Alameda Landing, and the Northern Waterfront area from the Park Street Bridge to the Webster Tubes. The majority of the future housing is located primarily at Alameda Point, Alameda Landing and surrounding areas in the West End, although a smaller portion of the total housing growth is also anticipated within the Northern Waterfront and on scattered smaller sites around the city, which may be redeveloped over the next 25 years.

Response 8-16: Board member Cunningham inquired whether alternate LOS measures and thresholds would be considered based on the classification of the route. Commissioner Krueger inquired about LOS at different legs of an intersection. As noted by President Kohlstrand, the current City standard applies level of service based on average seconds of delay for the whole...
intersection. Detailed LOS calculation worksheets provided in the technical appendices of the DEIR indicate the LOS of each leg of an intersection. The conclusions regarding the significance of the impacts in the Draft EIR was based upon the City’s current thresholds of significance that have been developed to reflect the policies in the 1991 General Plan Transportation Element. Once the community adopts a new Transportation Element, it will be important for the community to adjust its thresholds of significance to reflect policies in the new Transportation Element.

Response 8-17: Board member Moehring noted that safety while crossing intersections was a major issue and recommended use of both hand and directional signals. She would also like to see more traffic on Webster Street to support local businesses. Comment noted.

Response 8-18: Commissioner Knox-White commented on the light rail corridor discussed in the DEIR. The light rail discussed on page 4.2-2 of the DEIR, refers to the proposed light rail route identified in the 1992 Transportation Element.

Commissioner Knox-White requested that pedestrian and bicycle levels of service be addressed. The commenter is referred to Response 8-16. Commissioner Knox-White noted that two or three intersections found to be significant and unavoidable in the EIR had already been declared as such and expressed frustration that effects of proposed mitigation measures were not examined. The proposed mitigation measures in the EIR were identified to reduce the traffic impacts to meet the City’s LOS D standard. The commenter is referred to Response 8-12 regarding TDM and Response 8-13 Regarding Levels of Significance. Regarding intersections that have been found to be significantly impacted by prior projects, the commenter is correct that the City has found certain intersections to be significantly impacted by prior projects, such as Alameda Landing. Under the California Environmental Quality Act (CEQA), the EIR must disclose significant impacts associated with a project, even if a previous EIR for a different project has already identified the impact for the previous project.

Response 8-19: Commissioner Kruger requested that in the future that the Technical Appendixes be published separately. Comment noted.

Response 8-20: Board member Kohlstrand commented on the direction of the Transportation Element and the need for new thresholds. See Response 8-16.

Response 8-21: Board member Ezzy-Ashcraft commented on green landscaping ordinances. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-22: Board member Kolstrand commented Board member Ezzy Ashcraft’s comments. Because the comment does not address the adequacy of
the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.

Response 8-23: Commissioner Kruger commented on the Alternatives Section and the “environmentally superior” alternative. CEQA requires that all EIR’s include an “environmentally superior” alternative. The definition of an “environmentally superior” alternative is an alternative to the proposed project that would have less environmental impacts. The DEIR argued that in this case the “environmentally superior” alternative is an alternative that would allow road widening to reduce automobile congestion. Under the City of Alameda’s current thresholds of significance, automobile congestion is a significant impact and if a road can be widened to minimize automobile congestion, then under the City’s current thresholds, a widened road with less automobile congestions is “environmentally superior” to a narrow road with slightly more automobile congestion. The commenter is correct however, that the existing City thresholds of significance may not reflect either current community preferences and priorities or the policies in the proposed Transportation Element, which emphasize the importance of the other modes of transportation. If the City amends its thresholds of significance in the future to reflect the proposed Transportation Element’s emphasis on all modes of transportation, then in the future, under the revised thresholds, a widened road may not be environmentally superior to a narrow road because the narrower road may be better for pedestrians or other modes than the automobile.

Comment 8-24: The Board members and Commissioners began a discussion on the merits of a draft set of new thresholds prepared and distributed by Commissioner Knox-White. Because the comment does not address the adequacy of the environmental analysis, no response is required. The comment will be forwarded to the Transportation Commission, Planning Board, and City Council during their deliberations on the proposed Transportation Element.
4.0 ERRATA TO THE DRAFT EIR
Listed below are the complete changes, additions, and deletions that have been made to the text of the Draft EIR as a result of public and staff review. Changes to the text in the Draft EIR are shown as additions and deletions.

### 3.0 Project Description

In Section 3.0, Project Description on page 3.0-9 the following text is amended as follows:

The California Department of Transportation (Caltrans), which is responsible for interregional transportation services, including highways. Highways 261, 260 and 61, which bisects Alameda, is subject to Caltrans approval for projects. Land use changes along the Highway 61 corridor are subject to review by Caltrans.

### 6.0 Project Alternatives

In Section 6.0, Project Alternatives on page 6.0-4 the following text is amended as follows:

**Alternative Transportation**

As described under Impact 4.2.2, the proposed Transportation Element Update would result in a less than significant impact due to an increased demand for transit service, bicycling and walking throughout the city. The No Project Alternative would not include any land use changes that would result in an increased demand for alternative transportation including transit service or have an impact on transit service. The No Project Alternative would therefore also result in a less than significant impact on alternative transportation. However, without the proposed new transportation policies, there would be less emphasis in City policy on improving transit, bicycle or pedestrian services and facilities. Therefore it may be concluded that the proposed Element would have a greater beneficial impact on alternative transportation than the no project alternative.

**Traffic Safety**

As described under Impact 4.2.3, the proposed Transportation Element Update would result in a significant impact with the implementation of mitigation measures MM 4.2.2a and 4.2.2b due to an increased use of alternative transportation modes that would be the result of changes to the City’s circulation system. The No Project Alternative would not include any land use changes that would result in an increased use of transit, bicycle or pedestrian facilities; however, no changes would be proposed to make improvements to pedestrian and bicycle systems that would reduce potential conflicts between pedestrians, cyclists and vehicles. The No Project Alternative would not significantly increase the amount of vehicle traffic and would therefore not significantly increase the safety conflicts within the City. Therefore, the No Project Alternative would also result in a less than significant impact similar to the proposed General Plan Update.

**Emergency Access**

As described under Impact 4.2.4, the proposed Transportation Element Update would result in a significant impact associated with emergency response access and evacuation plans, but might also result in increased traffic delays with the
implementation of mitigation measures MM 4.2.4a and 4.2.4b. The No Project Alternative would not significantly make any land use or transportation improvements that would affect emergency response times over what they are now. Any future development projects and transportation improvements would still be reviewed by local emergency services for consistency with standards and provision of adequate emergency access. Therefore, the No Project Alternative would also result in a less than significant impact similar to the proposed Transportation Element Update.

In Section 6.0, Project Alternatives on page 6.0-5 the following text is amended as follows:

**Cumulative Transportation Impacts**

As described under Impact 4.4.6 4.2.5, the proposed Transportation Element Update would contribute to cumulatively considerable traffic impacts to on the local and regional transportation facilities. As identified in Table 6.0-1, the No Project Alternative would also generate increased traffic volumes and would result in cumulatively considerable traffic impacts to seven local intersections.

In Section 6.0, Project Alternatives on page 6.0-10 the following text is amended as follows:

**Emergency Access**

As described under Impact 4.2.4, the proposed Transportation Element Update would result in a less than significant impact associated with emergency response access and evacuation plans with the implementation of mitigation measures MM 4.2.4a and 4.2.4b. Alternative 2 would also result in a less than significant impact similar to the proposed Transportation Element Update with the implementation of these mitigation measures given that it would include the same Transportation Element policy provisions regarding emergency access, but would also result in less traffic delays on the four intersections noted above as improvements could be made under Alternative 2 that would not be allowed under the proposed project.
5.0 Final Mitigation Monitoring and Reporting Program
5.0 FINAL MITIGATION MONITORING AND REPORTING PROGRAM

5.1 INTRODUCTION

This document is the Final Mitigation Monitoring and Reporting Program (MMRP) for the Transportation Element Update Environmental Impact Report. This MMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” An MMRP is required for the proposed project because the EIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts.

The numbering of the individual mitigation measures follows the numbering sequence as found in the EIR.

5.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final EIR.

The City of Alameda (City) will be the primary agency responsible for implementing the mitigation measures that are required to be implemented during the operation of the project.

The MMRP is presented in tabular form on the following pages. The components of the FMMRP are described briefly below:

- **Mitigation Measures**: The mitigation measures are taken from the Draft EIR, in the same order that they appear in the Draft EIR. No revisions were necessary to the mitigation measures included in the Draft EIR.

- **Mitigation Timing**: Identifies at which stage of the project mitigation must be completed.

- **Monitoring Responsibility**: Identifies the party that is responsible for mitigation monitoring.

- **Compliance Verification Responsibility**: Identifies the party that is responsible for verifying compliance with the mitigation. In some cases, verification will include contact with responsible state and federal agencies.
### Table 5.0-1
**Mitigation Monitoring and Reporting Program**

<table>
<thead>
<tr>
<th>Proposed Mitigation</th>
<th>Summary of Measure</th>
<th>Monitoring Responsibility</th>
<th>Mitigation Timing</th>
<th>Verification (Date and Initials)</th>
</tr>
</thead>
</table>
| MM 4.3.1a           | The City shall require the following dust emission control measures be applied to transportation projects as appropriate and feasible. These measures are consistent with those recommended for use by BAAQMD.  
1) For all construction and similar earth-disturbing activities:  
- Apply water on all active construction areas at least twice daily and more often when conditions warrant.  
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.  
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites daily as needed to control dust.  
- Sweep all paved access roads, parking areas, and staging areas at construction sites and sweep streets daily if visible soil materials are carried onto adjacent public streets.  
2) For sites greater than 4 acres in size:  
- Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).  
- Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.).  
- Limit traffic speeds on unpaved roads to 15 miles per hour.  
- Install appropriate erosion control measures to prevent silt runoff to public roadways.  
- Replant soil stabilizing vegetation in disturbed areas as quickly as possible. | City of Alameda            | Prior to any site disturbance.                                      |                                  |
### 5.0 Final Mitigation Monitoring and Reporting Program

#### Proposed Mitigation

<table>
<thead>
<tr>
<th>Summary of Measure</th>
<th>Monitoring Responsibility</th>
<th>Mitigation Timing</th>
<th>Verification (Date and Initials)</th>
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<tbody>
<tr>
<td>3) For sites that are located adjacent to sensitive receptors or warrant additional controls:</td>
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<td>• Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the site.</td>
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<td>• Suspend grading activities when winds exceed 25 miles per hour and visible dust clouds cannot be prevented from extending beyond active construction areas.</td>
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<tr>
<td>• Limit the area subject to excavation, grading, and other construction activities at any one time.</td>
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<tr>
<td>Require transportation projects to implement construction emission control measures recommended by BAAQMD as appropriate, taking into account length of time of construction and distance from sensitive receptors. This may include the utilization of low-emission construction equipment, restrictions on the length of time of use of certain heavy-duty construction equipment, and utilization of methods to reduce emissions from construction equipment (alternative fuels, particulate matter traps, and diesel particulate filters) as feasible. Limit the idling of diesel equipment, particularly when parked near sensitive receptors or in other conditions as appropriate, for the construction and operation aspects of transportation projects consistent with applicable regional, state and federal standards.</td>
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</table>

#### 4.4 Noise

<table>
<thead>
<tr>
<th>MM 4.4.1</th>
<th>The following requirements shall be imposed on all transportation construction projects to reduce construction noise impacts to residential uses and other sensitive receptors.</th>
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<tr>
<td></td>
<td>• Provision of noise-reduction intake and exhaust mufflers and engine shrouds on construction equipment, in accordance with manufacturers’ recommendations.</td>
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<tr>
<td></td>
<td>• Construction of temporary barriers sufficient to the extent feasible to interrupt line of sight between onsite construction areas and the nearest noise-sensitive use(s).</td>
</tr>
<tr>
<td>City of Alameda</td>
<td>As a condition of project approval; Prior to and during any improvement projects/construction activities.</td>
</tr>
</tbody>
</table>