



# Memorandum

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**DATE:** April 18, 2019

**TO:** Alameda County Transportation Commission

**FROM:** Saravana Suthanthira, Principal Transportation Planner  
Chris G. Marks, Associate Transportation Planner

**SUBJECT:** Congestion Management Program (CMP): Summary of the Alameda CTC's Review and Comments on Environmental Documents and General Plan Amendments **Updates**

## Recommendation

This item is to provide the Commission with an update on the summary of Alameda CTC's review and comments on Environmental Documents and General Plan Amendments. This item is for information only.

## Summary

This item fulfills one of the requirements under the Land Use Analysis Program (LUAP) element of the Congestion Management Program (CMP). As part of the LUAP, Alameda CTC reviews Notices of Preparations (NOPs), General Plan Amendments (GPAs), and Environmental Impact Reports (EIRs) prepared by local jurisdictions and comments on them regarding the potential impact of proposed land development on the regional transportation system.

Since the last update on March 11, 2018, the Alameda CTC reviewed one NOP and one Draft EIR. Responses were submitted and are included as Attachments A and B.

**Fiscal Impact:** There is no fiscal impact associated with the requested action.

## Attachments:

- A. Response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Thornton Middle School Conversion Project in Fremont
- B. Response to the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the City of Pleasanton Downtown Specific Plan

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March 13, 2019

John Chwastyk  
Director of Facilities  
Fremont Unified School District  
4210 Technology Drive  
Fremont, CA 94538

**SUBJECT:** Response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Thornton Middle School Conversion Project in Fremont

Dear Mr. Chwastyk,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) for the Thornton Middle School Conversion Project. The project site is located at 4357 Thornton Avenue in northern Fremont. The site is approximately 18 acres in size, bordered by the residential subdivision south of Oak Street to the Northeast, Thornton Avenue/State Route 84 to the Southeast, Coronado Drive to the Southwest, and the Rancho Coronado Gardens subdivision to the Northwest. The site currently contains the existing Thornton Junior High School campus (Thornton) with 43 classrooms. The proposed project would demolish the existing school entrance building and build a new 9,560 square-foot structure to replace it; a series of four new two-story classroom structures totaling 35,400 square feet oriented to create courtyard-style outdoor learning spaces; and a 485 square foot addition to an existing building. Additionally, the Project will include reconfigurations and structural upgrades to the school locker room; facility modernizations to the existing multi-use room, modular buildings, and various classroom buildings; redevelopment of campus hardtop play areas; creation of new parking areas and a vehicle turnaround; and campus-wide Information Technology upgrades.

The Alameda County Transportation Commission (Alameda CTC) respectfully submits the following comments:

Basis for Congestion Management Program (CMP) Review

- It appears that the proposed project may generate 100 p.m. peak hour trips over existing conditions, and therefore the CMP Land Use Analysis Program requires the City to conduct a transportation impact analysis of the project. For information on the CMP, please visit: <https://www.alamedactc.org/planning/congestion-management-program/>.

Use of Countywide Travel Demand Model

- The Alameda Countywide Travel Demand Model should be used for CMP Land Use Analysis purposes. The CMP requires local jurisdictions to conduct travel model runs themselves or through a consultant. The City of Fremont and the Alameda CTC signed a Countywide Model Agreement on April 1, 2008. Before the model can be used for this project, a letter must be

submitted to the Alameda CTC requesting use of the model and describing the project. A copy of a sample letter agreement is available upon request. The most current version of the Alameda CTC Countywide Travel Demand Model was updated in June 2018 to be consistent with the assumptions of Plan Bay Area 2040.

### Impacts

- The DEIR should address all potential impacts of the project on the Metropolitan Transportation System (MTS) roadway network.
  - MTS roadway facilities in the project area include:
    - State Route 84 (Thornton Ave, Peralta Blvd, Mowry Ave), Interstate 880, Fremont Blvd, Paseo Padre Pkwy, and Central Ave.
  - For the purposes of CMP Land Use Analysis, the Highway Capacity Manual 2010 freeway and urban streets methodologies are the preferred methodologies to study vehicle delay impacts.
  - The Alameda CTC has *not* adopted any policy for determining a threshold of significance for Level of Service for the Land Use Analysis Program of the CMP. Professional judgment should be applied to determine the significance of project impacts (Please see Chapter 6 of the 2017 CMP for more information).
- The DEIR should address potential impacts of the project on Metropolitan Transportation System (MTS) transit operators.
  - MTS transit operators potentially affected by the project include: AC Transit, Amtrak, and the Altamont Corridor Express
  - Transit impacts for consideration include the effects of project vehicle traffic on mixed flow transit operations, transit capacity, transit access/egress, need for future transit service, and consistency with adopted plans. See Appendix J of the 2017 CMP document for more details.
- The DEIR should address potential impacts of the project to cyclists on the Countywide Bicycle Network.
  - Countywide bicycle facilities in the project area include:
    - Planned extension of the Fremont Blvd Bike Lane, Thornton Ave Bike Lane
  - Impacts to consider on conditions for cyclists include effects of vehicle traffic on cyclist safety and performance, site development and roadway improvements, and consistency with adopted plans. See Appendix J of the 2017 CMP document for more details.
- The DEIR should address potential impacts of the project to pedestrians in Pedestrian Plan Areas of Countywide Significance as defined by the Countywide Pedestrian Plan.
  - The Project overlaps with an Area of Countywide Pedestrian Significance:
    - The site is located within a 1/2 mile of a transit corridor
  - Impacts to consider on conditions for pedestrians include effects of vehicle traffic on pedestrian access and safety, site development and roadway improvements, and consistency with adopted plans. See Appendix J of the 2017 CMP document for more details.
- The DEIR should consider safety issues specific to active freight and passenger rail infrastructure located in the project area, as applicable.

### Mitigation Measures

- Alameda CTC's policy regarding mitigation measures is that to be considered adequate they must be:
  - Adequate to sustain CMP roadway and transit service standards;
  - Fully funded; and
  - Consistent with project funding priorities established in the Capital Improvement Program of the CMP, the Countywide Transportation Plan (CTP), and the Regional Transportation Plan (RTP) or the Federal Transportation Improvement Program, if the agency relies on state or federal funds programmed by Alameda CTC.
- The DEIR should discuss the adequacy of proposed mitigation measure according to the criteria above. In particular, the DEIR should detail when proposed roadway or transit route improvements are expected to be completed, how they will be funded, and the effect on service standards if only the funded portions of these mitigation measures are built prior to Project completion. The DEIR should also address the issue of transit funding as a mitigation measure in the context of the Alameda CTC mitigation measure criteria discussed above.
- Jurisdictions are encouraged to discuss multimodal tradeoffs associated with mitigation measures that involve changes in roadway geometry, intersection control, or other changes to the transportation network. This analysis should identify impacts to automobiles, transit, bicyclists, and pedestrians. The HCM 2010 MMLOS methodology is encouraged as a tool to evaluate these tradeoffs, but project sponsors may use other methodologies as appropriate for particular contexts or types of mitigations.
- The DEIR should consider the use of TDM measures, in conjunction with roadway and transit improvements, as a means of attaining acceptable levels of service. The Alameda CTC CMP Menu of TDM Measures and TDM Checklist may be useful during the review of the development proposal and analysis of TDM mitigation measures (See Appendices F and G of the 2017 CMP).

Thank you for the opportunity to comment on this NOP. Please contact me at (510) 208-7426 or Chris G. Marks, Associate Transportation Planner at (510) 208-7453, if you have any questions.

Sincerely,



Saravana Suthanthira  
Principal Transportation Planner

cc: Chris G. Marks, Associate Transportation Planner





March 18, 2019

Richard Patenaude  
Contract Planner  
City of Pleasanton  
Community Development Department  
P.O. Box 520  
Pleasanton, CA 94566

**SUBJECT:** Response to the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the City of Pleasanton Downtown Specific Plan

Dear Mr. Patenaude,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Pleasanton Downtown Specific Plan. The plan covers 319 acres in central Pleasanton. The Plan area is approximately bound by the Alameda County Fairgrounds to the west; the Arroyo del Valle and Union Pacific Railroad tracks to the north; portions of Second and Third Streets to the east; and Bernal Avenue to the south. The proposed Plan provides a policy framework which would apply to new development and redevelopment within the Plan area, as well as streetscape changes.

The Alameda County Transportation Commission (Alameda CTC) respectfully submits the following comments:

- Impact 3.12-1 of the DEIR considers the impacts of the proposed Plan on the existing circulation system. However, it does not include an analysis of the CMP routes including I-680, which was identified in our response to the Notice of Preparation of the DEIR dated April 9, 2018. Please include an impact analysis for I-680 in the DEIR.
- The proposed Plan area is adjacent to the Alameda County Fairgrounds. However the DEIR does not consider potential impacts due to special event traffic. The DEIR should consider potential impacts during events at the Fairgrounds.
- Alameda CTC acknowledges that under Impact 3.12-2 the DEIR indicates that any future development within the Plan area that generates more than 100 peak-hour trips would be required to evaluate, and potentially mitigate any identified traffic impacts.
- Alameda CTC also acknowledges that under Impact 3.12-6, the DEIR states that the proposed Plan uses a Complete Streets approach intended to improve the safety of transit and bicycle

facilities, and that amendments to the City's Bicycle and Pedestrian Master Plan will ensure avoiding any future conflicts.

Thank you for the opportunity to comment on this DEIR. Please contact me at (510) 208-7426 or Chris G. Marks, Associate Transportation Planner at (510) 208-7453, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Saravana Suthanthira', with a long horizontal flourish extending to the right.

Saravana Suthanthira  
Principal Transportation Planner

cc: Chris G. Marks, Associate Transportation Planner