



Memorandum

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DATE: February 21, 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

Recommendation

This item is 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 January 14, 2018, the Alameda CTC reviewed one NOP. A response was submitted and is included as Attachment A.

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

Attachment:

- A. Response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Oakland Waterfront Ballpark District Project

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December 28, 2018

Peterson Vollmann, Planner IV
City of Oakland Planning Bureau
250 Frank H Ogawa Plaza, Suite 2214
Oakland, CA 94612

SUBJECT: Response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Oakland Waterfront Ballpark District Project

Dear Mr. Vollmann,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) for the Oakland Waterfront Ballpark District Project. The project site is located at the Port of Oakland along the Inner Harbor of the Oakland-Alameda Estuary. The site is approximately 55 acres, including the Charles P. Howard Terminal and adjacent parcels. It is bordered by Jack London Square to the East, the Oakland Estuary Middle Harbor to the South, Union Pacific railroad tracks and the Embarcadero to the North, and the Schnitzer Steel heavy metal recycling center to the West. The project site currently offers maritime support uses for short-term tenants, and was previously used as a maritime container terminal until 2014. The proposed project would demolish existing buildings on the site and build a new open-air Major League Baseball park with a capacity of approximately 35,000 people, up to 4,000 residential units, approximately 2.27 million square feet of adjacent mixed use development, a performance venue, a 300-400 room hotel, new and expanded utility infrastructure, and new signage and lighting. The proposed project would also construct or provide improved access from surrounding neighborhoods and regional transportation networks, potentially including expanded bus or shuttle service and a new network of public streets and sidewalks.

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

Basis for Congestion Management Program (CMP) Review

- The proposed project will generate at least 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: http://www.alamedactc.org/app_pages/view/5224

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 Oakland and the Alameda CTC signed a Countywide Model Agreement on May 28, 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) and Congestion Management Program (CMP) roadway networks.
 - MTS roadway facilities in the project area include: I-880, I-980, SR-24, 7th Street, 8th Street, 11th Street, 12th Street, 14th Street, Middle Harbor Road, Market Street, Broadway, Embarcadero, the Webster Tube, and the Posey Tube.
 - 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).

- This project should identify and coordinate with other significant improvement projects in the area (such as the Oakland-Alameda Access Project) sponsored by Alameda CTC that are already in advanced project development stages. These projects did not include the proposed project during the project development and impact analyses. An impact assessment and potential mitigation, as appropriate, should be included in the DEIR.

- 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, BART, and the San Francisco Bay Ferry. In addition, Capitol Corridor and Amtrak operate intercity passenger rail in the project area.
 - 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 consider impacts to freight and passenger rail safety and performance. The project site is located close to the Oakland Jack London rail station, active freight railyards, and the Port of Oakland.

- 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 East Bay Greenway and the Bay Trail
 - 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.

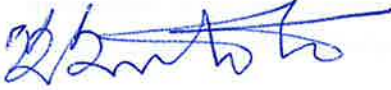
- The DEIR should address potential impacts of the project to pedestrians in Pedestrian Plan Areas of Countywide Significance as defined by the Countywide Pedestrian Plan.
 - The Project overlaps with an Area of Countywide Pedestrian Significance:
 - The site is located within a ½ mile of a transit corridor
 - Proximity to the Oakland Central Business District
 - 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.

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.
- Given the size and significance of project in trip generation, the DEIR should consider using TDM measures, in conjunction with roadway and transit improvements, as a means of attaining acceptable levels of service. Whenever possible, mechanisms that encourage ridesharing, shuttles, flextime, transit, bicycling, telecommuting and other means of reducing peak hour traffic trips should be considered. 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).
- The DEIR should identify impacts and propose mitigation measures related to freight and passenger rail services and the safety of vehicle, pedestrian, and bicycle traffic going in and out of the Port of Oakland and the Jack London Amtrak station due to the project site's proximity to the these facilities, and the overall complex traffic operations in the area.

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