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OAKLAND GENERAL PLAN LAND USE AND TRANSPORTATION ELEMENT

Final Addendum to the Draft EIR

February 1998

ER No. 97-18

State Clearinghouse No. 97062089

*Prepared for:
City of Oakland
Community and Economic Development Agency*

ESA Environmental Science Associates

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Prepared for:

City of Oakland

Community and Economic Development Agency

225 Bush Street
Suite 1700
San Francisco,
California
94104
(415) 896-5900

315 Washington Street
Suite 102
Oakland,
California
94607
(510) 839-5066

700 University Avenue
Suite 130
Sacramento,
California
95825
(916) 564-4500

4221 Wilshire Boulevard
Suite 480
Los Angeles,
California
90010
(213) 933-6111

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Associates

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CHAPTER I

INTRODUCTION

A. CEQA PROCESS

On October 31, 1997, the City of Oakland Planning Department (Lead Agency) released for public review a Draft Environmental Impact Report (Draft EIR or DEIR) on the proposed Oakland General Plan Land Use and Transportation Element (EIR 97-18, SCH No. 97062089). The public review and comment period on the Draft EIR began on October 31, 1997 and closed on December 30, 1997, which is greater than the 45 days required.

The Draft EIR for the Oakland General Plan Land Use and Transportation Element, together with this Addendum constitute the Final EIR for the proposed project. The Final EIR is an information document prepared by the Lead Agency (City of Oakland Planning Department) that must be considered by decision makers (including the Oakland City Planning Commission) before approving or denying a proposed project. California Environmental Quality Act (CEQA) Guidelines (Section 15132) specify the following:

“The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.”

This document has been prepared pursuant to CEQA Guidelines. This Final EIR Addendum incorporates comments from public agencies and the general public, and contains appropriate responses by the Lead Agency to those comments.

B. METHOD OF ORGANIZATION

This Final EIR Addendum for the proposed Oakland General Plan Land Use and Transportation Element contains information in response to concerns raised during the public comment periods.

Following this introductory Chapter I, Chapter II of this document contains text changes to the Draft EIR, reflecting necessary additions and corrections addressed by the public comments or responses to comments, or initiated by Planning Department staff to correct the Draft EIR text. Text changes appear in order of page number in the Draft EIR on which the change is made. Where a text change is made as part of a response to a public comment, the comment number is noted.

Chapter III contains a list of all persons and organizations that submitted written comments on the Draft EIR during the comment period.

Chapter IV contains copies of written comments received during the comment period and responses to those comments. Each comment is numbered in the margin of the comment letter, and the responses to all of the comments in a particular letter follow that letter. In some cases, the response refers to another response to a similar comment; the comments are referenced alphanumerically by letter and comment number, as in “the response to Comment A-2” (meaning the response to the second comment in Letter A). Where a response includes a change to the text of the Draft EIR, a reference is made to Chapter II, Addenda to the Draft EIR, where text changes are listed in order of page number in the Draft EIR.

CHAPTER II

ADDENDA TO THE DRAFT EIR

The following corrections and changes are made to the Draft EIR and are incorporated as part of the Final EIR. Revised or new language is underlined (except where all of the text is an addition). Brackets ([]) indicate where text has been deleted.

Where a change is made as part of a response to a comment on the Draft EIR, the comment number is noted in brackets at the end of the text change. Where no comment number is given, the change is initiated by the Planning Department staff.

Entire document, all references to the Airport are revised to read as follows:

Oakland International Airport

Page II-17, the second sentence under the Description for Regional Commercial is revised as follows:

Maximum FAR is 4.0. [B-2]

Page II-22, the first header is revised as follows:

[] Transit Oriented Districts [B-3]

Page II-27, the sixth entry under “Programmed Projects” is revised to read as follows:

[] Airport Roadway Project [G-20]

Page II-27, the sixth entry under “Projects Requiring Further Study” is revised to read as follows:

Water transportation (water taxis to points along the estuary in Oakland and Alameda; and ferries to San Francisco) [G-19]

Page III.A-4, first paragraph, a new sentence is added to the end of the paragraph as follows:

In addition, the former Acorn Plaza / future Bayport Shopping Center is a potential commercial center in West Oakland. [D-1]

Section III.B, all references to the CMA Model are revised to read as follows:

Countywide Model [G-3]

Page III.B-8, a new sentence is added to the end of the first paragraph as follows:

However, BART expects to increase the capacity of its system in the upcoming years as a result of the acquisition of new vehicles and the development of its Advanced Automated Train Control system. [B-8]

Page III.B-9, second paragraph, first sentence is revised to read as follows:

[] No modifications were made to the 2000 and 2010 CMA roadway networks for this analysis. For the 2005 roadway network, the CMA Year 2000 transportation network, which includes only projects with committed funding based on the 1994 Transportation Improvement Program (TIP), was used. For the year 2015 roadway network, no modifications were made to the 2010 Tier 1 transportation network. [G-2]

Page III.B-9, second paragraph, last sentence is revised to read as follows:

Transportation improvements within the City of Oakland that were included in the 2005 and 2015 model runs are ¹: [G-2]

Page III.B-9, the footnote is revised to read as follows:

¹ Year 2000 Baseline and 2010 Tier 1 improvements identified in Tables 6.1 and 6.2 of the CMA's *Transportation Vision 2010 and Beyond: A Diversified Strategy of Transportation Improvements for Alameda County* and a review of the Countywide Model roadway networks. [G-2]

Page III.B-20, the following two new paragraphs are inserted under the separate heading after the discussion of transit demand:

TRANSPORTATION FINANCING

The implementation program of the Land Use and Transportation Element identified several strategies to increase funding for transit in the City. These strategies include support of the reauthorization of the transportation sales tax with a fair share of funds for AC Transit, pursuit of State Transit Capital Improvement (TCI) funds, possible develop fees and contributions, and benefit assessment districts for AC Transit. Closer coordination with the funding agencies, such the Metropolitan Transportation Commission and the Alameda County Congestion Management Agency, also is encouraged.

Some of the improvements identified in this EIR are included in the 1995 Congestion Management Program (CMP) Capital Improvement Program (CIP). Specifically, the proposed Land Use and Transportation Element includes such projects as the AC Transit Transfer Station at West Oakland, the Coliseum BART Transit Center Improvements, the Telegraph-Foothill/Bancroft Electric Trolley Phase I, the San Pablo / East 14th Street

corridor analysis, and street rehabilitation and signal projects along Broadway, San Pablo, East 14th Street, and Foothill Boulevard. [G-8]

Page III.B-23, Figure III.B-2 is revised as shown on the following page. [G-30]

Page III.D-35, Mitigation Measure D.7-1a is revised as follows:

Mitigation Measure D.7-1a: [] To reduce overcrowding, the School District should periodically conduct a review an evaluation to determine if the following measures are feasible to implement:

- 1) reassigning students among district schools to account for changing population and new development;
- 2) ~~continuation and expansion of year round school;~~
- 3) more efficient use of underutilized and/or abandoned school facilities;
- 4) ~~addition of portable classrooms; and~~
- 5) ~~the busing of students to less crowded schools.~~

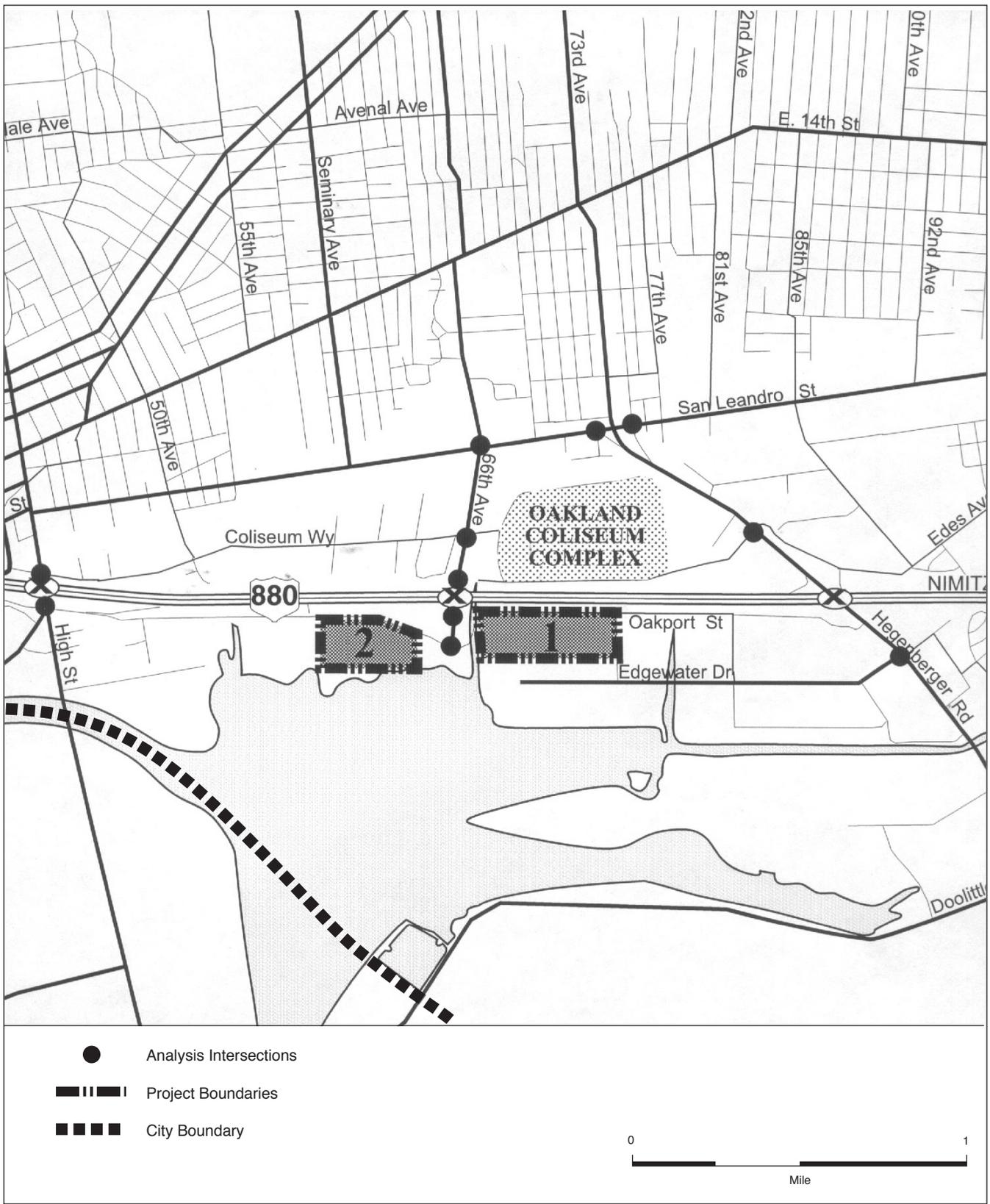
If these measures do not reduce overcrowding, OUSD may have to expand existing schools or construct new schools. All of these measures would require varying amounts of funding.

If current sources of funding including the ~~existing City of Oakland~~ school mitigation fees (developer school impacts fee), ~~increases in property taxes and sales tax revenues,~~ and increases in state funding are insufficient to pay for the cost of these mitigating overcrowding, the OUSD should formulate and implement specific measures to raise additional funds. Funding sources which may be considered by OUSD include:

- 1) adjustments of developer school impact fees on commercial and residential development;
- 2) the creation of special assessment or Mello Roos districts or annexation to a Community Facilities District;
- 3) sale of surplus OUSD property; and
- 4) any other funding mechanisms available to the OUSD by state law or local ordinances, including those measures identified in the OUSD's 1996 Developer Fee Justification Study.

Page III.D-35, Mitigation Measure D.7-1b is revised as follows:

Mitigation Measure D.7-1b: In reviewing major land use or policy decisions, the City will consider the availability of police and fire protection services, park and recreational services, schools, and library services in the affected areas and the impact of the project on the current service levels. The City shall require developers to consult with the School district regarding potential impacts on school facilities early in the project development planning.



SOURCE: CEDA City of Oakland General Plan Land Use and Transportation Element EIR / 970224

Figure III.B-2 (Revised)
 Analysis Intersections for the
 Coliseum Showcase District

Page III.D-36, new mitigation measure is added as follows:

Mitigation Measure D.7-1i: The District shall develop, in cooperation and coordination with the City, a Master Facilities Plan, which shall be periodically updated. The Plan shall provide a comprehensive view of the District's current and projected facilities, alternatives to reduce overcrowding (including without limitation the alternatives outlined in Mitigation Measure D.7-1a), and financing options (including without limitation the alternatives outlined in Mitigation Measure D.7-1a).

After the approval of the Master Facilities Plan, the City and District shall enter into an MOU that shall establish a continuing procedure for coordinating residential and commercial development and exploring the imposition of mutually agreed upon reasonable and feasible mitigation measures to reduce the impacts on school facilities. [C-6]

Page III.F-1, paragraph 4, sentence 2 is revised to read as follows:

These include views to and from Lake Merritt and downtown, across canyons and slopes in the hills, to Alameda and Coast Guard Island from the shoreline, across low ridges in places like Ivy Hill, Maxwell Park, and Millsmont, [] across bowl-shaped areas such as the Rose Garden, and towards distinctive features of Oakland's landscape, such as the shipping container cranes at the harbor. [G-31]

Page III.I-1, paragraph 3, sentence 2 is revised to read as follows:

In the Outer and Inner Harbor areas, the shipping channel is periodically dredged by the [U.S. Army Corps of Engineers to maintain adequate depth for shipping.

Page III.O-8, paragraph 4, a new sentence 6 is added as follows:

ABAG also is involved in the implementation of the Bay Trail Plan. [G-32]

Page III.O-15, paragraph 3, sentence 1 is revised to read as follows:

The proposed Land Use and Transportation Element identified the need for close coordination with Alameda in the improvement of transportation between the two cities, with particular focus on improving the Webster / Posey Tubes and providing access to the future uses at the former Naval Air Station. [G-33]

Page V-5, paragraph 2, last sentence is revised to read as follows:

Thus, cumulative impacts have been considered throughout this EIR and are summarized below.¹

Page V-5, a new footnote is added as follows:

For traffic, air quality, and noise impacts, two levels of cumulative impact analyses were conducted as part of this EIR. The first focused on cumulative impacts associated with the Land Use and Transportation Element and the second focused on cumulative impacts associated with the Showcase Development Projects. In the former case, cumulative impacts are associated with development consistent with the proposed Element plus development consistent with General Plans for other jurisdictions in the region. The Countywide CMA Model for 2010 was used as the basis for this analysis, with higher projections for Oakland inserted to reflect anticipated conditions in the horizon year of the General Plan (2015). In the second case, cumulative impacts are associated with “buildout” of the eight showcase projects, plus “background” growth associated with other development in Oakland and development elsewhere in the region, consistent with the General Plans of other jurisdictions. The Countywide CMA Model for year 2000 was used as the basis for this analysis. Higher projections were used for all traffic analysis zones (TAZs) in the model (including those outside Oakland) to estimate conditions in the Year 2005. An average of the CMA figures for 2000 and 2010 was used for TAZs outside of Oakland. Within Oakland, the cumulative impact assessment for the showcase projects assumed “buildout” of each project plus one half of the projected citywide growth increment in each TAZ for the 1995-2015 period.

CHAPTER III

LIST OF PERSONS AND ORGANIZATIONS COMMENTING ON THE DRAFT EIR

The following agencies and organizations submitted written comments on the Draft EIR during the Draft EIR review period (October 31, 1997 through December 30, 1997).

William R. Kirkpatrick, Manager of Water Distribution Planning, East Bay Municipal Utility District (December 15, 1997)

Karita Zimmerman, Manager of Environmental Compliance, San Francisco Bay Area Rapid Transit District (December 18, 1997)

Ineda Adesanya, Facilities Manager, Oakland Unified School District
(December 23, 1997)

Ineda Adesanya, Facilities Manager, Oakland Unified School District
(December 29, 1997)

Nancy J. Nadel, City Council District 3 (December 24, 1997)

Debbie Raucher, East Bay Housing Organizations (December 29, 1997)

Jean Hart, Deputy Director, Alameda County Congestion Management Agency
(December 30, 1997)

Collette Meunier, AICP, Planning Director, City of Alameda (December 30, 1997)

Hugh K. Phares, III, President, Jay-Phares Corporation (December 30, 1997)

CHAPTER IV

WRITTEN COMMENTS AND RESPONSES TO WRITTEN COMMENTS OF THE DRAFT EIR



MARILYN L. MILLER
DIRECTOR OF ENGINEERING AND CONSTRUCTION

December 15, 1997

Oakland City Planning Commission
Attn: Andrew Thomas, CEDA
1330 Broadway, Suite 310
Oakland, CA. 94612

SUBJECT: Draft Environmental Impact Report (DEIR) – City of Oakland Land Use
and Transportation Element

Dear Mr. Thomas:

Thank you for the opportunity to provide comments on the DEIR.

We have reviewed the DEIR text concerning Potable Water on pages III.D-1 through III.D-7, and Table S-1, Summary of Environmental Impacts and Mitigation. The author appears to have consulted appropriate EBMUD reference material such as the Water Supply Management Program and Urban Water Management Plan

Page III.D-6, the second paragraph under "Capital Improvement Needs" refers to the diameter and age of District water distribution pipelines and states: "such lines would need to be upgraded to provide adequate pressure for fire flow." We appreciate your recognition here but some of the pipelines may be adequate; a detailed analysis will need to be performed when appropriate. Please note that fire requirements are set by the Oakland Fire Department at the time of development, and related infrastructure improvements are subject to rigorous engineering analysis. The DEIR also infers that "quite old" water pipes are inadequate. Our experience is the age of a pipeline has less influence upon its useful life and reliability than does the material from which it is made, the quality of its construction and the corrosive influences of the soil in which it is placed.

1

As a related matter of interest, EBMUD will soon begin a comprehensive study of water demand based on present and future land use, according to the adopted general plans of the cities and counties of service area. The demand study will be formatted in a multi-layered GIS-based mapping environment with related data bases. We plan to develop the

2

Oakland City Planning Commission

Attn: Andrew Thomas, CEDA

December 15, 1997

Page 2

Oakland portion of the demand study in consultation with Oakland planning staff, and will be pleased to provide the results to the City at the expected completion of the project in late Summer, 1998.

2
Cont.

Again, thank you for the opportunity to comment on the DEIR.

Very truly yours,



WILLIAM R. KIRKPATRICK
Manager of Water Distribution Planning

WRK:MC:jbk

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LETTER A – EAST BAY MUNICIPAL UTILITY DISTRICT

1. Mitigation Measure D.1-2 on page III.D-7 of the Draft EIR indicates that a review of major new development proposals would be conducted to determine if the infrastructure is adequate to accommodate the specific development project. When such development proposals are made, the City would conduct specific environmental review to determine if capital improvements are required to serve the specific development project.
2. The City of Oakland acknowledges the comprehensive study of water demand being conducted by the East Bay Municipal Utility District and looks forward to receiving a copy of the study when it is completed.



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
 800 Madison Street - Lake Merritt Station
 P.O. Box 12688
 Oakland, CA 94604-2688
 Telephone (510) 464-6000



December 18, 1997

Mr. Andrew Thomas
 Community and Economic Development Agency
 1330 Broadway, Suite 310
 Oakland, CA 94612

DAN RICHARD
 PRESIDENT

SD#: 0617

MARGARET K. PRYOR
 VICE-PRESIDENT

Subject: Draft Land Use and Transportation Element of the Oakland General Plan and Draft Environmental Impact Report (DEIR);

THOMAS E. MARGRO
 GENERAL MANAGER

Dear Mr. Thomas:

DIRECTORS

Thank you for the opportunity to review and comment on the above referenced documents. This letter comprises the comments of BART staff on the General Plan Element and DEIR.

DAN RICHARD
 1ST DISTRICT

BART commends the City's effort to integrate land use and transportation decisions as well as create a transit-oriented environment in Oakland. We look forward to working with you to achieve that objective.

JOEL KELLER
 2ND DISTRICT

ROY NAKADEGAWA
 3RD DISTRICT

Comments on the Draft Land Use and Transportation Element of the General Plan:

MARGARET K. PRYOR
 4TH DISTRICT

Page Comment

SHERMAN LEWIS
 5TH DISTRICT

53 On page 51, under the Lake Merritt Station the Plan mentions possible development of the Laney College parking lot to create a Transit Oriented District. Has Peralta College District expressed any interest in such development? Where would existing parking for students be relocated?

THOMAS M. BLALOCK
 6TH DISTRICT

WILLIE B. KENNEDY
 7TH DISTRICT

52 Under MacArthur Station, the third sentence should be revised to read "~~...has been proposed as~~ is designated a Maximum Access Station by BART, a designation that ..."

JAMES FANG
 6TH DISTRICT

MICHAEL BERNICK
 9TH DISTRICT

Rockridge BART Station is noted as an "outstanding example of a Transit Oriented District". BART agrees with the general direction of continued mixed use supporting increased housing and commercial opportunities at Rockridge. One gap in the area's development is the BART/freeway underpass on College between Shafter/Keith and Miles, where buses stop and some BART drop off occurs. This dark underpass area has much pedestrian activity and offers an opportunity for a small amount of retail, with shop windows to brighten up the area. BART and the City could explore this opportunity with the Rockridge community.

54 There appears to be a contradiction in constitutes the radius of a transit oriented district; one approach is listed in Policy T2.3 (1/4 to 1/2

1

mile) and another approach is listed in footnote in the DEIR on p. II-24 (1,000 feet). Based on BART staff experience, the 1/4 to 1/2 mile radius is preferred.

- 58 There also appears to be a contradiction between Policy T5.2's objective of prioritizing transit projects with the Transportation Improvement Projects and Priorities list in Table II-9 on p. II-27 in the DEIR.
- 71 Another discrepancy appears between Policy D13.2, which advocates providing sufficient parking, and the Transit and Transportation Improvement Strategy e2 on p. 173 to "Participate in efforts discourage free BART and subsidized employer parking, particularly in the downtown area." At this time, the BART Board of Directors maintains the policy of free parking at BART stations. Therefore this proposed policy step is not in keeping with existing BART policy and is an issue that would have to be undertaken with the Board.
- 131 The discussion of the intermodal facility at the Coliseum Station should also mention that a new facility to improve transfers between BART and AC transit is programmed.
- 140 The classifications list maximum densities and FARs for developments near transit. To make the best use of sites near transit, the Element should also specify minimum densities.
- 172 We suggest that the bullet to "Work with BART" be expanded to also "see that land use decisions are made that foster opportunities for development at the transit stations."

1
Cont.

Comments on the Draft Environmental Impact Report:

Page Comment

II-22 BART's Coliseum Station area is also designated as a Transit Oriented District, with Regional Commercial designation. This is defined in the DEIR as sports, entertainment, shopping, arts, associated residential with FAR of 5.0 (II-17). In the draft Land Use and Transportation Element page 143, and on the 10/23/97 "Summary of Land Use Classifications" print out from SMWM, the Regional Commercial FAR is listed as 4.0, not 5.0. This discrepancy should be clarified. While BART supports the regional use emphasis at this station, office and business services should also be included in the Coliseum's allowed land uses.

2

In the Plan's Draft Land Use and Transportation Element, pages 50-53, BART's Rockridge is described as a TOD, 12th and 19th Stations as Downtown TOD's, and Lake Merritt Station as a potential TOD. These other stations should be mentioned in the DEIR as well.

3

The City in 1996 adopted a new S-15 zoning designation (transit oriented development zone) to support the Fruitvale transit village and other transit oriented development. The S15 has already been adopted for the Fruitvale station area. How will this zoning interact with the land use designations and is there any conflict with the S15 maximum densities and those allowed by the proposed new land use designations?

4

II-27 Table II-9 Transportation Improvement Projects - The City's top ranking project being proposed for funding under the 1998 STIP (State Transportation Improvement Program) cycle, and for Measure B reauthorization funding is currently the Fruitvale Transit Village garage. This project does not appear on the table and should be as it is a transportation project and is being considered as such by the City, County and MTC.

5

III.A-32 Policy T2.2 - The definition for transit oriented development should be broadened to include

6

not only pedestrian orientation, day and night use, and mixed uses. Basic to the definition of "transit oriented" is that development contain uses that are supportive of transit over auto use, contain high enough densities to produce a significant increase in transit riders, and that is designed to integrate the transit station with the development.

6
Cont.

III.B-5 One of the roadway improvements listed is Transit Centers at the Fruitvale, West Oakland, Coliseum, MacArthur BART stations and 14th & Broadway. "Transit Center" should be defined. Are these BART/bus intermodal connection centers? If so, there is already federal funding (to BART from AC Transit) for an Intermodal at Fruitvale, Coliseum and West Oakland stations.

7

To clarify improvements BART plans for its stations, staff will submit to the City an Access Improvement Plan for each of the Oakland BART stations.

III.B-7 The discussion on BART states that "Increases in BART ridership eventually could limit the opportunity to increase the use of the system for travel within Oakland during peak periods, since trains arriving in Oakland may already be at capacity." This section should note that service between the Coliseum and West Oakland stations has increased by approximately 50% since the opening of the Dublin/Pleasanton line. Further, BART is acquiring new vehicles and developing its Advanced Automated Train Control system to effectively double its transbay capacity. As a result, Oakland will experience substantial increases in transit capacity in the upcoming years.

8

Should you have any comments on these questions, please do not hesitate to contact Cam Bauer at 287-4894.

Sincerely,



Karita Zimmerman
Manager of Environmental Compliance

LETTER B – SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

1. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.
2. As described on page 143 of the proposed Land Use and Transportation Element, office and business services are included in the allowable land uses in the Regional Commercial designation.

The commenter is correct in noting that the Floor Area Ratio (FAR) within the Regional Commercial designation is 4.0. Please see Chapter II for changes to page II-17 of the Draft EIR.

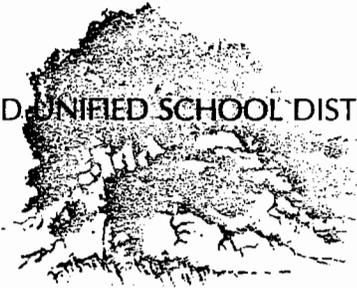
3. Page II-22 of the Draft EIR presents the proposed major land use designation changes in several of the Transit Oriented Districts. No changes are proposed for the Rockridge, 12th Street, 19th Street, or Lake Merritt Transit Oriented Districts. Please see Chapter II for changes to page II-22 of the Draft EIR to clarify this issue.
4. The S15 zoning designation is intended to be used as a tool to implement the land use designations. No conflict exists between the S15 zoning designation and the proposed land use designations in the Fruitvale Transit Oriented District.
5. The commenter is correct in noting that the Fruitvale Transit Village parking garage is proposed for funding. This project was not included in Table II-9 of the Draft EIR because none of the proposed parking garages or improvements to parking facilities in Oakland were included in this table that identifies major transportation-related projects.
6. Pages 44 through 49 of the proposed Land Use and Transportation Element describe the intent behind the Transit Oriented District (TOD). Each of the TODs in Oakland has its own character and the TOD land use designation is broadly defined to include a variety of land uses and provide residents and visitors opportunities to use alternative means of transportation.
7. A description of a “Transit Center” is provided on page 127 of the proposed Land Use and Transportation Element. The objective of a transit center is to allow quick and comfortable transfers from bus-to-bus, bus-to-rail, and bus-to-car.

The City acknowledges that BART will submit an Access Improvement Plan to the City for each of the Oakland BART Stations.

8. The City acknowledges that an increase in transit capacity is expected to occur in the future years. Please see Chapter II for changes to page III.B-8 of the Draft EIR.



OAKLAND UNIFIED SCHOOL DISTRICT



DIVISION OF FACILITIES PLANNING
AND MANAGEMENT

955 High Street
Oakland, California 94601
(510) 836-8302
Fax (510) 436-5371

December 23, 1997

VIA U.S. MAIL

Oakland City Planning Commission
Attention: Andrew Thomas
Planner II
Community and Economic Development Agency
1330 Broadway, Suite 310
Oakland, CA 94612

Re: Oakland Unified School District;
Comments regarding Draft Program Environmental Impact Report
Concerning the Draft Revised Land Use and Transportation Element
of the City of Oakland General Plan;

Dear Mr. Thomas:

This letter addresses the impact of the above-captioned revisions to the Oakland General Plan Draft Revised Land Use and Transportation Element (Land Use Element) and the Draft Program Environmental Impact Report (EIR) concerning those revisions.

The District's situation has changed strikingly in the past couple of years. District enrollment and the need for additional school facilities is increasing at each grade level, but most dramatically at the elementary level. Even more importantly, class size reduction (CSR), authorized by the California legislature in 1996, has significantly changed the District's facility availability in two years. Each elementary school in the District is implementing three years of CSR between kindergarten and grade three. In many cases, auditoriums, multi-purpose rooms, cafeterias, libraries, and other instructional space has been converted into classrooms, thereby depriving students of important auxiliary programs.

1

Andrew Thomas
Oakland City Planning Commission
December 23, 1997
Page 2

CSR has impacted classroom space availability at every grade level, not just in the elementary schools. Schools have added portable classrooms and the District has reconfigured to grades k-5 in elementary, 6-8 in middle, and 9-12 in high schools. In addition, in 1997-98, Foster School was converted from a middle school to an elementary school to accommodate CSR. This has reduced middle school capacity.

Many schools have no more available space for relocatable classrooms, and playground space has been dramatically reduced, often below state recommended levels. Reconfiguration has filled those schools that previously had available capacity, so the District has very little available classroom space at any level. As a result, building new facilities, including an elementary school and a high school, and expanding existing facilities are now necessary for the District to house projected increases in student enrollment.

The Land Use Element's Impact on Schools.

By generating both new housing and new employment opportunities, the Land Use Element will impact the capacity of the District's schools. Impact D.7-1 recognizes that "Development consistent with the proposed Land Use and Transportation Element could increase the number of students served by the Oakland Unified School District ("OUSD"). The greatest impacts would be Downtown and in the Waterfront area." (Oakland General Plan Land Use and Transportation Element Draft Environmental Impact Report (EIR), Table S-1, Summary of Environmental Impacts and Mitigation Measures, section B, Significant but Mitigable Impacts, subd. D., Public Services, Impact D.7-1, p. S-12; section III, Environmental Setting, Impacts and Mitigation Measures, subd. D, Public Services; p. III.D-34.)

With regard to the Land Use Element's proposals to encourage more housing development downtown and along the estuary waterfront [in the San Antonio-Fruitvale areas], the City should be aware of the impact of development in each of these areas on school capacity. (EIR, Table S-1, section B, subd. D, impact D. 7-1, p. S-12.) At the elementary level, downtown development would lead to increased enrollment at Lincoln Elementary School, a school with no available capacity. Limited child care facilities are available in that area. At the middle school level, downtown development would lead to increased enrollment at Westlake Middle School, a school with limited available capacity. At the high school level, downtown development would lead to increased enrollment at Oakland Technological High School, a school with no available capacity.

New development along the waterfront in the San Antonio-Fruitvale area would impact the most overcrowded elementary schools in the District. The City and District are currently working together to identify a site and obtain funding to construct a new elementary school to relieve the intense overcrowding that already exists in this area. The

1
Cont.

2

impact of new development on this overcrowded elementary school population should be seriously considered before the approval of a Land Use Element that would further exacerbate this overcrowding. At the middle school level, waterfront development could lead to increased enrollment at West Lake, Lowell, Roosevelt, and Simmons Middle Schools. The middle schools district-wide are currently over-capacity. At the high school level, waterfront development could lead to increased enrollment at Fremont, McClymonds, Oakland Tech, and Oakland High Schools.

2
Cont.

New development at the Leona Quarry may also generate additional students, and this would impact Carl Munck and Burckhalter Elementary Schools, King Estates Middle School and Skyline High School. (EIR, Table II-7, Major Land Use Diagram Change Areas, p. II-24.)

The EIR indicates that its student generation figures are conservative because of "diversions to private school," and "live-work units, lofts, and apartments in the waterfront and downtown areas that might not be attractive to families with children." (EIR, section III, Subd. D., p. III.D-34.) A reversal of the trend to divert children to private schools has occurred since the advent of CSR. With classes of twenty students available in public schools during the primary years, many families are reconsidering the wisdom of paying high tuition for equivalent class size. In addition, the housing trends on which this **exceptionally low** student generation rate is based already include the types of housing currently available and anticipated for the City of Oakland. A further discounting of impact based on this type of housing is not appropriate.

3

The EIR states that new school facilities will be needed in the Central East Oakland, San Antonio/Fruitvale waterfront, Oakland Hills, and Downtown areas whether or not the new element is adopted. (EIR, section III, Subd. D, p. III.D-34.) This avoids the issue of the cumulative impact of these anticipated facilities needs and the change in general plan policies if the Land Use Element is adopted. The cumulative need for school facilities will be greater if the Land Use Element is adopted than if the previous policies were to remain in effect.

4

With regard to the EIR's cumulative impact analysis for Public Services, the District believes that "additional and more specific measures" will, rather than may, "be needed as projects are proposed." (EIR, section V., Impact Overview, Public Services, p. V-6.)

5

Mitigation Measures.

Table S-1 outlines five mitigation measures "available to the School District to reduce overcrowding," none of which is feasible. (EIR, Table S-1, Mitigation measures D.7-1a, pp. S-12 - S-13.)

- 1) Reassigning students among district schools to account for changing population and new development;

Students can not be reassigned among district schools to account for changing population and new development because the District has just completed a major reconfiguration of the grade levels at all schools to accommodate CSR and overcrowding. By this reconfiguration, vacancies have already been minimized.

- 2) Continuation and expansion of year-round school;

The District has tried year-round education (YRE). The Board has determined that it is not a viable educational strategy in Oakland since the District's school facilities are not designed to accommodate the teacher movement from room to room required by YRE in light of the school overcrowding throughout the District.

6

- 3) More efficient use of underutilized and/or abandoned school facilities;

Reconfiguration and the sale of two undersized and improperly placed school sites have eliminated two of the District's "underutilized and/or abandoned school facilities." (EIR, Table S-1, subd. D, Mitigation Measure D. 7-1a, p. S-12.)

- 4) Addition of portable classrooms;

Most of the District's schools now have so many portable classrooms that the school sites have no more space to locate additional ones.

- 5) The busing of students to less crowded schools.

Busing will not solve the District's serious space needs because insufficient space exists even after moving students from school to school, and this problem will be more severe in future. In addition, busing does not address the issue of aging school facilities even though it depletes the District's resources and negatively impacts the environment.

Therefore, the District is already at the second level of mitigation proposed in the EIR. (EIR, Table S-1, D.7-1a, p. S-13.) It needs to expand existing schools and

construct new schools, while modernizing existing schools and replacing portable classrooms that are too old to be useful as classrooms.

The current sources of funding identified in the EIR are either insufficient or not relevant. These include "the City of Oakland school mitigation fees, increases in property taxes and sales tax revenues, and increases in state funding." (EIR, Table S-1, D.7-1a, p. S-13.) School mitigation fees at the statutory rate set by Government Code section 65995.1(a) are inadequate to fund facilities to house new students in Oakland. (See OUSD Developer Fee Justification Study dated September 30, 1996.)

Property tax increases are only available when property ownership transfers, and even then, increases do not produce additional revenues for District facilities. Property tax revenues support school operations, not facilities. Second, since the District funds its operations by state funding based on its average daily attendance, an increase in property taxes would not increase District operating revenue. Even when redevelopment increases a redevelopment project area's property tax base, the District receives only statutory pass through funding, a portion of which offsets State funding. (Health & Safe. Code, § 33607.5, et seq., as amended by Stats. 1993, chapter 942.)

Sales tax revenues are also not an available source of funding for District facilities. Since all the District's general fund operating revenues are needed for the operation of District programs, increases in these operational funds do not provide funding for additional facilities to relieve District overcrowding.

The EIR assigns to the District the task of formulating and implementing "specific measures to raise additional funds." (EIR, Table S-1, Mitigation measure D.7-1a, p. S-13.) This burden should be shared by the City. The EIR proposes the following funding sources:

- 1) Adjustment of school mitigation fees on commercial and residential development. (EIR, Table S-1, Mitigation Measure D.7-1a, p. S-13.)

This additional mitigation is authorized by the California courts in *Mira Development Co. v. City of San Diego* (1988) 205 Cal.App.3d 1201; *William S. Hart Union High School District v. Regional Planning Commission of the County of Los Angeles* (1991) 226 Cal.App.3d 1612; *Murrieta Valley Unified School District v. County of Riverside* (1991) 228 Cal.App.3d 1212. It does require the cooperation of the City to impose such supplemental mitigation requirements.

- 2) The creation of special assessment or Mello Roos districts or annexation to a Community Facilities District; (EIR, Table S-1, Mitigation measure D.7-1a, p. S-13.)

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Cont.

Again, with the support of the City to encourage developers to approve such districts, this type of funding may be feasible although it has not been popular in the Bay area. Without the City's cooperation and support, it is probably not feasible since the property owners in the proposed Mello Roos district must authorize special taxes on their property.

- 3) Sale of surplus OUSD property; (EIR, Table S-1, Mitigation measure D.7-1a, p. S-13.)

This measure is not feasible since two of the District's surplus properties have already been sold to complete desperately needed modernization of existing facilities. The only remaining potentially surplus property is being utilized for District programs that must be housed.

The District is not currently aware of additional funding mechanisms, other than City support and applying to the state under the Leroy Greene Lease Purchase Program for funds from the next state-wide bond measure for schools. (EIR, Table S-1, Mitigation measure D.7-1a, p. S-13.) Since the District recently passed Measure C, a local general obligation bond measure, to fund modernization of existing schools, a further local bond measure for construction of new facilities will not be practical for several years. Other financing mechanisms, such as certificates of participation, are merely interim measures requiring repayment from an identified funding source.

Proposed mitigation measures D.7-1b through D.7-1h all provide ways in which the City can support the District's efforts to adequately house its growing student population. (EIR, Table S-1, Mitigation measures D.7-1b - h, p. S-14-S-15.) However, without a structure for coordinating land use and school facility planning, their efficacy is likely to be marginal. We have not had an opportunity to review a mitigation monitoring plan to determine how the effectiveness of each of these measures could be evaluated.

As discussed by City and District planning staff, the City and District need to create a structure for evaluating and addressing the impact of new development on schools early in the planning process. They could negotiate a memorandum of understanding that would formalize a structure that would accomplish this purpose. From the District's side, a long range facilities master plan is currently being developed. It will serve as the District's equivalent to this general plan revision. The two should be coordinated.

The District recognizes that Oakland is uniquely situated in its need to encourage new development to stimulate economic growth. Since the City does not want to make a commitment that all new development will be burdened by all of the potential cost of mitigating its impact on schools, other methods of long range planning to utilize City,

6
Cont.

redevelopment, District and state resources need to be developed. The City's role must be more than considering (EIR, Table S-1, subd. D, Mitigation measure D.7-1b), supporting (measures D.7-1c and D.7-1h), encouraging (measure D.7-1d), assisting (measure D.7-1e), coordinating and continuing efforts (measure D.7-1f), or assessing (measure D.7-1g). The City will need to be an active participant in providing locations and funding school facilities, or it will need to evaluate development on the basis of availability of schools and reduce the size or delay the timing of new development until the need for schools can be addressed.

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Cont.

Significance of Impact After Mitigation.

The question is whether the residual impact of implementation of the Land Use Element on schools after mitigation will be significant or less than significant. The District disagrees with the EIR's assessment that the impact after mitigation will be less than significant. (EIR, Table S-1, Significance After Mitigation, p. S-12.)

7

Without further assurance that the City and District can meet the cumulative impact of projected population growth and students generated by the development policies included in this Land Use Element, the existence of a significant unmet residual impact on the District's ability to house students appears very probable. Such an impact will affect the desirability of Oakland as a place to live, work and raise children. The problem is circular. Development of a memorandum of understanding to establish a structure to coordinate planning of land use and school facilities may reduce this residual impact below the level of significance.

Land Use Element Goals and Policies.

Mark Wald, City Attorney, has requested that we identify other jurisdictions that have established a city or county-wide enabling ordinance that requires consideration of the impact of new development on school capacity before approval of legislative actions that are a prerequisite to new development. Other jurisdictions that have enacted enabling legislation include the cities of San Jose, Dublin, Half Moon Bay, and Hollister.

8

Policy N13.2, the only policy in the Land Use Element addressing schools is, by the EIR's own admission, inadequate to mitigate school impacts. (EIR, Section III, subd. D, pp. III.D-34 - III.D-35.) The enclosed draft includes goals and policies concerning schools and child care that could be incorporated in the Land Use Element. By doing so, instead of leaving the analysis of school and child care resources exclusively to the EIR, the Land Use Element could analyze the impact of new development on schools at the most basic and earliest opportunity. (See EIR, Table II-3, General Plan Goals, p. II-10 - II-11.)

Andrew Thomas
Oakland City Planning Commission
December 23, 1997
Page 8

Since child care is of vital interest to the District and an important concern for the City, especially with welfare reform in place, it has been included in these proposed goals and policies, just as it has been included in the EIR's impact and mitigation measure analysis.

9

Please contact us with any questions or comments, or to discuss any of the foregoing.

Very truly yours,

OAKLAND UNIFIED SCHOOL DISTRICT



Ineda Adesanya
Facilities Manager

Enclosure

cc: Carole Quan
Steve Stevens
Edgar Rakestraw
Vernon Hal
Terry Miller
Marilyn J. Cleveland
Dr. Joseph Adwere-Boamah

PROPOSED REVISIONS TO GENERAL PLAN

Schools

Goal: *To ensure the development of adequate school facilities to meet the needs of Oakland residents.*

Policies

Policy: The City shall work with the Oakland Unified School District (OUSD) and developers to ensure that adequate school capacity exists or is planned prior to approving new residential development. **For all new residential development projects requiring a tract map or any legislative actions, the City shall impose a condition to evaluate and address the impact of new development on the availability of school facilities, in cooperation with the OUSD.**

Policy: Prior to City Council approval of the Land Use Element, the City and OUSD shall **enter into a memorandum of understanding that shall establish a continuing procedure for coordinating residential and commercial development and mitigation of its impact on schools.** The City shall work with the School District to identify, establish, and implement additional measures that may be necessary to adequately finance school facilities. (parallel D.7-1c)

Policy: The City shall support the location of school facilities, where feasible, adjacent to local parks and trails and shall support the shared use of school facilities with recreation, child care, and other public uses. (D.7-1g goes further)

Policy: The City shall support the use of special school funding mechanisms such as local fees, assessment districts, and bond issues. (parallel D.7-1e and D.7-1f, part 2.)

Policy: The City shall encourage the School District to take actions necessary to qualify for state school funds. (parallel D.7-1c, but not as broad.) (No parallel to D.7-1b or D.7-1h.)

Child Care

Goal: To encourage the provision of accessible, well designed, and affordable child care services.

Policies

Policy: The City shall support the inclusion of child care centers in major residential and commercial developments near transit centers, community centers and schools. (Parallel D.7-1d.)

Policy: The City shall work with local resource and referral agencies to promote training for child care providers and employer use of child care benefit and information programs.

Policy: The City shall encourage major employers to contribute towards child care facilities and/or programs to help attract and maintain a productive work force.

Policy: The City shall consider the effects of major development projects on the supply of child care through the environmental review process, and shall require mitigation if a significant impact is identified. Mitigation may take the form of providing on-site or off-site facilities; in-lieu fees to provide facilities an/or supplemental child care provider training, salaries or information and referral services; or other measures to address supply, affordability or quality of child care.

Policy: The City shall support state and federal legislation to promote affordable, safe and high quality child care, and shall advocate for state subsidies to assist children with special needs.

LETTER C – OAKLAND UNIFIED SCHOOL DISTRICT (DECEMBER 23, 1997)

1. Pages III.D-32 and III.D-33 of the Draft EIR acknowledge that the Oakland Unified School District (OUSD) has experienced an increase in the number of students and that the capacity of all schools has been reduced by mandatory class size reduction.
2. Impact D.7-1 on page III.D-34 acknowledges that new schools may be needed in several neighborhoods to accommodate the increase in the number of students that would occur as a result of changes in land use designations contained in the proposed Land Use and Transportation Element.
3. The Draft EIR used the OUSD’s citywide generation rate in determining the increase in the number of students resulting from changes in land use designations contained in the proposed Land Use and Transportation Element. As indicated on page III.D-34, no “discount” was used in determining the increase in the number of students in the OUSD.
4. The impact described on page III.D-34 of the Draft EIR is the result of the proposed changes in land use designations contained in the proposed Land Use and Transportation Element. Thus, this impact includes the cumulative need for school facilities within the OUSD.
5. No changes to the text on page V-6 of the Draft EIR are warranted since not every project will require additional mitigation measures for school-related impacts and not every project will require additional mitigation measures for all public services. Therefore, additional mitigation measures “may” be required, rather than “will” be required.
6. The City acknowledges the position of the Oakland Unified School District (OUSD) regarding the feasibility of the implementation of measures to mitigate impacts to school facilities. This position of the OUSD is reflective of current conditions within the City of Oakland. However, the proposed Land Use and Transportation Element is intended for long-term planning purposes and the identified mitigation measures are presented as a “menu” of options available to the OUSD to reduce impacts to a less-than-significant level over the 20-year life of the Element. Thus, those measures that may not be immediately implementable by the OUSD may be feasible for implementation at future time. To clarify this issue, see Chapter II for changes to page III.D-35 of the Draft EIR.

The City also acknowledges the recommendation of the OUSD for additional measures to mitigate the impacts to school facilities. See Chapter II for changes to page III.D-36 of the Draft EIR.

With the implementation of the mitigation measures included in Chapter II of this document and in the Draft EIR, the impacts to school facilities would be reduced to a less-than-significant level.

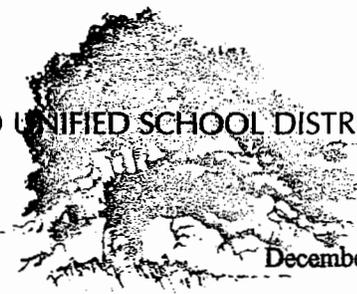
7. The measures identified in the Draft EIR and supplemented by those in Chapter II of this document would further mitigate the impacts to school facilities to a less-than-significant level. These measures include the development of a memorandum of understanding (MOU) between the City of Oakland and the Oakland Unified School District. Therefore, the conclusion that the level of significance after mitigation would be less than significant is still relevant.

8. The Draft and Final EIR propose mitigation measures adequate to ensure that the policies of the Land Use and Transportation Element do not result in significant overcrowding of schools. The mitigations proposed in the Draft and Final EIR reflect the intent of the commenter's proposed policies and will be included in the mitigation monitoring plan for the Land Use and Transportation Element, which will ensure implementation and allow for appropriate evaluation of school impacts on a project-by-project basis and establish a coordinated effort between the City and the Oakland Unified School District for establishing a Master School Facilities Master Plan and a Memorandum of Understanding for the implementation of the Master Plan.

9. Please see the response to Comment C-8, above.

D

OAKLAND UNIFIED SCHOOL DISTRICT



December 29, 1997

DIVISION OF FACILITIES PLANNING AND MANAGEMENT

955 High Street
Oakland, California 94601
(510) 879-8302
Fax (510) 879-1860

VIA FAX AND U.S. MAIL

Oakland City Planning Commission
Attention: Andrew Thomas
Planner II
Community and Economic Development Agency
1330 Broadway, Suite 310
Oakland, CA 94612

Re: Oakland Unified School District;
Comments regarding Draft Program Environmental Impact Report
Concerning the Draft Revised Land Use and Transportation Element
of the City of Oakland General Plan

Dear Mr. Thomas:

This letter supplements the District's comments concerning the Draft Environmental Impact Report for the Land Use and Transportation Element of the City of Oakland General Plan. Enclosed are proposed revisions to the General Plan Land Use Element, namely policies concerning schools and child care. Please replace the proposed policies attached to the District's December 23, 1997 letter with the policies attached to this letter. The changes to these policies are the result of discussions between the City and the District and have been revised to try to reach policies for incorporation in the General Plan Land Use Element that are workable for both entities.

1

Thank you for your cooperation.

Very truly yours,

OAKLAND UNIFIED SCHOOL DISTRICT

Ineda Adesanya
Facilities Manager

Enclosure

- cc: Jean Quan
- Carole Quan
- Steve Stevens
- Edgar Rakestraw
- Vernon Hal
- Terry Miller
- Marilyn J. Cleveland
- Dr. Joseph Adwere-Boamah

Attachment

PROPOSED REVISIONS TO GENERAL PLAN
December 29, 1997

Schools

Goal: To ensure the development of adequate school facilities to meet the needs of Oakland residents.

Policies

- Policy:** The City shall work with the Oakland Unified School District (OUSD) and developers to ensure that adequate school capacity exists or is planned to accommodate new residential development. For all new residential development projects requiring a tract map or any legislative actions, the City shall impose a condition to evaluate and address the impact of new development on the availability of school facilities in cooperation with the OUSD.
- Policy:** Prior to City Council approval of the Land Use Element, the City and OUSD shall enter into a memorandum of understanding that shall establish a continuing procedure for coordinating residential and commercial development and mitigation of its impact on schools. The City shall work with the School District to identify, establish, and implement additional measures that may be necessary to adequately finance school facilities.
- Policy:** The City shall support the location of school facilities, where feasible, adjacent to local parks and trails and shall support the shared use of school facilities with recreation, libraries, child care, and other public uses.
- Policy:** The City shall support the use of special school funding mechanisms such as local fees, assessment districts, and bond issues.
- Policy:** The City shall encourage the School District to take actions necessary to qualify for state school funds.

Child Care

Goal: To encourage the provision of accessible, well designed, and affordable child care services.

Policies

- Policy:** The City shall support the inclusion of child care centers in major residential and commercial developments near transit centers, community centers and schools.
- Policy:** The City shall work with local resource and referral agencies to promote training for child care providers and employer use of child care benefit and information programs.
- Policy:** The City shall encourage major employers to contribute towards child care facilities and/or programs to help attract and maintain a productive work force.
- Policy:** The City shall consider the effects of major development projects on the supply of child care through the environmental review process, and shall require mitigation if a significant impact is identified. Mitigation may take the form of providing on-site or off-site facilities; in-lieu fees to provide facilities an/or supplemental child care provider training, salaries or information and referral services; or other measures to address supply, affordability or quality of child care.
- Policy:** The City shall support state and federal legislation to promote affordable, safe and high quality child care, and shall advocate for state subsidies to assist children with special needs.

*Revisions to General Plan
December 29, 1997*

LETTER D – OAKLAND UNIFIED SCHOOL DISTRICT (DECEMBER 29, 1997)

1. Please see the response to Comment C-8.



NANCY J. NADEL
Councilmember
District #3

(510) 238-7003
FAX (510) 238-6129

December 24, 1997



MEMORANDUM

To: Andrew Altman, Chief of Planning

From: Nancy J. Nadel, City Council District 3 *N. Nadel*

Re: Oakland General Plan EIR

Thank you for your hard work in producing the General Plan Environmental Impact Report. However, there are several issues of importance that have been omitted from the document.

Page III.A-4 The West Oakland section doesn't mention former Acorn Plaza/future Bayport Shopping Center as a potential commercial center in West Oakland.

1

Section III.B – This section on traffic doesn't seem to incorporate traffic projections from the Port of Oakland, Vision 2000 expansion plans (page 17).

Air Quality and Port of Oakland Plans

Table S-1 doesn't list Vision 2000 plans as having significant unmitigatable air pollution impacts.

Page III.E-2 This section doesn't mention the two new PM10 monitoring stations at the Port of Oakland Marine Terminals and in the residential area of West Oakland. There is data from these stations that should be included.

2

Page III.E-6 The Sensitive receptors section should include mention of the high incidence of childhood asthma.

Section III.E doesn't discuss Vision 2000 air pollution impacts, and doesn't discuss truck routes.

Page III.O-18 says all aspects of the document were coordinated with the Port of Oakland but the EIR doesn't include vision 2000 impacts.

Page V-2 doesn't mention Port projects under air quality, second paragraph which discusses downtown and coliseum.

Environmental Justice

There are many incompatible land uses that have environmental justice impacts. These should be mentioned with potential mitigations

3

Business/Housing Mix Designation

This designation has impacts that should be discussed such as inability to limit billboards and truck parking.

4

Employment

Page III.C-3 Are unemployment figures from the unemployment office, census or welfare department. If they are from state unemployment office they are probably significantly lower than actual.

5

Solid Waste landfill capacity

Page III.D-17 There is litigation that might change the county and Authority's position. Potential settlement in possible in January.

6

If you have any questions about these comments, please don't hesitate to call me at 238-7303.

**LETTER E – NANCY J. NADEL, CITY COUNCIL DISTRICT 3
(DECEMBER 24, 1997)**

1. Please see Chapter II for changes to page III.A-4 of the Draft EIR.
2. The Port of Oakland, Vision 2000 plans are included in the Countywide model for traffic, air quality, and noise analysis purposes. Therefore, all references to impacts resulting from the proposed Land Use and Transportation Element include the projects envisioned in the Port of Oakland, Vision 2000 plans.

The two new PM10 monitoring stations in West Oakland were not included in the air quality analysis since no long-term data is available yet from these two stations.

As described on page III.E-6 of the Draft EIR, a variety of sensitive receptors exist throughout the City of Oakland. These sensitive populations include those persons with respiratory illnesses, which would include children with asthma.

3. Environmental justice impacts occur when minority or low-income populations are disproportionately affected by significant impacts of a given action. As described in Section III.A of the Draft EIR, no significant land use compatibility impacts would occur as a result of the proposed Land Use and Transportation Element. Therefore, without any significant land use impacts, no environmental justice impacts would occur. The proposed Land Use and Transportation Element seeks to remediate past environmental justice impacts through its policies and implementation programs.
4. The project analyzed in the Draft EIR is the proposed Land Use and Transportation Element. The actions described by the commenter would be included in zoning regulations associated with the land use designations contained in the proposed Land Use and Transportation Element. These zoning regulations could be structured to limit activities in the manner described by the commenter.
5. The unemployment figures referenced by the commenter are from the State of California Department of Finance and are the official numbers used for describing the unemployment in a given locale. These unemployment figures are intended to describe the situation in Oakland during the 1980s and provide context for the City's desire to increase employment opportunities within the City.
6. The City acknowledges the commenter's statement regarding solid waste landfill capacity. The decision-makers will be apprised of any resolution associated with the existing litigation regarding the landfill capacity.



EBHO
EAST BAY HOUSING ORGANIZATIONS

December 29, 1997

Iris Starr
Project Manager
CEDA - Strategic Planning Division

Fax: (510) 238-6538

Dear Iris,

The Local Policy Committee of East Bay Housing Organizations (EBHO) has reviewed the draft version of the Land Use and Transportation Plan and the accompanying Environmental Impact Report. The following are comments about the impact of the draft element's policies and implementation programs related to housing. These comments were prepared on behalf of EBHO by Mike Rawson. Our specific concern was the extent to which the EIR addresses the impact of the draft element on Oakland's obligation to make adequate provision for the housing needs of all economic segments of the community through its general plan. The EIR is inadequate in this regard, neglecting significant environmental effects of the proposed element. It fails in three basic ways:

- It does not analyze the existing need for housing and only considers the impact of the projected number of new households;
- It neglects to address the cumulative potential physical impact of the reduction of densities in residential neighborhoods on the ability of Oakland to provide sites for affordable housing; and
- It ignores the inconsistencies between the draft element and the City's current Housing Element with respect to the identification of sites for affordable housing.

The deficiencies are explained below. They should be corrected, and because of the significant new information provided, the draft EIR should be re-circulated for comment. In addressing and analyzing the omitted issues, the City should consider whether incorporation of the housing option listed under the Alternative Designations Alternatives section of the draft EIR would contribute to the mitigation of these deficiencies.

Existing Housing Need

Pursuant to Government Code §65584, the Association of Bay Area Governments (ABAG) has assigned Oakland a "fair share" of the housing need of the region for very low, low, moderate and above-moderate income households. Under §65583, Oakland must identify and maintain a sufficient inventory of developable sites, zoned at densities sufficient to facilitate the development, to meet the need for housing within each income category. While the draft EIR considers the projected additional households that will locate in Oakland through 2015, it does not address the substantial unmet need for existing very low, low and moderate income housing. Indeed the draft element mentions the fair share obligation only in the context of policies which encourage *other* communities to provide for the regional need for housing. (See Policies N4.1 and N4.2 on page 105 of the draft element)

1

Adding the number of new units needed to accommodate the existing need to the projected growth in new households yields a substantial increase in the number of new units the community will need to add during the time period covered by the draft element. The failure of the draft EIR to count and address these additional units renders analysis of the impact of household growth inadequate. Similarly, considerations of these units is also essential to the accuracy of the analysis of the impact of the draft element's shift of higher density residential development from residential neighborhoods to non-residential and redevelopment reuse areas (see below).

Down zoning of Residential Areas

As the draft EIR acknowledges, the draft element essentially reduces the density of residential development permitted in existing residential areas and instead proposes that future higher density development be located in commercial districts such as the downtown, the waterfront and areas located near transit stations and along major corridors. Although it may make sense to locate some housing in those areas, the impact of precluding the development of higher density housing in most areas where Oaklanders currently live must be analyzed. At least two potential significant effects should be assessed.

First, the elimination of new higher density housing from the neighborhoods could seriously reduce the number of residential sites that are feasible for the development of housing affordable to low and very low income households. Whereas the Housing Element indicates that inclusion of higher density sites in existing neighborhoods serves to reduce the per unit land costs to a point where development of low and very low income housing is attainable, the shifting of higher residential densities to commercial areas would not produce a corresponding reduction in costs. The central location and competing commercial uses raise the cost of land significantly above that of land zoned at similar densities in the existing residential areas.

2

The loss of sites adequate for the development of affordable housing would have a significant impact on the environment. The draft element emphasizes that there is a widespread overcrowding in Oakland partly due to a lack of adequate housing supply (page 17). The inability of the city to develop sufficient affordable housing under the draft element would severely exacerbate this problem, creating overcrowding can lead to health problems and

housing deterioration. Moreover, the lack of affordable housing would lead directly to an increase in homelessness.

The second significant effect of the proposed residential neighborhood down zoning is the substantial increase in demand for public services and facilities it would generate in the commercial areas to which high density residential development is shifted. While this housing would certainly be somewhat closer to public transportation, the draft EIR should assess whether existing schools, public health facilities, and police and fire services could accommodate the increased residential densities in those areas. Because those areas are not currently places of substantial residential development, they likely do not currently have adequate facilities to serve a substantial increase in residential households.

2
Cont.

Inconsistency With The Housing Element

Government code §65583 requires that the housing element of the local general plan identify adequate sites to meet the community's share of the regional need for affordable housing. In this regard, it was only recently that the state Department of Housing and Community Development (HCD) certified Oakland's Housing Element as complying with this requirement. HCD provided the certification based in substantial part on the City's representation that the zoning in certain residential neighborhoods would permit the increased densities necessary to supply sufficient sites to meet Oakland's share of the need for affordable housing. Consequently, the adoption of the proposed Land Use and Transportation element would render Oakland's General Plan internally inconsistent.

3

Even if this inconsistency was "corrected" by subsequent amendments to the Housing Element¹, the proposed revisions in the allocation of higher residential densities would have a significant impact on the environment of the region. As pointed out above, the shift in higher density residential development to the downtown and commercial areas of the city would likely reduce the number of sites feasible for the development of affordable housing below that which has been assigned to Oakland by ABAG. This would upset the regional planning agency's comprehensive plan for future development of the region by unilaterally shifting the need for development of affordable housing to other communities. The unauthorized transfer would create additional transportation, air quality, development and socio-economic impacts in areas, contrary to ABAG's comprehensive regional plan.

¹ The EIR incorrectly states that to the extent the proposed element is inconsistent with other elements of the Oakland General Plan, the proposed element will "supercede" the other elements. (See pp. III. O-18-19). One element of a general plan cannot legally supercede another. A local general plan must at all times be internally consistent. If a proposed element contains policies or programs that are inconsistent with existing elements, it must provide that the inconsistent policies or programs are not effective until the existing elements are properly amended. The essence of the general plan obligation is for development to occur only when guided by a plan that takes equal account of all significant planning environmental concerns. To achieve true comprehensive planning, each element necessarily focuses on one significant concern, and the competing interests identified in the elements are harmonized with the adoption of a fully integrated general plan. A community may not substitute the tangential treatment in one element of the subject matter that is the primary concern of another element. With respect to housing, the Oakland Housing Element is not due to be updated until 2001.

The draft EIR barely mentions this issue, commenting only that the proposed element identifies parts of the City where new housing opportunities would be created. See III.O-8-11. Whether these new opportunities would include the required opportunities for lower income households goes completely unaddressed. If the newly identified sites would only accommodate housing for moderate and upper income households, then they would only exacerbate the impacts of the existing shortage of affordable housing. Drawing demand for higher income housing, the new sites would create market pressures raising the land cost of the remaining affordable sites. As the draft EIR acknowledges, because of the tremendous projected increase in job growth and jobs to housing ratio, increase in demand can be expected, resulting in higher rents and declining affordability. See p. III. C-8. This potential significant effect must be analyzed.

3
Cont.

Thank you for your time and consideration of these comments. If you have any questions, please feel free to contact me at (510) 893-5611.

Sincerely,

Nie Raucher
or

LETTER F – EAST BAY HOUSING ORGANIZATION (DECEMBER 29, 1997)

1. The Draft EIR does acknowledge the existing unmet need for affordable housing in Oakland. Page III.C-4 lists the ABAG fair share allocations for the 1990-1995 period (now 1990-1999) and acknowledges that the City’s ability to meet these targets is constrained by the curtailment of state and federal housing assistance programs. Adoption of the proposed Land Use and Transportation Element will enhance—rather than hinder—the City’s ability to meet these unmet needs by increasing the City’s overall housing capacity and identifying housing opportunity areas that did not previously exist.

The analysis of household growth remains adequate, since it is purely a projection of the total number of households that would reside in Oakland by 2015 rather than an attempt to distinguish the income characteristics or housing needs of these households. Adding existing “unmet housing needs” to this equation would not be appropriate within the context of Impact C.1, as the discussion pertains to growth induced by increased land supply rather than increased demand and/or unmet needs.

In any event, housing capacity in Oakland would remain substantially higher than housing demand, with or without the proposed Land Use and Transportation Element. Total “buildout” capacity of all land where residential uses are permitted was not presented as part of the General Plan analysis (see page II-7 in the Draft EIR) because the physical capacity of such land (in terms of numbers of potential units) is disproportionately high compared to demand. Preliminary estimates by City staff indicate that vacant or underutilized land designated for residential or mixed uses in the General Plan could theoretically support well over 100, 000 new multi-family housing units.

2. The proposed Land Use and Transportation Element does not “preclude the development of high density housing in the areas where most Oaklanders live,” as the comment suggests. Rather, it focuses such development along corridors within established neighborhoods and creates new mixed-use neighborhoods in previously non-residential areas. By doing so, the proposed Land Use and Transportation Element achieves an important Housing Element goal of conserving the existing affordable housing stock in Oakland. To promote higher densities within stable low and medium density neighborhoods would achieve one housing goal at the expense of another. The Land Use Diagram and its accompanying policies take a more balanced approach by identifying appropriate locations for higher densities, both within stable neighborhoods and in areas with redevelopment potential.

Furthermore, the Land Use Map does not constitute a “downzoning” of existing residential areas as suggested by the commenter. The Element and Land Use Map strive to “maintain and enhance” existing residential areas. Therefore the land use classifications and land use map continue to allow development of new residential structures at densities comparable to those densities that currently exist within the neighborhood areas and is allowed under existing zoning designations. It is also important to note that in many cases where the Land Use Map was adjusted to reduce allowable General Plan densities from that which were

allowed under the existing 1980 General Plan, the adjustment was necessary to reflect existing density limitations imposed by current zoning designations in these areas.

The commenter indicates that formerly commercial sites may not be viable locations for residential uses due to the higher land value of commercial land relative to residential land. While this dynamic may be true in suburban communities, it is less applicable in Oakland due to the oversupply of “strip commercial” sites and the obsolescence of many commercial properties. In fact, a growing percentage of the affordable housing projects constructed in Oakland have been located on the corridors. Some of these projects have incorporated ground floor commercial uses to improve their economic return.

The commenter points out that overcrowding and homelessness would likely become worse as a result of the decreased land supply for higher density housing. Since the land supply for higher density units would increase (see analysis on page III.C-4 of Draft EIR), and since the City would be adopting a strong policy framework supporting higher densities downtown, along the waterfront, and along the corridors, this argument is unfounded. The reduced capacity for high density housing in established single family neighborhoods would be more than offset by the creation of new housing opportunities elsewhere in the City.

The commenter also notes that the demand for public services would increase in the areas to which higher density residential development is shifted. This is a correct assertion, and is assessed in the Public Services section of the Draft EIR. That section considers the potential impact of additional downtown, waterfront, and corridor housing on schools, libraries, parks, police, fire, and other categories of public services. Appropriate mitigation measures have been identified in the Draft EIR.

3. The proposed Land Use and Transportation Element would not render the General Plan internally inconsistent. The 1995 list of sites used to achieve State Department of Housing and Community Development (HCD) certification of the Housing Element through HCD has been reviewed by staff to determine if the proposed new Land Use Diagram designations would affect the City’s housing capacity. The list submitted to HCD included 68 sites with a capacity of 8, 261 units. The new land use designations would reduce development capacity on only two of these 68 sites. One of these sites is Dunsmuir Ridge, which was acquired by the City as parkland in 1995. That site was identified in the 1995 inventory as having capacity for 18 market rate units. The other site is a former R-70 zoned site in the Diamond District identified as having the capacity for 24 units. The redesignation of this site to “Mixed Housing Type” residential would probably reduce its capacity to about 8 units. These reductions represent less than one-third of one percent of the development capacity in Oakland.

The table submitted to HCD in 1995 identified the current zoning of the housing opportunity sites. Two-thirds of these sites (44 of 68) are currently zoned “commercial,” including many located downtown and along corridors. In many cases, the proposed Land Use Diagram will

facilitate the development of these sites with housing by changing their General Plan designation from “Commercial” to “Urban Density Residential.” Subsequent zoning amendments would change the designations on the sites from C-20, C-30, C-40, etc. to the future equivalent of R-70, R-80, or R-90.

At the same time, new housing opportunities will be created in areas previously designated for commercial and/or industrial uses. The Plan projects that opportunities for some 2,000 new units will be created along the waterfront alone. The 1995 inventory of housing sites submitted to HCD does not include these sites. A new list of housing opportunity sites will be prepared following adoption of the General Plan. Preparation of such a list is required by Mitigation Measure C.2 in the Draft EIR.

The Plan itself identifies updating of the Housing Element as a priority implementation task. This task will be initiated during 1998 and will ensure that the baseline data in the Element is quickly updated to reflect new land use designations. Moreover, a number of specific policies in the Housing Element will be amended concurrently with the adoption of the Land Use and Transportation Element. This will ensure that all elements of the General Plan remain internally consistent.

ALAMEDA COUNTY
CONGESTION MANAGEMENT AGENCY



December 30, 1997

AC Transit
Director
Matt Williams

Mr. Andrew Thomas
CEDA - Strategic Planning

Alameda County
Supervisor
Gail Steele

City of Oakland
1330 Broadway, 3rd Floor
Oakland, CA 94612

City of Alameda
Mayor
Ralph Appezato

City of Albany
Mayor
Bruce Mast

SUBJECT: Comments on the Draft Environmental Impact Report for the City of Oakland
General Plan Land Use and Transportation Element

BART
Director
Margaret K. Pryor

Dear Mr. Thomas:

City of Berkeley
Councilmember
Kris Worthington

Thank you for the opportunity to comment on the Draft Reports on the Land Use and Transportation Element of the Oakland General Plan (Volumes 1 and 2) and the Environmental Impact Report. The project is the update of the Land Use and Transportation Element of the Oakland General Plan. The Element combines the Land Use Element and the Circulation Element into a single document. It replaces the 1980 Land Use Element and the 1974 Circulation Element of the Oakland General Plan and updates the Land Use and Circulation sections of the Oakland Policy Plan. The Element also introduces new strategies, policies, and priorities for Oakland's development and enhancement during the next two decades.

City of Dublin
Vice Mayor
Dave Burton

City of Emeryville
Chairperson
Mayor
Nora Davis

City of Fremont
Mayor
Gus Morrison

The CMA respectfully submits the following comments. The comments focus on the DEIR, but they also apply to the Draft Land Use and Circulation Element:

City of Hayward
Vice Chairperson
Mayor
Roberta Cooper

City of Livermore
Councilmember
Ayn Wieskamp

City of Newark
Councilmember
Susan Boggs

City of Oakland
Councilmember
Larry Reid

City of Piedmont
Vice Mayor
Patty White

City of Pleasanton
Mayor
Ben Tarver

City of San Leandro
Mayor
Ellen Corbett

City of Union City
Mayor
Mark Green

Executive Director
Dennis R. Fay

- We understand that the City used the Countywide Transportation Model for all analysis years including Year 2000 and 2010, which the DEIR refers to as 2005 and 2015. The Countywide Model's analysis years are 2000 and 2010. Clarification should be provided in the DEIR about which analysis years and what land use assumptions were used in the modeling process. If Year 2005 and 2015 City of Oakland General Plan project scenarios were analyzed with corresponding Countywide Year 2000 and 2010 network and land use assumptions for areas external to the City of Oakland, then this should be stated in the DEIR. The differences between the CMP network and the General Plan networks were documented for 2000/2015, but not for 2000/2005. These should also be included in the DEIR. The 2010/2015 Coliseum and Downtown Showcase District analysis is not presented in the DEIR.
- Page III.B-9: The first sentence in the second paragraph should state that no modifications were made to the 2010 Tier 1 transportation network. This section should also include a list of roadway and transit modifications made to accommodate the 2005 network in the City of Oakland.

1
2

- References to the CMA Model should be changed in all documents to Countywide Model. All references to the 2005 CMA model or 2015 CMA model should be changed to 2000 Countywide model or 2010 Countywide model. The Countywide Model does not model horizon years 2005 and 2015. 3
- While the DEIR addressed impacts on a number of Metropolitan Transportation System (MTS) routes, potential impacts of the project on all MTS routes in Oakland need to be addressed, including transit systems. (See 1995 CMP Figures E-2 and E-3, pages viii and ix and Figure 4, page 16). The freeways, arterial routes, and transit corridors are shown on Figures 2 and 7 from the 1995 CMP. Both 2000 and 2010 impacts must be analyzed. These additional streets should be included in the description of regional roadways on page III.B-1 and corresponding tables. 4
- Page III.B-4 and Table III.B-2: The 1997 LOS Monitoring Study identifies the CMP routes that are operating at LOS F. This information supercedes references in the DEIR to the 1991, 1992, and 1995 LOS F segments and the table and text should be updated to reflect the most recent information. A copy of the 1997 LOS Monitoring Study is attached. 5
- Page III.B-8: The CMP roadway level of service standard is correctly documented for CMP/MTS roadways. This section should also state that although a roadway segment may be operating at LOS F, this does not preclude proposing mitigation measures for that facility. 6
- Page III.B-11 and Tables B-7 and B-9: As stated above, a roadway operating at LOS F is not precluded from mitigation measures being developed to mitigate project impact on those facilities. The text and tables should discuss and highlight all facilities that are operating at LOS F, including SR 24 west of the Caldecott Tunnel, SR 123, SR 260 and any other MTS routes subsequently analyzed in response to fourth bullet above. The footnote on Table B-9 should say 2015 or 2010 depending on the response to first bullet above. 7
- Although this is a policy document, the CMA requests that a discussion on financing infrastructure improvements be included in the DEIR. The CMP establishes a Capital Improvement Program (See 1995 CMP, Chapter 7) that assigns priorities for funding roadway and transit projects throughout Alameda County. The improvements called for in the DEIR should be consistent with the CMP CIP and this should be stated in the DEIR. 8
- The adequacy of any project mitigation measures should be discussed. On February 25, 1993 the CMA Board adopted three criteria for evaluating the adequacy of DEIR project mitigation measures: 9
 - ✓ Project mitigation measures must be adequate to sustain CMP service standards for roadways and transit;
 - ✓ Project mitigation measures must be fully funded to be considered adequate;
 - ✓ Project mitigation measures that rely on state or federal funds directed by or influenced by the CMA must be consistent with the project funding priorities

Mr. Andrew Thomas
December 30, 1997
Page 3

established in the Capital Improvement Program (CIP) section of the CMP or the Regional Transportation Plan (RTP).

It would be helpful to indicate in the DEIR the adequacy of proposed mitigation measures relative to these criteria. In particular, the DEIR should detail when proposed roadway or transit route improvements are expected to be completed, how they will be funded, and what would be the effect on LOS if only the funded portions of these projects were assumed to be built prior to project completion.

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Cont.

- Potential impacts of the project on CMP transit levels of service must be analyzed. (See 1995 CMP, Chapter 4). Transit service standards are 15-30 minute headways for bus service and 3.75-15 minute headways for BART during peak hours. The DEIR should address the issue of transit funding as a mitigation measure in the context of the CMA's policies as discussed above.

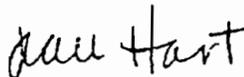
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- Page 128 of the Land Use and Circulation Element: The ACCMA is encouraged to see the I-880 Improvement Corridor highlighted in the Element. All improvements in the corridor are included in the CMP CIP and Countywide Transportation Plan Tier I Investment Plan and are not mandated by the I-880 Intermodal Corridor Study. This should be corrected in the text of the Element. The Element and the DEIR (Table II-9) identify HOV lanes on I-880 in the vicinity of 98th Avenue. This project is not identified in either the CMP or the Countywide Transportation Plan. There appear to be physical constraints that would prevent an affordable HOV improvement in this corridor. The City may wish to propose other alternatives to improving mobility on this portion of I-880.

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We appreciate the opportunity to review and comment on this project. If you have any questions, please feel free to call me or Beth Walukas at 510/836-2560.

Regards,



Jean Hart
Deputy Director

cc: Beth Walukas, Senior Transportation Planner
file: CMP - Environmental Review Opinions - Responses - 1997

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1997 LOS Monitoring Study

for the
Alameda County CMP Designated Roadway System

1.) Summary of Findings

This report documents the 1997 PM peak hour travel time and speed surveys for the Alameda County CMP network. The results indicate that overall traffic conditions and the severity of traffic congestion have generally remained stable during the past year. However, there are several segments on the County freeway system where traffic speeds have dropped and delay has increased in comparison to previous studies.

The specific results of the study can be found on various figures and tables in this report. The location of Level of Service "F" segments can be found on Figure 2 (page 12). The PM peak hour Level of Service (LOS) results for each area of the county can be found in the body of the report as follows:

<u>Area</u>	<u>Figure</u>	<u>Time Period</u>	<u>Page</u>
Countywide	Figure 2	PM (LOS "F")	12
Northern	Figure 3	PM Peak Hour	16
Upper Central	Figure 4	PM Peak Hour	17
Lower Central	Figure 5	PM Peak Hour	18
Southern	Figure 6	PM Peak Hour	19
Eastern	Figure 7	PM Peak Hour	20

The AM peak hour Level of Service results can be found in the body of the report as follows:

<u>Area</u>	<u>Figure</u>	<u>Time Period</u>	<u>Page</u>
Countywide	Figure 8	AM Peak Hour	27

LOS "F" Segments - The 1997 surveys found that sixteen (16) segments are operating at Level of Service "F" in 1997. Of these segments, twelve are on the freeway system, one is located on an arterial route, and three segments are on freeway to freeway ramps.

Of the sixteen (16) LOS "F" segments, there are two (2) freeway segments that have been measured at LOS "F" for the first time during the 1997 survey. One is SR 92 EB (the San Mateo Bridge) from the County line to the toll plaza. The second is I-238 WB from I-580 to I-880. In the past, this segment has been measured at LOS "F", but it was assumed to be caused by adjacent construction

activities. At the time of the 1997 survey, the construction was completed, but the segment is still found to be operating at Level of Service "F".

There is only one (1) arterial segment that was found to be operating at Level of Service "F" during the 1997 surveys. This is on a section of Hesperian Boulevard SB in the San Leandro area. This segment has been measured at LOS "F" in 1995 and in several earlier surveys. There were ten (10) segments which were also LOS "F" in previous surveys.

In addition to the network segments, a number of special connectors, including ramps and weaving sections, have been monitored. Three (3) ramp segments continue to operate at Level of Service "F", namely the ramp from SR 13 NB to SR 24 EB, the ramp from I-80 SB to I-580 EB, and the ramp from I-880 SB to I-238 EB. No "first time" or additional LOS "F" ramp segments were identified in the 1997 surveys.

The systemwide statistics for the county arterials and freeways have also been calculated. These data show that the overall average speeds on the freeway system dropped by 1.4 miles per hour between 1996 and 1997, while the average arterial speeds remained relatively constant.

AM Peak Data - AM peak period data was collected during the 1997 surveys on selected freeway routes. AM Peak data was previously collected in 1994 and 1996. The 1997 surveys showed a number of locations that are operating at LOS "F". These locations are: I-80 westbound from Albany to the San Francisco City Limits; I-880 SB in Hayward; I-880 SB in Fremont; and I-680 SB from Sunol to the Santa Clara County Line.

The I-80 WB segments are particularly congested, and have significant delay in the AM peak period. Travel time for this 8.2 mile segment is about 35 minutes, which translates to a delay of about 25 minutes for each vehicle. This delay may be due partially to the construction activities in the area.

Studies of O-D Pairs - Data was collected once again in 1997 to provide a direct comparison between auto and transit usage. Comparative travel time data for auto and transit was collected for five different routes in the County. For one of the routes, bicycle travel time was also collected. The results of these surveys illustrate some origin-destination (O-D) pairs where transit is quite competitive with auto travel time, and some pairs where the number of transfers result in very long travel times by transit.

2.) Introduction

The Alameda County Congestion Management Program (CMP)¹ requires that Level of Service (LOS) standards be established and monitored annually on the Alameda County CMP designated roadway system. This system is shown on Figure 1. The CMP roadway system consists of approximately 230 miles. Of this total, 115 miles are freeways, 89 miles are conventional state highways, and 26 miles are City/County arterials. The full list of routes, summarized by jurisdiction, is shown on Table 1.

The objectives of this study are: 1.) to determine the average travel speeds and existing LOS on the system; 2.) to identify those roadway segments in the County that are operating at LOS "F"; and 3.) to identify trends in traffic congestion on the CMP network.

A study of PM peak hour travel time has been conducted for the CMP network each year since 1991. Beginning in 1994, the study has included AM peak period runs on selected arterials and freeways. For the past two years (1996 and 1997), the study has also included a study of comparative travel times between auto and transit for five selected O-D pairs that reflect typical work trips in Alameda County.

3.) Study Methodology

Travel Time Studies - The Alameda County CMP has established that measurement of LOS be based on average travel speed, consistent with the method described in the "Manual of Traffic Engineering Studies"². To accomplish this, the "floating car" method is used to record travel times between checkpoints on the system (roadway segments). The travel times were then combined with measured distances for each roadway segment to determine average travel speeds. The study methodology involves collecting travel time data, computing travel speeds, and comparing the average speeds with the LOS speed ranges as specified in the 1985 Highway Capacity Manual³. Table 2 shows the relationship between average travel speed and LOS that has been approved by the Alameda County CMA, and used in this study.

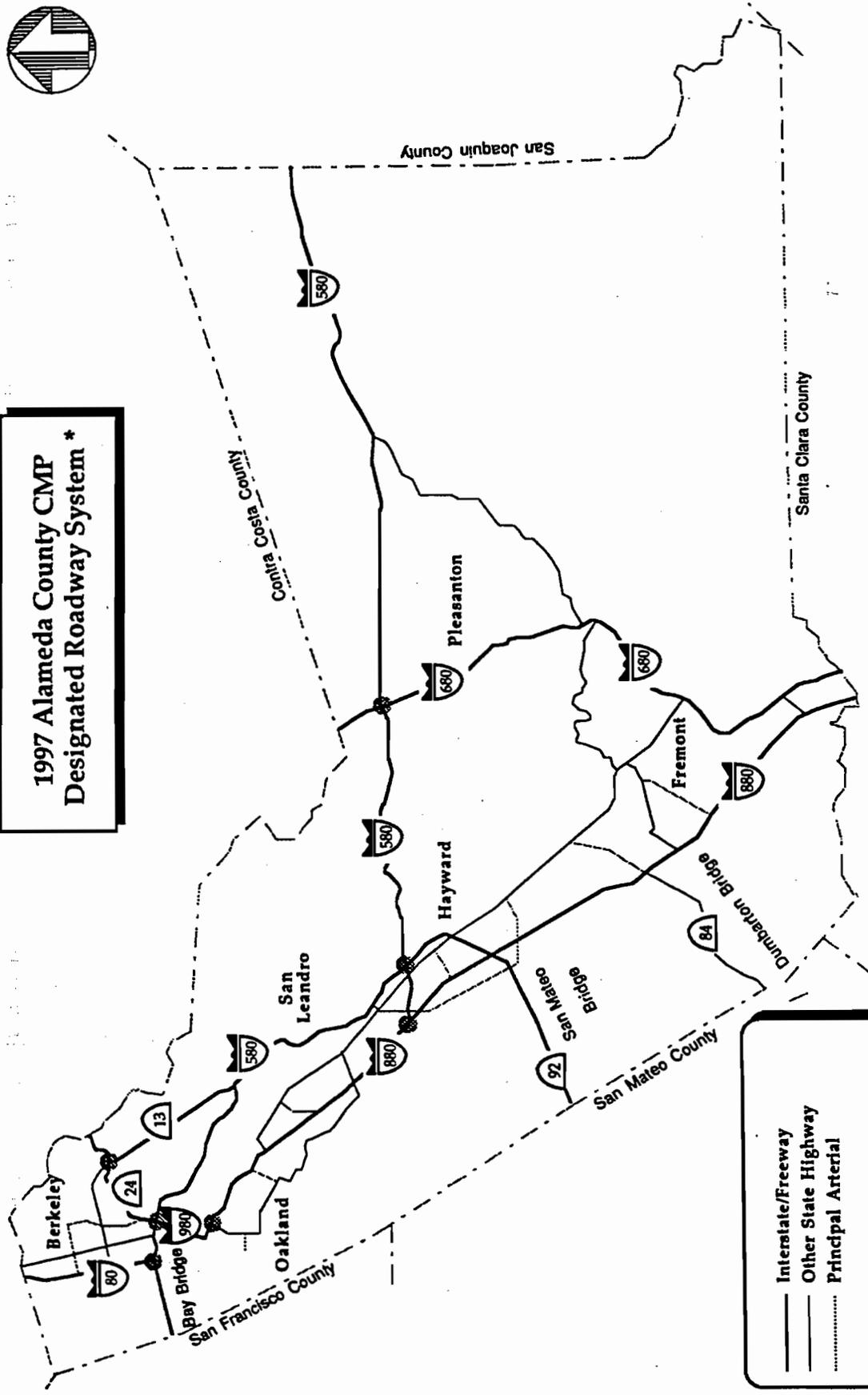
¹ The most recent Alameda County CMP was adopted by the Alameda County Congestion Management Agency in September, 1995. The original CMP was adopted on October 24, 1991.

² Paul C. Box and Joseph C. Oppenlander, *Manual Of Traffic Engineering Studies*, 4th ed. (Arlington VA.: Institute of Transportation Engineers, 1976).

³ Transportation Research Board Special Report 209, *Highway Capacity Manual*, (Washington, D. C.: Transportation Research Board, 1985).

Figure 1

**1997 Alameda County CMP
Designated Roadway System ***



- Interstate/Freeway
- Other State Highway
- Principal Arterial
- Freeway Interchanges Being Studied

* As adopted by the Alameda County Congestion Management Agency, October 24, 1991



Table 1
Alameda County CMP Designated Roadway System*
Routes and Estimated Mileage within each Jurisdiction

Jurisdiction	Freeway - Miles		Other State Highways - Miles		Other Arterials - Miles	
Albany	I-80 I-580	0.61 0.92	SR 123 (San Pablo Ave.)	1.22	None	-
Berkeley	I-80	3.14	SR 123 (San Pablo Ave.) SR 13 (Ashby/Tunnel Rd.)	2.36 3.87	University Ave. Shattuck Ave. ML King Jr Blvd. Adeline St.	2.04 1.84
Emeryville	I-80	1.31	SR 123 (San Pablo Ave.)	0.68	None	-
Oakland	I-80 I-880 I-980 I-580 SR 24 SR 13	4.09 7.66 2.30 11.28 4.50 5.43	SR 123 (San Pablo Ave.) SR 13 (Tunnel Rd.) SR 61/260 (Tubes) SR 61 (Doolittle Dr.) SR 77 (42nd Ave.) SR 185 (E 14th St.)	1.19 0.10 0.66 2.39 0.31 3.98	MLK Jr. Blvd. Hegenberger Rd. 29th Ave./23rd Ave. (See Park St- Alameda)	0.89 1.80 0.85
Piedmont	None	--	None	--	None	--
Alameda	None	--	SR 61 (Doolittle Dr., Otis, Webster St) SR 61/260 (Tubes)	4.47 0.65	Atlantic Ave. Park St.	0.80 0.55
San Leandro	I-880 I-580	3.78 2.95	SR 61 (Doolittle Dr.) SR 61/112 (Davis St.) SR 185 (E 14th St.)	0.70 1.78 3.16	150th Ave. Hesperian Blvd.	0.49 0.97
Hayward	I-880 SR 92	4.23 6.36	SR 185 (Mission Blvd.) SR 238 (Mission Blvd.) SR 238 (Foothill Blvd.) SR 92 (Jackson St.)	0.85 3.29 1.50 1.58	A St. Hesperian Blvd. Tennyson Rd.	1.61 2.60 2.32
Union City	I-880	1.70	SR 238 (Mission Blvd.)	2.57	Decoto Rd.	1.76
Fremont	I-680 I-880 SR 84	6.20 11.96 3.17	SR 238 (Mission Blvd.) SR 262 (Mission Blvd.) SR 84 (Thornton, Fremont, Mowry Ave.)	5.03 1.22 10.99	Decoto Rd. Mowry Ave.	1.15 2.96
Newark	SR 84	1.99	None	--	None	--
Pleasanton	I-580 I-680	4.65 5.26	None	--	None	--
Livermore	I-580	4.61	SR 84 (First St.)	4.63	None	--
Dublin	I-680	1.84	None	--	None	--
Unincorporated Areas	I-680 I-580 I-238 I-880	7.91 22.50 1.99 1.93	SR 84 (Vallecitos Rd.) SR 185 (Mission Blvd. & E 14th) SR 238 (Foothill Blvd.)	7.97 2.47 0.79	Hesperian Blvd.	1.99

* As adopted by the Alameda County Congestion Management Agency, October 24, 1991

1997 Level of Service Results
Freeway Segments - PM Peak

CMP Route	Segment Limits		To:	Jurisdiction	Plan Length Area (miles)	No of Lanes	1994 ADT	1997 LOS Results		Prior LOS "F"						
	From:	Area (miles)						LOS	Speed	1996 Results	91	92	93	94	95	96
I-580 - WB	Central	I-80 Jct		Alb	1	0.77	4	77,000	492	C	50.5/C					
I-580 - EB	I-80 Jct	Central		Alb	1	1.07	4	77,000	50.3	C	51.0/C					
I-680 - NB	Scott Creek	SR 238		Fre	3	5.98	6	108,000	38.6	E	45.9/D					
I-680 - NB	SR 238	SR 84		Unincorp	3	5.13	6	98,000	54.5	C	50.4/C					
I-680 - NB	SR 84	Bernal Ave		Uninc - Plea	4	4.97	6	87,000	55.7	B	58.5/B					
I-680 - NB	Bernal Ave	I-580		Plea	4	3.22	6	92,000	55.6	B	58.2/B					
I-680 - NB	I-580	Alcosta		Dub	4	1.83	6	115,000	55.2	B	56.8/B					
I-680 - SB	Alcosta	I-580		Dub	4	1.84	6	115,000	53.2	C	52.6/C					
I-680 - SB	I-580	Bernal		Plea	4	3.30	6	92,000	56.7	B	56.5/B					
I-680 - SB	Bernal	SR 84		Unincorp	4	5.12	6	87,000	62.4	A	64.9/A					
I-680 - SB	SR 84	SR 238		Unincorp	3	4.60	6	98,000	55.5	B	58.2/B					
I-680 - SB	SR 238	Scott Creek		Fre	3	6.41	6	108,000	52.5	C	64.2/A					
I-880 - NB	Dix Landing	SR 262/Mission		Fre	3	2.08	8	120,000	39.4	E	34.0/E					
I-880 - NB	SR 262/Mission	Stevenson		Fre	3	3.98	8	116,000	40.1	E	27.5/F					
I-880 - NB	Stevenson	Decoto		Fre	3	4.04	8	146,000	23.8	(F)	27.7/F					
I-880 - NB	Decoto	Aliv-Niles		Fre - Un Cty	3	2.68	8	140,000	36.0	E	39.8/E					
I-880 - NB	Aliv-Niles	Tennyson		Un Cty - Hay	3	2.66	8	160,000	46.9	D	33.1/E					
I-880 - NB	Tennyson	SR 92		Hay	2	1.14	8	166,000	50.8	C	44.9/D					
I-880 - NB	SR 92	A St		Hay	2	1.52	8	210,000	48.3	D	39.5/E					
I-880 - NB	A St	I-238		Unincorp	2	1.82	8	191,000	39.8	E	35.7/E					
I-880 - NB	I-238	Hegenberger		SL - Oak	2	5.33	8	167,000	58.7	B	53.8/C					
I-880 - NB	Hegenberger	High/42nd		Oak	1	2.47	8	168,000	50.9	C	55.4/B					
I-880 - NB	High/42nd	I-980		Oak	1	3.70	8	161,000	39.5	E	46.8/D					
I-880 - SB	I-980	23rd		Oak	1	2.78	8	165,000	35.5	E	42.1/D					
I-880 - SB	23rd St	High/42nd		Oak	1	1.34	8	162,000	47.9	D	41.4/D					
I-880 - SB	High/42nd	Hegenberger		Oak	1	2.27	8	168,000	37.1	E	38.9/E					
I-880 - SB	Hegenberger	I-238		Oak - SL	1	4.98	8	167,000	44.8	D	40.0/E					
I-880 - SB	I-238	A St		Unin - Hay	2	2.03	8	191,000	40.7	E	44.4/D					
I-880 - SB	A St	Rt 92		Hay	2	1.81	8	210,000	42.8	D	39.6/E					
I-880 - SB	Rt 92	Tennyson		Hay	2	0.96	8	166,000	40.1	E	42.7/D					
I-880 - SB	Tennyson	Aliv-Niles		Hay - UC	2	2.59	8	160,000	42.9	D	41.3/D					
I-880 - SB	Aliv-Niles	Decoto		UC - Fre	3	2.74	8	140,000	43.8	D	41.8/D					
I-880 - SB	Decoto	Stevenson		Fre	3	4.06	8	146,000	49.7	C	49.5/C					
I-880 - SB	Stevenson	SR 262/Mission		Fre	3	4.10	8	116,000	48.7	D	58.4/B					
I-880 - SB	SR 262/Mission	Dix Landing(off)		Fre	3	1.27	8	120,000	43.4	D	53.8/C					

**1997 Level of Service Results
Freeway Segments - PM Peak**

CMP Route	Segment Limits		Jurisdiction	Plan Area	Length (miles)	No of Lanes	1994 ADT	1997 Speed	1997 LOS	1996 Results	Prior LOS "F"				
	From:	To:									91	92	93	94	95
I-980 - WB	SR 24 @ 580	I-880	Oak	1	2.27	8	167,000	41.3	D	44.7/D					
I-980 - EB	I-880	SR 24 @ 580	Oak	1	2.33	8	167,000	37.4	E	42.9/D					
SR 13 - NB	Mountain On	Joa Miller/Linc	Oak	1	2.09	4	44,000	45.9	D	51.8/C					
SR 13 - NB	Joa Miller/Linc	Moraga Ave	Oak	1	1.77	4	51,000	45.7	D	54.4/C					
SR 13 - NB	Moraga Ave	Hiller (Sig)	Oak	1	1.56	4	58,000	38.5	E	39.2/E					
SR 13 - SB	Hiller Sig	Moraga Ave	Oak	1	1.66	4	58,000	47.1	D	40.4/D					
SR 13 - SB	Moraga Ave	Joa Miller/Linc	Oak	1	2.03	4	51,000	59.4	B	52.6/C					
SR 13 - SB	Joa Miller/Linc	I-580 Ramp	Oak	1	1.74	4	44,000	60.7	A	49.1/C					
SR 24 - EB	I-580 On-ramp	Fish Ranch	Oak	1	4.52	8	147,000	29.5	(F)	26.3/F					
SR 24 - WB	Fish Ranch	I-580 Off-ramp	Oak	1	4.47	8	147,000	48.3	D	49.7/C					
SR 84 - EB	San MCL	Toll Gate Outlet	Uninc - Hay	2	3.17	6	50,000	56.6	B	51.4/C					
SR 84 - EB	Toll Gate Outlet	Thornton	Uninc - Hay	2	0.65	6	50,000	51.8	C	55.7/B					
SR 84 - EB	Thornton	I-880	Newark	3	2.21	6	46,000	41.2	D	44.0/D					
SR 84 - WB	I-880	Toll Gate	Newark	3	2.89	6	50,000	46.3	D	49.5/C					
SR 84 - WB	Toll Gate	San MCL	Uninc - Hay	2	3.17	6	50,000	55.9	B	59.7/B					
SR 92 - EB	San MCL	Toll Gate Outlet	Uninc - Hay	2	2.61	6	72,000	22.7	(F)	30.6/E					
SR 92 - EB	Toll Gate Outlet	Clawiter	Uninc - Hay	2	1.76	6	72,000	25.6	(F)	23.2/F					
SR 92 - EB	Clawiter	I-880	Hay	2	2.10	6	83,000	21.9	(F)	35.5/E					
SR 92 - WB	I-880	Clawiter	Hay	2	2.01	6	83,000	49.3	C	56.8/B					
SR 92 - WB	Clawiter	Toll Gate	Uninc - Hay	2	1.87	6	72,000	44.7	D	37.1/E					
SR 92 - WB	Toll Gate	San MCL	Uninc - Hay	2	2.61	6	72,000	48.0	D	53.2/C					

1997 Level of Service Results
Arterial Segments - PM Peak Hour

CMP Route	Segment Limits		Jurisdiction (miles)	Length (miles)	Arterial Class	Plan Area	No of Lanes	1997 LOS Results		1996 Results	Prior LOS FY				
	From:	To:						Speed	LOS		91	92	93	94	95
150th St - EB	Hesperian	I-580	SL	0.49	II	2	2	12.4	E	15.2/D					
150th St - WB	I-580	Hesperian	SL	0.49	II	2	2	17.6	D	13.8/E					
A Street - EB	I-880	Western	Hay	1.08	II	2	2	29.2	B	24.8/B					
A Street - EB	Western	SR 238	Hay	0.53	III	2	2	7.1	E	10.4/D					
A Street - WB	SR 238	Western	Hay	0.53	III	2	2	14.0	C	16.0/C					
A Street - WB	Western	I-880	Hay	1.08	II	2	2	18.6	C	14.5/D					
Atlantic - EB	Main	Webster	Ala	0.80	II	1	2	29.8	B	18.8/C					
Atlantic - WB	Webster	Main	Ala	0.80	II	1	2	28.9	B	27.8/B					
Hegenberger - EB	Edgewater	Baldwin	Oak	0.71	I	1	3	26.1	C	22.7/C					
Hegenberger - EB	Baldwin	E 14th	Oak	1.09	I	1	3	16.8	E	33.0/B					
Hegenberger - WB	E 14th	Baldwin	Oak	1.09	I	1	3	15.4	E	32.3/B					
Hegenberger - WB	Baldwin	Edgewater	Oak	0.71	I	1	3	31.6	B	22.9/C					
Hesperian - NB	Tennyson	SH 92 - WB	Hay	0.36	I	2	3	15.1	E	16.3/E					
Hesperian - NB	SH 92	A St	Hay	2.19	II	2	3	18.9	C	22.0/C					
Hesperian - NB	A St	Hacienda	Unin	0.65	II	2	2	18.5	C	18.3/C					
Hesperian - NB	Hacienda	Grant	Unin	0.66	II	2	2	23.5	C	23.6/C					
Hesperian - NB	Grant	Llewelling	Unin	0.28	II	2	2	15.8	D	19.6/C					
Hesperian - NB	Llewelling	Springlake	Unin	0.40	II	2	2	15.8	D	21.3/C					
Hesperian - NB	Springlake	Fairmont	SL	0.65	II	2	2	18.8	C	18.7/C					
Hesperian - NB	Fairmont	14th	SL	0.33	II	2	2	15.3	D	11.2/E					
Hesperian - SB	14th	Fairmont	SL	0.31	II	2	2	9.8	••F••	13.4/E					
Hesperian - SB	Fairmont	Springlake	SL	0.65	II	2	2	17.0	D	18.7/C					
Hesperian - SB	Springlake	Llewelling	Unin	0.40	II	2	2	14.0	D	13.7/E					
Hesperian - SB	Llewelling	Grant	Unin	0.28	II	2	2	21.8	C	24.0/B					
Hesperian - SB	Grant	Hacienda	Unin	0.66	II	2	2	15.5	D	28.4/B					
Hesperian - SB	Hacienda	A St	Unin	0.65	II	2	2	25.4	B	20.8/C					
Hesperian - SB	A St	SH 92	Hay	2.19	II	2	3	20.5	C	24.3/B					
Hesperian - SB	SH 92 - WB	Tennyson	Hay	0.46	I	2	3	18.6	D	17.7/D					
Mowry - EB	I-880	Farwell	Fre	0.34	II	3	2	15.3	D	13.8/E					
Mowry - EB	Farwell	SH 84	Fre	2.62	II	3	2	23.4	C	22.9/C					
Mowry - WB	SH 84	Farwell	Fre	2.62	II	3	2	21.6	C	25.4/B					
Mowry - WB	Farwell	I-880	Fre	0.34	II	3	2	21.8	C	27.8/B					

1997 Level of Service Results
Arterial Segments - PM Peak Hour

CMP Route	Segment Limits		Jurisdiction	Length (miles)	Arterial Class	Plan Area	No of Lanes	1997 LOS Results	LOS	Prior LOS "F"					
	From:	To:								91	92	93	94	95	96
Park/23rd - EB	Encinal	Santa Clara	Ala	0.23	II	1	2	15.8	D	17.1/D					
Park/23rd - EB	Santa Clara	Kennedy	Ala	0.67	III	1	2	18.2	C	16.5/C					
Park/23rd - EB	Kennedy	E 11th	Ala - Oak	0.50	II	1	2	21.5	C	24.2/B					
Park/23rd - WB	E 11th	Kennedy	Oak - Ala	0.45	II	1	2	23.8	C	31.5/A					
Park/23rd - WB	Kennedy	Santa Clara	Ala	0.67	III	1	2	13.8	C	18.6/C					
Park/23rd - WB	Santa Clara	Enchal	Ala	0.23	II	1	2	15.2	D	13.2/E					
MLK Jr Way - NB	SH 24	Adeline	Oak	0.90	II	1	2	17.8	D	17.1/D					
Adeline - NB	MLK Jr - South	MLK Jr - North	Berk	0.29	II	1	2	13.3	E	12.9/E					
Adeline - NB	MLK Jr - North	Shattuck	Berk	0.63	II	1	2	21.3	C	13.1/D					
Shattuck NB	Shattuck	Dwight	Berk	0.32	II	1	2	18.9	C	14.6/D					
Shattuck NB	Dwight	Allston	Berk	0.40	III	1	2	10.8	D	13.0/C					
Shattuck NB	Allston	University	Berk	0.20	III	1	2	8.5	E	8.1/E					
Shattuck SB	University	Allston	Berk	0.20	III	1	2	14.5	C	11.2/D					
Shattuck SB	Allston	Dwight	Berk	0.40	III	1	2	12.5	D	15.4/C					
Shattuck SB	Dwight	Shattuck	Berk	0.32	II	1	2	20.7	C	24.3/B					
Adeline - SB	Shattuck	MLK Jr - North	Berk	0.63	II	1	2	16.9	D	12.6/E					
Adeline - SB	MLK Jr - North	MLK Jr - South	Berk	0.29	II	1	2	10.8	E	12.7/E					
MLK Jr Way - SB	Adeline	SH 24	Oak	0.88	II	1	2	20.0	C	20.0/C					
Tennyson - EB	Hesperian	I-880	Hay	0.87	I	2	2	14.8	E	25.8/C					
Tennyson - EB	I-880 NB	Rt 238	Hay	1.44	II	2	2	18.6	C	20.0/C					
Tennyson - WB	Rt 238	I-880	Hay	1.49	II	2	2	19.5	C	26.3/B					
Tennyson - WB	I-880	Hesperian	Hay	0.84	I	2	2	19.2	D	18.2/D					
University - EB	I-80 SB	6th	Berk	0.39	II	1	2	20.4	C	26.2/B					
University - EB	6th	San Pablo	Berk	0.31	II	1	2	14.5	D	10.6/E					
University - EB	San Pablo	Sacramento	Berk	0.56	II	1	2	16.2	D	18.0/C					
University - EB	Sacramento	ML King	Berk	0.48	II	1	2	19.9	C	18.5/C					
University - EB	ML King	Shattuck Pl	Berk	0.30	III	1	2	12.3	D	17.1/C					
University - WB	Shattuck Pl	ML King	Berk	0.30	III	1	2	10.3	D	16.5/C					
University - WB	ML King	Sacramento	Berk	0.48	II	1	2	16.4	D	16.1/D					
University - WB	Sacramento	San Pablo	Berk	0.56	II	1	2	13.6	E	18.6/C					
University - WB	San Pablo	6th	Berk	0.31	II	1	2	13.5	E	15.5/D					
University - WB	6th	I-80 SB	Berk	0.40	II	1	2	17.5	D	15.3/D					
SR 13 Ashby - WB	Hillier	Domingo	Oak - Berk	0.79	II	1	2	32.5	A	30.3/A					

1997 Level of Service Results
Arterial Segments - PM Peak Hour

CMP Route	Segment Limits		Length (miles)	Arterial Class	Plan Area	No of Lanes	Speed	1997 LOS Results	1996 Results	Prior LOS "F"				
	From:	To:								91	92	93	94	95
SR 13 Ashby - WB	Domingo	College	0.49	III	1	1	18.0	C	17.4/C					
SR 13 Ashby - WB	College	Telegraph	0.37	III	1	1	12.2	D	10.7/D					
SR 13 Ashby - WB	Telegraph	Shattuck	0.38	III	1	1	9.3	E	9.6/D	•	•			
SR 13 Ashby - WB	Shattuck	ML King	0.25	III	1	1	10.5	D	10.6/D	•	•			
SR 13 Ashby - WB	ML King	San Pablo	0.86	III	1	1	16.5	D	12.1/D					
SR 13 Ashby - WB	San Pablo	I-80 Ramps	0.64	II	1	2	23.8	C	22.1/C					
SR 13 Ashby - EB	I-80	San Pablo	0.61	II	1	2	13.4	E	14.6/D					
SR 13 Ashby - EB	San Pablo	ML King	0.86	III	1	1	23.7	B	15.2/C					
SR 13 Ashby - EB	ML King	Shattuck	0.25	III	1	1	13.5	C	13.5/C					
SR 13 Ashby - EB	Shattuck	Telegraph	0.38	III	1	1	23.6	B	14.2/C					
SR 13 Ashby - EB	Telegraph	College	0.37	III	1	1	12.4	D	15.9/C					
SR 13 Ashby - EB	College	Domingo	0.49	III	1	1	14.8	C	14.8/C	•				
SR 13 Ashby - EB	Domingo	Hillier	0.79	II	1	2	19.4	B	28.5/B					
SR 61 - SB	Atlantic	Cent/Webster	0.55	III	1	2	16.2	D	10.8/D					
SR 61 - SB	Cent/Webster	Sher/Encino	0.74	II	1	2	17.4	C	18.4/C					
SR 61 - SB	Sher/Encino	Park	1.22	II	1	1	22.3	C	22.4/C					
SR 61 - SB	Park	High/Otis	1.05	II	1	1	21.9	C	23.0/C					
SR 61 (Doolittle) - SB	High	Harbor Bay	0.91	I	1	1	19.6	C	24.0/C					
SR 61 - SB	Harbor Bay	Airport Dr	2.14	I	1	1	35.0	B	32.3/B					
SR 61 (Doolittle) - SB	Airport	Davis	0.95	I	1	2	29.3	B	30.4/B					
SR 61 (Doolittle) - NB	Davis	Airport	0.94	I	2	2	25.4	C	23.7/C					
SR 61 - NB	Airport Dr	Harbor Bay	2.15	I	1	1	34.4	B	33.1/B					
SR 61 (Doolittle) - NB	Harbor Bay	High/Otis	0.91	I	1	1	21.2	D	21.9/D					
SR 61 - NB	High/Otis	Park	1.05	II	1	1	30.4	A	23.7/C					
SR 61 - NB	Park/Encinal	Sher/Cent	1.22	II	1	1	17.1	D	22.1/C					
SR 61 - NB	Sher/Cent	Web/Cent	0.74	II	1	2	18.4	C	20.8/C					
SR 61 - NB	Cent/Web	Atlantic	0.55	III	1	2	14.6	C	17.3/D					
SR 77 (42nd) - EB	I-880 NB	E 14th	0.32	I	1	2	22.7	C	20.8/B					
SR 77 (42nd) - WB	E 14 th	I-880 NB	0.30	I	1	2	23.7	C	25.6/C					
Decoto - WB	SH 238/Mission	Union Square	0.85	II	3	2	25.9	B	19.4/C					
Decoto - WB	Union Square	Alv-Niles Rd	0.25	II	3	2	10.8	E	9.7/F	•	•	•	•	•
Decoto - WB	Alv-Niles Rd	Fremont CL	0.66	II	3	2	23.3	B	23.4/B					
Decoto - WB	Fremont CL	I-880 NB (off)	1.15	II	3	2	19.5	C	17.4/D					
Decoto - EB	I-880 NB (off)	Union City CL	1.15	II	3	2	16.5	D	12.7/E					

1997 Level of Service Results
Arterial Segments - PM Peak Hour

CMP Route	Segment Limits		Jurisdiction	Length (miles)	Arterial Class	Plan Area	No of Lanes	1997 LOS Results		1996 Results	Prior LOS "F"				
	From:	To:						Speed	LOS		91	92	93	94	95
Decoto - EB	Union City CL	Alv-Niles Rd	UC	0.66	II	3	2	14.7	D	18.3/C					
Decoto - EB	Alv-Niles Rd	Union Square	UC	0.25	II	3	2	16.3	D	14.1/D					
Decoto - EB	Union Square	SH 238/Mission	UC	0.85	II	3	2	25.6	B	28.1/B					
SR 84 (Fre) - WB	SH 238	Mowry	Fre	0.90	I	3	3	25.3	C	22.4/C					
SR 84 (Fre) - WB	Mowry	Fremont	Fre	1.72	I	3	3	28.8	B	28.0/B					
SR 84 (Fre) - WB	Fremont	Thornton	Fre	0.33	II	3	3	13.9	E	14.2/D					
SR 84 (Fre) - WB	Thornton	I-880 SB	Fre	1.34	II	3	3	22.9	C	27.2/B					
SR 84 (Fre) - EB	I-880 SB	Fremont	Fre	1.34	II	3	3	17.2	D	23.8/C					
SR 84 (Fre) - EB	Fremont	Peralta	Fre	0.33	II	3	3	13.3	E	17.3/D					
SR 84 (Fre) - EB	Peralta	Mowry	Fre	1.72	I	3	3	25.4	C	25.4/C					
SR 84 (Fre) - EB	Mowry	SH 238	Fre	0.90	I	3	3	15.2	E	17.7/D					
SR 84 (Liv) - SB	I-580	N Mines	Liv	0.79	I	4	4	27.9	A	30.7/A					
SR 84 (Liv) - SB	N Mines	Railroad	Liv	1.35	I	4	4	34.4	B	31.3/B					
SR 84 (Liv) - SB	Railroad	P St	Liv	0.62	III	4	4	18.8	B	19.7/B					
SR 84 (Liv) - SB	P St	4th/Murr	Liv	0.35	II	4	4	13.6	D	14.2/D					
SR 84 (Liv) - SB	4th/Murr	Concannon	Liv	1.04	I	4	4	27.8	C	25.3/C					
SR 84 (Liv) - WB	Concannon	Val Nu Ce	Unlin - Liv	5.76	I	3	3	—	A	47.7/A					
SR 84 (Liv) - EB	Val Nu Ce	Concannon	Liv - Unlin	5.76	I	4	4	—	A	39.7/A					
SR 84 (Liv) - EB	Concannon	4th/Murr	Liv	1.04	I	4	4	24.0	C	25.6/B					
SR 84 (Liv) - EB	4th	P St	Liv	0.35	II	4	4	14.6	D	21.7/C					
SR 84 (Liv) - EB	P St	Railroad	Liv	0.62	III	4	4	16.1	C	15.3/C					
SR 84 (Liv) - EB	Railroad	N Mines	Liv	1.35	I	4	4	36.1	A	41.2/A					
SR 84 (Liv) - EB	N Mines	I-580	Liv	0.79	I	4	4	25.2	C	28.9/C					
SR 84 - EB	SR 238	Ple-Sunol Rd	Fre	6.70	Rural2	3	3	36.4	C	32.3/C					
SR 84 - EB	Ple-Sunol Rd	Val Nu Ce	Unlin	7.75	Rural2	3	3	—	B	36.2/B					
SR 84 - WB	Val Nu Ce	Ple-Sunol Rd	Unlin	7.75	Rural2	3	3	—	B	47.0/B					
SR 84 - WB	Ple-Sunol Rd	SR 238	Fre	6.70	Rural2	3	3	—	B	36.3/B					
SR 92 - EB	I-880	Mission	Hay	1.58	II	2	3	15.8	D	18.6/C					
SR 92 - WB	Mission	I-880	Hay	1.58	II	2	3	18.4	D	17.9/D					
SR 112 (Davis) - EB	Doolittle	I-880	SL	0.97	II	2	2	22.7	C	23.2/C					
SR 112 (Davis) - EB	I-880	San Leandro	SL	0.54	II	2	2	20.6	C	17.9/D					
SR 112 (Davis) - EB	San Leandro	14th	SL	0.27	III	2	2	13.4	C	13.3/C					

1997 Level of Service Results
Arterial Segments - PM Peak Hour

CMP Route	Segment Limits		Jurisdiction (miles)	Length (miles)	Arterial Class	Plan Area	No of Lanes	1997 LOS Results		1996 Results	Prior LOS "F"				
	From:	To:						Speed	LOS		91	92	93	94	95
SR 112 (Davis) - WB	E 14th	San Leandro	SL	0.28	III	2	2	12.4	D	13.1/C					
SR 112 (Davis) - WB	San Leandro	I-880	SL	1.00	II	2	2	26.5	B	20.7/C					
SR 112 (Davis) - WB	I-880	Doolittle	SL	0.50	II	2	2	19.7	C	19.6/C					
SR 123 San Pablo - SB	Carlson	Washington	Alb	0.53	II	1	2	25.2	B	28.7/B					
SR 123 San Pablo - SB	Washington	Marin	Alb	0.44	III	1	2	16.7	C	18.0/C					
SR 123 San Pablo - SB	Marin	Gilman	Alb - Berk	0.47	II	1	2	18.4	C	28.1/B					
SR 123 San Pablo - SB	Gilman	University	Berk	0.85	II	1	2	16.1	D	19.4/C					
SR 123 San Pablo - SB	University	Allston	Berk	0.20	III	1	2	13.9	C	11.0/D					
SR 123 San Pablo - SB	Allston	Ashby	Berk	1.08	II	1	2	19.3	C	13.8/E					
SR 123 San Pablo - SB	Ashby	Stanford	Berk	0.81	II	1	2	20.4	C	25.9/B					
SR 123 San Pablo - SB	Stanford	53rd	Oak	0.27	II	1	2	23.0	C	29.8/B					
SR 123 San Pablo - SB	53rd	Park	Emer	0.35	II	1	2	14.2	D	15.5/D					
SR 123 San Pablo - SB	Park	35th	Emer - Oak	0.44	II	1	2	14.8	D	11.1/E					
SR 123 San Pablo - NB	35th	Park	Oak - Emer	0.44	II	1	2	19.2	C	14.2/D					
SR 123 San Pablo - NB	Park	53rd	Emer	0.35	II	1	2	22.4	C	26.4/B					
SR 123 San Pablo - NB	53rd	Stanford	Oak	0.27	II	1	2	11.4	E	16.4/D					
SR 123 San Pablo - NB	Stanford	Ashby	Oak	0.81	II	1	2	16.5	D	16.4/D					
SR 123 San Pablo - NB	Ashby	Allston	Berk	1.08	II	1	2	20.6	C	22.2/C					
SR 123 San Pablo - NB	Allston	University	Berk	0.20	III	1	2	9.1	D	13.2/C					
SR 123 San Pablo - NB	University	Gilman	Berk	0.85	II	1	2	16.3	D	17.2/D					
SR 123 San Pablo - NB	Gilman	Marin	Alb - Berk	0.47	II	1	2	16.8	D	15.5/D					
SR 123 San Pablo - NB	Marin	Washington	Alb	0.45	III	1	2	26.7	A	24.7/B					
SR 123 San Pablo - NB	Washington	Carlson	Alb	0.53	II	1	2	23.3	C	22.9/C					
SR 185 (14th) - SB	42nd	Seminary	Oak	1.06	II	1	2	23.0	C	21.0/C					
SR 185 (14th) - SB	Seminary	73rd	Oak	0.80	II	1	2	19.3	C	18.3/C					
SR 185 (14th) - SB	73rd Ave	98th Ave	Oak	1.39	II	1	2	16.7	D	19.6/C					
SR 185 (14th) - SB	98th	Broadmoor	Oak	0.74	II	1	2	25.2	B	23.6/C					
SR 185 (14th) - SB	Broadmoor	Davis	SL	0.72	II	2	2	19.8	C	23.8/C					
SR 185 (14th) - SB	Davis	San Leandro	SL	1.04	III	2	2	19.3	C	16.6/C					
SR 185 (14th) - SB	San L Blvd	Hesperian	SL	0.94	II	2	2	30.3	A	30.2/A					
SR 185 (14th) - SB	Hesperian	Bayfair	SL	0.46	II	2	2	26.0	B	22.2/C					
SR 185 (14th) - SB	Bayfair	170th	Unin	1.24	II	3	2	20.2	C	25.7/B					
SR 185 (14th) - SB	170th	Llewelling	Unin	0.21	II	3	2	32.9	A	27.3/B					
SR 185 (14th) - SB	Llewelling	Sunset	Unin	1.02	II	3	2	24.4	B	20.6/C					
SR 185 (14th) - SB	Sunset	SR 92/238	Hay	0.85	III	2	2	13.1	C	13.7/C					
SR 185 Hayward - NB	SR 92/238	Sunset	Hay	0.85	III	2	2	16.4	C	17.2/C					

1997 Level of Service Results
Arterial Segments - PM Peak Hour

CMP Route	Segment Limits		Jurisdiction	Length (miles)	Arterial Class	Plan No of Area Lanes	Speed	1997 LOS Results		LOS	Prior LOS "F"									
	From:	To:						Results	Results		91	92	93	94	95	96				
SR 185 (14th) - NB	Sunset	Llewelling	Unin	1.11	III	3	21.4			C										
SR 185 (14th) - NB	Llewelling	170th	Unin	0.21	II	3	28.6			B										
SR 185 (14th) - NB	170th	Bayfair	Unin	1.24	II	3	25.6			B										
SR 185 (14th) - NB	Bayfair	Hesperian	SL	0.46	II	2	19.5			C										
SR 185 (14th) - NB	Hesperian	San L Blvd	SL	0.93	II	2	22.4			C										
SR 185 (14th) - NB	San Leandro	Davis	SL	1.03	III	2	19.7			B										
SR 185 (14th) - NB	Davis	Broadmoor	SL	0.72	II	2	28.0			B										
SR 185 (14th) - NB	Broadmoor	98th	Oak	0.74	II	1	17.0			D										
SR 185 (14th) - NB	98th Ave	73rd Ave	Oak	1.36	II	1	19.0			C										
SR 185 (14th) - NB	73rd Ave	Seminary	Oak	0.80	II	1	14.8			D										
SR 185 (14th) - NB	Seminary	42nd	Oak	1.06	II	1	23.8			C										
SR 238 (Foothill) - NB	Jackson	City Center	Hay	0.62	III	2	11.6			D										
SR 238 (Foothill) - NB	City Center	I-580	Unin-Hay	0.73	II	3	15.9			D										
SR 238 (Foothill) - NB	I-580 Ramp	I-580 Merge	Unin	0.71	I	3	36.6			A										
SR 238 (Foothill) - SB	I-580	Castro V Blvd	Unin	0.86	I	3	22.6			C										
SR 238 (Foothill) - SB	Castro V Blvd	City Center	Hay-Unin	1.03	II	2	19.2			C										
SR 238 (Foothill) - SB	City Center	Jackson	Hay	0.62	III	2	14.8			C										
SR 238 (Mission) - NB	680 NB Rmp	Stevenson	Fre	2.46	I	3	30.4			B										
SR 238 (Mission) - NB	Stevenson	Nursery	Fre	2.57	I	3	23.3			C										
SR 238 (Mission) - NB	Nursery	Tamarack	UC	2.07	I	3	29.5			B										
SR 238 (Mission) - NB	Tamarack	Industrial	UC - Hay	1.96	I	3	38.2			A										
SR 238 (Mission) - NB	Industrial	Sorenson	Hay	1.47	II	2	26.9			B										
SR 238 (Mission) - NB	Sorenson	Jackson	Hay	1.82	II	2	18.2			C										
SR 238 (Mission) - SB	Jackson	Sorenson	Hay	1.82	II	2	28.4			B										
SR 238 (Mission) - SB	Sorenson	Industrial	Hay	1.47	II	2	34.7			A										
SR 238 (Mission) - SB	Industrial	Tamarack	Hay - UC	1.96	I	2	33.8			B										
SR 238 (Mission) - SB	Tamarack	Nursery	UC	2.07	I	3	29.8			B										
SR 238 (Mission) - SB	Nursery	Stevenson	Fre	2.57	I	3	25.1			B										
SR 238 (Mission) - SB	Stevenson	680 NB Rmp	Fre	2.46	I	3	28.7			B										
SR 260 (Tubes) - NB	Atlantic	7th/Web	Oak	1.31	I	1	--			A										
SR 260 (Tubes) - SB	7th/Web	Atlantic	Oak	1.31	I	1	--			B										
SR 262 (Mission) - EB	I-880 NB	I-880 NB	Fre	1.32	I	3	15.9			E										
SR 262 (Mission) - WB	I-880 NB	I-880 SB	Fre	1.11	I	3	19.5			D										

1997 Level of Service Results
Ramps and Special Segments - PM Peak Hour

CMP Route	Segment Limits		Plan Area	Length (miles)	No of Lanes	Free Flow		1997 Results		1996 Results					Prior LOS TM				
	From:	To:				Juris	Speed	Speed	LOS	Speed	LOS	91	92	93	94	95	96		
I-80/I-580 Interchange	I-80 SB	I-580 EB	Oak	1	0.30	1	38.0	10.0	(F)*	24.9/D				
I-80/I-580 Interchange	I-580 WB	I-80 NB	Oak	1	0.41	1	40.0	20.9	E	31.9/C				
SR 24 WB/I-580 WB	SR 24 On	I-580 Off	Oak	1	0.69	2	Weaving	28.7	E	30.8/E				
I-580/SR 24 Interchange	I-580 WB	SR-24 EB	Oak	1	0.51	2	45.0	34.8	C	44.4/A				
I-580/SR 24 Interchange	SR-24 WB	I-580 EB	Oak	1	0.74	2	51.0	47.7	A	49.0/A				
SR 13/SR 24 Interchange	SR-13 NB	SR-24 EB	Oak	1	0.32	1	40.0	11.8	(F)*	14.4/F				
SR 13/SR 24 Interchange	SR-24 WB	SR-13 SB	Oak	1	0.16	1	31.0	24.9	B	25.4/B				
I-880/I-238 Interchange	I-880 SB	I-238 EB	San L	2	0.74	2	47.0	18.3	(F)*	25.7/E				
I-880/I-238 Interchange	I-238 WB	I-880 NB	San L	2	0.54	1	54.0	37.1	D	41.8/C				
I-880/I-238 Interchange	I-880 NB	I-238 EB	San L	2	0.33	1	32.0	21.5	D	18.8/E				
I-880/I-238 Interchange	I-238 WB	I-880 SB	San L	2	0.76	1	53.0	35.2	D	46.1/B				
I-580/SR 238 Interchange	I-580 SB	I-238 EB	Hay	2	0.35	1	37.0	27.6	C	33.2/B				
I-580/SR 238 Interchange	I-238 WB	I-580 NB	Hay	2	0.32	1	38.0	30.4	B	41.8/A				
I-580/I-680 Interchange	I-580 EB	I-680 NB	Pleas	4	0.46	1	35.0	25.0	C	30.1/A				
I-580/I-680 Interchange	I-580 EB	I-680 SB	Pleas	4	0.28	1	42.0	27.7	D	38.8/A				
I-580/I-680 Interchange	I-680 NB	I-580 EB	Pleas	4	0.32	1	40.0	25.0	D	33.6/B				
I-580/I-680 Interchange	I-680 NB	I-580 WB	Pleas	4	0.66	1	41.0	33.7	B	30.5/C				
I-580/I-680 Interchange	I-580 WB	I-680 NB	Pleas	4	0.43	1	41.0	41.5	A	38.7/A				
I-580/I-680 Interchange	I-580 WB	I-680 SB	Pleas	4	0.66	1	39.0	31.0	C	30.0/C				
I-580/I-680 Interchange	I-680 SB	I-580 EB	Pleas	4	0.48	1	35.0	30.2	B	33.8/A				
I-580/I-680 Interchange	I-680 SB	I-580 WB	Pleas	4	0.35	1	41.0	33.3	B	34.6/B				
I-880/SR 260 Connection	I-880 SB	SR-260 WB	Ala	1	0.99	1	32.0	26.4	B	27.4/B				
I-880/SR 260 Connection	SR-260 EB	I-880 NB	Ala	1	0.36	1	35.0	24.1	D	23.2/D				

Table 2
Relationship Between
Average Travel Speed and Level of Service
(Alameda County Congestion Management Agency)

Arterial Levels of Service¹

Arterial Class	I	II	III
Range of Free Flow Speeds (mph)	45 to 35	35 to 30	35 to 25
Typical Free Flow Speed (mph)	40 mph	33 mph	27 mph
Level of Service	Average Travel Speed (mph)		
A	≥35	≥30	≥25
B	≥28	≥24	≥19
C	≥22	≥18	≥13
D	≥17	≥14	≥9
E	≥13	≥10	≥7
F	<13	<10	<7

Levels of Service for Freeway Sections²

LOS	Density (pc/mi/ln)	Speed (mph)	V/C Ratio	MSF³ (pcphpl)
A	≤ 12	≥60	0.35	700
B	≤20	≥55	0.58	1,000
C	≤30	≥49	0.75	1,500
D	≤42	≥41	0.90	1,800
E	≤67	≥30	1.00	2,000
F	>67	<30	— ⁴	—

¹ Table 11-1, Special Report 209, Highway Capacity Manual, 1985. For Rural Roadways, refer to Table 8-1 in the Highway Capacity Manual.

² Adapted from Table 3-1, Special Report 209, Highway Capacity Manual; 1985.

³ Maximum service flow under ideal conditions, expressed as passenger cars per hour per lane.

⁴ Highly variable, unstable flow; V/C Ratio is not applicable.

Travel time data was collected during the period from April 10, 1997 through May 22, 1997. The field data consisted of travel time runs during the afternoon peak hours of 4 - 6 PM. The data was collected for all segments of the CMP network except those which were measured at LOS "A" and "B" during previous surveys. This is slightly different from previous years surveys where all segments were measured. In addition, runs were made during the AM peak period (7 - 9 AM) on selected critical segments. Consistent with the CMP guidelines, all runs were made on a Tuesday, Wednesday, or Thursday. The travel time runs were spread evenly throughout the two hour period. For each travel time run, the actual clock time was recorded as the test car passed the check point. The travel times between check points were then computed as the difference between the two corresponding clock times.

For the majority of the CMP system, at least six runs were made on each roadway segment. More than six runs were made on many LOS "E" and "F" segments where heavy congestion has been previously reported, where a greater range of fluctuation in travel speed was exhibited, or where questionable data was reported. On certain routes where free flow conditions of LOS "C" or better were experienced in 1997, and where the data is consistent with previous reports, the studies were concluded after four runs were completed. A table has been prepared showing the number of runs that were conducted on each route, and has been included in the Technical Compendium to this report.

Roadway Segments - Segments have been defined differently for each roadway classification. For **arterials**, the section between two adjacent signals was first reviewed to determine its arterial class as either Class I, II, or III. Arterial Class is based on access control, land use intensity, free-flow speed, etc. as defined in the 1985 Highway Capacity Manual (Chapter 11, pp. 11-1 to 11-4)⁴. Break points between segments generally occur at jurisdiction boundaries, at points where the number of travel lanes change, at major arterial street crossings, and at points where land use, speed limit, or channelization schemes change significantly. The segment boundaries for the arterial roadways are identical for both directions and the distances are generally the same or sufficiently close to be considered equal. Nevertheless, the distances by direction may differ somewhat in cases of very wide intersections, because the travel times were recorded from check point to check point (i.e. stop bars).

For **freeways**, major interchanges were used as the segment boundaries. Along more heavily traveled sections, the segments generally span from one to three interchanges. Three or more sections were combined into longer segments where traffic volumes entering and exiting was minor in terms. This is the case, for instance, in the eastern section of the I-580 corridor.

⁴ **Highway Capacity Manual**, Special Report 209, a publication of the Transportation Research Board, Washington D. C., 1985

One of the CMP routes is a two-lane rural roadway, where a special analysis procedure was required. This is State Route 84 from the southern city limit of Livermore to Mission Boulevard in Fremont. On this two-lane roadway, traffic and speed characteristics are fairly uniform. Variations in speed are a function of roadway curvature and the presence of slow trucks in the traffic stream. Based on suggested guidelines from the Highway Capacity Manual,⁵ LOS "A" is deemed to occur when vehicles are traveling at a free flow speed for the given roadway conditions. Special studies were conducted in the 1992 surveys during off-peak, low-volume conditions to document this condition. LOS "F" is estimated to occur when speeds have dropped below 50 percent of the free flow speeds.

Separate travel time/speed runs were also conducted for the ramps at freeway to freeway interchanges, since these connections can frequently have very different characteristics than the freeways themselves. The guidelines for establishing LOS were similar to those for rural highways. LOS "A" is deemed to occur when vehicles are traveling at the free flow speed for the given roadway conditions. Special studies were previously conducted as a part of the 1992 studies, during off-peak, low-volume conditions to document this condition. Per the suggested guidelines of the Highway Capacity Manual, LOS "F" would occur when speeds dropped below 50 percent of the free flow speeds. LOS from B to E were then established at even intervals. The ramp locations that have been studied for the 1997 LOS study are the following:

- 1.) I-80 to I-580 connections (Oakland-Emeryville area)
- 2.) I-580 to SH 24 connections (Oakland interchange)
- 3.) SH 13 to SH 24 connections (in the vicinity of Caldecott Tunnel)
- 4.) I-880 to I-238 connections (in the Hayward area)
- 5.) I-238 to I-580 connections (in the Hayward area)
- 6.) I-580 to I-680 connections (Pleasanton Interchange)
- 7.) I-880 to SH 260 connections (at the Alameda tubes)

The results of these special studies of ramps are discussed in Section 5 of this report.

4.) Data Analysis Procedures

The travel speeds have been determined using the measured times and the distances between check points. These section-by-section and run-by-run travel time and speed data were checked for errors and for abnormal results. Mathematically, the average travel time for a segment was computed as the sum of the average travel times of the individual sections comprising the segment. The average travel speed has been determined by dividing the average travel time for

⁵ Highway Capacity Manual, Special Report 209, a publication of the Transportation Research Board, Washington D. C., 1985.

the segment into the segment length. For a more complete discussion of the study methodology, see the description that was included in the initial study for establishing the existing Level of Service.⁶

The LOS results represent the average travel time during the two-hour period of 4 - 6 PM on an average weekday. For many roadway segments, the range of measured speeds are very constant throughout the two-hour period. For others, the travel times within this period can be quite different, especially when the peak congestion lasts for less than two hours.

For arterials, the travel time results are closely related to (1) traffic signal timing, and (2) the vehicle location in the traffic platoon during the study. In analyzing the data, if a travel time run was made at the very beginning of the two hour period, or toward the end of the period, and the data point was significantly different than other runs, the data point was then discarded, and additional travel time runs were made during the time period when traffic congestion was more severe.

For freeways, the travel times were more consistent. Additional runs were generally required only on freeways approaching unstable LOS "E" or "F" conditions. Some special conditions exist on freeway segments in the vicinity of major off-ramps, where there may be different speeds in each lane, depending on the lane that is adjacent to the off-ramp. Frequently, the right lane on a freeway can be affected by the off-ramp congestion, and is not caused by the freeway itself. At many of the freeway to freeway ramp connections on the CMA network, there is a different Level of Service than the adjacent freeways. In this study, separate travel time/speed runs were made for the ramps since these connections can frequently have very different characteristics than the freeways themselves.

Construction Activities - Several CMP roadway segments were under construction during the 1997 study period, and the travel time/speed data is likely to be considerably different than normal average traffic conditions. At the time of the travel time runs (April-May, 1997), there was major construction on I-80 through Emeryville and Berkeley; in the interchange areas approaching the Bay Bridge; on I-880 near Hegenberger Road and 98th Avenue; and at I-880 interchange areas in Fremont and Union City. Each of these construction zones appears to have had an effect on the travel time runs. Where construction was considered to be a factor, this has been noted in the Technical Compendium.

As a result of this freeway construction, the distance between ramps is changing in many cases. As the construction becomes complete, these distances need to be checked and revised accordingly.

⁶ Establishing the Existing Level of Service for the Alameda County CMP Designated Roadway System, Abrams Associates, November 26, 1991

5.) 1997 Data Collection Results for the PM Peak Hour

The peak hour speed and Level of Service results for the CMP network segments that were studied during this project are shown in the Appendix, on pages A-1 through A-11. The data are subdivided into:

PM Freeway segments, Pages A-1 to A-3
PM Arterial segments, Pages A-4 to A-9
PM Ramps and special segments, Page A-10, and
AM peak hour travel time runs, Page A-11.

In addition to the speed and LOS results, these tables also show the number of lanes on each segment, and the estimated average daily traffic (ADT). Each entry also shows the results of the 1996 studies to provide a convenient comparison to the previous year's results. The complete study results and field data for the 1997 Alameda County CMP designated roadway system are contained in a "Technical Compendium of Travel Time Studies - 1997," which is available from the Congestion Management Agency (CMA).

The 1997 PM peak hour results show that that overall travel times appear to be slightly slower in comparison to 1996. There were a number of locations where decreases in travel speed or a deterioration in Level of Service were noted, especially on the freeway network. On the other hand, there were several locations where there were traffic improvements, and increases in travel speed were recorded. These improved travel times are the result of completed construction projects, more efficient traffic signal systems, and in some cases, reduced traffic volumes.

In addition to the study results themselves, this section of the report presents two other aspects of the study: 1) the LOS "F" segments; and 2) segments with major changes in operating characteristics. The results of the AM peak period studies are presented in Section 6.

LOS "F" Segments

A total of sixteen (16) route segments were found to operate at LOS "F" during the weekday PM peak period in the 1997 studies. Of these segments, twelve are on the freeway system, one is located on an arterial route, and three segments are freeway to freeway ramps. The 1997 LOS "F" segments for the CMP designated roadway system are shown on Figure 2. These segments are also listed in Table 3.

The 1997 LOS "F" conditions fall into three categories with respect to historical trends. These categories are as follows:

1. **Segments which are LOS "F" for the first time (2 locations).** Two segments were shown to be operating at LOS "F" for the first time. One is SR 92 EB (the San Mateo Bridge) from the County line to the toll plaza. The second is I-238 WB from I-580 to I-880. In the past, this segment has been measured at LOS "F", but it was assumed to be caused by adjacent construction activities. At the time of the 1997 surveys, the construction was completed, but the segment was still found to be operating at Level of Service "F". During the 1997 surveys, there were no unusual events such as construction activities or accidents that were noted on these two segments.
2. **Segments which were LOS "F" in previous surveys and continue to operate at LOS "F".** There were fourteen segments which have previously been designated as LOS "F" in one or more previous surveys and which continue as LOS "F". These segments have previously been measured at LOS "F" in 1991, or are the result of ongoing construction. These segments are identified in Table 3.
3. **Segments which have previously been designated at LOS "F", but which have improved in the 1997 surveys.** There were two (2) segments in 1997 which improved from the 1996 surveys, and are currently operating at LOS "E". These are the following:
 - 1.) A section of I-880 that was previously designated as LOS "F" has improved LOS "E". This is the segment on northbound I-880 from SR 262 to Stevenson, which probably improved due to the completion of construction in this area.
 - 2.) A segment on Decoto Road WB from Union Square to Alvarado-Niles Road has improved from LOS "F" (9.7 mph) to LOS "E" (10.4 mph)

There is only one (1) arterial segment that was found to be operating at Level of Service "F" during the 1997 surveys. This is on a section of Hesperian Boulevard SB in the San Leandro area. This segment had been measured at LOS "F" in 1991 and in several other surveys.

In addition to the network segments, a number of special connectors, including ramps and weaving sections, have been monitored. No new LOS "F" ramp segments were identified. Three ramps, as noted on Table 3, continue to operate at Level of Service "F". One of these ramps, from SR 13 NB to SR 24 EB, was also LOS "F" in 1997. The other two ramp segments, on I-80 SB to I-580 EB, and on I-880 SB to I-238 EB, were not at LOS "F" in 1996, but were at LOS "F" in 1994 and in several earlier studies.

Table 3
1997 LOS Surveys - LOS "F" Segments - PM Peak Hour

CMP Route	From:	To:	Facility Type	Length (miles)	1996	1997	Grandfathered in 1991	Comments
Segments that have become Level of Service "F" for the first time								
1. SR 92 EB (Hayward)	County Line	Toll Plaza	Freeway	2.61	E 30.6	F 22.7	N	Significant decrease in speed. Congestion and queue backs up from I-880.
2. I-238 WB (Unincorp)	I-580	I-880	Freeway	1.60	E 40.9	F 23.7	N	Was previously at LOS "F" in 1994 and 1995 due to construction.
Freeway Segments that are operating at LOS "F"								
3. I-80 EB (Oakland)	Toll Plaza	I-580/80	Freeway	1.15	F 17.0	F 20.4	N	Data consistent with earlier studies. LOS "F" since 1993, and remains critical.
4. I-80 EB (Emery-Berk)	I-580/80	University	Freeway	2.8	E 30.8	F 24.0	Y	Significant decrease since 1996. Low speed may be influenced by construction.
5. I-80 EB (Berkeley)	University	Central	Freeway	2.40	F 23.6	F 29.4	Y	LOS "F" in 1991, 1992 and 1996. Significant decrease since 1996.
6. I-80 WB (Berk-Emery)	University	I-580 Split	Freeway	2.43	F 17.0	F 14.7	Y	Has been consistently LOS "F" in all surveys.
7. I-80 WB (Oakland)	I-580 Split	Toll Plaza	Freeway	1.20	E 35.6	F 25.7	Y	Has previously been at LOS "F". Low speed may be influenced by construction.
8. I-238 EB (Unincorp)	I-880	I-580	Freeway	2.28	F 22.8	F 28.0	Y	Speeds have decreased for the past two years.

Table 3 (continued)
1997 LOS Surveys - LOS "F" Segments - PM Peak Hour

CMP Route	From:	To:	Facility Type	Length (miles)	1996	1997	Grandfathered in 1991	Comments
<i>Freeway Segments that are operating at LOS "F" (continued)</i>								
9. I-880 NB (Fremont)	Stevenson	Decoto	Freeway	4.04	F 27.7	F 23.8	N	Has now been at LOS "F" for two years due to construction.
10. SR 24 EB (Oakland)	I-580	Fish Ranch	Freeway	4.52	F 26.3	F 29.5	Y	Has been consistently LOS "F" in all previous surveys.
11. SR 92 EB (Hayward-Unincorp)	Toll Gate	Clawiter	Freeway	1.76	F 23.2	F 25.6	Y	Has been consistently at LOS "F" in previous surveys
12. SR 92 EB (Hayward-Unincorp))	Clawiter	I-880	Freeway	2.10	E 35.5	F 21.9	Y	Has been at LOS "F" in previous surveys. Very sharp decline in speed since last year.
<i>Arterial Segments that are operating at LOS "F"</i>								
13. Hesperian SB (San Leandro)	14th Street	Fairmont	Arterial	0.31	E 13.4	F 9.8	Y	Has previously been at LOS "F" in 1995 and in earlier surveys
<i>Ramps that are operating at LOS "F"</i>								
14. I-80 ramp (Oakland)	I-80 SB	I-580 EB	Ramp	0.30	D 24.9	F 10.0	Y	Affected by construction activities.
15. SR 13 ramp (Oakland)	SR 13 NB	SR 24 EB	Ramp	0.32	F 14.4	F 11.8	Y	This ramp has always been at LOS "F" since 1992.
16. I-880 ramp (San Leandro)	I-880 SB	I-238 EB	Ramp	0.74	E 25.7	F 18.3	N	Has been LOS "F" in 94-96.

Segments with Notable Changes In the Last Year

Table 4 shows those roadways and segments for which the 1997 surveys reported significant changes in the travel time results as compared to previous surveys. The changes noted are on routes where there has been a greater than a twenty percent change in travel speeds between 1996 and 1997.

Many of these changes are the result of growing traffic volumes. Some of these changes are on routes that have been affected by construction activities, while some changes may have occurred due to improvements in signal timing or roadway widening improvements.

The systemwide statistics for the county arterials and freeways are shown below. Based on an average of all CMP roads in the County, the overall average speeds on the freeway system dropped by 1.4 miles per hour, while the average arterial speeds remained relatively constant.

Average Vehicle Speeds in PM Peak on Alameda County CMP Roadways

	1996 Results	1997 Results
Freeways	48.39 mph	46.99 mph
Arterials	25.52 mph	25.42 mph

Figures 3 through 7 show the results of the travel time runs and the resulting LOS for each of the segments on the CMP designated system by roadway and by jurisdiction. These figures each portray a subarea of the County which generally corresponds to the County planning areas. (See Appendix tables on page A-1 through A-11).

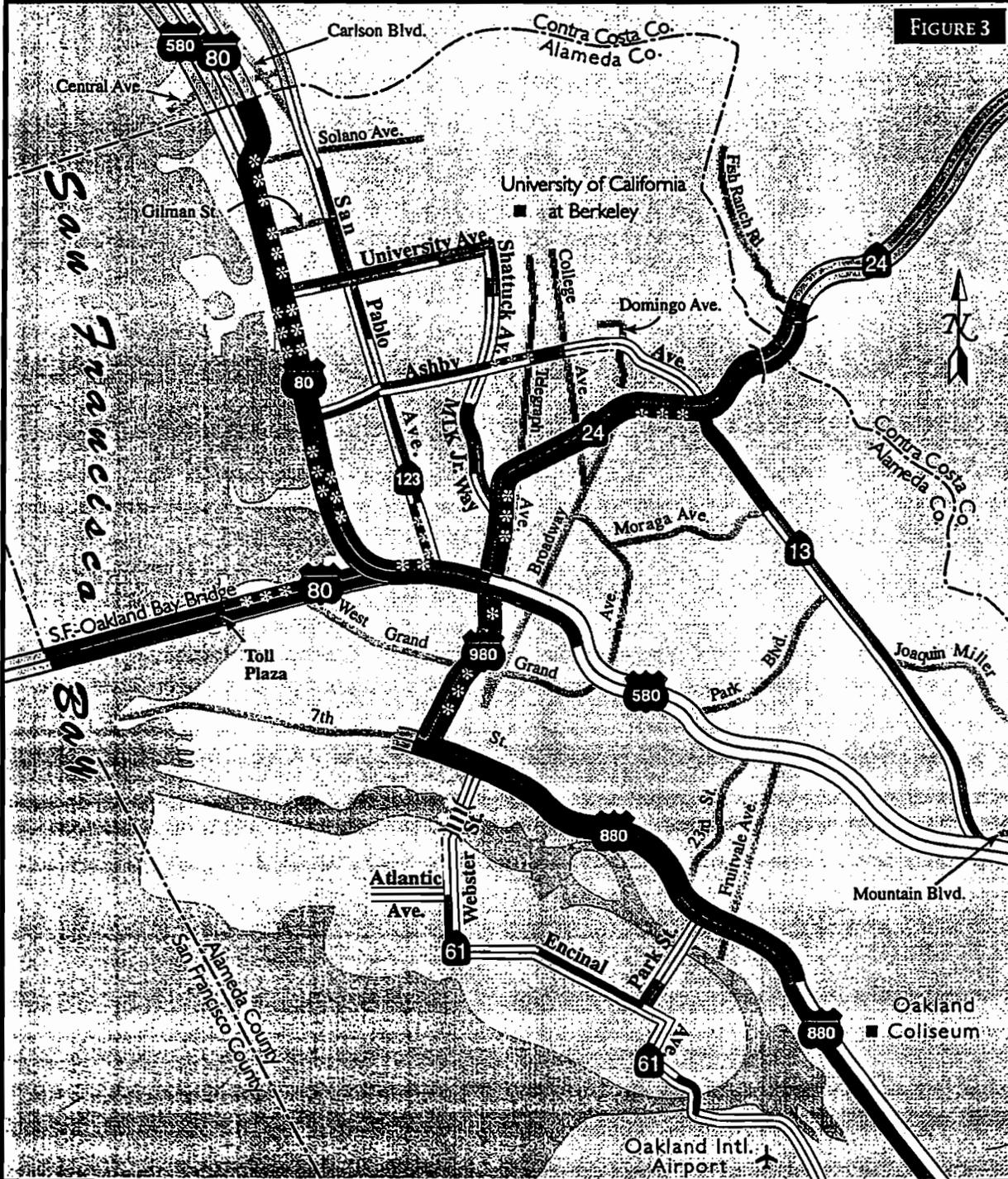
Changes to Ramps and Special Segments - The 1997 results for ramps and special segments are generally consistent with the previous studies. One of the locations that was noted in the 1996 study continues to operate at LOS "F." This is the ramp between SR 13 northbound and SR 24 eastbound toward the Caldecott Tunnel. This condition has continuously existed throughout the earlier LOS studies. Two other LOS "F" ramp segments, on I-80 SB to I-580 EB, and on I-880 SB to I-238 EB, were not at LOS "F" in 1996, but were at LOS "F" in 1994 and in several earlier studies. The complete summary of the ramp data is shown in the Appendix on page A-10.

Comparisons to Earlier Studies - The following tables provide a comparison of the survey results for the periods from 1991 to 1997 on the major routes on the Alameda County CMP system. Table 5 shows these results for the freeway system. For each route, the segments have been aggregated to show the entire length of the route throughout Alameda County.

ALAMEDA COUNTY LEVEL OF SERVICE STUDY RESULTS, 1997

PM PEAK HOUR - NORTHERN AREA

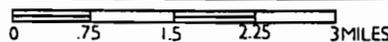
FIGURE 3



LEGEND

- | | | |
|-------------------------|------------------|--|
| LOS "A" or "B" Segments | LOS "E" Segments | This segment was previously identified as Level of Service "F" in 1991 when the CMP was first adopted. |
| LOS "C" Segments | LOS "F" Segments | |
| LOS "D" Segments | | |

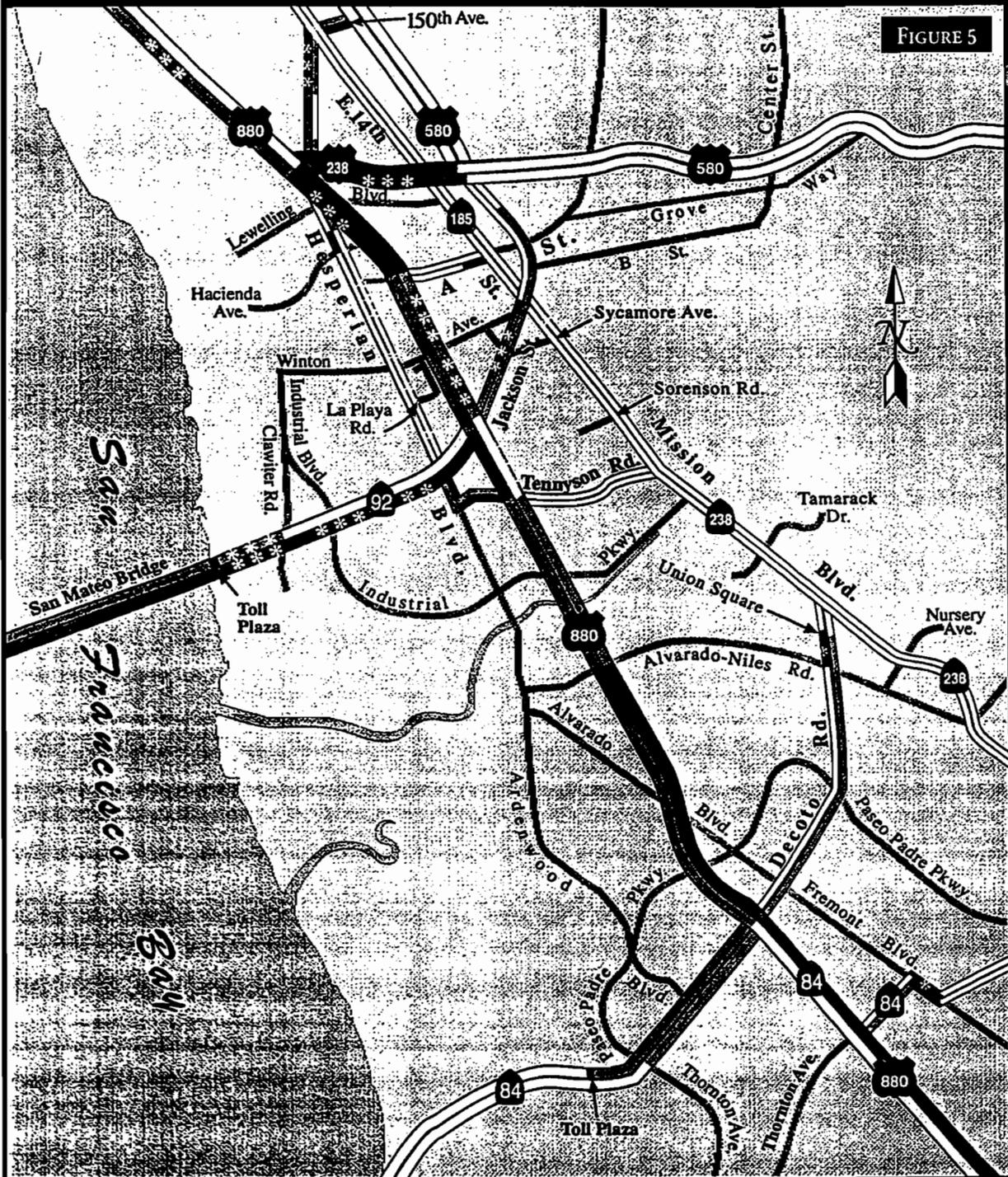
SCALE



ALAMEDA COUNTY LEVEL OF SERVICE STUDY RESULTS, 1997

PM PEAK HOUR - LOWER CENTRAL AREA

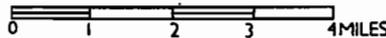
FIGURE 5



LEGEND

- | | | |
|-------------------------|------------------|--|
| LOS "A" or "B" Segments | LOS "E" Segments | This segment was previously identified as Level of Service "F" in 1991 when the CMP was first adopted. |
| LOS "C" Segments | LOS "F" Segments | |
| LOS "D" Segments | | |

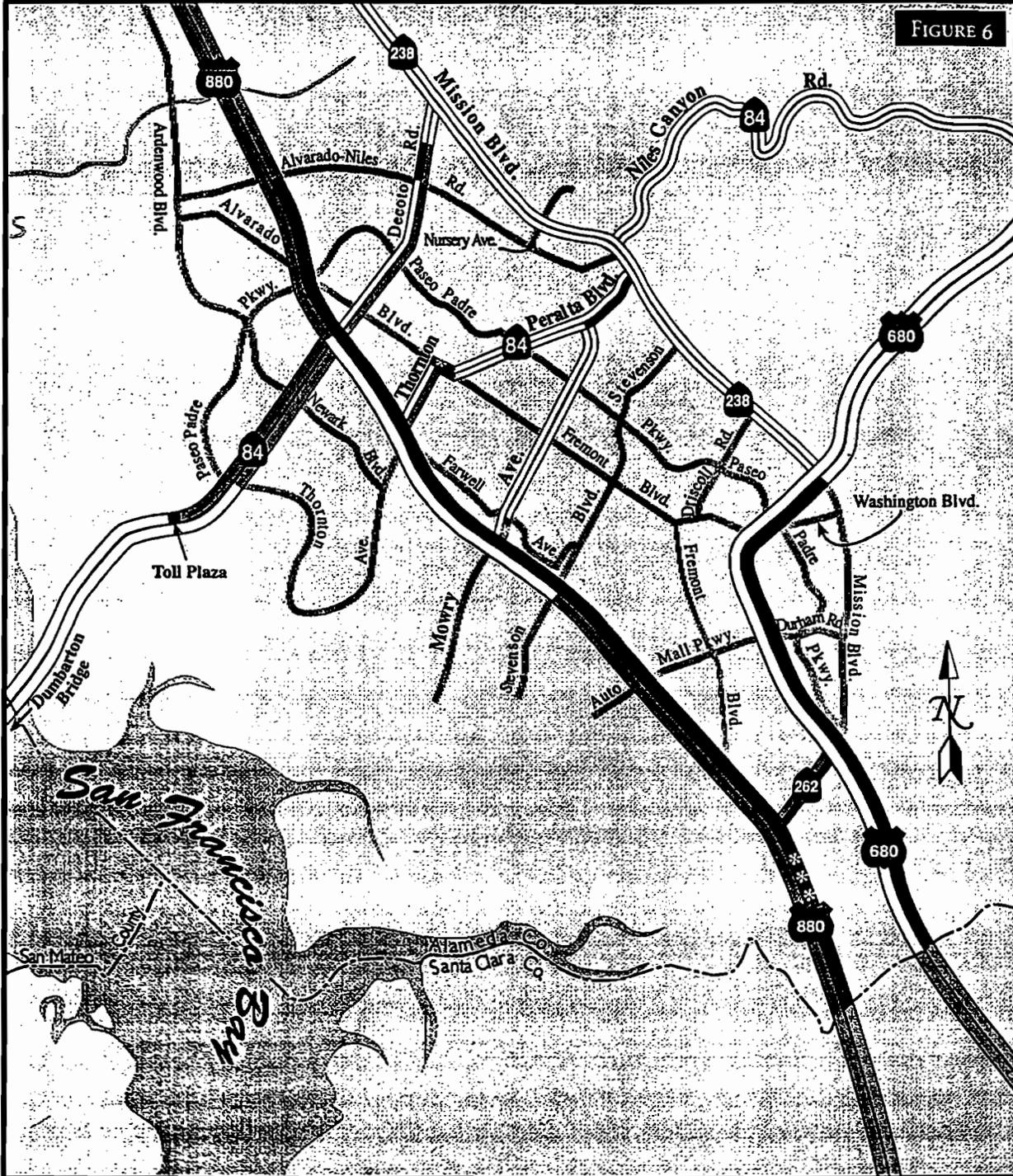
SCALE



ALAMEDA COUNTY LEVEL OF SERVICE STUDY RESULTS, 1997

PM PEAK HOUR - SOUTHERN AREA

FIGURE 6



LEGEND

- | | | |
|-------------------------|------------------|--|
| LOS "A" or "B" Segments | LOS "E" Segments | This segment was previously identified as Level of Service "F" in 1991 when the CMP was first adopted. |
| LOS "C" Segments | LOS "F" Segments | |
| LOS "D" Segments | | |

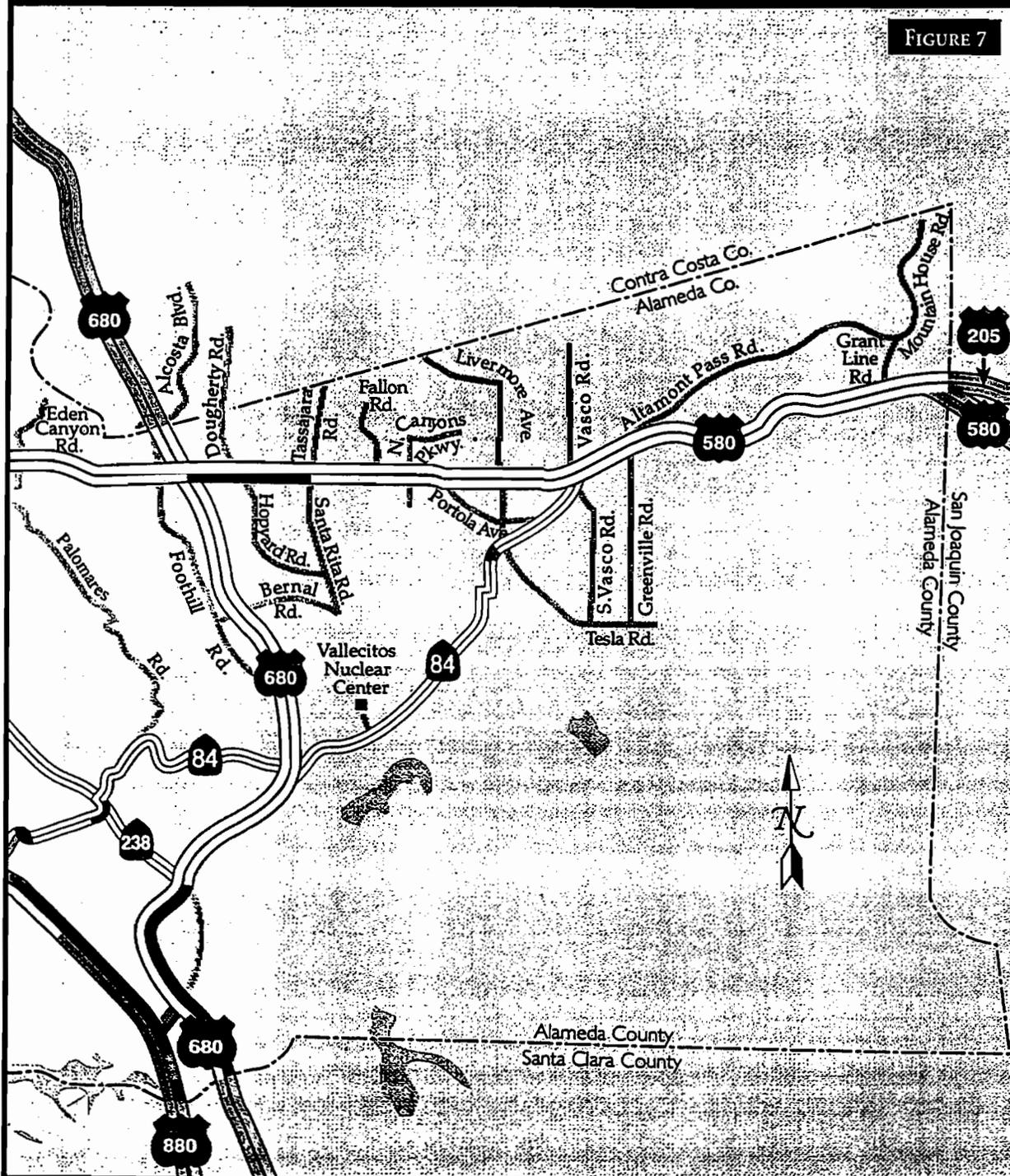
SCALE



ALAMEDA COUNTY LEVEL OF SERVICE STUDY RESULTS, 1997

PM PEAK HOUR - EASTERN AREA

FIGURE 7



LEGEND

- | | | | | | |
|---|-------------------------|---|------------------|--|--|
|  | LOS "A" or "B" Segments |  | LOS "E" Segments |  | This segment was previously identified as Level of Service "F" in 1991 when the CMP was first adopted. |
|  | LOS "C" Segments |  | LOS "F" Segments | | |
|  | LOS "D" Segments | | | | |

SCALE

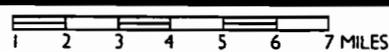


Table 4
Segments with Significant Changes in PM Peak Hour Operating Characteristics

<u>CMP Route</u>	<u>Segment</u>	<u>Change in Speed Data</u>	<u>Comments</u>
I-80 WB	From I-580 Split to SF County Line (3.20 mi)	Overall speeds have been reduced from 37 to 27 mph.	Construction activities and increased volume.
I-80 EB	From County Line to Toll Plaza	Speeds decreased from 45 to 35 mph.	Increasing backup from I-580 area.
I-880 SB	I-980 to SR 238	Speeds reduced from 48 to 40 mph.	Construction and increasing volume.
I-880 NB	From 262/Mission to A Street	Overall speeds have increased from 30 to 36 mph.	Some construction activities have been completed.
Hegenberger Rd.	E14th to Baldwin in both directions	Speeds have decreased from 33 to 16 mph.	
Hesperian SB	Grant to Hacienda	Speeds have decreased from 28 to 15 mph.	
University EB and WB	From ML King to Shattuck in both directions	Overall speed reduced from 16 mph to 11 mph.	
Ashby Ave EB	From San Pablo to Telegraph	Speed increased from 15 mph to 23 mph.	

The results on Table 5 portray an interesting mixture of results. In the vicinity of the Bay Bridge, the traffic conditions appear to be worsening in the southbound direction towards the toll plaza, while improving in the eastbound direction. In other areas of the County, the results are more stable. On I-880, the northbound travel time is somewhat better than last year, but is still much slower than the travel times measured in 1991 to 1995. In the southbound direction, the opposite appears to be the case. Travel time increased in comparison to 1996, but is still better than it was in 1992 to 1994. On SH 24, to and from the Caldecott Tunnel, the results are very consistent during the four years of the study; then they increased substantially in 1996, then decreased in 1997 back to previous levels.

Table 6 shows the results of the travel time for selected segments on the arterial system in Alameda County. These results have also been aggregated to show the entire lengths of these routes, to determine if there any patterns in the data that would suggest trends in traffic performance.

Table 5
Comparison of PM Peak Hour Travel Time Data on Freeway Routes
Alameda County CMP System (1991-1997)
Travel Time in Minutes/Seconds

CMP Route	From	To	Length (miles)	1991	1992	1993	1994	1995	1996	1997
I-80 NB	Tollgate	Central	6.35	15:56	18:24	18:12	17:19	18:32	18:23	16:37
I-80 SB	Central	Tollgate	6.11	14:27	15:26	16:31	15:41	12:52	14:53	17:37
I-580EB	SR 238/ Foothill	I-205	30.33	32:55	33:40	33:24	33:37	33:05	33:04	N/A
I-580 WB	I-205	SR 238/ Foothill	30.11	32:10	33:05	33:14	32:07	32:48	29:30	N/A
I-580 SB	I-80	I-238	16.18	18:18	18:35	19:37	21:53	20:08	18:13	23:09
I-580 NB	I-238	I-80	15.28	16:11	16:50	16:48	18:20	18:18	15:36	17:26
I-680 NB	Scott Creek Rd.	Alcosta (On)	21.13	21:59	22:31	23:07	22:31	23:01	24:16	25:59
I-680 SB	Alcosta (On)	Scott Creek Rd.	21.27	21:45	22:05	22:36	23:23	22:48	21:04	22:49
I-880 NB	Dixon Landing	I-980	31.42	40:49	41:15	39:00	42:37	42:59	50:26	47:05
I-880 SB	I-980	Dixon Landing	30.93	41:55	44:41	43:17	47:36	41:55	40:31	42:45
SR 13 NB	Mountain	Hiller	5.42	6:12	6:40	7:09	6:51	6:45	6:45	8:00
SR 13 SB	Hiller	Mountain	5.43	6:04	5:46	6:02	6:31	6:48	6:55	5:45
SR 24 EB	I-580 (On)	Fish Ranch Rd.	4.52	9:19	9:35	9:14	9:25	9:34	11:10	9:21
SR 24WB	Fish Ranch Rd.	I-580 (Off)	4.47	5:00	4:58	5:07	5:01	4:41	5:24	5:33

The overall travel times on Alameda County freeways show mixed results during the PM peak. On seven of the routes there is a worsening of travel times. I-80 SB, I-580 SB, and SR 13 NB show particularly notable changes in travel times, although all segments still continue to operate at acceptable levels. On four routes, the travel times have improved in comparison to the 1996 surveys. SR 13 SB showed a significant decrease in travel time, perhaps as a result of some completed construction in the vicinity of SR 24.

In addition to the above, the data has also been compared in terms of the changes in average travel speed. Table 7 shows the comparison in speeds on the freeway system for each of the studies since 1991. Table 8 shows this data for the arterial network.

Table 6
Comparison of PM Peak Hour Travel Time Data on Arterial
Routes of the Alameda County CMP System (1991-1997)
Travel Time in Minutes/Seconds

CMP Route	From	To	Length (Miles)	1991	1992	1993	1994	1995	1996	1997
Hesperian - NB	Tennyson	14th St.	5.62	19:35	19:19	19:07	18:40	18:04	16:06	18:32
Hesperian - SB	14th St.	Tennyson	5.60	17:20	16:05	16:03	17:38	16:56	16:10	18:40
SR 13-Ashby -EB	I-80	Hillier	3.75	15:17	13:19	12:00	13:40	14:29	13:40	13:03
SR 13-Ashby-WB	Hillier	I-80	3.78	14:13	13:09	16:47	13:49	15:25	15:09	13:35
SR 61 - SB	Atlantic	Davis	7.56	18:40	18:07	23:06	18:30	18:32	19:36	19:09
SR 61 - NB	Davis	Atlantic	7.93	19:32	18:38	21:07	18:41	18:31	18:78	19:34
SR 84 -WB (Fre)	SR-238	I-880 SB	4.29	10:07	8:27	10:30	10:56	13:49	10:27	10:41
SR 84 - EB (Fre)	I-880 SB	SR-238	4.29	11:21	10:24	11:50	11:45	13:08	11:38	13:48
SR 84 - SB (Liv)	I-580 WB	Concannon	5.04	9:20	10:36	10:59	9:27	11:18	11:03	9:52
SR 84 - EB (Liv)	Concannon	I-580 WB	5.04	11:32	10:32	9:35	10:23	8:02	10:46	10:23
SR 123 - SB	Carlson	35th St.	5.44	16:26	16:32	15:19	14:22	17:15	18:09	18:08
SR 123 - NB	35th St.	Carlson	5.45	16:56	15:32	17:30	18:12	15:30	17:42	18:23
SR 185 - SB	42nd St.	SR 92/238	10.47	42:55	28:47	34:34	N/A	33:36	30:31	30:47
SR 185 - NB	SR 92/238	42nd St.	10.47	38:34	28:54	32:14	N/A	30:37	28:40	30:09
SR 238 - NB (Mission)	I-680 NB	Jackson	12.35	24:05	N/A	26:24	27:30	24:36	27:10	28:06
SR 238 - SB (Mission)	Jackson	I-680 NB	12.35	24:28	N/A	31:09	28:15	28:15	26:45	24:45
MLK / Shattuck Ave - NB	Rt 24	University	2.05	7:02	6:43	6:09	6:07	10:30	12:01	10:59
MLK / Shattuck Ave - SB	University	Rt 24	2.76	10:07	9:12	9:06	9:59	10:55	10:26	10:21
University Ave - EB	I-80 Off	Shattuck Pl	2.05	7:02	6:43	6:09	6:07	5:50	7:07	7:27
University Ave - WB	Shattuck Pl	I-80 Off	2.05	6:38	6:30	7:47	7:07	6:04	7:27	8:44
Decoto - WB	Hwy 238	County Line	8.97	11:46	12:43	12:45	13:56	14:03	16:30	15:45
Decoto - EB	County Line	Hwy 238	8.94	12:41	14:01	13:53	14:40	16:31	17:89	16:28
SR 84 -EB (Liv)	SR 238	Concannon	15.35	N/A	N/A	N/A	25:20	24:27	25:17	N/A
SR 84 - WB (Liv)	Concannon	SR 238	15.01	N/A	N/A	N/A	20:37	20:43	25:58	N/A

N/A - Data not available. Some LOS A and B segments were not measured.

Table 7
Comparison of PM Peak Hour Speed Data on Freeway
Routes Alameda County CMP System (1991-1997)
Average Speed In Miles per Hour

CMP Route	From	To	Length (miles)	1991	1992	1993	1994	1995	1996	1997
I-80 NB	Tollgate	Central	6.35	23.5	20.4	20.6	21.7	20.2	20.8	20.8
I-80 SB	Central	Tollgate	6.11	25.3	23.7	22.1	23.3	28.4	24.6	24.9
I-580 EB	SR 238/ Foothill	I-205	30.33	56.3	55.0	55.4	55.1	49.9	55.0	N/A
I-580 WB	I-205	SR 238/ Foothill	30.10	57.2	55.6	55.4	57.3	56.1	61.3	N/A
I-580 SB	I-80	I-238	16.18	52.6	51.8	49.1	44.0	47.8	53.2	41.9
I-580 NB	I-238	I-80	15.79	57.7	55.5	55.6	51.0	50.1	52.2	54.3
I-680 NB	Scott Creek Rd.	Alcosta (On)	21.14	58.1	56.7	55.2	56.7	55.4	52.2	48.8
I-680 SB	Alcosta (On)	Scott Creek Rd.	21.27	59.0	58.1	56.8	54.9	56.3	60.6	55.9
I-880 NB	Dixon Landing	I-980	31.41	44.8	44.4	46.9	42.9	42.6	45.5	40.0
I-880 SB	I-980	Dixon Landing	30.95	43.0	40.4	41.7	37.9	43.0	45.8	43.4
SR 13 NB	Mountain	Hiller	5.81	53.6	49.9	46.5	48.5	51.3	48.1	43.6
SR 13 SB	Hiller	Mountain	5.45	56.4	59.4	56.7	52.5	48.5	47.2	56.9
SR 24 EB	I-580 (On)	Fish Ranch Rd.	4.52	30.1	29.2	30.3	29.8	29.3	24.3	29.5
SR 24WB	Fish Ranch Rd.	I-580 (Off)	4.47	54.4	54.7	53.1	54.2	58.0	49.7	48.3

Table 8
Comparison of Speed Data on Arterial Routes
on the Alameda County CMP System (1991-1997)
Average Speed In Miles per Hour

CMP Route	From	To	Length (Miles)	1991	1992	1993	1994	1995	1996	1997
Hesperian - NB	Tennyson	14th St.	5.62	17.2	17.5	17.6	18.1	18.7	20.5	18.2
Hesperian - SB	14th St.	Tennyson	5.60	19.4	20.9	20.9	19.1	19.8	20.7	18.0
SR 13-Ashby -EB	I-80	Hillier	3.77	14.7	16.9	18.8	16.5	15.5	16.5	17.3
SR 13-Ashby-WB	Hillier	I-80	3.80	16.0	17.2	13.5	16.4	14.7	15.0	16.8
SR 61 - SB	Atlantic	Davis	7.57	24.9	25.0	19.6	24.5	24.5	23.1	23.7
SR 61 - NB	Davis	Atlantic	7.57	24.3	25.5	22.5	25.5	25.7	24.1	23.2
SR 84 -WB (Fre)	SR-238	I-880 SB	4.29	25.0	30.5	24.5	23.5	18.6	24.6	24.1
SR 84 - EB (Fre)	I-880 SB	SR-238	4.29	24.3	24.8	21.8	21.9	19.6	22.1	18.7
SR 84 - SB (Liv)	I-580 WB	Concannon	4.14	32.4	28.5	27.5	32.0	26.8	27.4	25.2
SR 84 - EB (Liv)	Concannon	I-580 WB	4.11	26.2	28.7	31.6	29.1	37.6	28.1	23.7
SR 123 - SB	Carlson	35th St.	5.44	19.0	19.7	21.3	22.7	18.9	18.0	18.0
SR 123 - NB	35th St.	Carlson	5.45	20.1	21.1	18.7	18.0	21.1	18.5	17.8
SR 185 - SB	42nd St.	SR 92/238	10.47	14.1	21.8	18.2	N/A	18.7	20.6	20.4
SR 185 - NB	SR 92/238	42nd St.	10.47	18.6	21.7	19.5	N/A	20.5	21.8	20.5
SR 238 - NB (Mission)	I-680 NB	Jackson	12.34	30.7	N/A	28.0	26.9	30.1	27.3	26.4
SR 238 - SB (Mission)	Jackson	I-680 NB	12.34	30.3	N/A	23.8	26.2	26.2	27.7	30.0
Shattuck Ave - NB	Rt 24	University	2.78	17.5	18.3	20.0	20.1	11.7	13.7	15.2
Shattuck Ave - SB	University	Rt 24	2.76	16.4	18.0	18.2	16.6	15.2	15.7	16.0
University Ave - EB	I-80 Off	Shattuck Pl	2.05	17.5	18.3	20.0	20.1	21.1	17.2	16.5
University Ave - WB	Shattuck Pl	I-80 Off	2.05	18.5	18.9	15.8	17.3	20.3	16.5	14.1
Decoto - WB	Hwy 238	County Line	8.97	45.7	42.3	42.2	38.6	38.3	32.6	34.2
Decoto - EB	County Line	Hwy 238	8.94	42.3	28.3	38.6	36.6	32.5	30.0	30.5
SR 84 -EB (Liv)	SR 238	Concannon	15.35	N/A	N/A	N/A	36.4	37.7	34.3	N/A
SR 84 - WB (Liv)	Concannon	SR 238	15.01	N/A	N/A	N/A	43.7	43.5	41.4	N/A

N/A - Data not available. Some LOS A segments were not measured.

6.) AM Peak Hour Study Results

The AM peak period was once again surveyed in 1997. This data was first collected in 1994, and again in 1996. The AM peak data was collected only for selected segments that were considered to be the most critical freeway segments during the morning commute peak hours. The study methodology was the same as for the PM studies. Approximately 58 miles of the CMP network, comprising 22 distinct segments, were studied to determine the AM Peak Level of Service. For the 1997 surveys, I-80 from Albany to the Bay Bridge, was added to the study for the first time, and studies of I-580 were dropped in the AM peak period. I-580 was not studied because it was judged to be operating at LOS "A" and "B".

The results of these studies are not used to determine CMP conformity findings, but only to provide supplemental information for use by the CMA, and for use in the Countywide traffic model. The results of these surveys are shown in Figure 8 and are included in the Appendix on page A-11.

There are eight segments (out of 22 studied) that were found to be at LOS "F" during the AM Peak surveys. These are listed on Table 9 and shown in Figure 8. Four of these segments were previously identified as Level of Service "F" in 1996, and four are segments on I-80 WB, which was measured for the first time in 1997. I-80 has perhaps the worst congestion in the study area. The 8.2 mile trip from Albany to the Bay Bridge/County Line averaged about 35 minutes, which equates to a delay of about 25 minutes for each vehicle. During the 1997 surveys, the entire route was under construction, and this undoubtedly contributed to the delay and congestion.

Two segments on I-880 SB are shown to be operating at LOS "F" in 1997. I-238 WB between I-580 and I-880 was also measured to be LOS "F." On I-680 SB, the traffic congestion continues to be very severe in the AM peak period, although slightly less than in the 1996 surveys. With an average speed of 18.6 mph, this segment has about 15 minutes of delay for each vehicle in the AM peak.

**1997 ALAMEDA COUNTY DESIGNATED ROADWAY SYSTEM
AM PEAK HOUR LEVEL OF SERVICE STUDY RESULTS, 1997**

LOS "A" or "B" Segments
 LOS "C" Segments
 LOS "D" Segments
 LOS "E" Segments
 LOS "F" Segments
 This segment was previously identified as Level of Service "F" in 1991 when the CMP was first adopted.

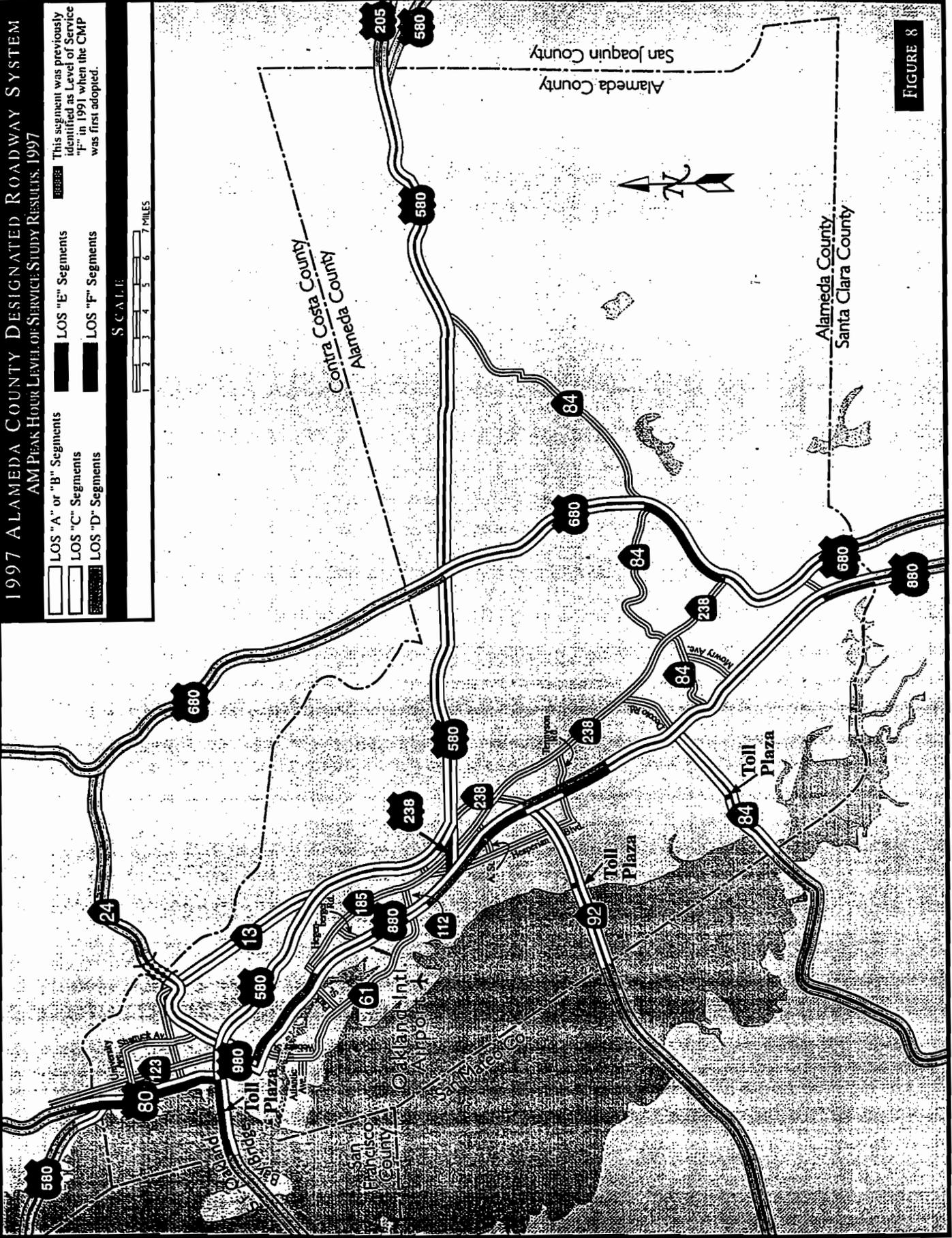


FIGURE 8

Table 9
AM Peak Hour Level of Service "F" Segments

CMP Route	From:	To:	Jurisdiction	1997 Speed and LOS	1996 Speed and LOS
I-880 SB	A St	Rt 92/Jackson	Hayward	29.3/F	25.1/F
I-238 WB	I-580 WB	I-880 NB/SB Split	Unincorporated	20.5/F	22.1/F
I-880 SB	Rte 262/Mission	Dixon Landing	Fremont	13.5/F	16.8/F
I-680 SB	Rt 84 (Niles Cnyn)	Rt 238 (Mission)	Unincorporated	18.6/F	10/8/F
I-80 WB	Central	University	Alb/Berk	13.9/F	N/A
I-80 WB	University	I-80/I-580 Split	Alb/Berk	12.1/F	N/A
I-80 WB	I-80/I-580 Split	Toll Gate	Oakland	10.0/F	N/A
I-80 WB	Toll Gate	SF County Line	Oakland	16.9/F	N/A

N/A - Not measured in 1996

I-880 SB in the Fremont area showed worsening traffic conditions in the 1997 study. The average speed of 13.5 mph in this area results in about 10 minutes of delay for each vehicle during the AM peak period.

7.) Travel Time Studies of O-D Pairs

For the second year, the LOS monitoring surveys included travel times studies between selected origin and destination points for both auto and transit trips. The purpose of these studies is to evaluate the comparative performance of various transportation modes for the Annual Performance Report required by the CMP. These paired tests, which were run simultaneously in the same corridor, provide insight into journey-to-work travel times between major employment centers and residential areas in Alameda County.

Five origin-destination (O-D) pairs have been selected by the CMA Board and by ACTAC to simulate typical evening commute trips on the County's major travel corridors. These O-D pairs and the specific routes that were followed are listed in Table 10. Both auto and transit trips were conducted for each of the five O-D Pairs. In addition, bicycle travel was recorded for O-D Pair #2, between Emeryville and Berkeley.

Table 10
Travel Routes for the Alameda County O-D Pairs - PM Peak Hour

#	Origin	Destination	Transit/Bus Route	Highway Travel
1	Kaiser Med. Ctr, 27400 Hesperian Hayward	Lafayette St at Newark Blvd. Newark	Walk to Hesperian, then AC Rte 97 to AC Rte 29, (transfer at UC BART station), to local area, then walk.	From parking, Hesperian Blvd to Union City Boulevard to Newark Blvd.
2	Chiron Office Bldg., 4560 Horton St., at 53rd & Hollis Sts.. Emeryville	Marin Circle at Los Angeles Ave Berkeley	Walk to 53rd and San Pablo, AC 72 to AC 43 (Solano Way), exit at Marin Circle, walk	From parking to 53rd St to San Pablo Avenue, to Hopkins Street to Marin Circle.
3	Cal State University at Carlos Bee Ave. Hayward	Portola and North Livermore Avenue in Livermore	Walk to bus, AC Rte 92 to Hayward BART, BART to Dub-Pleas Station, Wheels Route 12X to Portola & N. Murietta, walk to Portola and North Livermore Ave.	From parking, to Carlos Bee, to Mission Blvd, to "A"/Redwood, to I-580, to Portola exit, to N Livermore Ave.
4	Downtown Oakland 1333 Broadway Oakland	Manor St. and Chapel Ave. San Leandro	Walk to 12th St Station, BART to San Leandro, AC Rte 84, walk.	From parking to local streets to I-880, to Marina Blvd, then to Chapel Avenue.
5	NUMMI Plant 45500 Fremont Blvd. Fremont	Valley Ave. and Greenwood Rd. Pleasanton	Walk to AC Rte 22 to Fremont BART, BART to Dub/Pleas Station, Wheels Route 8 to Greenwood Road and Valley Avenue.	From parking to Fremont Blvd to Durham Road to I-680 to Sunol Blvd to Greenwood Rd.

Two surveyors, one driving an auto and one taking transit, traversed between the designated origin and destination points, documenting their travel times and identifying any anomalies which they encountered during the course of their trip (i.e., traffic accidents). Transit trips were taken either on buses (AC Transit, BART Express, Wheels), rapid transit (BART), or a combination of these modes. The bicycle trip was taken on local streets in Emeryville and Berkeley. Data was collected during the PM peak period (4 - 6 PM), Tuesday through Thursday during the period from May 6th through May 22nd. Table 11 shows the travel times and number of runs for each travel mode including auto, transit and bicycle.

Table 11
O/D Pairs PM Peak Hour Travel Times -- Auto/Transit/Bike

Comparative Travel Times for O-D Pairs (time in minutes)							
Auto Travel				Transit Travel			
No of Runs	Range of Times	Percent Range	Average Time	No. of Runs	Range of Times	Percent Range	Average Time
<i>Pair #1 - Kaiser, Hayward to Lafayette at Newark Blvd. in Newark - Length = 11.2 miles</i>							
6	18-22	20%	19.8	3	73-85	14%	80.3
<i>Pair #2 - Chiron, Emeryville to Los Angeles Ave. at Marin Circle, Berkeley - Length = 4.8 miles</i>							
6	21-30	33%	25.3	3	48-58	16%	54.1
(Bike)	(Bike)	(Bike)	(Bike)				
4	26-33	21%	29.6				
<i>Pair #3 - CSU/Hayward to N. Livermore Ave. Livermore - Length = 34.5 miles</i>							
6	47-57	19%	50.9	3	89-110	19%	101.7
<i>Pair #4 - Downtown Oakland (1333 Broadway) to Chapel Avenue in San Leandro - Length = 10.8 miles</i>							
6	28-43	38%	33.5	3	44-51	14%	48.2
<i>Pair #5 - Nummi Plant (Fremont) to Greenwood Road in Pleasanton; Length = 18.0 miles</i>							
6	32-42	26%	38.2	3	98-112	13%	105.2

Methodology - Selected travel time data were recorded for each trip. In addition to actual driving time, walk times at the start and end of the trip were noted. For transit trips, each segment of the trip was documented, including the walking time to and from the transit stop; the transfer waiting time; and the on-board vehicle travel time. No more than half of a route's scheduled headway was used as the initial waiting time, while the actual waiting time was used for all other trip transfers. Trip start and end times were recorded for both auto and transit trips.

Bicycle Surveys - The Emeryville-Berkeley O-D pair was also surveyed by bicycle. Two travel time studies were conducted on this route. This data was also collected between 4 and 6 PM, on days with good weather, and no incidents or accidents affecting traffic flow. These times do not include parking the bicycle, walking to the final destination, or changing clothes at the work site.

Table 12 shows a comparison between the 1996 and 1997 survey results for each of the five O/D pairs. The auto travel times are reasonably consistent between 1996 and 1997. The transit travel time increased significantly for O/D pair #1 due to extratime required to transfer between buses. The transit travel time decreased significantly for O/D pair #3 due to the opening of the Dublin/Pleasanton BART extension.

Table 12
Comparison of O/D Results (1996 and 1997)

O-D Pair	1996 Travel Time Results Time (minutes)	1997 Travel Time Results Time (minutes)
Pair #1 - Kaiser, Hayward to Newark Length = 11.2 miles	Auto - 19.2 Transit - 68.0	Auto - 19.8 Transit - 80.3
Pair #2 - Chiron, Emeryville to Marin Circle, Berkeley Length = 4.8 miles	Auto - 22.8 Transit - 48.2 Bicycle - 34.3	Auto - 25.2 Transit - 54.1 Bicycle - 29.6
Pair #3 - CSU/Hayward to Livermore Length = 34.5 miles	Auto - 54.0 Transit - 142.0	Auto - 50.9 Transit - 101.7
Pair #4 - Downtown Oakland to San Leandro Length = 10.8 miles	Auto - 37.5 Transit - 46.0	Auto - 33.5 Transit - 48.2
Pair #5 - Nummi Plant (Fremont) to Pleasanton Length = 18.0 miles	Auto - 34.3 Transit - 115.0	Auto - 38.2 Transit - 105.2

The findings for each O-D Pair survey are discussed in the following sections.

1.) From Kaiser Hospital in Hayward to Newark. Auto travel times averaged about 20 minutes, giving a significant advantage over bus transit. On transit, the trip for the same O-D Pair took an average of 80 minutes. This trip involves transfers from bus and BART and then back to bus. A significant amount of time is lost at these transfers. In such cases, when more than one transit transfer is necessary, the transit trip becomes very difficult.

2.) From Chiron (Emeryville) to Berkeley. Auto travel times had an average travel time of approximately 25 minutes. Transit trips were completed within a range of 48-58 minutes, with an average transit travel time of approximately 54 minutes. In addition, three bicycle commute trips revealed travel times ranging between 26-33 minutes, with an average of 30 minutes. For this O-D combination, which is about 3 to 4 miles in length, the bicycle is quite competitive with the auto. The transit trip lost time at the transfer point.

3.) From CSU-Hayward to Livermore. Both auto and transit trips were completed between the Health Sciences Building at California State University (CSU) Hayward and N. Livermore Ave. in Livermore. Door to door travel times for the auto trips averaged about 51 minutes. For the transit trip, the opening of the BART station in Dublin/Pleasanton provided a new option. The transit trips

averaged one hour, forty minutes, with a range of from 89 to 110 minutes. This was an improvement of about 40 minutes in comparison to last year's transit trip before the BART extension was completed.

4.) From Downtown Oakland to San Leandro. Travel times for the auto trips between 1333 Broadway in downtown Oakland and Chapel Ave. in San Leandro ranged from 28 to 43 minutes. Transit trips were completed with the line haul segment on BART, with one transfer to bus. This transfer operated especially conveniently. Transit trip times ranged from 44 to 51 minutes, which is very competitive with auto.

5.) From NUMMI Plant (Fremont) to Pleasanton. Travel times for the auto trips averaged approximately 38 minutes via I-680. On transit, this trip now involved a bus to Hayward BART, then BART to Pleasanton, and finally a local bus within Pleasanton. The total trip by transit took one hour, forty-five minutes, with a range of from 98 to 112 minutes. This is about ten minutes faster than last year's trip prior to the opening of the BART extension to Pleasanton. The distance traveled in making the transit trip was more than 50 percent greater than the distance by auto.

Supplemental Studies. In order to supplement the O-D survey work, CMA and ACTAC staff members volunteered to collect O-D data representing their typical commutes from home to work during both the AM and PM peak hours. The attached Appendix Table on Page A-12 documents the data collected.

Recommendations for future studies. It is recommended that this data collection effort be revised to include some more typical O-D pairs. In future studies, it is also suggested that some adjustments to the data collection techniques be made. We would recommend the following:

- Perform the runs in both the inbound (AM), and outbound (PM) directions. Limit the number of auto travel time runs to three, and the number of transit runs to two in each direction. This will give representative data on a more cost-effective basis, and should not affect the statistical significance. Additional runs do not appear to add to the accuracy of the data collection.

- Choose some different O-D pairs with no more than one transfer between transit modes. When there is more than one transfer, and the bus schedules are not timed appropriately, the total transit trip becomes unrealistic. For example, the trip from NUMMI to Pleasanton would not be a practical alternative to the private auto. Some other destination should be selected.

- Choose at least one O-D pair where only one transit mode was necessary, and no transfers would be involved. One might be from Fremont to Berkeley via BART. Another could be a trip using AC Transit between Alameda and Oakland. These would likely be more competitive with auto trips.

1997 Level of Service Results
Freeway Segments - PM Peak

CMP Route	Segment Limits		Jurisdiction	Plan Area (miles)	Length (miles)	No of Lanes	1994 ADT	1997 LOS Results		1996 Results	Prior LOS "F"				
	From:	To:						Speed	LOS		91	92	93	94	95
I-80 - EB	SF County Line	Toll Gate Outlet	Oak	1	2.06	10	250,000	35.2	E	44.8/D					
I-80 - EB	Toll Gate Outlet	I-580 SB Merge	Oak	1	1.15	10	250,000	20.4	(F)	17.0/F					
I-80 - EB	I-580/80 Merge	University	Emery - Berk	1	2.80	10	239,000	24.0	(F)	30.8/E					
I-80 - EB	University	Central	Berk - Alb	1	2.40	10	232,000	29.4	(F)	23.6/F					
I-80 - WB	Central	University	Alb - Berk	1	2.48	10	232,000	30.3	E	34.7/E					
I-80 - WB	University	I-580 Split	Berk - Emery	1	2.43	10	239,000	14.7	(F)	17.0/F					
I-80 - WB	I-580 Split	Toll Plaza	Oak	1	1.20	10	250,000	25.7	(F)	35.6/E					
I-80 - WB	Toll Plaza	SF County	Oak	1	2.00	10	250,000	32.1	E	39.7/E					
I-238 - EB	I-880	I-580	Uninc-San L	2	2.28	6	135,000	28.0	(F)	22.8/F					
I-238 - WB	I-580	I-880	Uninc-San L	2	1.60	6	135,000	23.7	(F)	40.9/E					
I-580 - EB	I-238/Phl Off	Grove	Unincorp	2	2.88	8	127,000	51.8	C	52.4/C					
I-580 - EB	Grove	I-680	Uninc - Plea	4	7.74	8	135,000	59.2	B	60.7/A					
I-580 - EB	I-680	Santa Rita	Plea	4	2.73	8	140,000	34.8	E	33.3/E					
I-580 - EB	Santa Rita	Portola	Unincorp	4	4.47	8	122,000	53.5	C	51.3/C					
I-580 - EB	Portola	SH 84/1st	Liv	4	2.70	8	115,000	—	A	60.4/A					
I-580 - EB	SH 84/1st	I-205 (SJ Co) Off	Liv - Uninc	4	9.91	8	97,000	—	A	61.0/A					
I-580 - WB	I-205 (SJ Co)	SH 84/1st St	Uninc - Liv	4	10.00	8	97,000	—	A	63.4/A					
I-580 - WB	SH 84/1st St	Portola Ave	Liv	4	2.52	8	115,000	—	A	61.3/A					
I-580 - WB	Portola Ave	Tassajara Rd	Unincorp	4	4.71	8	122,000	58.0	B	64.6/A					
I-580 - WB	Tassajara Rd	I-680	Plea	4	2.87	8	140,000	56.3	B	62.4/A					
I-580 - WB	I-680	Center	Plea - Uninc	4	8.07	8	135,000	57.5	B	61.3/B					
I-580 - WB	Center	I-580/238	Unincorp	2	1.94	8	127,000	49.7	C	58.5/B					
I-580 - SB	I-80	Harrison	Oak	1	2.67	8	200,000	39.9	E	42.7/D					
I-580 - SB	Harrison	SH 13 Off	Oak	1	5.09	8	190,000	59.2	B	56.2/B					
I-580 - SB	SH 13 Off	MacArthur	Oak - SL	1	4.09	8	130,000	56.4	B	56.9/B					
I-580 - SB	MacArthur	I-580/238	SL - Hay	2	4.33	8	124,000	58.0	B	55.0/B					
I-580 - NB	I-238	Estudillo	Hay - SL	2	3.95	8	124,000	56.5	B	57.9/B					
I-580 - NB	Estudillo	SH 13 Off	SL - Oak	1	4.39	8	130,000	60.0	A	61.1/A					
I-580 - NB	SH 13 Off	Fruitvale	Oak	1	2.87	8	190,000	61.7	A	63.8/A					
I-580 - NB	Fruitvale	Harrison	Oak	1	2.22	8	195,000	51.7	C	51.5/C					
I-580 - NB	Harrison	SH 24 On-ramp	Oak	1	1.16	8	200,000	51.8	C	50.3/C					
I-580 - NB	SH-24 On-ramp	I-80/580 Split	Oak	1	0.69	8	250,000	34.0	E	42.0/D					

1997 Level of Service Results
AM Peak Travel Time Results

CMP Route	Segment Limits		Plan Area	Length (miles)	No of Lanes	1994 ADT	1997 LOS Results		1996 Results	Prior "F"
	From:	To:					Speed	LOS		
I-80 WB	Central (On)	University	Alb/Berk	1	2.48	8	239,000	13.9	(F)*	N/A
I-80 WB	University	I-80/I-580 Split	Alb/Berk	1	2.43	8	246,000	12.1	(F)*	N/A
I-80 WB	I-80/I-580 Split	Toll Gate	Oak	1	1.20	8	280,000	10.0	(F)*	N/A
I-80 WB	Toll Gate	SF County Line	Oak	1	2.00	8	280,000	16.9	(F)*	N/A
I-880 NB	High/42nd St	I-980 (Off)	Oak	1	3.70	8	161,000	47.4	D	43.9/D
I-880 SB	Marina	A St	Unin/Hay	2	4.44	8	191,000	40.1	D	44.0/D
I-880 SB	A St	RT 92/Jackson	Hay	2	1.81	8	210,000	29.3	(F)*	25.1/F
I-880 SB	RT 92/Jackson	Tennyson	Hay	2	0.96	8	166,000	54.1	C	50.7/C
I-880 SB	Tennyson	Alvarado-Niles Rd	Hay/Unin	2	2.59	8	160,000	31.0	E	51.6/C
I-880 NB	Alvarado-Niles Rd	Tennyson Rd	UC/Hay	2	2.65	8	160,000	47.7	D	33.6/E
I-880 NB	Tennyson Rd	SR 92/Jackson	Hay	2	1.14	8	166,000	47.0	D	42.5/D
I-880 NB	SR 92/Jackson	A St	Hay	2	1.52	8	210,000	51.1	C	52.0/C
I-880 NB	A St	Marina	Unin	2	4.48	8	191,000	55.8	B	49.8/C
I-238 WB	I-580 WB/SR 238 WB	I-880 NB/SB (Split)	Unin	2	1.70	6	135,000	20.5	(F)*	22.1/F
I-880 SB	RT 262/Mission	Dixon Landing (Off)	Fre	2	1.27	6	135,000	13.5	(F)*	16.8/F
I-680 SB	Alcosta	I-580	Dub	4	1.84	6	115,000	48.3	D	57.7/B
I-680 SB	I-580	Bernal Ave	Plea	4	3.30	6	92,000	58.3	B	61.3/A
I-680 SB	Bernal Ave	Rt 84 (Niles Canyon)	Unin	4	5.12	6	87,000	59.4	B	41.7/D
I-680 SB	Rt 84 (Niles Canyon)	Rt 238/Mission	Unin	3	4.60	6	108,000	18.6	(F)*	11.8/F
I-580 WB	Portola Ave	Tassajara Rd	Unin	4	4.70	8	122,000	44.6	A	65.5/A
I-580 WB	Tassajara Rd	I-680	Plea	4	2.87	8	140,000	53.3	B	58.9/B
I-580 WB	I-680	San Ramon (On)	Plea	4	0.69	8	135,000	44.1	B	59.9/B

1997 Level of Service Results
O-D Surveys by CMA/ACTAC

O-D Survey By CMA/ACTAC for the 1997 CMP LOS Monitoring

O-D Pair	AM Start	AM End	Net Time	PM Start	PM End	Net Time
1 Marneez-Downtown Oakland (N Concord to 12th St. Bart Station)	7:21	8:12	0:51	16:45	18:01	1:16
	7:20	8:15	0:55	16:49	18:44	1:55
Average Bart Travel Time	6:39	7:31	0:52	15:52	17:04	1:12
			0:52			1:27
2 Albany-Downtown Oakland (Garage to Garage)	6:44	7:09	0:25	17:33	17:52	0:19
	7:51	8:14	0:23	15:58	16:18	0:20
Average Auto Travel Time	6:44	7:04	0:20	15:45	16:03	0:18
	5:27	5:49	0:22			0:19
3 Richmond-Downtown Oakland (El Cerrito Del Norte-Lake Merritt)				18:19	19:21	1:02
				18:02	18:48	0:46
Average Bart Travel Time				18:00	18:50	0:50
				18:15	19:14	0:59
						0:54
Richmond-Downtown Oakland (El Cerrito Plaza-Lake Merritt)				20:28	21:14	0:46
Average Bart Travel Time				18:58	19:48	0:48
						0:47
4 San Leandro-Downtown Oakland (Bayfair-12th St.)	7:40	8:23	0:43	16:58	17:35	0:39
	7:40	8:40	1:00	16:58	17:55	0:59 Missed AM Train -
Average Bart Travel Time	7:40	8:23	0:43	16:56	17:35	0:39 - & PM Train Late
			0:48			0:45
Auto Travel Time(Door to Door)	8:02	8:25	0:23			
5 Orinda-Downtown Oakland	8:30	8:56	0:26	17:15	17:43	0:28
	8:29	8:53	0:24	17:10	17:39	0:29
Average Auto Travel Time			0:25	17:20	17:48	0:28
				17:33	17:59	0:28
				17:32	18:00	0:28
6 El Cerrito-Downtown Oakland (El Cerrito Plaza-12th St.)	8:25	8:54	0:29			0:27
	9:05	9:34	0:29			
Average Bart Travel Time			0:29			
El Cerrito to Downtown Oakland-Bicycle Trip	8:10	9:00	0:50			

City of Oakland, CA

LETTER G – ALAMEDA COUNTY CONGESTION MANAGEMENT AGENCY

1. The CMA is correct that the City used the Countywide Transportation Model for all analysis years, including years 2000 and 2010. The CMA is correct that the Year 2000 model scenario was used to estimate conditions in Oakland in 2005 and that the Year 2010 model scenario was used to estimate conditions in Oakland in 2015. In each case, the Draft EIR modified the land use assumptions in the model to reflect projected housing and employment conditions in those years.

In the “2005” scenario, the EIR assumed a certain increment of growth in each TAZ in Oakland based on the buildout of specific development projects (listed in the EIR) and the more general effects of land use and transportation policies on different parts of the City. For TAZs elsewhere in the region, the Year 2005 scenario averaged the CMA housing and employment figures for 2000 and 2010. The “2005” model run used the CMA’s Year 2000 transportation network. This tended to produce more conservative results because capital projects programmed for completion between 2000 and 2005 were not included.

In the “2015” scenario, the EIR assumed an additional increment of growth in each TAZ in Oakland for the 2005-2015 period. No additional specific development projects were added. For TAZs elsewhere in the region, the population and employment projections already in the CMA model for 2010 were retained. The model run used the CMA’s Year 2010 transportation network. Again, this tended to produce more conservative results because capital projects programmed for completion between 2010 and 2015 were not included.

The 2005 and 2015 housing and employment numbers for Oakland were derived by refining ABAG TAZ-level projections for each respective year. These refinements were based on land use assumptions that in some cases were different than those used by ABAG when developing their projections. Each of the 264 TAZs in Oakland was individually examined to determine whether the ABAG projections were reasonable (in light of known development projects in those TAZs and the likely effects of proposed land use policies).

In the hill areas, where most development would occur on vacant land, the accuracy of the ABAG projections was evaluated based on the supply of vacant land and known development projects. In some hill TAZs, ABAG showed a greater addition of housing units than was possible given the number of vacant lots left. The numbers were adjusted downward accordingly. In other cases, the ABAG numbers did not reflect recently proposed projects such as the planned housing at Oak Knoll. Units were added in these cases.

In the flatland areas, the accuracy of the ABAG projections was evaluated based on a number of factors, including the availability of vacant land, the designations of the proposed Land Use and Strategy Diagrams, and interpretation of proposed policies for that particular part of the City. For instance, there were some TAZs where ABAG showed a sizeable increase in housing despite the fact that there was little or no vacant land available. If the TAZ in

question was designated “Detached Unit Residential” on the Plan Map and was noted as a “Maintain and Enhance” area on the Strategy Map, the projections were reduced. In such cases, only vacant sites were presumed to have development potential. Conversely, projections were increased in those TAZs, which included frontage along corridors (where the Plan encourages redevelopment and more intense uses). In most cases, the adjustments were relatively small. More substantial adjustments were made Downtown and along the Estuary, based on specific projects and recommended policies and objectives for these areas contained in the draft Land Use and Transportation Element and the draft Estuary Plan.

A similar process was followed for employment. The Year 2015 figures for each TAZ were examined to determine where adjustments up or down needed to be made. Based on proposed policies, existing manufacturing and wholesaling jobs were generally eliminated from TAZs which were designated for exclusively residential uses; retail and service projections were generally decreased for TAZs which did not include transportation corridor frontage and increased for TAZs which did include corridor frontage; little or not increase in employment was assumed in areas noted a “Maintain and Enhance” on the Strategy Diagram; and substantial increases in employment were assumed in areas noted as “Reuse and Intensify.” Employment also was increased in areas where specific projects were proposed, particularly the Downtown and Coliseum Showcase Districts.

2. The City acknowledges the need for clarification of the roadway and transit network modifications for the 2005 and 2015 analyses. Please see Chapter II for changes to page II.B-9 of the Draft EIR.
3. The City acknowledges the correct name of the traffic model used in the analysis for the Draft EIR. Please see Chapter II for changes to Section III.B of the Draft EIR.
4. The purpose of the Transportation and Circulation impact analysis in the Draft EIR is to analyze the potential traffic and circulation impacts of the draft Land Use and Transportation Element over the 20 year life of the Element. In preparation for this analysis, a number of roadways were chosen for analysis. This selection of roadways included all of the State Highways and all of the arterials that could reasonably be expected to be potentially impacted by the adoption and implementation of the Land Use and Transportation Element. This determination was based upon the intent of the Plan to affect change in certain clearly identified areas of the City. The Element clearly establishes and illustrates (see Strategy Diagram, page 114 of Element) which areas of the City will experience change, (reuse, intensification, and transition) and which areas of the City will be “maintained and enhanced” at current land uses and densities. Finally, although every route chosen by the Alameda County Congestion Management Agency for inclusion in the Countywide Congestion Management Program (a different purpose than the draft EIR) was not deemed necessary for the EIR analysis, it was deemed necessary to include some additional roadways that are not included in the MTS. Therefore the selection of roadways in the draft EIR is adequate to evaluate the potential traffic and circulation impacts of the Element.

5. The City acknowledges the receipt of the 1997 LOS Monitoring Study. The analysis contained in the Draft EIR is based on the most recent information available at the time. The 1997 LOS Monitoring Study was not available at the time that the analysis was completed. Therefore the analysis completed in the EIR is the best possible given the circumstances. Any subsequent environmental documentation on projects in Oakland would be required to use the information contained in the 1997 LOS Monitoring Study.
6. The commenter is correct in noting that mitigation measures could be provided for the CMP/MTS roadways that are currently operating at LOS F. Mitigation measures for significant impacts that are the result of the implementation of the proposed Land Use and Transportation Element are presented on pages III.B-18 through III.B-20 of the Draft EIR.
7. As stated on page III.B-11 of the Draft EIR, the three roadways that are currently operating at LOS F (SR 24 west of the Caldecott Tunnel, SR 123 east of Stanford Avenue, and SR 260 through the Webster-Posey Tubes) would continue to operate at LOS F with the implementation of the proposed Land Use and Transportation Element. In accordance with the significance criteria presented on page III.B-8 of the Draft EIR, this is not a significant impact. Therefore, no mitigation measures are required. In addition, given that these roadways are state highways, the City of Oakland would not be responsible for the implementation of mitigation measures associated with these roadways.
8. The City acknowledges the need for a discussion of transportation financing and consistency with the CMP CIP. Please see Chapter II for changes to page III.B-20 of the Draft EIR.
9. The Draft EIR included transportation improvement mitigation measures that met all three of the following criteria: 1) could be reasonable expected to improve the level of service, 2) were consistent with the goals and objectives of the Land Use and Transportation Element, and 3) funding sources have been identified or secured. A discussion of the feasibility of the mitigation measures identified for significant traffic-related impacts in included on pages III.B-18 through III.B-20, page III.B-26, and page III.B-31 of the Draft EIR.
10. A discussion of transit-related impacts associated with the proposed Land Use and Transportation Element is included on page III.B-20 of the Draft EIR. Since this impact is considered to be less than significant, no mitigation measures are warranted. Therefore, no discussion of transit funding as a mitigation measure is warranted.
11. Table II-9 on page II-27 of the Draft EIR does not identify HOV lanes on I-880 in the vicinity of 98th Avenue as a transportation improvement project. This table does identify I-880 interchange improvements at 98th Avenue and I-880 modernization and improvement as a “programmed project” and a “project requiring further study,” respectively. The Countywide model used for the traffic analysis in the Draft EIR did not include HOV lanes on I-880 as part of the proposed Land Use and Transportation Element. Therefore, no additional analysis is warranted.



December 30, 1997

Andrew Thomas
Strategic Planning
City of Oakland Community and Economic Development Agency
1330 Broadway, Suite 310
Oakland, CA 94612

RE: Draft Environmental Impact Report (EIR) for the City of Oakland General Plan Land Use and Transportation Elements (Envision Oakland)

Dear Mr. Thomas:

Thank you for the opportunity to review and provide comments on the above documents. We incorporate by reference the comments the City of Alameda has already expressed to Oakland regarding the General Plan in the letter dated June 26, 1996 to Iris Starr from Colette Meunier regarding Comments on a Preliminary Policy Framework for Oakland's Draft Goals, Objectives and Policies Report.

Adequacy of Land Use Element of the General Plan

The scope of the "Project" remains not fully and properly defined. The Land Use and Transportation Diagram continues to designate the estuary area as a "Mixed Use Waterfront/Estuary Plan Area", which is described as allowing a full range of urban activities, including commercial, industrial and residential uses, but without providing any specific detail of the density or intensity for development.

1

The specific land use distribution for the Estuary area is being developed independently under the Estuary Plan. Depending on the final specific land uses and transportation improvements proposed, the Estuary Plan could affect Alameda in varied magnitudes. Development of the estuary could impact portions of Alameda positioned directly across the estuary by producing added light and glare, noise, dust, traffic congestion, interruptions or extending passenger loadings beyond the capacity of the service of the ferry operation, traffic delays resulting from increased bridge opening or other impacts.

Table II.A-3 through 5 of the EIR indicate the environmental review for the Estuary Plan is subject to a separate process. This is

2

Office of the City Manager

2263 Santa Clara Avenue, Room 320
Alameda, California 94501
510 748-4505 Office - 510 748-4504 Fax - TDD 510 522-7538

contrary to the **Intended Uses of the EIR** section, which indicates the document may be used for adoption of area plans, such as the Oakland Estuary Plan. Additionally, the Land Use and Transportation Element on page 148 indicates that the Estuary Plan will be adopted as part of the City of Oakland General Plan, presumably as part of the Land Use Element.

Until the Estuary Plan is incorporated into the Land Use Element, the Element fails to meet the state requirements as a comprehensive general plan which addresses all areas. Although the eventual inclusion of the Estuary Plan in the General Plan will satisfy the statutory requirements to provide a complete General Plan, by not contemplating the proposed Estuary Plan in the subject EIR, the environmental review of the Land Use Element is being assessed in a "piecemeal" fashion. The Land Use Element, and thus, the General Plan, is therefore legally inadequate and the environmental review is flawed.

2
Cont.

Due to the potential impacts of the Estuary Plan on Alameda, we request that this EIR be revised and recirculated or a separate Environmental Impact Report be prepared and circulated in conjunction with the adoption of the Estuary Plan.

Environmentally Superior Alternative

The description of the environmentally superior alternative is not sufficiently well defined to be able to adequately determine the environmental impacts. No housing or employment numbers are provided to be able to make the assertions that impacts would be less substantial.

3

Transportation

The Transportation Element is critical to Alameda since all of Alameda's access to and from regional facilities, both transit and freeways, require traversing through Oakland. We further request the following transportation issues be addresses in the EIR:

1. The Project Description, in Table II-9 refers to several project requiring further study, most of which would affect Alameda. The City of Alameda believes that these projects should be incorporated into the subject Element and Draft EIR at this time. The Land Use and Transportation Element, Volume One, Chapter 3, Page 190, Improvement Strategies for East Oakland should include the following:

4

- Circulation improvements for the 7th Avenue between 29th Avenue and 23rd Avenue to facilitate 29th Avenue north-south traffic into mixed use Waterfront/Estuary area and Alameda Park Street Business District.

5

- Provide coordinated implementation strategies to improve Doolittle Drive between Harbor Bay Parkway and Hegenberger Road. 5 Cont.
2. The Land Use and Transportation Element, Volume Two, Chapter 4, Page 44, third paragraph states that Association of Bay Area Governments (ABAG) Projections '94 was used to forecast future travel demand. Please note that these projections generally underestimated development due to a recession period. The ABAG Projection '96 would yield a more accurate forecast for the future travel demand and would be more consistent with other assumptions in the document which rely upon the ABAG Projection '96 data. 6
3. The Roadway Level of Service analysis omits fundamental information and understates the projects impacts. Specifically, there is no comparison of the baseline, year 2005 and year 2015 levels of service and traffic volumes with the project versus without the project, even though this information is provided for the "showcase districts." This type of basic information, which is typically provided in an EIR, is notably absent in this document. 7
- Additionally, in Volume Two, Chapter 4, of the Land Use and Transportation Element, please indicate what level of land use activity was included for the Alameda Point (formerly Alameda Naval Air Station) in the 2015 General Plan Scenario. The land use activity level should be consistent with the NAS Alameda Community Reuse Plan. 8
4. The EIR states, on page III.B-11, "[a]lthough the following three segments (SR24-west of the Caldecott Tunnel (AM/PM) and SR 260 Webster-Posey Tubes) (AM/PM) are forecast to operate at LOS F during the AM and/or PM peak hours in 2015, these segments currently operate at LOS F; therefore, this is not considered to be a significant impact." This conclusion has no warrant in existing law. In fact, this mode of analysis was specifically rejected in Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d692, 718 (Holding an EIR inadequate which used "the magnitude of the current ozone problem in the air basin in order to trivialize the project's impact.") The City may not trivialize the impacts of the project on these road segments simply because they already operate at an unacceptable level of service. The EIR must examine to what extent the project further worsens the traffic performance of these intersections. It is the City's position that **any** further deterioration of the level of service in the Webster-Posey Tube is a significant impact for which the sole mitigation is a supplemental crossing. 9
5. The development of Alameda Point includes the need for additional access from west Alameda to the regional facilities. Plans for access have been considered for years - in the 1988 South 10

Bay Crossing Study prepared for the Metropolitan Transportation Commission and in the 1994 Alameda Seaport Access Assessment prepared by Korve Engineering, prepared for the East Bay Conversion and Reinvestment Commission, which evaluated five potential locations for linking Oakland with Alameda. The 1996 NAS Alameda Community Reuse Plan, adopted by the Alameda Reuse and Redevelopment Authority, contains a policy regarding a new vehicle access to Oakland. Lastly, comments provided to the Port of Oakland on the reconstruction of Charles P. Howard Terminal and the Site B development both noted the need for this access. This access will need to be either a bridge or tunnel crossing since there will not be additional capacity in the existing Webster/Posey tubes, as Table III.B-2 indicates. The Transportation Element and the EIR need to incorporate and evaluate alternative locations for this access.

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Cont.

Land Use and Transportation Element, Volume One, Chapter 3, Page 132, section under the "Oakland/Alameda Improvement Corridor" states that improved access to Alameda through either a new connection or improvements to the existing Posey-Webster tunnels would relieve congestion near the existing tunnel portal near 5th Street and Broadway. Add that it would also improve the existing tunnel portal near 7th Street/Harrison Street.

11

6. The EIR states on page III.O-15 that "The proposed Land Use and Transportation Element is generally consistent with the City of Alameda's General Plan, although there are potential areas of conflict at 66th Avenue." The Draft Element does not include a future crossing at this location, and the EIR does not include analysis of a crossing at this location or alternative locations, such as the Pardee Extension, although the OSCAR Element states that a tube crossing at the 66th Avenue location is acceptable. A crossing at this location would mitigate increased traffic resulting from the expansion of the Airport and the buildout of Harbor Bay Business Park, and should be included in the Element and the EIR.

12

7. The EIR further states the need for coordination with the City of Alameda in the improvement of transportation between the two cities. The Element further indicates the need for improving access from Downtown Oakland to Alameda for all modes of transportation, including bicycles and pedestrians. The Element states that over 25% of the employees in Alameda reside in Oakland and over 9% of Alameda residents work in Oakland. Additionally, the Element and EIR recognize the need for future vehicle access to the former Naval Air Station, Alameda (Alameda Point). Therefore, in addition to the analysis of alternative locations for a future access to Alameda Point, the inclusion of transportation improvements at Park Street (23rd) should be included in the Element and analyzed in the EIR. Special attention needs to be

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given to Park Street/23rd since it is already an indirect (circuitous) access.

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Cont.

8. The Land Use and Transportation Element, Volume One, Chapter 3, Page 132, should provide specific alternatives for bicycle and pedestrian access between Oakland and the west end portion of Alameda. Provision of shoreline access, especially in terms of completing interregional bicycle and pedestrian access along the Estuary and Bay is important. Many of the pedestrian and bicycle facilities are lacking. Especially critical are the substandard facilities from West Alameda to Oakland via the Webster/Posey Tubes. One mitigation is introduction of hydrocrafts for bicycle transport. The potential impacts of these facilities and the use of hydrocrafts should be studied, but cannot be fully evaluated without the Estuary Plan, therefore the EIR cannot evaluate or consider these potential mitigation measures without the inclusion of the Estuary Plan in the Land Use Element.

14

9. The City of Alameda has identified the need for interim transit capacity improvements across the Estuary to Oakland West BART and Jack London Square. The Land Use and Transportation Element support this conceptually, and indicates that funding would be likely, but falls short of providing specifics. Details on specific routes and vehicles should be included in the Land Use and Transportation Element, and analyzed in the EIR.

15

10. Land Use and Transportation Element, Volume One, Chapter 3, Page 128, Regional Access should discuss the need/demand for additional shuttle services to/from West Oakland and 12th Street/City Center BART stations. I-880 Improvement Corridor should include the proposed I880/980/Broadway/Jackson Interchange Improvements.

16

11. Land Use and Transportation Element, Volume One, Chapter 3, Page 202, regarding the Improvement Strategies for San Antonio/Fruitvale/Lower Hills. The EIR should discuss the planned reduction in parking at the Fruitvale BART in the light of a 3% increase in retail and service jobs and address the negative impacts to the City of Alameda transit-dependent population. Consider new bus service as a mitigation.

17

12. Land Use and Transportation Element, Volume Two, Chapter 4, Page 47, first paragraph states that "Caltrans is responsible for the improvements to these facilities, while coordinating with the City and other affected agencies." With SB 45 placing the State Transportation Improvement Program (STIP) process in local hands, this statement should be modified to include continued efforts by Oakland, Alameda and the Congestion Management Agency (CMA) to fund and implement for the I880 Improvements. Other non-freeway strategies should be considered to mitigate the Alameda/Oakland

18

Corridor and Estuary Development such as amphibious buses, additional ferries, and/or water taxi's. | 18
Cont.

13. Table II-9, under the Water Transportation category should include Alameda as a destination for water taxis and ferries. | 19

14. Page III.B-5 identifies the Airport Roadway Project, yet elsewhere in the document, it is referred to as the Cross Airport Roadway. We suggest consistent referencing indicating in the EIR that the Cross Airport Roadway is a component of the Airport Roadway Project. | 20

Public Services

1. The EIR on page III.D-8 does not address the existing submarine utilities, particularly the Navy sewer which serves the former Alameda Naval Air Station and the Bureau of Electricity lines, both of which traverse the Estuary. The wastewater demand impact and mitigation measures should include analysis of the capacity of the system to handle proposed NAS redevelopment and the proposed project. Additionally, the Capital Improvement Needs does not specifically include the future development of Alameda Point (NAS Alameda) as an area which may result in the requirement for additional EBMUD laterals or infrastructure. | 21

2. Page III.D-10 should address more specifically wastewater generation, in particular, hazardous material generation and pre-treatment requirements. The OSCAR General Plan Element policies do not address hazardous materials. | 22

3. Inadequate open space and park deficiencies have been identified as existing conditions. Proposed residential development would exacerbate the problem. Proposed mitigation measures, which rely on policies in the OSCAR Element, are inadequate to address this need. The Land Use Element must set aside the additional acreage for park land and open space otherwise the level of service standard in OSCAR Policy REC-3.1 is not achievable and the mitigation is not adequate to bring this impact to a less than significant level. | 23

Vegetation and Wildlife

1. The Vegetation and Wildlife section of the EIR does not include eelgrass beds and other aquatic features in the plant and animal communities, nor does it indicate therefore, analyze potential impacts of the Land Use Element on fish, marine mammals and aquatic birds which may be on Federal and State Endangered Species lists. | 24

2. Reference to a separate EIR being prepared for the 50-foot dredging project, which may include the establishing of new eelgrass bed habitat, should be part of this section.

25

3. The EIR does not address the intensification of development proposed at the Metropolitan Oakland International Airport (MOIA). There is no discussion of the characteristics, which include wetlands area and loss of wetlands indicated in the FEIR for the Proposed Airport Development Program for MOIA. Direct Loss of Habitat Impact H.1 should be expanded to include MOIA.

26

Noise Impacts

The Noise section of the Environmental Setting, Impacts and Mitigation Measures section of the does not discuss or analyze the potential noise impacts on the residential areas of the City of Alameda adjacent to the "Coliseum Showcase Area." CEQA does not permit a lead agency to limit its discussion of environmental impacts solely to its own jurisdiction. (See CEQA Guidelines section 15126(a).) This area of Alameda already suffers significant noise impacts from existing uses within the boundaries of this proposed planning area. It is likely that the additional industrial uses described in the project will only aggravate this problem. The EIR must analyze and model these potential noise impacts given the unique acoustical properties of the Oakland/Alameda Estuary and identify appropriate mitigation measures.

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General Comments

1. Figure II-3 shows the Showcase Districts extending beyond the City of Oakland boundaries. The figure should be modified to more accurately show the extent of the Districts.

28

2. Figure II-5 does not provide the designated land use for the portion of property adjacent to the Alameda/Oakland border which is adjacent to the northernmost portion of the airport. According to the Draft for Discussion Estuary Plan Map - May 8th, 1997 - this property is not part of the Estuary Plan. Therefore, a designated land use should be assigned to this land as part of this diagram.

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3. In Figure III.B-2, the City boundary should be extended into the Estuary.

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4. On page III.F-1, please change Government Island to Coast Guard Island.

31

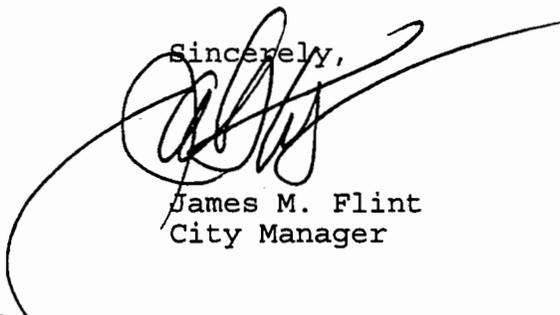
5. Page III.O-8 should indicate ABAG's implementation of the Bay Trail Plan.

32

6. Page III.O-15 incorrectly states that a seaport is envisioned on the former Naval Air Station. Land uses contemplated for this property are described in the NAS Alameda Community Reuse Plan. 33
7. Appendix 2, Tables 2-4 include numerous locations on Webster Street which are within the City limits of Alameda. These locations should be deleted as they are not in Oakland. 34
8. Figure 8 in Chapter 4 of Volume 2 incorrectly places the Alameda ferry terminal at the Webster/Posey tubes. The ferry terminal is located on Main Street by Alameda Point. Additionally, the full extent of Active Port usage is not accurately shown and should reflect proposed Port projects. 35

Please provide us with four copies of the Final Draft Environmental Impact Report and Land Use and Transportation Element of the General Plan once it is available. Thank you again for the opportunity to provide comments.

Sincerely,



James M. Flint
City Manager

cc: Assistant City Manager
City Attorney
Public Works Director
Community Development Director
Planning Director
Executive Director, ARRA
Supervising Civil Engineer
Administrative Management Analyst

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City of Alameda • California

June 26, 1996

Ms. Iris Starr, AICP
Community and Economic
Development Agency
Comprehensive Planning Division
General Plan Update
1330 Broadway, Suite 310
Oakland, CA 94612

RE: Comments on "A Preliminary Policy Framework for Oakland:
Draft Goals, Objectives, and Policies Report"

Dear Ms. Starr:

Thank you for including the City of Alameda in your distribution list for the Oakland General Plan Congress. Planning and development activities within Oakland have the potential to significantly affect Alameda. For this reason, the City of Alameda has reviewed the above report and provides the following comments at this time. Additional comments may be provided in the future.

1. Airport Expansion

Several of the proposed policies appear to promote an overall philosophy of limitless airport expansion. At some point in the future, regardless of the need for more services, the airport will not be able to physically expand beyond its geographical boundaries. There should be a realization of the maximum capacity of this facility and recognition of the constraints to development, in terms of geography, environmental impacts and the need to minimize nuisance impacts on existing development. The purposes for expansion should be quantified and driven by regional demand, and should be the minimum necessary to accomplish the goal of providing airport services to the Bay Area. Airport expansion should be balanced between the need for regional economic growth and the needs of neighboring communities.

The City of Alameda does not, and would not, support uncontrolled airport growth. Due to implications of the Airport Noise and Capacity Act of 1993 (ANCA), once capacity is built at an airport, the airport itself loses the ability to control the use of that capacity. Therefore, we request you consider modification to the wording of the following policies to address our concerns: Policy W2.1, Policy W3.1, and Objective T1. The City of Alameda would like to meet our citizens' concerns by assuring that future airport-related development will not adversely affect the quality of their lives.

Planning Department

East Wing, Historic Alameda High School
50 Central Avenue, Room 160 • 94501
0 748.4554 • TDD 510 522.7538

IV-95

2. Airport Operations

The operations of the Metropolitan Oakland International Airport significantly affect properties in neighboring cities like Alameda and San Leandro. One area in particular, the Harbor Bay Business Park is clearly affected by airport activities. Although it serves as somewhat of a buffer for those homes which are in line with Runway 11-29, these residences are already impacted by on-going aircraft operations.

The City of Alameda continues to seek mechanisms to address the resolution of impacts related to the operation of the airport. The City of Alameda continues to propose a new Settlement Agreement (attached for your reference) to be signed by the Port of Oakland and Alameda. The proposed agreement would permit expansion of airport facilities so long as there were no new significant adverse noise, traffic or safety impacts to Alameda residents. The proposed agreement outlines a reasonable, feasible approach to airport operations and development that would satisfy both regional economic development needs and local environmental concerns. We request consideration of the adoption into the Oakland General Plan of the approach of this agreement. Incorporation of the philosophy of this document into the Goals, Objectives and Policies Report would acknowledge Oakland's commitment to achieving Objective I/C4.

36
Cont.

3. Land Use Compatibility around the Airport

Several other policies in this document appear to ignore historical land use patterns surrounding the airport and existing geographical boundaries, and at the very least, respect for Alameda's city limits. For example, Policy W3.2 promotes airport activities without any regard for neighboring cities and/or existing uses. The City of Alameda believes that the airport and surrounding uses can and should co-exist.

In addition, Alameda would like policy W3.2 to be more specific in using the term "proximate." This is important because of the number of residences which are currently in line with flight paths. If "proximate" is given a precise definition, Alameda could then determine what areas of the city would potentially be affected by this policy. A map of these areas would be beneficial.

There is similar concern regarding Policy W2.1, which should clarify which specific lands have the potential for airport-related development. Harbor Bay Business Park, while adjacent to the airport, has a Development Agreement for office and research and development uses and is designated "Business Park" on Alameda's General Plan. Certain airport-related uses may not be compatible with this agreement or designation.

In addition, Policy W2.1 should clarify which specific uses would be permitted that do not interfere with the functional operations of the airport. These uses may be of concern to Alameda because of the proximity of the Bay Farm Island residential areas. If land

near and around the airport is to be developed in the future with the intention of being compatible with airport operations, it should also be compatible with other existing uses, specifically these residential areas. Any development policy related to airport operations should respect Alameda's jurisdiction over lands within its own city limits.

4. Incompatible Land Uses

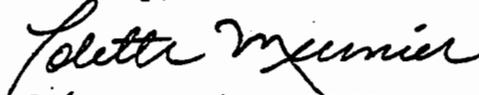
Land use conflicts can occur between Oakland and Alameda in other areas besides the airport. For example, residential development in Alameda occurs across the Estuary from heavy industrial and seaport uses. We have received citizen complaints regarding noise from Estuary industries such as Owens-Illinois, ABF Trucking, Gallagher & Burke, Inc., and Tidewater Sand and Gravel. We understand that you are in the process of revising the Oakland Municipal Code regarding noise to provide enforceable provisions, but there are also other areas of potential concern, including, but not limited to odors, lighting and visual impacts.

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Cont.

Alameda supports policies like Policy W6.2 which require the buffering of heavy industrial uses, but question the ability of buffering to provide relief along waterfront areas where traditional buffering methods, such as acoustic barriers, would appear infeasible. These methods are also ineffective in mitigating airport noise. The Oakland General Plan should be enhanced with conflict resolution policies to provide a method for discussion and resolution of these types of land use conflicts across jurisdictional boundaries.

I look forward to working with you in the future on the Oakland General Plan. Please feel free to contact Cynthia Eliason of my staff to discuss any of the concerns expressed herein.

Sincerely,


Colette Meunier, AICP
Planning Director

Attachment

cc: w/o attachments

City Manager
City Attorney
Administrative Management Analyst, Public Works

CM:CE:G:\SPEC PROJ\GENPLAN\OAKGOPS1.LTR
FILE: CITY OF OAKLAND GENERAL PLAN UPDATE

bc: E. Clement Shute, Jr.
Shute, Mihaly & Weinberger
396 Hayes Street
San Francisco, CA 94102

LETTER H – CITY OF ALAMEDA

1. The “Project” being contemplated at this time by the City of Oakland (Lead Agency) is the Land Use and Transportation Element. It is described in a 29 page project description in the draft EIR beginning on Page II-1. As stated on page I-3 of the Draft EIR, the Draft EIR is a program-level EIR. Therefore, if and when an Estuary Plan is completed for the waterfront area, the Draft EIR may be used by the City as a “first tier” environmental document for use with a Supplemental EIR for the Estuary Plan.

A definition of the “Mixed Use Waterfront District” is included on Page II-19 of the Draft EIR and on Page 148 of the Land Use and Transportation Element. The Waterfront Mixed Use District is one of 15 land use classifications used in the Land Use and Transportation Element. All of the Land Use and Transportation Element land use classifications include a description of the intent of the classification, the desired character and uses appropriate in the areas of City covered by the Classification and a maximum density of development allowed in the areas covered by the classification. As clearly stated in the Draft EIR and the Element, the Waterfront Mixed Use District has a maximum non-residential Floor Area Ratio (FAR) of 5 and a maximum residential density of 125 units per gross acre. The Draft EIR assumed that development of the Mixed Use Waterfront Area would occur.

2. The commenter is correct in stating that one of the Intended Uses of the EIR is to adopt area plans. However, since a detailed description of the Estuary Plan has not been developed, adoption of this area plan would not be possible within subsequent environmental review. The City intends to prepare a separate EIR for the Estuary Plan in the future when an area plan has been developed.
3. The Environmentally Superior Alternative identified on pages IV-8 and IV-9 of the Draft EIR is based on adding stronger policies to the Land Use and Transportation Element to address the significant impacts that were identified in Chapter III of the Draft EIR. This alternative would reduce the amount of development that could occur in Oakland through the year 2015 compared to that anticipated under the proposed Land Use and Transportation Element. Under this alternative, it is anticipated that the number of housing units and the number of jobs anticipated under the Project Alternative and described in the Draft EIR would be reduced due to more restrictive development policies. To attempt to determine the actual number of unit and jobs lost under this alternative would be highly speculative, and as described on page IV-9, not particularly useful in determining whether the specific regional impacts, such as regional traffic, would be significantly reduced.
4. The information contained in Table II-9 on page II-27 of the Draft EIR is taken from Appendix C of the proposed Land Use and Transportation Element, which explains the status of these future transportation projects. These projects require further studies for a variety of reasons, including extensive coordination efforts between numerous jurisdictions and lack of available funding and timing. Each of these projects will be subject to separate environmental review when the project is fully defined and funding sources are available. As

such, these projects are not included in the CMA's Countywide Model and are considered to be too speculative for inclusion in the Draft EIR.

5. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element, as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.
6. As described in Chapter II of the Final EIR, the Transportation analysis for the City's network of roadways was conducted using the Alameda County Congestion Management Associations county-wide traffic model. At the time that the transportation modeling was conducted by the CMA for preparation of the Draft EIR, the CMA had not yet updated the model to incorporate the 1996 data. Regarding the commenter concern that Projections 94 underestimated job growth, it should be noted that Projections 96 projects less job growth for Oakland than Projections 94. Although the commenter indicates the Projections 94 data underestimated job growth due to the recession, the job projections for 2010 for Oakland are, in fact, higher in Projections 94 than they are in Projections 96.
7. As described in Chapter II of this document, the Draft EIR examines the potential traffic impacts of the "Project" alternative based upon a detailed data base in which the City's 267 Transportation Analysis Zones were individually examined, vacant parcels were identified, and development potential was projected based upon the goals and policies of the Land use and Transportation Element. This data base was then provided to the Congestion Management Agency to be modeled by the county wide transportation model. This exercise was not completed for the No Project alternative or any of the other alternatives.

Page III.B-8 of the Draft EIR identified the criteria for determining whether a traffic-related impact is significant or not. A comparison of "project" versus "no project" conditions is not relevant in the determination of an impact's significance. Tables III.B-6 through III.B-9 on pages III.B-12 through III.B-15 of the Draft EIR identify all roadway segments that would operate at an unacceptable level of service in bold type. This analysis is consistent with the significance criteria identified on page III.B-8 of the Draft EIR. Therefore, no changes to this analysis are warranted. Regarding the "showcase districts," the Draft EIR examines specific intersection impacts based upon specific projects that may occur within five years. In this case the analysis required a comparison of existing intersection level of service with projected level of services as a result of a specific number of trips being generated from specific locations.

8. The Land Use and Transportation Element did not make independent land use assumptions for Alameda but relied instead on the assumptions in the adopted Countywide CMA model. These assumptions are presumably consistent with the Alameda General Plan and the inputs provided by the City of Alameda to the CMA when the model was developed.

9. As stated on page III.B-11 of the Draft EIR, SR 260 through the Webster-Posey Tubes would continue to operate at LOS F with the implementation of the proposed Land Use and Transportation Element. In accordance with the CMA's established level of service standards that are used as criteria for determining the significance of an impact (see page III.B-8 of the Draft EIR), the continued operation of a roadway that operated at LOS F when the program was initiated is not a significant impact. Thus, the Draft EIR uses the standards developed by the CMA for determining the significance of an impact. Since no significant impact occurs on SR 260, no mitigation measures are required. In addition, given that these roadways are state highways, the City of Oakland would not be responsible for the implementation of mitigation measures associated with these roadways.

The Draft EIR finds the impacts to be insignificant based upon the established threshold for significance described in the Draft EIR and above. Furthermore, an analysis of the projected impact of the Land Use and Transportation Element on the Webster Posey Tubes finds that the level of service in the AM period would experience an 0.6% and 1% in the PM period.

Regarding the commenter's suggestion that the City of Oakland is "trivializing" the importance of the Alameda to Oakland connections and that the City of Alameda's position that the sole mitigation for the deterioration of the level of service in the Webster-Posey Tube is a supplemental crossing, the City of Alameda may wish to consider that the City of Oakland is currently underway on the following projects with the full support and request of the City of Alameda for the purposes of improving access for the residents of Alameda:

1. Redesign of the Broadway/Jackson Interchange: a \$50 million project which includes improvements to Posey Tube exists and the I-880 Off ramp to Alameda.
2. Reconfiguration of the I-880/High Street Interchange: a \$10.2 million project to improve access to High Street to and from Alameda and to the Fruitvale BART station.
3. Construction of an \$11 million dollar parking structure at the Fruitvale BART station (license plate surveys show that currently 50% of the parking lot users are from Alameda).
4. Construction of a \$7 million Transit Center on Broadway at 14th which is the transfer center for Alameda residents who depend on AC Transit to reach the 12th Street BART station.
5. Construction of the \$1.5 million Embarcadero Bay Trail which is a high priority for Alameda bicyclists and for which the City of Alameda has pledged \$50,000 to ensure that the project is designed in a manner that suites Alameda residents.
6. Construction of the multi-million dollar Oakland Cross Airport Roadway project to provide additional access to the Alameda from the Hegenberger and 98th Avenue I-880 interchanges and Doolittle Drive.

10. The development of Alameda Point is not included in the Oakland General Plan Land Use and Transportation Element because this project is not within the City's limits and not within the City's planning authority. Analysis of access requirements for the Alameda Point project is not the responsibility of the City of Oakland. However, the City does acknowledge that connections between Oakland and Alameda are subject to future study (see Table II-9 on page II-27 of the Draft EIR). Therefore, since alternative access locations is the purview of the lead agency implementing the Alameda Point development and since future access is considered to be too speculative (see the response to comment G-4), no analysis of alternative locations for access to this project is included in the Draft EIR.
11. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element, as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.
12. The OSCAR Element's discussion of a potential tube crossing at 66th Avenue should not be interpreted as an endorsement of such a project but rather as recognition that the possibility for such a project exists. The City's priority continues to be to explore other alternatives to improving mobility around San Leandro Bay. A crossing is not the preferred solution at this time, and therefore was not incorporated or endorsed in the Land Use and Transportation Element.
13. For a discussion of improvements to access Alameda, see the response to comment G-10.
14. For a discussion of the Estuary Plan and future environmental review, see the response to comment G-2.
15. As stated on page I-3 of the Draft EIR, this is program-level document. Therefore, the identification of specific transit routes and vehicles is considered to be too speculative at this time. Therefore, no analysis of this issue is required in the EIR.
16. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element, as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.
17. No planned reduction in parking availability is included as part of the proposed Land Use and Transportation Element. In fact, a parking garage at the Fruitvale BART Station is being planned that will increase the number of spaces at this transit center (see comment B-5). Therefore, no additional analysis of this issue is required.

18. The commenter's comments are noted and the commenter's "non-freeway" suggested mitigations are included in the Land Use and Transportation Element as transportation improvement priorities for the City of Oakland, but they were not included as mitigation measures in the draft EIR because funding for these additional services is not currently available. However, the Land Use and Transportation Element does include policies regarding the placement of Element transportation improvement priorities into the City Capital Improvement Program for future funding.
19. The commenter is correct in noting that the destinations of water taxis would include points in Alameda. Please see Chapter II for changes to page II-27 of the Draft EIR.
20. Please see Chapter II for changes to page II-27 of the Draft EIR.
21. The development of Alameda Point is not included in the Oakland General Plan Land Use and Transportation Element because this project is not within the City's limits and not within the City's planning authority. Therefore, no analysis of infrastructure requirements for this project is included in the Draft EIR.
22. The proposed Land Use and Transportation Element does not include specific development projects that would generate hazardous material during operation. None of the specific projects included in the Showcase Districts (see Tables II-5 and II –6 on pages 20 and 21 of the Draft EIR) would be expected to generate hazardous materials in the wastewater stream. Therefore, any analysis of such hazardous materials generation would be too speculative for inclusion in the EIR on the Land Use and Transportation Element.
23. Although existing park and open space deficiencies could potentially be exacerbated by future residential development, the City believes that the policies and programs in the adopted OSCAR Element provide adequate mitigation. The City is presently preparing legislation to implement OSCAR Policy REC-3.1, which establishes a level of service standard for parkland. This legislation would establish parkland dedication requirements, in lieu fees, and park impact fees for future residential development. Adoption of the park impact fee ordinance would ensure that future residential development mitigates its impact on recreation and open space needs by providing the funding necessary to secure additional parkland and develop new recreational facilities.
24. The proposed Land Use and Transportation Element does not include specific development projects that would effect any aquatic biological resources generate hazardous material during operation. None of the specific projects included in the Showcase Districts (see Tables II-5 and II –6 on pages 20 and 21 of the Draft EIR) would affect aquatic biological resources in the Estuary or San Francisco Bay. Therefore, any analysis of such impacts would be too speculative for inclusion in the EIR on the Land Use and Transportation Element. However, all future projects would require additional environmental analysis.

25. The commenter is correct in noting that the Port of Oakland is currently preparing an EIR on its 50-foot dredging project. Since none of the specific projects included in the proposed Land Use and Transportation Element would affect the area being studied by the Port of Oakland, no changes in the Draft EIR are warranted.
26. Any habitat loss that would occur at Metropolitan Oakland International Airport (MOIA) would be the result of the Port of Oakland's plans for MOIA and not as a result of the proposed Land Use and Transportation Element. Therefore, inclusion of this impact as a result of the proposed project would be misleading and incorrect.
27. The Land Use and Transportation Element recognizes a number of potential impacts that may result in mixed use areas of the City where residential uses are located in close proximity to industrial or manufacturing uses. A number of mitigations are identified in the Land Use Chapter, the Visual and Aesthetic Chapter, and the Noise Chapter to ensure that appropriate standards and requirements are established to ensure that residents are significantly impacted by noise generating businesses in the mixed use areas. These mitigations are applicable in all mixed use areas including the Mixed Use Waterfront Areas adjacent to Alameda.
28. The showcase Districts do not apply to Alameda. Figure II-3 on page II-12 of the Draft EIR depicts the general areas of the City's showcase district. This figure was intended to be a general representation of the Showcase districts and does not provide the specific boundaries of each Showcase district. For a description of the areas that are part of each Showcase district, see pages II-19 through II-21 of the Draft EIR.
29. Figure II-5 on page II-15 of the Draft EIR is the same as the Land Use Diagram presented in the proposed Land Use and Transportation Element. As shown in Figure 5 on page 134 of the proposed Land Use and Transportation Element, the property referred to by the commenter is designated as "General Industrial/Transportation."
30. Please see Chapter II for changes to Figure III.B-2 on page III.B-23 of the Draft EIR.
31. Please see Chapter II for changes to page III.F-1 of the Draft EIR.
32. Please see Chapter II for changes to page III.O-8 of the Draft EIR.
33. Please see Chapter II for changes to page III.O-15 of the Draft EIR.
34. The properties on Webster Street within the City of Alameda have been deleted from Tables 2 through 9 of Appendix 2.
35. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element, as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.

36. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element, as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.



I

JAY-PHARES CORPORATION*Commercial Real Estate Development*

Telephone: (510) 562-9500

FAX: (510) 562-9505

VIA FAX TO 238-6538

December 30, 1997

Andrew Altman, Chief of Planning
Community and Economic Development Agency
1330 Broadway, 3rd Floor
Oakland, CA 94612

RE: Comments on Draft Environmental Impact Report
for Oakland General Plan Land Use and
Transportation Element

Dear Mr. Altman:

We wish to submit the following comments on the referenced Draft EIR in its analysis of the proposed "Regional Commercial" land use classification proposed for the ± 20 acre base of the Leona Quarry, and the impacts of that new land use designation on the Elmhurst and Central East Oakland communities.

1. **Deficient Social and Economic Impacts Analysis.** The DEIR is deficient in completely ignoring and failing to analyze the enormous social and economic impacts on Elmhurst and Central East Oakland of adoption of this land use classification. Such analysis is essential to accurately determine the significance of the effect of adopting the proposed land use classification. Even though the proposed land use classification purports to enable "regional" commercial uses which will attract shoppers from Contra Costa County and other distant points, the 20 acre site is in fact far too small to accommodate a "regional" center with true destination tenants such as department stores which could have such regional drawing power. In fact, it is common knowledge that Gallagher & Burk, Inc., the owner of this site, desires to develop purely "neighborhood" serving retail uses (grocery, pharmacy, home improvement, small shops) on this site (Ted Gallagher, quoted in article "Quarry's Future in Quandry", Oakland Tribune, August 13, 1997, page 1). Such neighborhood serving uses will directly compete with, and largely replace, identical neighborhood goods and services now existing or proposed for development within the Elmhurst and Central East Oakland commercial centers. The DEIR must analyze the substantial adverse social and economic effects of relocating such existing convenient neighborhood goods and services farther away from the flatland communities to the "hills", including without limitation, (1) the increased number and distance of car and vehicle shopping trips for flatland residents; (2) the extent of resulting hardship to flatland residents, particularly those without cars; (3) resulting increased burden on the public transportation system; (4) the extent of lost jobs at existing and proposed flatland retail locations; (5) the magnitude and extent of increased blight due to closure of flatlands businesses; (6) the extent of lower flatlands property values and decreased property tax revenues due to such blight and loss of convenient goods and services; (7) resulting increases in flatlands street crime and so-

1

Andrew Altman, Chief of Planning

December 30, 1997

Page 2

cial problems, and corresponding increases in needed police services; and (8) increased "social separation" between the "haves" on the hillside and the "have nots" in the flatlands by giving the "haves" on the hillside less reason to venture into the flatlands to shop. These substantial adverse effects can be avoided entirely by simply precluding retail development at the quarry.

1
Cont.

2. Internal Inconsistency. The proposed land use classification "Regional Commercial", in permitting neighborhood retail commercial development as described above, is inherently in conflict with adopted and existing goals, programs, plans and policies, including the following elsewhere within the Draft Land Use Element.

2

3. Traffic Impacts. The DEIR should re-analyze traffic impacts in light of the City Council's recent decision to withdraw the proposed "Hegenberger/73rd Extension to I-580" project from Measure B funding. This important event means that for the next 10 or 20 years, public funding will almost certainly be unidentified and unavailable to implement such \pm \$30 million corridor improvement, including widening the approach to Edwards Avenue, enhancements to the Edwards/I-580 interchange essential to mitigate substantial and otherwise unavoidable adverse traffic impacts and levels of service on Edwards Avenue, Keller and quarry access routes caused by any retail commercial development at the base of the quarry. The DEIR identifies substantial adverse traffic effects which would be worsened by allowing retail development at the quarry. Such impacts could be reduced or eliminated entirely by adopting the "urban park and open space" classification, or some other non-retail use classification, for the \pm 20 acre base of the quarry.

3

4. Alternatives Analysis. The sole "Alternate Designations Alternative" examined by the DEIR specifies mapping the Leona Quarry with "Community Commercial". This is no different from the project alternative, however, because the physical size of the site precludes "regional" uses. Instead, to reflect the land uses provided in the existing general plan, the following two classifications should be adopted; if not adopted, they should at least be analyzed as alternatives: (1) the "hillside residential" classification for the hillside portions of the quarry; and (2) the "urban park and open space" classification for the \pm 20 acre base of the quarry. Other potential non-retail alternatives for EIR evaluation would include specific development guidelines for congregate care towers, an R&D facility, or a mixed use development including a health club. None of such non-retail uses would involve the substantial adverse impacts of a "regional commercial" or "community commercial" designation.

4

5. Improper Reliance on OSCAR Element. The DEIR's reliance on OSCAR Element policies as mitigation for substantial adverse effects is not appropriate, because the OSCAR Element was adopted prior to any proposal to modify the land use classification for the base of the quarry, and assumed no commercial development whatsoever at the base of the quarry.

5

6. 1987 EIR. The DEIR should be expanded to include a discussion and reconciliation of the findings and recommendations for the Leona Quarry contained in the Environmental Impact Report dated September 23, 1987, which assumed implementation of the reclamation plan (CM 80-425) required by Major Conditional Use Permit (CM 80-32) in accordance with the Surface Mining and Reclamation Act; Implementation of the reclamation plan was assumed in the adopted OSCAR Element. The DEIR must clarify the extent, if at all, to which the requirements of the existing Major Conditional Use Permit would be relaxed or removed if the new land use classifications proposed for the Leona Quarry are adopted. Neither the Draft Land Use Element nor the DEIR is explicit on these issues.

6

7. Inadequate Cumulative Impacts Analysis. The DEIR fails to adequately address the probable combined traffic impacts on levels of service that would be caused by new developments both at Oak Knoll and opposite the Coliseum.

7

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Page 3

8. **Suggested Mitigations.** Adverse and substantial traffic, seismic, landslide, and drainage impacts resulting from quarry development have been identified by the DEIR. These could be reduced by limiting the use to exclude retail. Another possible mitigation would be for the City to trade the 22 acre parcel opposite the Coliseum at I-880 to the quarry site owner for development. In this way, the quarry base could be left for open space.

8

9. **Additional Comments.** The two pages of additional comments titled "Comments and responses to October 1997 version of Draft City of Oakland General Plan and October 31, 1997 Draft EIR..." are attached hereto and by this reference submitted as a part hereof.

9

Thank you for your consideration of these comments.

Very truly yours,

FOOTHILL SQUARE MERCHANTS' ASSOCIATION

BY: JAY-PHARES CORPORATION

By: 
 Hugh K. Phares, III, President

Comments and responses to October 1997 version of Draft City of Oakland General Plan and October 31, 1997 Draft EIR as related to proposed land use designations for the Leona Quarry site, Oakland, California

... Quarry site designated as an "Activity Center" (page 30 et seq., October 1997 Draft Envision Oakland City of Oakland General Plan) And for Regional Commercial land use (Land Use Diagram Figure 5)

Draft Environmental Impact Report October 31, 1997

While identifying in Table S-1 that hazardous materials could have a significant impact (which can be mitigated to less than significant) and in Table 3 identifying the Leona Quarry site as once containing (albeit mitigatable) hazardous materials, specifically a leaking underground storage tank (LUST) the EIR does not at all address the geology and seismology of the site. Nor does the EIR or the Draft Plan give much emphasis on designating land uses with the effect of future geological or seismic effect on the specific uses encouraged for the site taken into consideration. The EIR simply says no mitigation measures are necessary since for construction on the problematic site, appropriate construction technique will resolve the problem to Less than Significant after these "mitigations". This response does not seem to consider the appropriateness of maximizing population densities/intensities in areas where there are highly probable geological or seismic events that can cause injury and destruction. The portion of the quarry site designated as an Activity Center and for Regional Commercial Land Use is shown on Map 3 of the Environmental Hazards Element of the Oakland Comprehensive (General) Plan as being within the State of California Special Studies Zone; and probably within 1,000 feet of the Hayward Fault. The April 1995 report published by the Association of Bay Area Government "on Shaky Ground" predicts that the shaking intensity of a 7.3 magnitude earthquake along the Hayward Fault could produce extreme and heavy shaking in the area of the Leona Quarry. Under extreme damage most masonry and frame structure could be destroyed. Under heavy damage Class B masonry buildings would sustain serious damage; lower class masonry buildings would be severely damaged or destroyed. General panic would result. Approximately 1/2 mile to the northeast of the quarry and along the stream bed of Rifle Range branch of Arroyo Viejo Creek lies the Chabot Fault. While there is conflict about the status of this fault - - is it active or inactive? - - it is present and poses some stability issues which are not addressed in the EIR. Why be concerned about LUST and not about the greater potential environmental hazards posed by fault line proximity to intensive land uses?

10

Draft General Plan Questions

Is it appropriate public policy to designate a land use category for a large, open area that encourages the second highest residential density outside of the Central Business District? The Regional Commercial designation of the Quarry site proposes maximum residential densities of up to 125 units per gross acre. The selected land use designation identifies the desired character and use of the area as a "mix of commercial, office, entertainment, arts, recreation, sports - - - and other uses of similar or supportive regional drawing power." What do these activities have in common? Large numbers of people assembled in a relatively small space adjacent to an active fault. Is this a wise land use decision?

11

At the public hearings on the Draft plans it was explained that since the quarry was available, large and relatively unused acreage next to an interstate freeway (U.S. 580) it had the ideal characteristics for use as Regional Commercial site. The plan document devotes a whole page (page 200) to development of the quarry site which is "... conveniently accessed by multiple modes of transportation." What multiple modes? The regional access to the site is restricted by limited freeway ramp systems. Edwards Avenue in front of the site affords only an on ramp in a northerly direction and an off ramp in a southerly direction. While the freeway may provide regional traffic with good visibility of the site, freeway related access from the southerly portion of the "region" (San Leandro, Hayward, Castro Valley, south) is problematic. Access from Richmond, El Cerrito, Emeryville, Albany, Berkeley is circuitous at best. Does the site really have a regional significance?

11
Cont.

In addition to questioning regional strategic location, there are the local traffic issues to consider. Does the site readily serve the South Hills Plan Area? Access from the South Hills is difficult at best. Golf Links Road, Keller Avenue, and Redwood Road are the only east-west access arterials out of the hills to the site. Is this convenient? Will Regional Commercial use of the site bring heavy concentration of traffic through the residential neighborhood of Eastmont? Will the commercial development of the site with large commercial establishments result in truck and service traffic that will use city streets to avoid the truck ban on Interstate 580? While Regional Commercial reuse of the quarry site may bring needed economic development for the City, are the trade offs appropriate?

LETTER I – JAY-PHARES CORPORATION

1. The California Environmental Quality Act (CEQA) Guidelines Section 15131 indicates that social and economic impacts are not required to be analyzed in an EIR. Furthermore, the Draft EIR is intended to analyze the environmental impacts of the proposed Land Use and Transportation Element; the Draft EIR is not intended to analyze the impacts of each potential development that may be proposed in the future for each land use designation on each site. The Regional Commercial designation provides for a wide range of potential uses, including office, entertainment, arts, recreation, sports, and visitor-serving uses like hotels and restaurants. Therefore, the Draft EIR does not analyze the potential impacts of a “neighborhood”-serving retail center on a single Regional Commercial site in the Element as requested by the commenter. If and when a development application is submitted for development of the site, the City will prepare the necessary environmental documents, per CEQA, to evaluate the specific environmental impacts of the proposed project. The scope and content of the project-specific environmental document will be determined by the use-type and size of the proposed development. For example, a proposal for an office park would have different potential environmental impacts than a commercial center.

Furthermore, the proposed regional commercial designation is intended to encourage uses with a broader regional market draw than the neighborhood commercial or community commercial designated areas along MacArthur Boulevard near the site. The Element anticipates that the sites designated as regional commercial sites located on highways will draw different customers than the neighborhood commercial and community commercial sites located on neighborhood arterials such as MacArthur Boulevard and not result in significant adverse impacts on the economic vitality of either commercial locations. Since the regional commercial designation does not include a proposal for development of a project at this time, subsequent analysis of potential economic consequences should be prepared for any specific project proposed for the site when the details and commercial character of that development proposal is known.

2. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element, as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.
3. The Draft EIR traffic analysis did not assume or include the “Hengenberger/73rd Extension to I-50” since this project was highly speculative and funding had not been identified. Therefore a re-analysis at this time would result in the same conclusions already included in the Draft EIR. As discussed on pages III.B-17 and III.B-19 of the Draft EIR, a significant impact would occur along the Hegenberger Road corridor between I-580 and I-880. This corridor includes 73rd Avenue and Edwards Avenue. The Countywide model that was used for the traffic analysis included in the Draft EIR did not assume any improvements within the Hegenberger Road corridor. Therefore, the City Council’s decision would not change the

analysis presented in the Draft EIR.

The commenter is not correct in stating that alternative land uses at the Leona Quarry would have less significant impacts on the Hegenberger Road corridor. Even without retail development at this location, the Hegenberger Road corridor would continue to operate at LOS E.

4. An analysis of impacts associated with the two land use classifications requested by the commenter for the Leona Quarry are included in the Draft EIR as the No Project Alternative. The other “non-retail” uses cited by the commenter for the Leona Quarry are possible land uses under the Regional Commercial designation. Therefore, a separate analysis of these land uses is not warranted in the EIR.
5. It is proper to rely on adopted policies in the Open Space and Recreation Element of the General Plan as mitigation measures for the proposed Land Use and Transportation Element because these policies are relevant to the overall development of Oakland. It is the content of the policies, not the timing of when the policies were adopted, that is relevant to their applicability to be used as mitigation measures for the proposed Land Use and Transportation Element.
6. The commenter is correct in noting that there is an applicable reclamation plan for the Leona Quarry. The proposed change in land use for the Leona Quarry identified in the proposed Land Use and Transportation Element does not affect the validity of the reclamation plan. Any future change to the reclamation plan would require separate and subsequent environmental review.
7. Both of the projects cited by the commenter were included in the overall development envisioned for the City of Oakland. Both projects were included in the Congestion Management Agency’s Countywide Model for analyzing traffic impacts and the project “opposite the Coliseum” is included in the Coliseum Showcase District (see Table II-6 on page II-21 of the Draft EIR).
8. Prohibition of retail uses at the Leona Quarry site would not result in the elimination of any of the impacts cited by the commenter. These impacts would occur under any development scenario at the Leona Quarry. The commenter’s suggestion regarding the use of the Leona Quarry site for open space is included in the Draft EIR as part of the No Project Alternative.
9. These comments are acknowledged and responses to these comments have been prepared (see the responses to comments H-10 and H-11, below).
10. Section III.K of the Draft EIR describes the geology and seismicity impacts that would occur as a result of the proposed Land Use and Transportation Element and specific mention is made of the challenges associated with development at the Leona Quarry. Any development

at or use of the Leona Quarry would be required to comply with City policies and building standard to minimize the effects of a seismic event.

11. These comments are associated with the text of the proposed Land Use and Transportation Element and not on the Draft EIR. The City acknowledges these comments and will revise the proposed Land Use and Transportation Element, as appropriate. These comments will be made part of the record and made available to the decision-makers prior to a final decision on the proposed project.