



November 22, 2017

Fatema Crane
Associate Planner
Planning and Development Department
Land Use Planning Division
City of Berkeley
1947 Center Street
Berkeley, CA 94704

SUBJECT: Response to the Notice of Preparation of the Draft Environmental Impact Report for the 600 Addison Street Project

Dear Ms. Crane,

Thank you for the opportunity to comment on the Notice of Preparation of the Draft Environmental Impact Report (DEIR) for the proposed 600 Addison Street Project. The 8.67-acre, single parcel, project site is bound by Addison Street to the north, Bancroft Street to the south, and Union Pacific Railroad track to the east and Bolivar Drive to the west. The proposed project would replace the existing 55,000 square feet of light industrial and manufacturing space and 130 surface parking spaces and replace it with 475,000 square feet of research and development and office space and either 55,789 or 34,544 square feet of parking

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

Basis for Congestion Management Program Review

- It appears that the proposed project will generate at least 100 p.m. peak hour trips over existing conditions, and therefore the Congestion Management Program (CMP) Land Use Analysis Program requires the City to conduct a transportation impact analysis of the project. For information on the CMP, please visit: http://www.alamedactc.org/app_pages/view/5224

Use of Countywide Travel Demand Model

- The Alameda Countywide Travel Demand Model should be used for CMP Land Use Analysis purposes. The CMP was amended on March 26th, 1998 so that local jurisdictions are responsible for conducting travel model runs themselves or through a consultant. The City of Berkeley and the Alameda CTC signed a Countywide Model Agreement on September 15, 2010. Before the model can be used for this project, a letter must be submitted to the Alameda CTC requesting use of the model and describing the project. A copy of a sample letter agreement is available

upon request. The most current version of the Alameda CTC Countywide Travel Demand Model is the December 2015 update.

Impacts

- The DEIR should address all potential impacts of the project on the Metropolitan Transportation System (MTS) roadway network. MTS roadway facilities in the project area include:
 - Interstate 80
 - University Avenue
 - 6th Street
 - 7th Street
 - San Pablo Avenue

For the purposes of CMP Land Use Analysis, the Highway Capacity Manual 2010 freeway and urban streets methodologies are the preferred methodologies to study vehicle delay impacts. Also, the Alameda CTC has *not* adopted any policy for determining a threshold of significance for Level of Service for the Land Use Analysis Program of the CMP. Professional judgment should be applied to determine the significance of project impacts (Please see chapter 6 of 2015 CMP for more information).

- The DEIR should address potential impacts of the project on MTS transit operators.
 - MTS transit operators potentially affected by the project include AC Transit and Capitol Corridor.
 - Transit impacts for consideration include the effects of project vehicle traffic on mixed flow transit operations, transit capacity, transit access/egress, need for future transit service, and consistency with adopted plans. See Appendix J of the 2015 CMP document for more details.
- The DEIR should address potential impacts of the project to cyclists on the Countywide Bicycle Network.
 - Bicycle related impacts to consider include effects of vehicle traffic on bicyclist conditions, site development and roadway improvements, and consistency with adopted plans. See Appendix J of the 2015 CMP document for more details.
- The DEIR should address potential impacts of the project to pedestrians in Pedestrian Plan Areas of Countywide Significance.
 - Pedestrian related impacts to consider include effects of vehicle traffic on pedestrian conditions, site development and roadway improvements, and consistency with adopted plans. See Appendix J of the 2015 CMP document for more details.

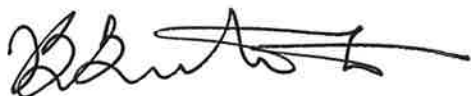
Mitigation Measures

- Alameda CTC's policy regarding mitigation measures is that to be considered adequate they must be:

- Adequate to sustain CMP roadway and transit service standards;
 - fully funded; and
 - consistent with project funding priorities established in the Capital Improvement Program of the CMP, the Countywide Transportation Plan (CTP), and the Regional Transportation Plan (RTP) or the federal Transportation Improvement Program, if the agency relies on state or federal funds programmed by Alameda CTC.
- The DEIR should discuss the adequacy of proposed mitigation measure according to the criteria above. In particular, the DEIR should detail when proposed roadway or transit route improvements are expected to be completed, how they will be funded, and the effect on service standards if only the funded portions of these mitigation measures are built prior to Project completion. The DEIR should also address the issue of transit funding as a mitigation measure in the context of the Alameda CTC mitigation measure criteria discussed above.
 - Jurisdictions are encouraged to discuss multimodal tradeoffs associated with mitigation measures that involve changes in roadway geometry, intersection control, or other changes to the transportation network. This analysis should identify whether the mitigation will result in an improvement, degradation, or no change in conditions for automobiles, transit, bicyclists, and pedestrians. The HCM 2010 MMLOS methodology is encouraged as a tool to evaluate these tradeoffs, but project sponsors may use other methodologies as appropriate for particular contexts or types of mitigations.
 - The DEIR should consider the use of TDM measures, in conjunction with roadway and transit improvements, as a means of attaining acceptable levels of service. Whenever possible, mechanisms that encourage ridesharing, flextime, transit, bicycling, telecommuting and other means of reducing peak hour traffic trips should be considered. The Alameda CTC CMP Menu of TDM Measures and TDM Checklist may be useful during the review of the development proposal and analysis of TDM mitigation measures (See Appendices F and G of the 2015 CMP).

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

Sincerely,



Saravana Suthanthira
Principal Transportation Planner

cc: Chris G. Marks, Associate Transportation Planner

