11.2B REGIONAL & LOCAL AGENCY COMMENTS

LETTER B1

California Regional Water Quality Control Board
San Francisco Bay Region

Terry Tamminen
Secretary for Environmental Protection

Internet Address: http://www.swrcb.ca.gov
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 • FAX (510) 622-2460

Arnold Schwarzenegger
Governor

May 21, 2004
File No.: 2198.09 (BT)

Ms. Jennifer Lawrence
University of California, Berkeley
1936 University Avenue, Suite 300
Berkeley, CA 9470-1380

Re: Long Range Development Plan & Chang-Lin Tien Center for East Asian Studies Draft Environmental Impact Report (SCH#2003082131)

Dear Ms. Lawrence:

We have reviewed the Draft Environmental Impact Report (DEIR) for the 2020 Long Range Development Plan & Chang-Lin Tien Center for East Asian Studies (Project) at the University of California, Berkeley. The proposed project will replace the 1990-2005 LRDP as the policy document that guides land use and capital investment at UC Berkeley. The Project involves plans to construct the Chang-Lin Tien Center for East Asian Studies (Center). The Center will consist of two buildings placed along the southern and western perimeter of Observatory Hill, between Haviland and McCone Halls. Thank you for the opportunity to offer the following comments, which are to advise the University of California at Berkeley of the San Francisco Regional Water Quality Control Board's (Water Board) concerns and permitting requirements.

The proposed development would disturb more than one acre of land during construction. It must be covered under the State NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Permit). This can be accomplished by filing a Notice of Intent (NOI) with the State Water Resources Control Board, Division of Water Quality. Copies of the General Permit and NOI can be obtained from the State Board's web page, www.swrcb.ca.gov/stormwtr/construction.html, or by contacting Board staff at (510) 622-2300. The project sponsor must propose and implement control measures that are consistent with the General Permit and with the recommendations and policies of the local agency and the RWQCB.

B1-1

The DEIR indicates that there may be a potential for impacts to aquatic resources including wetland habitat, streams or tributaries, or other waters of the State. Both a Clean Water Act (CWA) Section 401 water quality certification and a CWA Section 404 Permit from the U.S. Army Corps of Engineers may be necessary for projects involving impacts to waters of the U.S. Additionally, the project proponent may need to file a Report of Waste Discharge if the project may result in a discharge of pollutants to waters of the State. Work involving stream channels may require a Stream Bed Alteration Agreement from the California Department of Fish and Game.

B1-2

LETTER B1 Continued

The Board adopted U.S. EPA's Section 404(b)(1), "Guidelines for Specification of Disposal Sites for Dredge or Fill Material," dated December 24, 1980, in its Basin Plan for determining the circumstance under which filling of wetlands, streams or other waters of the State may be permitted. Section 404(b)(1) Guidelines prohibit all discharges of fill material into regulated waters of the United States, unless a discharge, as proposed, constitutes the least environmentally damaging practicable alternative that will achieve the basic project purpose.

The Guidelines sequence the order in which proposals should be approached: 1) Avoid - avoid impacts to waters; 2) Minimize - modify project to minimize impacts to waters; and, 3) Mitigate – once impacts have been fully minimized, compensate for unavoidable impacts to waters. When it is not possible to avoid impacts to water bodies, disturbance should be minimized. Mitigation for lost water body acreage and functions through restoration or creation should only be considered after disturbance has been minimized. Where impacts cannot be avoided, the creation of adequate mitigation habitat to compensate for the loss of water body acreage, functions and values must be provided.

Cumulative and indirect impacts of wetlands must also be prevented. Indirect impacts include deposition of sediments; erosion of substratum; additional water (flooding); reduced water supply or flows; creating a condition of pollution; shading; and watershed degradation.

This project would increase the amount of impervious surfaces and as a result increase the amount of stormwater runoff from the site. Regional Board recommends the development and implementation of a long term Storm Water Management Plan (SWMP) to protect water quality after construction. Post-construction stormwater concerns may include significant changes in the hydrograph of the receiving waters caused by stormwater runoff, or discharge of pollution such as fertilizers, pesticides and petroleum products to a waterway. We encourage the use of innovative site designs that reduce impermeable surfaces and incorporate Best Management Practices (BMPs) to protect and treat stormwater. These considerations should be incorporated into project design as early in the planning phase as possible.

B1-3

Regional Board staff also recommends obtaining a copy of *Start at the Source-Design Guidance manual for Stormwater Quality Protection.* This manual provides innovative design techniques for structures, parking lots, drainage systems and landscaping. This manual may be obtained from the San Francisco Estuary Project at (510) 622-2465, or can be electronically accessed from www.basmaa.org.

If you have any question, please call Dale Bowyer at (510) 622-2323, or reach me via e-mail at dcb@rb2.swrcb.ca.gov.

Sincerely,

Dale Bowyer
Senior Water Resources Control Engineer

cc: State Clearinghouse

11.2B1 RESPONSE TO COMMENT LETTER B1

RESPONSE TO COMMENT B1-1

The writer's comment is noted. As described in Chapter 4.7, Hydrology, of the Draft EIR, UC Berkeley would comply with all RWQCB requirements.

RESPONSE TO COMMENT B1-2

The writer's comment is noted. UC Berkeley would comply with all applicable regulatory requirements.

RESPONSE TO COMMENT B1-3

Chapter 4.7 of the Draft EIR describes a number of best practices UC Berkeley implements to reduce stormwater pollutant impacts. As noted at page 4.7-29, the net effect of implementation of the 2020 LRDP would be no net increase in runoff over existing conditions.

LETTER B2

"Saravana Suthanthira" <ssuthanthira@accma.ca.gov>

06/09/2004 04:48 PM

To: <2020LRDP@cp.berkeley.edu>
cc:
Subject: Comments on the LRDP EIR

Hello Jennifer,
We would like to request an extension of one week to submit our comments on the above EIR. We would very much appreciate it. Please let me know your response soon.
Thank you

Saravana Suthanthira
Associate Transportation Planner
ACCMA
Ph- (510) 836-2560
Fax - (510) 836-2185

11.2B.2 RESPONSE TO COMMENT LETTER B2

RESPONSE TO COMMENT B2-1

The agency's comments were accepted.

LETTER B3

EAST BAY
MUNICIPAL UTILITY DISTRICT

RECEIVED
JUN 17 2004
PHYSICAL & ENVIRONMENTAL
PLANNING

June 14, 2004

Jennifer Lawrence, Senior Planner
Environmental and Long Range Planning Capital Projects
1936 University Avenue
Berkeley, CA 94720

Dear Ms. Lawrence:

Re: Draft Environmental Impact Report – University of California, Berkeley 2020 Long Range Development Plan and Chang – Lin Tien Center for East Asian Studies, Berkeley

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the University of California, (UC) Berkeley 2020 Long Range Development Plan and Chang – Lin Tien Center for East Asian Studies in Berkeley. EBMUD commented on the Notice of Preparation (NOP) for the Draft EIR for the subject project on September 29, 2003, and also prepared and forwarded a Water Supply Assessment (WSA) on January 29, 2004, pursuant to Sections 10910-10915 of the California Water Code. All input contained in those documents still apply. With regard to the subject Draft EIR, EBMUD has the following comments.

WATER RECYCLING

On page 2-55, Continuing Best Practice USS-2.1-d, please revise the mitigation measure to include the following language *(italic represents new language)*:

UC Berkeley will continue to incorporate specific water conservation measures *and the use of recycled water from EBMUD for appropriate uses* into project design to reduce *potable* water consumption and wastewater generation. This could include the use of special air flow aerators, water-saving shower heads, flush cycle reducers, low-volume toilets, drip irrigation systems, drought restraint plantings in landscape areas. *EBMUD's Policy 8.1 requires "...that customers ...use non-potable water for non-domestic purposes when it is of adequate quality and quantity, available at reasonable cost, not detrimental to public health and not injurious to plant life, fish and wildlife" to offset demand on EBMUD's limited potable water supply. EBMUD has been coordinating with UC Berkeley officials on a potential Satellite Recycled Water Treatment Plant Project. UC Berkeley officials have been supportive of project concept. If implemented, portions of UC Berkeley's campus would receive recycled water for irrigation within the next ten years. EBMUD will continue to closely coordinate development of this project with UC Berkeley.*

B3-1

LETTER B3 Continued

WATER CONSERVATION

The proposed UC Berkeley 2020 Long Range Development Plan and Chang – Lin Tien Center for East Asian Studies presents an opportunity to incorporate many water conservation measures. EBMUD staff would appreciate the opportunity to meet with the project sponsor both prior to drafting the Final EIR and for specific projects as they become subject to this long-range plan. A key objective of these discussions will be to explore timely opportunities to expand water conservation via early consideration of EBMUD's conservation programs and best management practices applicable to the projects.

On page 2-55, Table 2-1, Continuing Best Practice USS-2.1-d, second sentence, we request that the following language *(italic represents new language)* be added:

This could include the use of special air-flow aerators, water-saving shower heads, flush cycle reducers, low-volume toilets, drip irrigation systems, *weather based or ET irrigation controllers, and the use of turf for functional uses only and* drought restraint plantings in landscape areas. **B3-2**

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

Sincerely,

WILLIAM R. KIRKPATRICK
Manager of Water Distribution Planning

WRK:GAA:sb
sb04_153.doc

11.2B.3 RESPONSE TO COMMENT LETTER B3

RESPONSE TO COMMENTS B3-1 AND B3-2

Best Practice USS-2.1-d has been revised in the Final EIR as follows:

> **Continuing Best Practice USS-2.1-d:** UC Berkeley will continue to incorporate specific water conservation measures into project design to reduce water consumption and wastewater generation. This could include the use of special air-flow aerators, water-saving shower heads, flush cycle reducers, low-volume toilets, weather based or evapotranspiration irrigation controllers, drip irrigation systems, ~~and~~ the use of drought resistant plantings in landscaped areas, and collaboration with EBMUD to explore suitable uses of recycled water.

The writer had also requested the phrase "... turf for functional uses only ..." in this Best Practice. However, the Campus Park landscape, particularly within the classical core, includes many areas where turf is integral to the historic design concept of the place, such as Faculty Glade, Memorial Glade or the West Crescent. While the University supports drought resistant plantings in general, the suggested language would be overly restrictive for the Campus Park.

LETTER B4

1600 Franklin Street, Oakland, CA 94612 - Ph. 510/891-4716 - Fax. 510/891-7157

June 18, 2004

Ms. Jennifer Lawrence
Co-Director, 2020 LRDP EIR
Facilities Services
1936 University Avenue #300
University of California
Berkeley, CA 94720

Subject: Draft Environmental Impact Report (EIR) University of California Berkeley 2020 Long Range Development Plan

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the Draft EIR for the University of California Berkeley's 2020 Long Range Development Plan (LRDP).

UC Berkeley is one of the most important transit and travel destinations in the entire AC Transit service area. With over 30,000 students, more than 10,000 employees and additional visitors, it is one of the largest trip "attractors" in the East Bay. AC Transit and the University have frequently worked together, most notably on the student "Ecopass" that provides a bus pass for each student paid for through registration fees. AC Transit and the University are planning an experiment in providing bus passes for UC faculty and staff. B4-1

1. GENERAL COMMENTS

A. Scope and Purpose of the LRDP and the EIR

The LRDP is roughly analogous to a city General Plan. The LRDP sets out academic goals and states physical expansion demands for academic space, housing, and parking that it asserts are required to implement the goals. The LRDP anticipates some 1,650 additional students—growth of approximately 5%. It also anticipates addition of 2,870 new faculty and staff—or approximately 20%. The LRDP states that 2,200,000 additional square feet of academic space, 2,600 additional student beds, and 2,300 additional parking spaces are required to support this increase in campus population.

The LRDP provides siting guidelines for the development of facilities, in some cases indicating potential development/redevelopment sites on and around campus, and in some cases designating "zones" where various facilities might be built. However, it does not specifically site individual facilities, other than the Chang Lin Tien Center for East Asian Studies. The EIR evaluates the campus' overall development program, rather than individual projects. This programmatic approach means that further environmental review (although not necessarily EIRs) will be required to evaluate the localized impacts of construction projects as they are developed. B4-1

B. **The LRDP and the EIR Overall**

AC Transit supports the University's goal of developing needed "academic and support" space to maintain the University's academic excellence. We also support the University's effort to develop this space on and around the main campus, although we have concerns about the consideration of transit in siting facilities. AC Transit supports the Housing Zone concept, although we believe that some refinements of the idea would make it more realistic and comprehensive in guiding siting decisions.

We applaud the University's commitment to maintaining no more than a 10% drive alone share for students commuting to campus. However, we are concerned about the LRDP's approach to transportation for employees. We understand that the campus' current employee drive alone share, like that in Downtown Berkeley as a whole, is lower than in most East Bay employment centers.

However, the LRDP relies heavily on single occupant private automobiles to provide increased faculty and staff access to the campus. It assumes that at least 50% of new faculty and staff will drive alone to campus, and in fact provides parking spaces that accommodate a higher level of driving (to compensate for previous "shortfalls"). The document largely dismisses transit as a mode of handling increased trips. The EIR calls for 3,000 additional parking spaces, an increase of more than 40% over the existing level. B4-2

This approach would increase congestion, air pollution, and conflicts with pedestrians and bicyclists in an area already suffering from all of these problems. It will make bus transit less attractive, by making the bus trip slower and making the walk from bus stop to final destination less pleasant. Simultaneously, it will increase the attractiveness of driving. We believe that the University should instead continue and intensify its efforts to shift trips from single occupant vehicles to other modes. We urge the University to build open its strong record in supporting non-automotive modes of travel.

AC Transit believes that there are numerous approaches that could further reduce the share of employees driving alone to campus. A reduction of only 10% in the share of employees driving alone to campus could take over 3,000 trips off the streets of Berkeley daily. Therefore, at the end of this letter we suggest mitigations concerning transit passes, improvements to Berkeley streets, express bus service, and evaluation of additional potential transit improvements. B4-3

C. Land Use Planning--The Location of University Buildings

The LRDP is a long range land use planning document that includes both criteria and potential locations for University buildings. Land use planning should consider the relationship of development locations to transit. The LRDP should include ease of access to transit as an important siting criterion. However, the LRDP fails to do so. B4-4

For access purposes, the LRDP appears to treat the entire 180 acre "Central Campus Park" as a single site. At no point, does the LRDP or the EIR distinguish between more and less transit-accessible locations on the central campus. However, the Central Campus Park is almost one mile long. Some parts of the Campus Park have better access to transit than others, even though transit service is available around the entire periphery of the campus. These differences are longstanding and likely to persist. They result from the location of BART, the hills along and around the north side of campus, the city' street and land use patterns, and the interruption of the city street grid by the campus park itself. B4-5

These differences are important for siting facilities. Most travelers are generally unwilling to walk long distances to a transit stop, particularly if the alternative is a car parked closer to their origin. The industry standard for an easy walk to transit stop is 1/4 mile, or approximately 1,300 feet. This is a distance most people can walk in 5 minutes or less. AC Transit's recent survey of passengers confirmed this pattern for people walking to our bus stops. Over 85% of passengers who walked to the bus walked four blocks or less.

The highest level of transit service for the Berkeley campus is at Berkeley BART station, one block west of the campus. Berkeley BART is also the city's principal bus hub. The next highest level of service is available at Bancroft and Telegraph. This stop is served not only by existing trunk lines, including College-University line 51, but is also planned for a stop on the Telegraph-International Bus Rapid Transit line.

The western and southern sides of campus are within 1/4 mile of Berkeley BART and Bancroft & Telegraph respectively. All other things being equal, buildings in these locations will be more likely to attract transit riders than buildings in the northern and eastern portions of the central campus.

The University could refine its understanding of these relationships by analyzing the travel modes of employees working in various sectors of the central campus. The spatial elements of the Plan (Chapter 3.1) would be easier to understand if the scale of the maps was indicated. We would also suggest a list of figures for the EIR and the LRDP. B4-6

D. Housing Zone

The LRDP defines a target area for new University-related housing--the "Housing Zone." The Housing Zone is defined as areas that are either a) within one mile of the center of campus or b) within one block of a transit line providing a trip to the center of campus (including walk time) of 20 minutes. Areas that do not allow densities of at least 40 units per acre are excluded. The zone thus defines areas for transit-accessible student housing. The zone is mapped on p. 3.1-26 of the LRDP.

In general this approach is sound; we also suggest some modest modifications to the definition and the map. The standard of housing locations being within "one block" of a transit line is both imprecise and unduly restrictive, since block lengths vary greatly. As noted above, the industry standard for easy walking distance to a bus stop is 1/4 mile. The Housing Zone should be expanded to included appropriately zoned parcels within 1/4 mile of the major transit corridors shown on Figure 3.1-5. This would typically represent 2-3 blocks from the corridor. B4-7

The projections for areas within 20 minutes travel time appear to be based on current AC Transit schedules. However, by 2020, AC Transit plans to be operating significantly faster service, which would bring more areas within a 20 minute radius. This is particularly important on Telegraph Avenue in North Oakland, where the Bus Rapid Transit should extend the 20 minute travel time area well south of Highway 24 where it is shown to end. We also plan to develop "Rapid" service on the University-College corridor, allowing an extension of the 20 minute radius south along College Avenue beyond Rockridge BART (the current ending point). B4-8

2. TRANSPORTATION ANALYSIS

AC Transit has comments about the document's background assumptions and assertions, the Plan's parking proposals, the EIR's analysis of impacts, and mitigations for impacts.

A. Background: UC Berkeley and Other Campuses

The Plan states that UC Berkeley has done well in trip-reduction: "*By California standards, UC Berkeley has an exemplary record of promoting alternatives to the automobile*" (p. 3.1-28). However, other large California campuses are not the most appropriate for UC Berkeley to compare itself to. These campuses are generally located in lower density suburban locations that are not amenable to transit commuting (e.g. UC Irvine, UC Riverside, UC San Diego). It may be useful to compare UC Berkeley with similarly situated campuses in dense urban areas with adjacent bus and rail transit. Similarly situated campuses include Harvard University and the Massachusetts Institute of Technology (MIT) in Cambridge, Massachusetts; the University of Pennsylvania in Philadelphia; the University of Maryland in College Park (just outside Washington D.C.) and Northwestern University in Evanston, Illinois (outside Chicago). B4-9

B. Plan Assumptions: Transit Improvements, Capital Requirements, and Fares

The Plan and the EIR at several points make an unsupported assertion that "*significant further reductions in drive-alone trips require major capital investments in new transit systems*" (p. 4.12-41). However, this claim is not correct, is not supported in transit literature, and should not be used to rationalize inaction on improving transit. B4-10

While some types of transit improvements--Bus Rapid Transit lines with dedicated median lanes--require major capital investments, many do not. In the last ten years, the transit industry has become increasingly effective at improving service and increasing ridership without making major capital investments.

Cost, speed, and amenities shape travelers' mode choices. There are ways of improving each of these without major capital investments. Employer paid passes can alter the relative cost of various modes. Amenities can be improved in many ways. Bus shelters can be improved, real time information ("Nextbus") can be provided both at stops and away from the stop, buses themselves can be and have been upgraded. UC Berkeley could contribute to the construction and maintenance of upgraded bus shelters around its periphery. The campus could bring Nextbus information into campus buildings. B4-11

The transit industry has made major advances in its efforts to improve bus travel speed in congested urban areas. The Bay Area has a large and expanding network of freeway express buses operating on High Occupancy Vehicle lanes. There are all day and peak hour bus lanes on arterial streets. In some cases, parking is prohibited during peak hours. The San Pablo Rapid benefits from transit signal priority, which reduces delay at red lights. Bus bulbs can speed up boarding and alighting and reduce bus dwell times. Many of these techniques for improving bus speed do not require major capital investments. B4-12

The Plan also asserts that "*…overall, cost is a less important factor in mode choice than convenience and travel time …*" This assertion is unsupported in the Plan and is unsupported in the literature of travel mode choice. The levels of cost involved, time savings and time penalties, and many other factors influence how travelers trade off convenience and time against cost. It is also clear that making transit free significantly increases ridership, as the Class Pass at UC Berkeley--among other instances--demonstrates. The success of Class Pass is a factor in allowing the University to realistically set a target that only 10% of students drive to campus. The assertion about cost and convenience should be removed from the document. B4-13

There are a number of methods to reduce (or eliminate) the cost of transit to the passenger, improve its speed, and improve the convenience and amenity level of transit. The LRDP presents an excellent opportunity to work with AC Transit and other transit providers to evaluate potential transit improvements and develop a world class transit system for the UC Berkeley campus. B4-14

C. Plan Assumptions: Rapids and the Anticipated 2020 Transit Network

The EIR describes the anticipated 2020 transit network in the "Baseline 2020 Transit Service" section (pp. 4.12-39 &40). This section discusses AC Transit's plan for Bus Rapid Transit on the Telegraph-International corridor. However, it overlooks our plans to provide Rapid service on several corridors serving the campus. These plans are summarized in AC Transit's **Strategic Vision**, which is a section of our main service planning document, the **Short Range Transit Plan** (the **Strategic Vision** has also been published as a stand alone document). B4-15

The **Strategic Vision** calls for development of Rapid bus service on the Shattuck/ Alameda and College/University corridors. University-related users might also benefit from planned upgrades on the Sacramento/Market and 6th/Hollis corridors. The City of Berkeley has repeatedly requested the extension of Bus Rapid Transit service from Downtown Berkeley to West Berkeley via University Avenue, although it has not identified any potential for dedicated lanes. The services anticipated in the **Strategic Vision** would be comparable to that provided by the San Pablo Rapid. AC Transit is developing cost estimates and identifying funding sources to implement these plans.

Transit service would therefore be upgraded on all four of the principal transit access corridors to the campus: Shattuck, University, and College Avenues, as well as Telegraph Avenue. These main corridors would have service to campus which is faster, probably more frequent, and certainly more comfortable. These changes will tend to boost transit ridership. These Rapid lines should be built into the assumed 2020 transit network and the modeling using that network.

D. Plan Proposal-- 3,000 New Parking Spaces to address "Inadequate Parking Capacity"—and Alternatives

The Plan's principal transportation initiative is the addition of 2,300 parking spaces above currently planned levels. Since some 700 spaces are approved but not yet built, the total addition of parking above current levels would be approximately 3,000 spaces, or over 40%. These spaces are proposed in response to presumed future and current shortfalls. The existence of the current shortfall is demonstrated by the fact that not all drivers who wish to park on campus are able to do so—a completely inappropriate criterion. B4-16

The EIR proposes a parking "Standard" as a criterion for measuring whether the LRDP has a significant impact under the California Environmental Quality Act (CEQA). The proposed standard is "*Would the project result in inadequate parking capacity?*" (p.4.12-40). However, this "standard" is both vague and environmentally counterproductive, and should be eliminated. Providing high levels of parking will encourage auto trip-making and degrade air quality. B4-17

The EIR provides no definition of "adequate" parking. It is in fact difficult to define "adequate" parking, because parking demand responds to a series of other conditions. The demand for parking changes with the cost of operating a vehicle, the cost of parking, and the cost and attractiveness of other travel modes, among other factors. B4-18

Because the "adequacy" of parking is driven by context and policy, the City of San Francisco has explicitly dropped parking shortfalls as an environmental impact in its Environmental Impact Reports. San Francisco notes that shortfalls in parking are temporary, not permanent physical impacts of the type that the California Environmental Quality Act (CEQA) was designed to address. They note that drivers adjust their behavior in response to localized parking shortages, often eliminating the shortfall. Thus it could be counterproductive and expensive for the University to build parking to meet a presumed shortfall that later turns into a surplus.

At the same time, the Plan rejects a transit-based alternative because of the incorrect assumption that large capital investments would be required. We recommend an alternative approach that does not increase parking, but instead focuses on improving transit stops, transit operating conditions and transit service, as well as the pedestrian and bicycle environment. The goal of this alternative approach would be accommodating the reasonable levels of campus population growth proposed by the LRDP without increasing automobile traffic. B4-19

E. Measuring Impacts: Traffic Increases

In our letter responding to the Notice of Preparation, AC Transit asked that the LRDP EIR specifically examine the impact of traffic and congestion increases on bus travel, but this was not done. Traffic increases concern AC Transit greatly because they tend to reduce the speed of bus travel. Traffic increases tend to affect buses more strongly than private cars, because buses usually must pull into and out of travel lanes. Increases in congestion also have a direct financial cost to AC Transit. If travel times slow, we must add buses in order to maintain a given headway--frequency of service--on a route. This typically requires cutting service elsewhere. Alternatively, AC Transit can reduce the frequency of a route and operate the same number of buses, degrading service to the passengers and probably reducing ridership. B4-20

Traffic increases also tend to degrade the pedestrian environment—a concern the LRDP reflects in its discussion of limiting vehicle traffic on the central campus. Any degradation of the pedestrian environment is detrimental to bus transit, since it makes potential passengers less willing to walk to their bus stops. B4-21

We are not in a position to evaluate whether the EIR has in fact projected traffic increases correctly. We are more concerned with the direction of change—are operating conditions for buses and environmental conditions for pedestrians improving or degrading. One area of uncertainty in the traffic analysis is whether the EIR has evaluated the localized impacts of planned parking increases. Intersections around new parking garages are likely to experience surges of traffic at peak hours, especially in the afternoon. This would slow bus travel and interfere with pedestrian and bicycle travel. B4-22 B4-23

The EIR seeks to minimize the impact of increases in congestion. It asserts that only increases in delay of 5% or more at an intersection are significant. Other EIRs, such as those prepared by the City of Emeryville, typically use a standard that a 3% increase is significant. Thus the EIR understates the number of significantly delayed intersection. A series of intersections on a bus corridor each suffering from small additional delays can result in a cumulative loss of bus travel time, an issue the EIR does not address. B4-24

The EIR notes, on p. 4.12-54 that select link levels of service would be degraded on University Ave. (on a segment which is almost two miles long), on San Pablo Avenue and on Shattuck Avenue (other major streets with bus lines are also impacted). These three streets are major bus corridors and the resultant slowing of bus operations will result in a loss of time and convenience for bus riders. It could easily result in a counterproductive loss of bus ridership. The EIR argues that these impacts are significant and unavoidable. However, AC Transit believes that they could be mitigated at least in part with the measures we describe in the next section. For these reasons, we strongly urge the University to build its response to employment growth around transit rather than parking. B4-25

F. Data Corrections on Class Pass Use

We have the following corrections to data on Class Pass use reported on p. 4.12-30. B4-26

Of 7, 121 respondents to the survey on Class Pass use:

- 83% of respondents use the Class Pass to ride AC Transit buses at least once a week;
- 35% of respondents use Class Pass to ride AC Transit buses at least once a day;
- The most popular bus routes are line 51 (45% of respondents), line 52 (19% of respondents), line 52L (14% of respondents), line 7 (19% of respondents) and line 40 (16% of respondents);
- About 65% of Class Pass respondents use AC Transit to commute between home and school and about 31% use AC Transit for shopping, recreational, and social purposes
- 75% reported willingness to pay additional costs to include BART ticket purchases with the Class Pass.

G. Mitigations that Would Support Transit

The Draft EIR does not adequately mitigate the significant negative impacts that increases in automobile travel would cause. It neither adequately addresses the impact of traffic congestion, nor provides mitigations that support transit. B4-27

The LRDP should incorporate and fund mitigations to address the increased congestion and to increase the transit share of travel to campus, particularly for employees. As noted above, the goal should be accommodating population growth without increasing automobile traffic. While detailed planning would be required to develop these approaches, certain types of mitigations would clearly be useful. B4-28

Commitment Not To Increase Auto Trips: The commitment not to increase automobile trips to the campus is an important policy baseline that UC Berkeley should adopt. Stanford University has made a long term commitment that the growth of the campus will result in no net new peak hour automobile trips. They have taken many actions as a result. Among other efforts, Stanford is providing substantial financial support for a new AC Transit line from Fremont to Stanford, with free service for Stanford employees. B4-29

Transit Fares: The University should assure that all students and staff have transit passes as a condition of employment or of being a student, with a universal funding mechanism like the registration fees currently used for Class Pass. This would clearly increase ridership, particularly if both AC Transit and BART participated. B4-30

New Transit Lines: While the UC campus is served by a rich network of transit lines, some augmentations may be useful. In particular, express bus service from locations not served by BART could be helpful. Such services could serve the University and other employers. The West Contra Costa corridor north from Richmond is a location with many UC employees and could be an appropriate candidate for such service, which UC Berkeley could help fund. B4-31

Improving Existing Transit Lines: The most important changes in transit service will be improvements to existing lines. UC Berkeley could provide financial and institutional support to these efforts. Beyond the Bus Rapid Transit, AC Transit will be developing Rapid service along Shattuck, College, and University Avenues. These will require funding for intersection improvements, transit signal priority, purchase of additional buses, and possibly for streetscape improvements such as bus bulbs. The University could fund improvements of the numerous bus stops on and near the campus that serve University students and staff. B4-32

Providing Transit Information: Information about transit is needed to make it possible for people to use transit. UC Berkeley could provide more such information. For example, bus arrival information could be provided in all campus buildings, using "Nextbus" signs like those being used along San Pablo Avenue. B4-33

Finally, we urge the University to fully enlist its own intellectual resources in the effort to further improve travel patterns to campus. UC Berkeley has a number of transportation planning resources beyond those of most employers. Because the University surveys student and staff travel patterns regularly, it has a rich database for evaluating travel patterns and actions that might improve these patterns. AC Transit would be happy to assist the University in analyzing the locations of students and staff and how transit service might be tailored for them. B4-34

UC Berkeley is also one of the nation's leading centers for research on transit and transportation. It is home to both topflight faculty and leading students in the field. The University administration should draw on this expertise as you develop transportation plans. This would serve to deepen and broaden the knowledge base that can be applied to campus planning. B4-35

Thank you for your interest on our comments. If you have any questions about them please contact Nathan Landau, Long Range Planning Division, 891-4792.

Yours Truly,

Nancy Skowbo
Acting Deputy General Manager for Service Development

Cc: AC Transit Board of Directors
Peter Hillier, City of Berkeley

11.2B.4 RESPONSE TO COMMENT LETTER B4

RESPONSE TO COMMENT B4-1
Summary statement. Please refer to detailed comments and responses, below.

RESPONSE TO COMMENT B4-2
2020 LRDP policies regarding parking and transit appear at pages 3.1-28 through 3.1-29 of the Draft EIR. See also Thematic Response 9 regarding parking demand, and Thematic Response 10 regarding alternative transportation.

RESPONSE TO COMMENT B4-3
Summary statement. Please refer to detailed comments and responses, below.

RESPONSE TO COMMENT B4-4
The statement is incorrect. Transit access is clearly a criterion for the location of new student housing in the 2020 LRDP: the Housing Zone, in which all new student housing built under the 2020 LRDP would be located, is defined by the criteria of walking distance and transit access to campus. See section 3.1.8 and figure 3.1-5 of the Draft EIR. See also response to comment B4-5, below.

RESPONSE TO COMMENT B4-5
For most campus locations and for most who frequent the central campus, transit is more convenient and accessible than any other mode. Please refer to page 3.1-26 of the Draft EIR, showing the boundaries of a one mile radius of the central campus. Please also refer to page 4.12-34, showing the Bear Transit campus shuttle routes; and page 4.12-32, showing AC Transit routes. Central campus parking is not available to most staff or students; further the 2020 LRDP would reduce the quantity of central campus parking. See pages 3.1-45 to 3.1-46 of the Draft EIR. The writer's opinions are noted.

RESPONSE TO COMMENT B4-6
The writer suggests UC Berkeley look for a relationship between travel modes and work location. UC Berkeley regularly surveys staff and students regarding housing and transportation, and the writer's suggestion will be forwarded for consideration in the next survey.

RESPONSE TO COMMENT B4-7
While the writer's comments regarding easy walking distance to transit stops are noted, the one-block distance used to define the Housing Zone reflects not only the desire to have a very strong incentive for transit use, but also the land use designations in the Berkeley and Oakland General Plans. In general, designations suitable for high density housing tend to extend only one block on either side of major arterials. UC Berkeley therefore believes the one-block limit should be retained.

RESPONSE TO COMMENT B4-8
In fact, the original Housing Zone was larger, because it used the criterion of a 20 minute transit trip to the edge of campus. As the result of comments received from the ASUC during the scoping process, however, the zone was reduced to its present dimensions. The objections of the ASUC had to do with both a more realistic measure of travel time, to include the walk from transit stop to destination, and the impact of

physical dispersion on the intellectual community. UC Berkeley finds the arguments of the ASUC to be persuasive, and the Housing Zone should remain as presently defined.

The writer is correct in anticipating the zone boundaries could change over time in response to service changes; however this would not change the definition of the zone itself, which is based on travel time. Future improvements in travel time due to BRT would be taken into consideration in adjusting the Housing Zone boundary in the future. The caption to figure 3.1-5 has been revised in the Final EIR to clarify the distinction. See also response to comment B7-28.

RESPONSE TO COMMENT B4-9

A variety of urban campuses are suggested as examples for transportation promotion; yet urban environments differ in the availability, desirability, service quality, cost and commute context for transit, and strictly comparable environments are difficult to ascertain. Programs adopted at other universities may help mitigate the traffic impacts of campus growth but such benefits may not be known at this time. Accordingly, the effects of these measures in mitigating traffic impacts cannot be guaranteed and cannot be used as a rationale for identifying a potential impact as mitigated to a less than significant level. The effectiveness of UC Berkeley trip reduction measures will be apparent in the mitigation monitoring process. See Thematic Response 2 on mitigation monitoring; see also Thematic Response 10 on trip reduction.

Thematic Response 9 compares the parking program in the 2020 LRDP with several other urban research universities, suggested by the writer and other commentors as having exemplary programs of incentives for alternate transportation modes.

RESPONSE TO COMMENT B4-10

The writer notes that some types of transit improvements do not require major capital investments. The writer presents no data on any program UC Berkeley might implement to leverage limited funding for maximum benefit in its transit programs.

RESPONSE TO COMMENT B4-11

In addition to the Bear Pass program for faculty and staff to be implemented this fall (see Thematic Response 3 and Thematic Response 10), UC Berkeley is negotiating a contract with Lamar Advertising (Alameda County's shelter vendor) to install freestanding shelters and kiosks at campus shuttle and AC Transit bus stops on campus property. The City of Berkeley is implementing a similar program for sites throughout the City.

In certain settings around the campus, bus shelters are physically difficult to place and a kiosk (one side campus map/shuttle routes, one side advertising) would be substituted to mark the stop and provide information. The current program calls for the installation of 14 shelters and 4 kiosks; most will be installed on the campus perimeter, along Oxford Street, Hearst Avenue, Gayley Road and Piedmont Avenue, and Bancroft Way. This program is envisioned as the first phase of a larger bus shelter/kiosk program that would eventually be expanded to include shuttle routes in the Southside, downtown Berkeley, the Northside, and possibly Albany and Richmond.

Other improvements, such as Nextbus technology, are under consideration. Usually, and particularly in times of limited resources, transportation planners must responsibly

evaluate the cost of any program against the anticipated benefits to prioritize program implementation.

RESPONSE TO COMMENT B4-12

The comment is not a comment on the Draft EIR. No response is required. See also response B4-10, above.

RESPONSE TO COMMENT B4-13

The text at page 3.1-29 of the Draft EIR clearly attributes the referenced finding to a UC Berkeley survey.

While the UC Berkeley Class Pass "significantly increases ridership" it may not be a significant factor in the student mode split. As surveyed in 1997 (prior to the Class Pass) the student drive alone rate was 13%; in 2000 (after the Class Pass was instituted) the drive alone rate was 11%. How much this reduction is associated directly with the Class Pass is unclear – other issues such as parking fee, parking availability, campus housing availability, rainy vs. dry winter, can all influence driving rates year to year. For a little fewer than half of students who have cars, the Class Pass influences how often they drive to campus, according to a 2001 Class Pass survey.

The writer suggests "making transit free", presumably implying "free" to the end user. For the City of Berkeley Eco Pass, the City pays AC Transit $60 annually per pass, and is required under the program to purchase a minimum of 1400 passes. Students similarly pay AC Transit for the Class Pass, and UC Berkeley and participating employees will pay AC Transit for the Bear Pass. The comment is noted.

RESPONSE TO COMMENT B4-14

The writer's opinion that the LRDP presents an excellent opportunity to work with AC Transit is noted. UC Berkeley has a fruitful ongoing relationship with AC Transit: UC Berkeley and AC Transit jointly developed the Class Pass program putting AC Transit passes in the hands of every Cal student; with AC Transit and the City of Berkeley, UC Berkeley jointly developed and implemented a pilot shuttle program from Rockridge BART; UC Berkeley leases AC Transit buses for the campus shuttle program; UC Berkeley staff serve on the Bus Rapid Transit Planning technical advisory committee; this year, UC Berkeley and AC Transit developed the Bear Pass program for UC Berkeley employees; AC Transit tickets are sold through UC Berkeley parking and transportation offices.

RESPONSE TO COMMENT B4-15

The Draft EIR discussion of future 2020 baseline transit service includes only projects that are fully funded in AC Transit's 2001-2010 Short Range Transit Plan. UC Berkeley users would benefit from rapid bus service on the other corridors noted, namely Shattuck/Alameda, College/University, Sacramento/Market and Sixth/Hollis, and UC Berkeley supports AC Transit's efforts to achieve this service level. However, because the funding for these projects is not assured, the 2020 LRDP EIR traffic and transit impact evaluations do not assume them to be in place. If they are funded in the future, the number of transit riders could increase and this would have a beneficial impact on traffic.

RESPONSE TO COMMENT B4-16
The writer's opinion is noted. Please see Thematic Response 9 regarding parking demand.

RESPONSE TO COMMENT B4-17
The significance thresholds in the Draft EIR are based on those set forth in the California Environmental Quality Act. See Appendix G of the CEQA Guidelines, CCR Title 14, Chapter 3. The Secretary of the California Resources Agency, which promulgates the CEQA Guidelines and their appendices, deemed the referenced threshold appropriate. The threshold was also included in the 2020 LRDP EIR Notice of Preparation.

When inadequate parking exists, persons in cars looking for parking tend to circulate more, influencing traffic and air quality.

RESPONSE TO COMMENT B4-18
The writer's comments are noted.

RESPONSE TO COMMENT B4-19
See Thematic Response 3 regarding 2020 LRDP Alternatives.

RESPONSE TO COMMENT B4-20
The incremental increase in traffic congestion created by the 2020 LRDP is analyzed in Impacts TRA-6, 7, 8, 9 and 10 at pages 4.12-48 thru 4.12-55 of the Draft EIR. The increase in transit vehicle delays are assumed to be similar to those of other vehicles at the impact locations, although the comment is noted that baseline transit speeds and headways are affected by the special operational requirements of buses, namely pulling in and out of traffic frequently. The 2020 LRDP does not directly identify additional bus stops nor does it call for increased service frequency, other than that which AC Transit itself is planning for. Therefore, the impact on transit service delays is similar to the impact on general vehicle traffic delays, as described in Impacts TRA-6 through TRA-10. It is only appropriate for UC Berkeley to evaluate the environmental impacts; it has no authority to evaluate AC Transit's operations.

RESPONSE TO COMMENT B4-21
The writer's assertion is not a comment on the Draft EIR. No response is required.

RESPONSE TO COMMENT B4-22
Data regarding traffic were closely coordinated between consultants for AC Transit and consultants for UC Berkeley.

RESPONSE TO COMMENT B4-23
Appendix F, in the Draft EIR Volume 2, provides a detailed description of how traffic generated by the 2020 LRDP was assigned to the intersections both near the parking zones and throughout the City. Please refer to the text on page F.1-9, along with Figure F.1-2, for a description of the parking locations assumed for analysis purposes, and the text on page F.1-16 and Table F.1-9 for a description of the trip distribution. The commenter is correct that intersections nearest a parking structure will experience traffic surges or "peaks"; the traffic analysis has been designed to project traffic volumes in the

vicinity of new parking supplies as accurately as possible, given the program-level definition of parking locations.

RESPONSE TO COMMENT B4-24
The 5% threshold of significance for intersection and CMP/MTS route impacts was chosen as a reasonable contribution level to represent significance, and to be as consistent as possible with the thresholds used in the City of Berkeley General Plan EIR. Corridor-level congestion increases are addressed by Impact TRA-10, which finds that segments of 5 CMP/MTS routes in Berkeley would exceed the CMP LOS standard with traffic generated by the 2020 LRDP.

RESPONSE TO COMMENT B4-25
The comment is noted. Below, at response to comments B4-29 through B4-34, the proposed mitigation measures are discussed.

RESPONSE TO COMMENT B4-26
The data that appears in the Draft EIR is correct for the survey years noted in the Draft EIR. The information presented by the writer is partly correct for the 2003 survey. According to the survey, 25% of respondents used AC Transit once a day; the top three bus lines used by students were the 51 (45%); 7 (19%); 52 (18%).

RESPONSE TO COMMENT B4-27
The writer's opinion is noted.

RESPONSE TO COMMENT B4-28
Access goals of the 2020 LRDP are presented at pages 3.1-28 through 3.1-29 of the Draft EIR. Further, as noted in Thematic Response 9, UC Berkeley may defer some portion of the 2020 LRDP parking program in recognition of AC Transit's BRT/Telegraph project.

RESPONSE TO COMMENT B4-29
The writer's suggestion that no net new peak hour auto trips be a policy baseline for UC Berkeley is noted. UC Berkeley attempts to capture information about campus-associated trips through regular surveys of faculty, staff and student travel; however, UC Berkeley is located in a densely urbanized environment where parking and travel access options are diverse. For example, the City/UC TDM Study found over 2000 study area commuters park in surrounding residential neighborhoods and walk to their destinations.[1] UC Berkeley has no direct control over modes of access.

Stanford has approximately 22,000 parking spaces for a population of 32,000 faculty, staff and students; Stanford also spends more than twice as much for a demand reduction program that generates a poorer mode split than UC Berkeley's.[2]

RESPONSE TO COMMENT B4-30
The Class Pass, paid for through student registration fees, was approved by vote of the students. The new Bear Pass is a voluntary program for faculty and staff. The writer's opinion that participation in the program should be required "as a condition of employment" is noted.

RESPONSE TO COMMENT B4-31

The writer's opinion is noted. Weighted results from the 2001 faculty and staff housing and transportation survey indicate that some 2750 faculty and staff looked for a new residence in the previous 5 years in West Contra Costa County and north to Vallejo. UC Berkeley and AC Transit have an active partnership, and UC Berkeley is eager to work with AC Transit to implement programs that would increase transit ridership and reduce congestion. As noted in Thematic Response 9, UC Berkeley may defer some portion of the 2020 LRDP parking program in recognition of AC Transit's Bus Rapid Transit/Telegraph project. However, a commitment by UC Berkeley to measures of unknown effectiveness, on an uncertain timetable, and under the authority of one or more other agencies, is not required by CEQA.

RESPONSE TO COMMENT B4-32

The writer suggests UC Berkeley help fund a number of transit improvements. Some, such as bus stop improvements, are already under consideration by UC Berkeley: see response B4-11, above. UC Berkeley and AC Transit have an active partnership, one that has resulted in innovation and improvements, including the Class Pass and the Bear Pass, and additional collaborative efforts would be welcome. However, the potential effects of the proposed measures in mitigating traffic impacts cannot be used as a rationale for identifying a potential impact as mitigated to a less than significant level.

UC Berkeley is eager to work with AC Transit to implement programs that would increase transit ridership and reduce congestion, and as noted in Thematic Response 9, may defer some portion of the 2020 LRDP parking program in recognition of AC Transit's Bus Rapid Transit/Telegraph project. However, a commitment by UC Berkeley to measures of unknown effectiveness, on an uncertain timetable, and under the authority of one or more other agencies, is not required by CEQA.

RESPONSE TO COMMENT B4-33

Please see response B4-11, above.

RESPONSE TO COMMENT B4-34

The writer's exhortation and offer of assistance is noted.

RESPONSE TO COMMENT B4-35

The writer's exhortation, and opinion that UC Berkeley is one of the nation's leading centers for research on transit and transportation, is noted.

LETTER B5

ALAMEDA COUNTY
CONGESTION MANAGEMENT AGENCY

1333 BROADWAY, SUITE 220 • OAKLAND, CA 94612 • PHONE: (510) 836-2560 • FAX: (510) 836-2185
E-MAIL: mail@accma.ca.gov • WEB SITE: accma.ca.gov

June 18, 2004

RECEIVED
JUN 21 2004
PHYSICAL & ENVIRONMENTAL PLANNING

Ms. Jennifer Lawrence
University of California, Berkeley
Facility Services
1936 University Ave., Suite 300
Berkeley, CA 94720-1380
e-mail: 2020LRDP@cp.berkeley.edu

SUBJECT: Comments on the Draft Environmental Impact Report for the UC Berkeley 2020 Long Range Development Plan and Chang-Lin Tien Center for East Asian Studies in the City of Berkeley

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the University's Draft Environmental Impact Report (DEIR) for the UC Berkeley 2020 Long Range Development Plan and Chang-Lin Tien Center for East Asian Studies in the City of Berkeley. The proposed plan and the project would add 2.2 million GSF of academic and support space, 2,600 additional housing bed space and 2,300 additional parking spaces, as well as construct the Chang-Lin Tien Center for East Asian Studies (approximately 430,000 GSF). The sites, totaling 1,200 acres, are located in the UC Berkeley Campus Park and adjacent Hill Campus.

The ACCMA has reviewed the DEIR and submits the following comments. These comments are consistent with the comments that were made in the response to the NOP for the DEIR on September 26, 2003. Where possible, the DEIR page numbers are referenced.

- Page 2-52 –Table 2-1 Summary of Impacts, Mitigation Measures and Continuing Best Practices – LRDP Impact TRA-10: The report states that 2020 LRDP would have significant and unavoidable impacts on seven CMP/MTS roadway segments and two interchanges on these roadways. The only possible mitigation measures proposed are trip reduction measures. To make the mitigation measures effective in alleviating the added traffic impacts of the project on the above roadways and intersections, additional options should be explored. **B5-1**

  The City of Berkeley could be required to prepare deficiency plans for any CMP segments with LOS F in the future. The University should participate in funding any necessary improvements to improve the LOS. **B5-2**

LETTER B5 Continued

- Proposed New Housing and Trip Generation: Regarding the new housing supply proposed in the plan, it is not clear how many more residential units the suggested locations could accommodate. Part of the suggested locations fall within the City of Berkeley's jurisdiction, for which the city approval would be required, over which the University has no control. In the event that these housing units were not built, then most of the new 2020 LRDP population, assumed to live within 5 mile radius (809+578 =1387) and walk/bike to the University, would not have residences in that proximity. These residents would have to shift to other modes to commute to the University thereby increasing the new trips that would be generated by this plan. The traffic analysis should include an assessment of how many new units are possible and an analysis of the impacts for "no new housing within the City's Jurisdiction". **B5-3**

- Parking Supply and Demand: On page F I-18, the report states that the surplus 555 parking spaces from the 2020 LRDP would be absorbed mostly by the existing un-met parking demand of the University. Although it is reasonable to assume that some of the university-related vehicle trips currently parked on the on-street and non-university operated parking facilities would be diverted to these proposed surplus parking, these spaces may attract new trips to the University that are currently being made by other modes. Since it is difficult to ensure that the new parking spaces would be specifically provided to the new additional LRDP 2020 population, creating the proposed 2,300 new parking spaces may trigger new trips that are currently made by non-auto. **B5-4**

  Further, the report states that these proposed surplus parking spaces would indirectly free-up the non-university related parking that is currently occupied by the university-related trips, and in turn, those spaces would be provided to partly meet the estimated future deficit of 600 parking spaces in the downtown. These freed-up on-street and private parking spaces may also generate new trips in the study area. It is requested that the traffic analysis be revised to consider these two types of potential new trips. **B5-5**

- Page 4.12-40 – Standard of Significance: Reference to ACCMA's Congestion Management Program (CMP) standards from this section should be deleted. The standard referenced in the CMP is for the LOS Monitoring Program identified in the CMP and is applicable only for monitoring *existing* conditions. This project is subject to the requirements of the Land Use Analysis Program of the CMP and for that element the Alameda County CMA does not have a policy for determining a threshold of significance. Professional judgment should be applied to determine the significance of project impacts. **B5-6**

- Page F-1-25- Bear Transit: the traffic analysis states that increasing the service frequency for the campus shuttle is critical to meet the increased need for **B5-7**

LETTER B5 Continued

connectivity between the campus and transit. However, no specific recommendation to increase the frequency has been made in the report. Operating plans and funding should be identified. **B5-7**

Once again, thank you for the opportunity to comment on this DEIR. Please do not hesitate to contact me at 510/836-2560 ext. 24 if you require additional information.

Sincerely,

Saravana Suthanthira
Associate Transportation Planner

cc: Chron
file: CMP - Environmental Review Opinions - Responses - 2004

11.2B.5 RESPONSE TO COMMENT LETTER B5

RESPONSE TO COMMENTS B5-1 AND B5-2

The Draft EIR identified mitigation measures to alleviate traffic congestion impacts where feasible measures exist, and UC Berkeley is eager to work with the City of Berkeley and the Alameda County Congestion Management Agency in the development and implementation of solutions for impact locations where feasible mitigation measures were not identified. However, the City of Berkeley would be the lead in implementing any improvements to City streets and intersections.

The City of Berkeley Transit First policies, which restrict roadway capacity expansion and support multi-modal solutions, are acknowledged in the Draft EIR at pages 4.12-6 to 4.12-8. The Berkeley General Plan EIR notes that these solutions may not reduce traffic congestion impacts to a less than significant level. Because these measures may not mitigate traffic impacts, mitigation cannot currently be assumed and cannot be used as a rationale for identifying a potential impact as mitigated to a less than significant level. See also responses B7a-9, B7a-117 and B7a-118.

As noted in Thematic Response 9, UC Berkeley may defer some portion of the 2020 LRDP parking program in recognition of AC Transit's BRT/Telegraph project.

RESPONSE TO COMMENT B5-3

The writer theorizes that the full extent of the 2020 LRDP housing program may not be constructed, and requests UC Berkeley analyze the addition of up to 1387 trips under a "no new housing within the City's Jurisdiction" alternative. However, as stated in Appendix F, page F.1-12, "Although the housing component of the 2020 LRDP would lower the overall project trip generation, it has not been taken into account, in order to provide a more conservative analysis." The Draft EIR traffic analysis does not reduce the total 2020 LRDP person-based traffic generation to reflect housing construction within the housing zone; therefore, the analysis requested by the commenter is supplied by the Draft EIR analysis.

RESPONSE TO COMMENT B5-4

The writer's concern that added parking may result in shifting non-auto commuters to driving is addressed in the 2020 Draft EIR in Mitigation TRA-11 at page 4.12-56.

RESPONSE TO COMMENT B5-5

The effect of the shift in parking usage described by the commenter is already reflected in the traffic numbers. This is because the "freed up" spaces noted by the commenter are the same spaces that would disappear in the future with the 600-space growth in the downtown parking deficit. Thus, the spaces would not generate additional traffic; rather, the University-related vehicles that are presumed to be using many of the spaces would shift to the 555 new University-provided spaces under the 2020 LRDP, as the downtown supply shrinks and the UC supply grows.

RESPONSE TO COMMENT B5-6

The comment is noted. To clarify, the Draft EIR does not intend to imply that the threshold of significance used for CMP/MTS routes is required by the CMA; but rather, that the University chooses to apply the same LOS standards that the CMA applies in its biennial monitoring, for the University's CEQA purposes.

RESPONSE TO COMMENT B5-7

As stated in Appendix F, page F.1-25, trip growth would be monitored by the Parking and Transportation Office. Continuing Best Practice TRA-5, at page 4.12-48 of the Draft EIR, calls for continuing coordination of transit services to new buildings, parking facilities and campus housing. The level of detail requested by the comment is not required by CEQA; however, please see Thematic Response 10, and response to comment B7a-78 for additional details regarding the Bear Transit shuttle system.