

ALTA BATES SUMMIT MEDICAL CENTER, SUMMIT CAMPUS SEISMIC UPGRADE AND MASTER PLAN

Responses to Comments and
Final Environmental Impact Report
SCH # 2009012067

Prepared for
City of Oakland, California

May 2010



CITY OF OAKLAND



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ALTA BATES SUMMIT MEDICAL CENTER, SUMMIT CAMPUS SEISMIC UPGRADE AND MASTER PLAN PROJECT NOTICE OF RELEASE AND AVAILABILITY OF RESPONSES TO COMMENTS AND FINAL ENVIRONMENTAL IMPACT REPORT (FEIR)

TO: All Interested Parties

SUBJECT: Notice of Release/Availability of Responses to Comments and Final Environmental Impact Report for the Alta Bates Summit Medical Center (ABSMC), Summit Campus Seismic Upgrade and Master Plan Project.

CASE NO.: ER 09-0001 (CEQA State Clearing House Number 2009012067)

PROJECT SPONSOR: Alta Bates Summit Medical Center, an affiliate of Sutter Health

PROJECT LOCATION: The project area includes the approximately 20.4-acre ABSMC Summit Campus in Oakland, generally located between Telegraph Avenue and Webster Street, and between 30th Street and 34th Street.

PROJECT DESCRIPTION: The Project Sponsor, Alta Bates Summit Medical Center, proposes the ABSMC Summit Campus Seismic Upgrade and Master Plan project, which is intended to provide a long-term vision for the campus in order to meet hospital and community needs, as well as to comply with state seismic safety requirements of SB 1953.

Phase 1 of the Master Plan includes demolition of the existing Bechtel Hall building which contains Samuel Merritt University classroom space and currently vacant student dormitories, and demolition of three (3) other small buildings and associated surface parking lots on the campus, followed by construction of a new 230,000 sq. ft. (11-story) acute care hospital plus a new approximately 1,067-space (7-level) parking garage. Future phases include longer-term campus-wide improvements including a new medical office building along Summit Street, a new Samuel Merritt University classroom expansion building on Elm Street, a fitness center, and closure of a portion of Summit Street (between 30th Street and Hawthorne Avenue) to create a new campus plaza.

The project is proposed as a Planned Unit Development with a Preliminary Development Plan for the overall Master Plan and a Final Development Plan for Phase 1. Phase 1 will also need Design Review approval, a conditional use permit and a zoning variance for off-street parking, as well as numerous non-discretionary approvals. Approvals or permits will also be required from other state and regional agencies and districts including but not limited to the California Office of Statewide Health Planning and Development (OSHPD).

ENVIRONMENTAL REVIEW: The preparation of the Responses to Comments has been overseen by the City's Environmental Review Officer and the conclusions and recommendations in the document represent the independent conclusions and recommendations of the City. Copies of the Responses to Comments and Final Environmental Impact Report are available for distribution to interested parties at no charge at the Community and Economic Development Agency, Planning Division, 250 Frank H. Ogawa

Plaza, Suite 3315, Oakland, Monday through Friday, 8:30 a.m. to 5:00 p.m. The Final EIR is also available on the City of Oakland website at <http://www.oaklandnet.com/government/ceda/revised/planningzoning/MajorProjectsSection/AltaBatesSummitMedicalCenter.html>.

PUBLIC HEARING: The Oakland Planning Commission will hold a public hearing to consider the project on May 19, 2010. This action consists of the certification of the Final EIR and consideration of the planning-related items discussed above. The Planning Commission hearing begins at 6:00 p.m. in Hearing Room 1, City Hall, 1 Frank H. Ogawa Plaza. For further information, please contact Scott Gregory at (510) 535-6690 or at sgregory@lamphier-gregory.com.

Copies of the DEIR were available for review at the Community and Economic Development Agency, Planning Division, 250 Frank H. Ogawa Plaza, Suite 3315, Oakland, the Oakland Public Library, Social Science and Documents, 125 14th Street, Oakland, and on the City's website at <http://www.oaklandnet.com/government/ceda/revised/planningzoning/MajorProjectsSection/AltaBatesSummitMedicalCenter.html>. Copies of the DEIR were also distributed to interested parties.

The public were encouraged to provide comments during the public comment period from December 21, 2009 through February 3, 2010. Public Hearings were held on January 20, 2010 at the Meeting of the City Planning Commission and February 8, 2010 at the Meeting of the Landmarks Preservation Advisory Board. Comments were made at the public hearings as well as received in writing. All comments that were received have been addressed in this Responses to Comments and Final EIR document.

If you challenge the environmental document or other actions pertaining to the Project in court, you may be limited to raising only those issues raised at the public hearings described above or in written correspondence received by the Community and Economic Development Agency on or prior to May 19, 2010.



Eric Angstadt
Deputy Community and Economic Development Agency Director
Environmental Review Officer

File Number ER 09-0001
Date of Notice: May 7, 2010

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Prepared for
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May 2010

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CHAPTER 1

Introduction

1.1 CEQA Process

An Environmental Impact Report (EIR) is an informational document prepared by a Lead Agency (in this case, the City of Oakland) that contains environmental analysis for public review and for agency decision-makers to use in their consideration of development proposals. On December 21, 2009, the City of Oakland (Lead Agency) released for public review a Draft EIR (or DEIR) for the Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan (ER09-0001). The 45-day public review and comment period on the DEIR began on Monday, December 21, 2009, and the City of Oakland Planning Commission held a public hearing on the DEIR January 20, 2010. The public review and comment period ended at 4:00 p.m. Monday, February 3, 2010.

This Responses to Comments document, together with the DEIR and its Appendices constitute the Final EIR (or FEIR) for the project. Due to its length, the text of the DEIR is not included with this Response to Comments document; however, it is included by reference as part of the Final EIR.

The Oakland City Planning Commission will consider the Final EIR before approving or denying the proposed project. Before the Lead Agency may approve the project, it must certify that the Final EIR adequately discloses the environmental effects of the proposed project, that the Final EIR has been completed in conformance with the California Environmental Quality Act (CEQA), and that the decision-making body of the Lead Agency independently reviewed and considered the information contained in the Final EIR. Certification of the Final EIR would indicate the City's determination that the Final EIR adequately evaluates the environmental impacts that could be associated with the proposed project.

The City of Oakland has prepared this document pursuant to CEQA Guidelines Section 15132 which specifies the following (and which also applies to Draft and Final EIRs):

“The Final EIR shall consist of:

- (a) The DEIR or a revision of that draft.
- (b) Comments and recommendations received on the DEIR either verbatim or in a summary.
- (c) A list of persons, organizations, and public agencies commenting on the DEIR.

- (d) The response of the Lead Agency to significant environmental points raised in review and consultation process.
- (e) Any other information added by the Lead Agency.”

This Final EIR incorporates comments from public agencies and the general public and contains the Lead Agency’s responses to those comments.

1.2 New Information in the Final EIR

If *significant new information* is added to an EIR after notice of public review has been given, but before final certification of the EIR, the lead agency must issue a new notice and re-circulate the EIR for further comments and consultation. (*Laurel Heights Improvement Association v. Regents of the University of California*, 6 Cal 4th 112, (1993)) None of the corrections or clarifications to the DEIR identified in this document constitutes *significant new information* pursuant to Section 15088.5 of the CEQA Guidelines. As a result, a Recirculation of the DEIR is not required.

Specifically, the new information, corrections or clarifications presented in this document do not disclose that:

- A new significant environmental impact would result from the project or from a new mitigation measure (or standard condition) proposed to be implemented;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures (or standard conditions) are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure (or standard condition) considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it; or
- The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines Section 15088.5)

Information presented in the DEIR and this document support the City’s determination that Recirculation of the DEIR is not required.

1.3 Organization of this Final EIR

This Final EIR contains information about the proposed project, supplemental environmental information, and responses to comments raised during the public review and comment period on the DEIR. Following this introductory chapter, the document is organized as described below.

- Chapter 2, *Project Summary*, summarizes the proposed project as presented in the DEIR as the Project Applicant has not made any changes to the project since publication of the DEIR.

- Chapter 3, *Changes to the DEIR*, contains text changes and corrections to the DEIR initiated by the Lead Agency or resulting from comments received on the DEIR.
- Chapter 4, *Commenters on the DEIR*, lists all agencies, organizations and individuals that submitted written comments on the DEIR during the public review and comment period, and/or that commented at the Planning Commission Public Hearing and/or the Landmarks Preservation Advisory Board Public Hearing on the DEIR.
- Chapter 5, *Master Responses to Recurring Comments*, presents single, comprehensive responses to a number of topics that were raised numerous times by several commenters.
- Chapter 6, *Responses to Written Comments Received on the DEIR*, contains each of the comment letter received on the DEIR and presents individual responses to the specific comments raised in each letter.
- Chapter 7, *Responses to Comments Received at the Planning Commission Hearing and the Landmarks Preservation Advisory Board Public Hearing on the DEIR*, includes transcripts of the two Public Hearings on the DEIR and presents responses to the specific comments received.

Appendices to this document follow Chapter 7 and include:

- Transportation Demand Management Plan
- Greenhouse Gas Emissions Reduction Plan

CHAPTER 2

Project Summary

ABSMC (Project Applicant) proposes to develop the ABSMC Summit Campus located in Oakland, California, with a state-of-the-art medical center. The proposed project meets the operational and legal mandates of the Alfred E. Alquist Hospital Facilities Seismic Safety Act, as amended in 1994 by Senate Bill (SB) 1953, which requires the replacement or seismic retrofitting of existing hospitals by January 1, 2013. Under the Act, construction of a replacement facility must be completed by 2015, so long as construction has commenced by January 1, 2011. The Project Applicant submitted a Basic Application for Development Review to the City of Oakland CEDA describing the proposed actions. Based on preliminary direction received from the City of Oakland, it was determined that a project-level EIR would be the appropriate document to analyze the potential environmental effects of the proposed project under CEQA. This EIR addresses all environmental topics identified in the City of Oakland's CEQA Thresholds/Criteria of Significance document.

2.1 Project Site and Vicinity

The 20.40-acre project site is comprised of 27 parcels within and along the general confines of 30th Street, Telegraph Avenue, 34th Street, and Webster Street.

The General Plan land use classification of the existing hospital is *Institutional*. Surrounding areas to the east, west, and south of the project site are within the *Community Commercial* land use classification. To the north, properties are within the *Mixed Housing Type and Neighborhood Center* land use classification. The current zoning designations of the project site is S-1, *Special Zoning—Medical Center*. The project is consistent with the Oakland General Plan *Institutional* land use designations, and generally consistent with the S-1: Medical Center zoning district that applies to the project site.

2.2 Project Components and Phasing

The proposed project would be developed in several phases. Phase 1 would be developed between 2010 to 2015. Future phases could be developed after Phase 1 and any time prior to 2035. Project buildout includes Phase 1 and future phase development, together. The proposed phasing would ensure that the medical center could continue to provide uninterrupted medical service at the existing hospital location during implementation of the project.

2.2.1 Phase 1

This phase would demolish 111,620 square feet of medical office and classroom spaces and construct a new patient care pavilion hospital tower (approximately 230,000 square feet) and parking garage (approximately 392,800 square feet; 1,067 total spaces, 835 net new spaces).

2.2.2 Future Phases

Future phases would demolish 17,382 square feet of medical office space and construct a new Medical Office Building (approximately 175,000 square feet, including 10,000 square feet of street level retail); a fitness center (approximately 32,000 square feet on top of the new parking garage), a building for Samuel Merritt University (approximately 72,500 square feet) and the following site improvements: Summit Street closure and plaza construction, new garage entrance from 30th Street, and new entrance for the Providence Pavilion South.

ABSMC has requested the flexibility to construct the new MOB concurrent with Phase 1, instead of during future phases as described above for the proposed project. Therefore, the construction and operational impacts of the new MOB are analyzed in this EIR both as part of the future phase development as well as concurrent with Phase 1.

At buildout, the project would result in a reduction of 28 hospital beds, from 509 to 481 beds. The total buildout of 1,818,157 square feet of building floor area would reflect an increase of 380,498 square feet from the existing campus. The project would result in a net increase of 705 off-street parking spaces, for a total of 2,417 off-street spaces throughout the entire medical center (including existing facilities).¹

¹ This total number of off-street parking spaces excludes the 477 parking spaces currently used by ABSMC in the West Garage. Although parking spaces in this garage may be used by ABSMC in the future, pursuant to the City of Oakland Planning Code (Sections 17.116.180 and 190) this garage is not considered to qualify as meeting off-street parking requirements since ABSMC does not currently have permanent control over the garage.

CHAPTER 3

Changes to the DEIR

The changes presented in this chapter are initiated by the City of Oakland (Lead Agency) staff or by comments received on the DEIR. Changes include corrections, revisions or clarifications to information presented in the DEIR. Throughout this chapter, newly added text is shown in double underline format, and deleted text is shown in ~~strikeout format~~. For changes specifically initiated by comments received on the DEIR, an alpha-numeric designator for the comment is indicated in brackets.

In Section 3.1 of this chapter, changes are listed generally in the order in which they would appear in the DEIR document. A revised Summary Table of Impacts, Mitigation Measures, Standard Conditions, and Residual Impacts, which shows proposed final text as modified from the DEIR, is presented at the end of this chapter.

As indicated in Chapter 1 (Introduction), the entirety of the Final EIR for the ABSMC Summit Campus Seismic Upgrade and Master Plan Project consists of the DEIR and its Appendices and this Response to Comments document. Thus, the DEIR changes presented in this chapter (including the revised Summary Table of Impacts, Mitigation Measures, Standard Conditions, and Residual Impacts) incorporate and supersede original text in the DEIR.

Summary (Chapter 2)

The following change is made to the title of Alternative 4 on page 2-7 of the DEIR (*deleted text is in strikeout type, and new text is double underlined*):

Maximum Avoidance of All Impacts

- Alternative 4: ~~Fully Mitigated~~ Maximum Avoidance Alternative – Phase 1 Only, No Backfill at Merritt Pavilion

Please note that this change applies to *all* references to Alternative 4 in the entire DEIR document.

Project Description (Chapter 3)

Figure 3-4, *Phase 1 Site Plan* is revised to show correct location of the proposed emergency generators. Figure 3-5, *Future Phases Site Plan*, is revised to show the redesigned Future Phases Medical Office Building (MOB) and the retention of the property at 418 30th Street. The revised figures are included below.

Visual Quality and Shadow (Section 4.2)

The following change is made to the discussion of Impact VIS-4, *After Phase 1 of the Proposed Project*, on page 4.2-47 of the DEIR (*deleted text is in strikeout type, and new text is double underlined*):

~~Based on the above, Phase 1 of the proposed project's impact with respect to shadows would be potentially significant. ABSMC considered a number of factors during the process of designing the new patient care pavilion. A key factor was the goal of minimizing the height of the building and its resulting shadow cast on adjacent uses to the north. The existing Bechtel Hall already casts shadows extending to the front steps of the Parks Chapel A.M.E. Church in the late fall and early winter; however, any replacement building on the Bechtel Hall site that is taller than the existing building would cast shadows that would extend farther onto the church. Therefore, there is no feasible mitigation to lessen the indirect significant impact on this historic resource.~~

Transportation, Circulation, and Parking (Section 4.3)

The following change is made to Construction Impacts, Truck Routing on page 4.3-84 (*deleted text is in strikeout type, and new text is double underlined*):

DPR Construction developed truck routes for use during Phase 1 construction. The intent of this routing is to direct construction traffic to Telegraph Avenue south of 34th Street and Broadway south of Piedmont Avenue. The use of ~~Telegraph Avenue~~ is these routes is intended to avoid conflicts with Kaiser Medical Center construction traffic, which uses Telegraph Avenue, MacArthur Boulevard, and Broadway and Piedmont Avenue. To the extent possible, use of minor and residential streets is minimized. It should be noted that the inbound routes to the Patient Care Pavilion site would use Hawthorne from Telegraph and outbound routes would use Hawthorne-34th Street to and from Telegraph Avenue north of MacArthur Boulevard and Hawthorne Avenue to Broadway. Construction traffic to and from the new garage site would use Hawthorne Avenue and the Summit Campus driveway south of Hawthorne to and from Telegraph. A flag person would be used to allow trucks to make left turning movements from the garage site.

The following routes (also depicted in **Figure 4.3-12**) would be used by construction traffic for both Phase 1 and future phases of the proposed project:

Inbound routes:

- From I-880 / I-980 to 17th Street to Telegraph Avenue to Hawthorne Avenue or Summit Campus driveway
- ~~From I-580 to Webster Street to Hawthorne Avenue~~

Outbound routes:

- From Hawthorne Avenue or Summit Campus driveway to Telegraph Avenue to 27th Street to I-980 / I-580



Legend

- Proposed Greenspace
- Proposed Building
- Proposed Retail
- Existing Building (to remain)
- Remove Building
- Proposed Pedestrian Path
- Proposed Pavers
- Proposed Emergency Vehicle Access
- Existing Road

Demolition (R)

- 3043 Sur
- 3023 Sur
- 418 30th

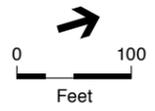
New Construction (P)

- Medical (Including 10,000 SF Street Level Retail)
- Fitness Center (1 Story) 32,000 SF Approx.
- Samuel Merritt College Expansion (4 Stories) 72,500 SF Approx.

Site Improvements

- Summit Street Closure and Plaza
- New 30th Street Driveway to Garage
- Providence Pavilion South New Entrance

(E) Existing



- From Hawthorne Avenue or Summit Campus driveway to Telegraph Avenue to West Grand Avenue to Brush Street to I-980 / I-580
- From Hawthorne Avenue to Webster Street to 34th Street to Telegraph Avenue to 27th Street to I-980 / I-580
- From Hawthorne Avenue to Webster Street to 34th Street to Telegraph Avenue to West Grand Avenue to Brush Street to I-980 / I-880
- From Hawthorne Avenue to Broadway to 27th Street to I-980 / I-580
- From Hawthorne Avenue to Broadway to West Grand Avenue to Brush Street to I-980 / I-880

Figure 4.3-12, Proposed Construction Truck Routes, on page 4.3-85 of the DEIR is replaced with the revised figure provided below.

Construction-related pollutant emissions are discussed on pages 4.4-15 through 4.4-18, and shown in Table 4.4-3 of the DEIR. The change in construction truck route depicted in revised Figure 4.3-12 would not increase construction-related pollutant emissions from that analyzed in the DEIR because the number of construction truck trips would remain the same. The new truck routes as shown in Figure 4.3-12 in this document, differs from that previously proposed by only one block in a residential area (34th Street between Webster Street and Elm Street) and would not affect any sensitive land uses not previously identified. This change would not result in a substantial change in the dispersion of emissions discussed in the DEIR. Therefore, no new analysis is needed. Likewise, there are no new impacts to traffic and circulation, as the applicant will still be required to prepare a comprehensive construction traffic management plan for review and approval by the City.

The following changes are made to Impact TRANS-1 on page 4.3-50 of the DEIR:

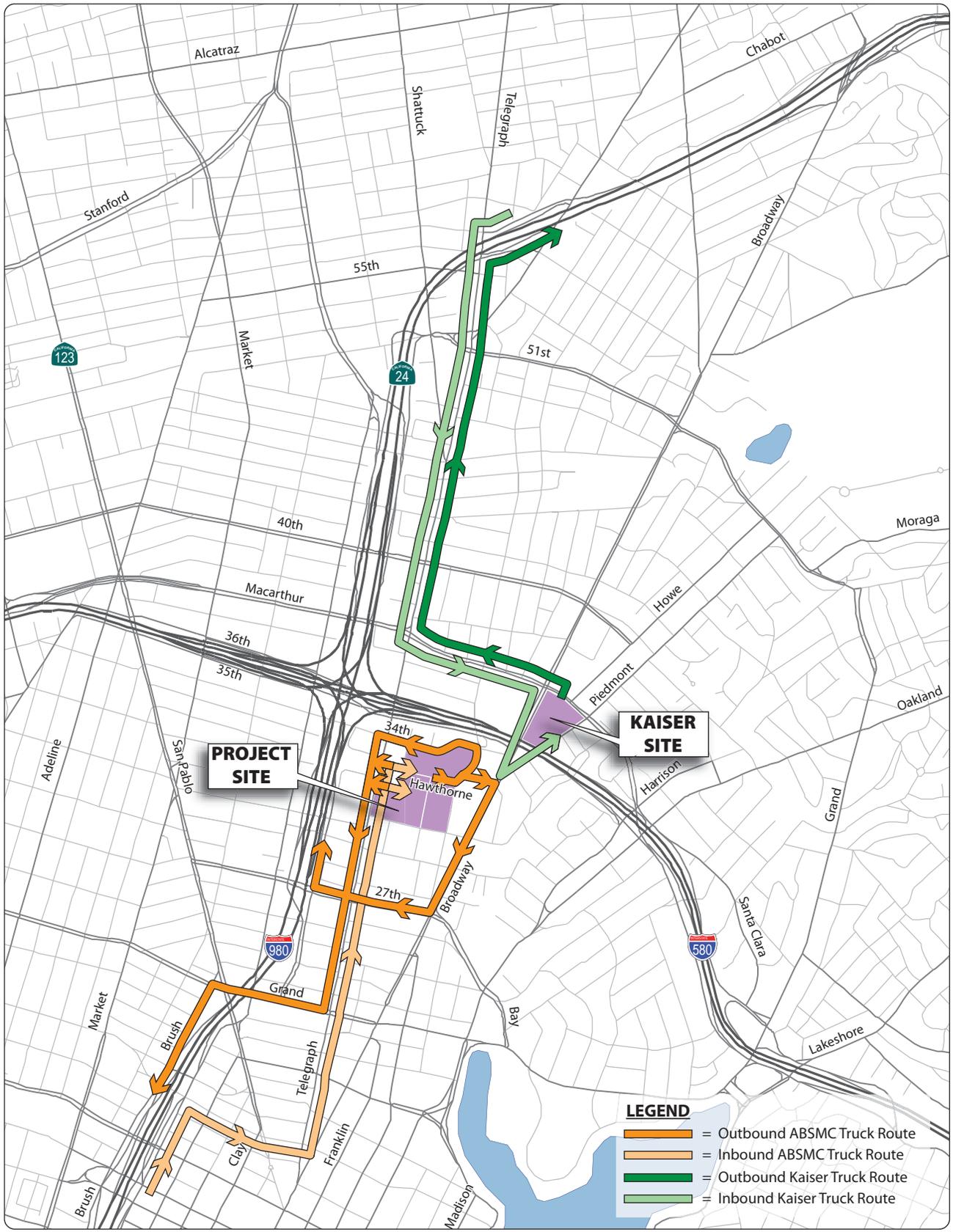
Impact TRANS-1: Phase 1 of the proposed project, when added to existing traffic levels, would add more than 10 trips to Intersection #11-Telegraph Avenue / Hawthorne Avenue (Existing), which meets peak-hour volume signal warrants. (Significant)

Mitigation Measure TRANS-1: Implement the following measures at the Telegraph Avenue / Hawthorne Avenue intersection:

- Signalize the intersection, providing actuated operation, with permitted left turns and communication conduit/cabling connecting the traffic signal to the existing traffic signals on Telegraph Avenue at 30th Street and 34th Street.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.



SOURCE: Fehr & Peers

Alta Bates Summit Medical Center (ABSMC) Summit Campus Seismic Upgrade and Master Plan EIR . 207376

Figure 4.3-12
Revised Construction Truck Routes

- Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should. All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) installation at locations that are not in the City's ITS Master Plan
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber Ssignal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet
- Signal timing plans for the signals in the coordination group.
- A complete traffic signal warrant analysis to verify that this location meets MUTCD signal warrants, subject to review and approval of the City.

The project sponsor shall fund ~~the cost of preparing and implementing these plans, prepare, and install the approved plans and improvements.~~

~~Prior to the installation of the traffic signals, a complete traffic signal warrant analysis shall be conducted at this location to verify that this location meets MUTCD signal warrants and be subject to review and approval of the City. After implementation of this measure, the intersection would operate at LOS A during both AM and PM peak hours. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-2 on page 4.3-50 of the DEIR:

Impact TRANS-2: Phase 1 of the proposed project, when added to existing traffic levels, would add more than 10 trips to *Intersection #44-West Grand Avenue / Brush Street* (Existing), which meets peak hour volume signal warrants. (Significant)

The subject intersection is complicated due to its immediate adjacency with the West Grand/San Pablo intersection and other factors. After further review by City and consulting traffic engineers, the specific mitigation measure in the Draft EIR was determined to have the potential for secondary impacts, which are not acceptable to the City. However, there appear to be several acceptable design solutions which would reduce the impacts from the Project, but which require a detailed intersection/signalization engineering design study to determine the most feasible design to implement. Therefore, the proposed mitigation measure is revised to read as follows:

Mitigation Measure TRANS-2: Implement the following measures at the West Grand Avenue / Brush Street intersection:

- Signalize the intersection providing actuated operation and signal communication with the existing signal interconnect on West Grand Avenue and making other necessary City-approved associated improvements. The project sponsor shall work with the City to perform a detailed intersection/signalization engineering design study to determine the most feasible design to implement, which improves intersection operations and minimizes any potential secondary impacts, in accordance with City standards, which may include measures not specified herein, or even an alternative to signalization of the intersection, but which result from the detailed study.
- ~~Close the north leg of Brush Street at West Grand Avenue to traffic.~~
- ~~Incorporate the south leg of Brush Street at West Grand Avenue into the existing traffic signal at the West Grand Avenue / San Pablo Avenue intersection (Intersection # 45)~~
- ~~Operate the West Grand Avenue / San Pablo Avenue / Brush Street intersection such that the traffic movements at the West Grand Avenue / Brush Street intersection are served twice during one cycle at the West Grand Avenue / San Pablo Avenue intersection. One cycle under existing conditions with Phase 1 development can remain 75 seconds in the AM peak hour and 80 seconds during the PM peak hour.~~
- ~~Install (through striping changes) a westbound left turn lane from West Grand Avenue to southbound Brush Street.~~
- ~~Prohibit pedestrian movements across West Grand Avenue at Brush Street.~~

Because several design alternatives may be acceptable, a final, detailed design plan for this intersection improvement shall be prepared, subject to review and approval of the City.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards, taking into consideration the adjacency with the West Grand/San Pablo intersection and other factors.

- The study shall address necessary access improvements (including without limitation signage, signal operations, intelligent transportation systems and employee/patient/visitor education) from the ABSMC campus to southbound I-880 for at least three (3) alternative routes, including without limitation: (a) street closures; (b) queuing impacts of short left turn lane; (c) geometric analysis of new lane configurations and offsets (safety and operations); (d) analysis of cycle length on vehicle, bus, and pedestrian crossings (safety and operations); (e) potential bike lane removal (policy conflict); (f) prohibition of pedestrian crossing; (g) potential parking space removal; and (h) drainage relocation. The study could result in recommendations that would not require the intersection to be signalized.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection ~~to accommodate the signal installation.~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock)
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full signal-actuation (~~includes~~ video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
- Signal timing plans for the signals in the coordination group.
- A final design plan for this intersection improvement, subject to review and approval of the City.

The project sponsor shall fund, prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would operate at an acceptable LOS C during both AM and PM peak hours. No secondary impacts would result from implementation of this measure. However, because further study is required to determine feasibility of this measure, this impact is conservatively deemed significant and unavoidable at this time. If, after submission of final design plans, these improvements are determined to be feasible, then this impact would be reduced to a less than significant level.~~

Significance After Mitigation: Conservatively deemed to be Significant and Unavoidable because the intersection is complicated, and the specific improvements to be implemented, according to City standards, must be finalized after a detailed intersection/signalization engineering design study is performed and a preferred, detailed design selected by the City.

The following changes are made to Impact TRANS-3 on page 4.3-52 of the DEIR:

Impact TRANS-3: Buildout of the proposed project, when added to existing traffic levels, would add more than 10 trips to *Intersection #11-Telegraph Avenue / Hawthorne Avenue* (Existing), which meets peak hour signal warrants. (Significant)

Mitigation Measure TRANS-3: Implement See Mitigation Measures TRANS-1.

~~After implementation of this measure, the intersection would operate at LOS A and B during the AM and PM peak hours, respectively. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-4 on page 4.3-53 of the DEIR:

Impact TRANS-4: Buildout of the proposed project, when added to existing traffic levels, would add more than 10 trips to *Intersection #44-West Grand Avenue / Brush Street* (Existing), which meets peak hour signal warrants. (Significant)

Mitigation Measure TRANS-4: Implement See Mitigation Measure TRANS-2.

~~After implementation of this measure, the intersection would operate at an acceptable LOS C during both AM and PM peak hours. No secondary impacts would result from implementation of this measure.~~ However, because further study is required to determine feasibility of this measure, this impact is conservatively deemed significant and unavoidable at this time. If, after submission of final design plans, these improvements are determined to be feasible, then this impact would be reduced to a less-than-significant level.

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-5 on page 4.3-56 of the DEIR:

Impact TRANS-5: Phase 1 of the proposed project plus the MOB from Future Phases, when added to projected 2015 traffic levels, would add more than 10 trips to *Intersection #11-Telegraph Avenue / Hawthorne Avenue* (2015), which meets peak hour signal warrants. (Significant)

Mitigation Measure TRANS-5: ~~Implement~~ See Mitigation Measure TRANS-1.

~~After implementation of this measure, the intersection would operate at LOS A and B during the AM and PM peak hours, respectively. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-6 on page 4.3-56 of the DEIR:

Impact TRANS-6: Phase 1 of the proposed project plus the MOB from Future Phases, when added to projected 2015 traffic levels, would add more than 10 trips to Intersection #44-West Grand Avenue / Brush Street (2015), which meets peak hour signal warrants. (Significant)

Mitigation Measure TRANS-6: Implement Mitigation Measure TRANS-2, and optimize/adjust signal timing and/or review the adequacy of the measures implemented under TRANS-2, and make necessary adjustments.

The project sponsor shall fund, prepare, and install the approved plans and improvements. ~~After implementation of this measure, the intersection would operate at an acceptable LOS D during the AM and PM peak hours. No secondary impacts would result from implementation of this measure.~~ However, because further study is required to determine feasibility of this measure, this impact is conservatively deemed significant and unavoidable at this time. If, after submission of final design plans, these improvements are determined to be feasible, then this impact would be reduced to a less-than-significant level.

Significance after Mitigation: Conservatively deemed to be Significant and Unavoidable because the intersection is complicated, and the specific improvements to be implemented, according to City standards, must be finalized after a detailed intersection/signalization engineering design study is performed and a preferred, detailed design selected by the City.

~~Significant and Unavoidable.~~

The following changes are made to Impact TRANS-7 on page 4.3-57 of the DEIR:

Impact TRANS-7: Buildout of the proposed project, when added to projected 2015 traffic levels, would add more than 10 trips to Intersection #11-Telegraph Avenue / Hawthorne Avenue (2015), which meets peak-hour signal warrants. (Significant)

Mitigation Measure TRANS-7: ~~Implement~~ See Mitigation Measure TRANS-1.

~~After implementation of this measure, the intersection would operate at LOS B during both the AM and PM peak hours. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-8 on page 4.3-57 of the DEIR:

Impact TRANS-8: Buildout of the proposed project, when added to projected 2015 traffic levels, would add more than 10 trips to *Intersection #44-West Grand Avenue / Brush Street (2015)*, which meets peak hour signal warrants. (Significant)

Mitigation Measure TRANS-8: Implement Mitigation Measure TRANS-2, and optimize/adjust signal timing and/or review the adequacy of the measures implemented under TRANS-2, and make necessary adjustments, but with the following change to the traffic signal cycle length at the West Grand Avenue / San Pablo Avenue intersection. One cycle would need to be increased from 75 seconds to 90 seconds in the AM peak hour and from 80 seconds to 100 seconds during the PM peak hour.

~~After implementation of this measure, the intersection would operate at an acceptable LOS D during both AM and PM peak hours. No secondary impacts would result from implementation of this measure. However, because further study is required to determine feasibility of this measure, this impact is conservatively deemed significant and unavoidable at this time. If, after submission of final design plans, these improvements are determined to be feasible, then this impact would be reduced to a less than significant level.~~

Significance after Mitigation: Conservatively deemed to be Significant and Unavoidable because the intersection is complicated, and the specific improvements to be implemented, according to City standards, must be finalized after a detailed intersection/signalization engineering design study is performed and a preferred, detailed design selected by the City. Significant and Unavoidable

The following changes are made to Impact TRANS-9 on page 4.3-65 of the DEIR:

Impact TRANS-9: Under 2035 cumulative traffic conditions, Buildout of the proposed project would increase the vehicle delay to a critical movement by more than four seconds during the AM and PM peak hour at *Intersection #6-27th Street / Northgate Avenue / I-980 On-Ramps (2035)*, which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-9: Implement the following measure at the 27th Street / Northgate Avenue / I-98 On-Ramp intersection:

- Optimize signal timing (i.e., ~~changing the amount of~~ adjust the allocation of green time assigned to each lane of traffic approaching the intersection) for each intersection approach) for the AM and PM peak hours.
- Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. This intersection is under the jurisdiction of Caltrans so any equipment or facility upgrades must be approved by Caltrans prior to installation.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division and Caltrans for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal timing changes supporting vehicle travel and alternative modes travel consistent with Caltrans requirements.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund, ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would operate at LOS E in both the AM and PM peak hours. LOS E is an unacceptable service level, but the vehicle delay during the AM peak hour would be less than under the 2035 Without Project condition, and the PM peak hour condition would improve from LOS F to LOS E. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: This project impact would be significant and unavoidable because it is not certain that the measure could be implemented because the City of Oakland, as lead agency, could not implement Measure TRANS-9 without the approval of Caltrans. However, in the event that Mitigation Measure TRANS-9 could be implemented, the impact would be less than significant.

The following changes are made to Impact TRANS-10 on page 4.3-66 of the DEIR:

Impact TRANS-10: Under 2035 cumulative traffic conditions, Buildout of the proposed project would degrade the vehicle level of service from an acceptable LOS E to an unacceptable LOS F during the PM peak hour at *Intersection #7-Telegraph Avenue / Grand Avenue (2035)*. (Significant)

Mitigation Measure TRANS-10: Implement the following measures at the Telegraph Avenue / Grand Avenue intersection:

- Provide protected left-turn phase(s) for all approaches

- Optimize signal timing (i.e., ~~changing the amount of~~ adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach) for the AM and PM peak hours.
- Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection ~~to accommodate the signal modifications. The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call ~~among other items~~ for the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) ~~installation at locations that are not in the City's ITS Master Plan~~
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber S ~~signal~~ interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet
 - Installation of PTZ cameras
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund, prepare, and install the approved plans and improvements ~~the cost of preparing and implementing these plans.~~

~~After implementation of this measure, the intersection would worsen the LOS F conditions over the unmitigated condition during the PM peak hour because the protected left turn phasing mitigation worsens LOS. The protected left turn phasing is necessary because of the high volume of left turning traffic conflicting with both oncoming traffic and pedestrians~~

crossing the street. The protected left turn phasing removes these conflicts but adversely impacts vehicle traffic flow. The impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-11 on page 4.3-67 of the DEIR:

Impact TRANS-11: Under 2035 cumulative traffic conditions, buildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the PM peak hour at Intersection #8-Telegraph Avenue / 27th Street (2035), which would operate at LOS F during both peak hours under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-11: Implement the following measures at the Telegraph Avenue / 27th Street intersection:

- Provide protected left-turn phase(s) for the northbound and southbound approaches
- Optimize signal timing (i.e., ~~changing the amount of~~ adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach) for the ~~AM and~~ PM peak hours.
- Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection ~~to accommodate the signal modifications. The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) installation at locations that are not in the City's ITS Master Plan

- Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber Signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
 - Installation of PTZ cameras
- Signal timing plans for the signals in the coordination group.

The project sponsor shall fund, ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection operation would worsen the LOS F condition over the unmitigated condition during the AM and PM peak hours because the protected left turn phasing mitigation worsens LOS. The left turn phasing is necessary because of the high volume of left turning traffic conflicting with both oncoming traffic and pedestrians crossing the street. The protected left turn phasing removes these conflicts. The impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-12 on page 4.3-68 of the DEIR:

Impact TRANS-12: Under 2035 cumulative traffic conditions, Buildout of the proposed project would add more than 10 trips to Intersection #11-Telegraph Avenue / Hawthorne Avenue (2035), which meets peak hour signal warrants. (Significant)

Mitigation Measure TRANS-12: Implement Mitigation Measure TRANS-1.

~~After implementation of this measure, the intersection would operate at LOS A and B during the AM and PM peak hours, respectively. No significant effects would result from implementation of this measure. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-13 on page 4.3-68 of the DEIR:

Impact TRANS-13: Under 2035 cumulative traffic conditions, Buildout of the proposed project would degrade PM peak-hour operations from LOS E to LOS F (and increase the average intersection delay by more than two seconds) during the PM peak hour at Intersection #13-Telegraph Avenue / MacArthur Boulevard (2035). In addition, buildout of the proposed project would increase the average intersection vehicle delay by more than four seconds (under prevailing LOS E conditions) during the AM peak hour. (Significant)

Mitigation Measure TRANS-13: Implement the following measures at the Telegraph Avenue / MacArthur Boulevard intersection:

- Provide protected left-turn phase(s) for the northbound and southbound approaches
- Optimize signal timing (i.e., ~~changing the amount of~~ adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach) for the ~~AM and~~ PM peak hours.
- Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- Plans, Specifications, and Estimates (PS&E) to modify the intersection ~~to accommodate the signal modifications. The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) ~~Installation at locations that are not in the City's ITS Master Plan~~
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber S ~~signal~~ interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.

- Installation of PTZ cameras

- Signal timing plans for the signals in the coordination group

The project sponsor shall fund ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would deteriorate from LOS E to LOS F during the AM peak hour, but PM peak hour operations would improve from LOS F to LOSE. The deteriorated conditions during the AM peak hour are due to the protected left turn phasing mitigation. The protected left turn phasing is necessary because of the high volume of left turning traffic conflicting with both oncoming traffic and pedestrians crossing the street. The protected left turn phasing removes these conflicts. As a result, the impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-14 on page 4.3-69 of the DEIR:

Impact TRANS-14: Under 2035 cumulative traffic conditions, bBuildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the PM peak hour at *Intersection #29-Broadway / 27th Street (2035)*, which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-14: Implement the following measures at the Broadway / 27th Street intersection:

- Provide actuated traffic signal operation
- Optimize signal timing (i.e., ~~changing the amount of~~ adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach) for the ~~AM and~~ PM peak hours.
- Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection ~~to accommodate the signal modifications. The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or

upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:

- 2070L Type Controller
 - GPS communication (clock) Installation at locations that are not in the City's ITS Master Plan
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber Ssignal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund the cost of preparing and implementing these plans prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would maintain LOS F during the PM peak hour; however, the intersection delay would be improved over the unmitigated condition. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-15 on page 4.3-70 of the DEIR:

Impact TRANS-15: Under 2035 cumulative traffic conditions, Bbuildout of the proposed project would increase the average intersection vehicle delay by more than six seconds during the AM peak hour at Intersection #34-Broadway / West MacArthur Boulevard (2035), which would operate at LOS E during the AM peak hour under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-15: Implement the following measures at the Broadway / West MacArthur Boulevard intersection:

- Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the AM peak hour

- Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. ~~The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) Installation at locations that are not in the City's ITS Master Plan
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber sSignal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund, ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection operations would deteriorate from LOS E to LOS F during the AM peak hour, As a result, the impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-16 on page 4.3-71 of the DEIR:

Impact TRANS-16: Under 2035 cumulative traffic conditions, Buildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the AM peak hour at Intersection #36-Broadway / 51st Street / Pleasant Valley Avenue (2035), which would operate at LOS F during both peak hours under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-16: Implement the following measures at the Broadway / 51st Street / Pleasant Valley Avenue intersection:

- Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the AM peak hour
- Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. ~~The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) Installation at locations that are not in the City's ITS Master Plan
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber Ssignal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would operate at LOS E during the AM peak hour; reducing the project's impact to less than significant. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-17 on page 4.3-72 of the DEIR:

Impact TRANS-17: Under 2035 cumulative traffic conditions, Buildout of the proposed project would add more than 10 trips to Intersection #39-Harrison Street / 29th Street (2035), which would meet peak-hour signal warrants under 2035 Without Project conditions. (Significant)

~~**Mitigation Measure TRANS-17: None Recommended.** Signalization of this intersection was considered and rejected as a mitigation measure. ~~The 29th Street corridor between Fairmount Avenue and Harrison Street is narrow (less than 30 feet wide) with on-street parking serving residential uses. The corridor, based on its design, was not intended to serve traffic traveling between the commercial corridors of Broadway and Telegraph Avenue and Harrison Street. Signalization could encourage additional traffic through the residential area along 29th Street.~~~~

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-18 on page 4.3-72 of the DEIR:

Impact TRANS-18: Under 2035 cumulative traffic conditions, Buildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the PM peak hour at Intersection #41-Oakland Avenue / Perry Place / I-580 Off-Ramp (2035), which would operate at LOS F during both peak hours under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-18: Implement the following measure at the Oakland Avenue / Perry Place / I-580 Off-Ramp intersection:

- ~~Optimize signal timing (i.e., changing the amount of adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach) for the AM and PM peak hours.~~
- Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. This intersection is under the jurisdiction of Caltrans so any equipment or facility upgrades must be approved by Caltrans prior to installation.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division and Caltrans for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal timing changes supporting vehicle travel and alternative modes travel consistent with Caltrans requirements.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would operate at LOS F during the PM peak hour but reduce the project impact to less than significant levels by improving intersection delay over the unmitigated condition. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: This project impact would be significant and unavoidable because it is not certain that the measure could be implemented because the City of Oakland, as lead agency, could not implement Measure TRANS-18 without the approval of Caltrans. However, in the event that Mitigation Measure TRANS-18 could be implemented, the impact would be less than significant.

The following changes are made to Impact TRANS-19 on page 4.3-73 of the DEIR:

Impact TRANS-19: Under 2035 cumulative traffic conditions, Buildout of the proposed project would increase the average intersection vehicle delay by more than six seconds during the AM peak hour at Intersection #43-Piedmont Avenue / West MacArthur Boulevard (2035), which would operate at LOS E during the AM peak hour under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-19: Implement the following measures at the Piedmont Avenue / West MacArthur Boulevard intersection:

- Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the AM peak hour
- Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. ~~The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) installation at locations that are not in the City's ITS Master Plan
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber Signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~If this measure were implemented, the intersection would worsen the LOS E conditions (increase the vehicle delay) compared to the unmitigated condition during the AM peak hour. No other secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-20 on page 4.3-74 of the DEIR:

Impact TRANS-20: Buildout of the proposed project would add more than 10 trips to Intersection #44-West Grand Avenue / Brush Street (2035), which would meet signal warrants under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-20: Implement Mitigation Measures TRANS-2 and TRANS-6.

After implementation of this measure, the intersection would continue to operate at LOS F during the AM and PM peak hours primarily because of the substantial increase in east/west traffic volumes assumed in this study. As a result, the impact remains significant and unavoidable even with the stated mitigation measure. ~~No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-21 on page 4.3-74 of the DEIR:

Impact TRANS-21: Under 2035 cumulative traffic conditions, Buildout of the proposed project would increase the v/c ratio at Intersection #45-West Grand Avenue / San Pablo Avenue (2035), which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)

~~**Mitigation Measure TRANS-21:** No feasible mitigations have been identified other than Mitigation Measure TRANS-2. The West Grand Avenue / San Pablo Avenue intersection would be combined with the West Grand Avenue intersection at Brush Street (see Mitigation Measure TRANS 20). Intersection operations would remain at LOS F with the stated mitigation measure. This occurs because of the substantial increase in east/west traffic volumes assumed in this study. As a result, the impact remains significant and unavoidable even with the stated mitigation measure.~~

Significance after Mitigation: Significant and Unavoidable.

The following changes are made to Impact TRANS-22 on page 4.3-75 of the DEIR:

Impact TRANS-22: Under 2035 cumulative traffic conditions, Buildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the PM peak hour at Intersection #50-17th Street / Castro Street (2035), which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-22: Implement the following measures at the 17th Street / Castro Street intersection:

- Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the PM peak hour
- Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. ~~The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) Installation at locations that are not in the City's ITS Master Plan
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber Signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would operate at an acceptable LOS D during the PM peak hour. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-23 on page 4.3-76 of the DEIR:

Impact TRANS-23: Under 2035 cumulative traffic conditions, Buildout of the proposed project would increase the v/c ratio at Intersection #52-West MacArthur Boulevard / Market Street (2035), which would operate at LOS F during both peak hours under 2035 Without Project conditions. (Significant)

Mitigation Measure TRANS-23: Implement the following measures at the West MacArthur Boulevard / Market Street intersection:

- Optimize signal timing (i.e., ~~changing the amount of~~ adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach) for the AM and PM peak hour.
- Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group.

To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:

- An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.
- Plans, Specifications, and Estimates (PS&E) to modify the intersection ~~to accommodate the signal modification. The signal should~~ All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for ~~among other items~~ the elements listed below:
 - 2070L Type Controller
 - GPS communication (clock) installation at locations that are not in the City's ITS Master Plan
 - Accessible pedestrian crosswalks according to Federal and State Access Board guidelines
 - City Standard ADA wheelchair ramps
 - Full actuation (video detection, pedestrian push buttons, bicycle detection)
 - Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines
 - Countdown Pedestrian Signals
 - Fiber Ssignal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.
- Signal timing plans for the signals in the coordination group

The project sponsor shall fund, ~~the cost of preparing and implementing these plans~~ prepare, and install the approved plans and improvements.

~~After implementation of this measure, the intersection would operate at LOS E during both the AM and PM peak hours. LOS E is an unacceptable service level, but conditions would be~~

~~better than the LOS F conditions under the 2035 Without Project condition. No secondary impacts would result from implementation of this measure.~~

Significance after Mitigation: Less than Significant.

The following changes are made to Impact TRANS-27 on page 4.3-93 of the DEIR:

**Impact TRANS-27: Summit Street Closure Conflicts with AC Transit Line 59.
(Significant)**

Mitigation Measure TRANS-27: Develop a contingency plan for Re-routing line 59/59A from Summit Street (between 30th Street and Hawthorne Avenue) ~~to Webster Street. This measure that~~ would allow AC Transit to continue to provide service to the project site. This contingency plan should include potential re-location of bus stops, bus shelters and way-finding signage for passengers.

Significance after Mitigation: Less than Significant.

Air Quality (Section 4.4)

The following changes are made to the Significance Criteria under Section 4.4.3 Impacts and Mitigation Measures on page 4.4-13 of the DEIR to clarify greenhouse gas/climate change thresholds of significance (*deleted text is in strikeout type, and new text is double underlined*):

~~Based on the Governor's Office of Planning and Research (OPR) Draft amendments to the CEQA Guidelines, in the City of Oakland the proposed project would be considered to have a significant cumulative impact regarding GHG emissions if it would[†]:~~

- ~~• Exceed adopted numeric thresholds of an appropriate regulatory agency, either directly or indirectly, may have a significant impact on the environment; or~~
- ~~• Conflict with any applicable plan, policy or regulation of an appropriate regulatory agency adopted for the purpose of reducing greenhouse gas emissions.~~

The November 2009 Draft BAAQMD Guidelines discussed above identify a project specific threshold of 1,100 metric tons per year as resulting in a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact to global climate change. The analysis in this EIR considers that, because the quantifiable threshold established in the Draft BAAQMD Guidelines was formulated based on AB 32 reduction strategies, a project cannot exceed the numeric threshold without also conflicting with an

[†] OPR's Draft proposed amendments to the CEQA Guidelines are awaiting adoption by the Secretary for Natural Resources, as required by SB 97 (Chapter 185, 2007). The Natural Resources Agency will conduct formal rulemaking in 2009, prior to certifying and adopting the amendments, as required by SB 97.

applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

A project would have a significant impact with regard to climate change if it would generate greenhouse gas (GHG) emissions, either directly or indirectly, that would:

- a. Exceed adopted, numeric thresholds of an appropriate regulatory agency; or
- b. Conflict with any applicable plan, policy or regulation of an appropriate regulatory agency adopted for the purpose of reducing GHG emissions.

The BAAQMD is still in the process of considering revised CEQA Guidelines which include thresholds for assessing the significance of a project's GHG emissions. The most recent draft of the Guidelines was released in December 2009, and BAAQMD's next hearings on the Guidelines are currently scheduled for June 2010. Although no thresholds have been adopted to date and the project will not have an impact with respect to GHG emissions unless the proposed thresholds are in fact adopted, the analysis herein uses the plan-level and project-level thresholds for the draft BAAQMD CEQA Guidelines to determine the project's significance with respect to the issue of climate change assuming the thresholds are adopted as currently proposed.

Specifically, for "a" above, based on the proposed draft BAAQMD Guidelines, a project would have a significant impact on the environment if it would:

Plan-Level Impacts:

1. Produce emissions of more than 6.6 metric tons of CO₂e per service population¹ annually.

Project-Level Impacts (Land Use Development Projects)²:

2. Produce total emissions of more than 1,100 metric tons of CO₂e annually; and³
3. Produce emissions of more than 4.6 metric tons of CO₂e per service population annually.

Project-Level Impacts (Stationary Source Projects)⁴

4. Produce total emissions of more than 10,000 metric tons of CO₂e annually.

¹ The per service population emissions total includes both the residents and employees of a proposed development project.

² Land Use Development projects are projects (or components of projects) that do not require a BAAQMD permit to operate.

³ A project's impact would be considered significant under the proposed BAAQMD thresholds if the emissions exceed BOTH of these thresholds. Accordingly, the impact would be considered less than significant if a project's emissions are below EITHER of these proposed thresholds. However, for a project or plan that is a "very large project" (as that term is used in the proposed CEQA Guidelines), which the City of Oakland considers to be any plan or project meeting the criteria in CEQA Guidelines section 15206 (Projects of Statewide, Regional, or Area-wide Significance), the City considers the impact to be less than significant only if the emissions would be below BOTH of these proposed thresholds.

⁴ Stationary Source Projects are projects (or components of projects) that require BAAQMD permit to operate.

Although the BAAQMD has not proposed a construction-related GHG threshold, the City nevertheless has quantified and disclosed such emissions, and made a significance determination based on the annualized construction emissions compared to the 1,100 metric tons of CO₂e per year threshold (which BAAQMD specifies for operational emissions only) and in relation to meeting AB 32 GHG reduction goals.

The proposed, draft BAAQMD Guidelines state that potential plan-level and project-level impacts would be considered less than significant if the lead agency has adopted a Climate Action Plan that meets certain requirements (referred to as a “Qualified Climate Action Plan”) and the plan or project complies with the Qualified Climate Action Plan. To date, the City has not adopted a Qualified Climate Action Plan. If and when, the City adopts a Qualified Climate Action Plan, the potential impacts of future projects would be considered less than significant if the projects comply with the Qualified Climate Action Plan.

The following changes are made to Impact AIR-2 on pages 4.4-18 through 4.4-20 of the DEIR (*deleted text is in strikethrough type, and new text is double underlined*):

The proposed project would need to implement a Transportation Demand Management Plan in accordance with Standard Condition of Approval TRANS-1, *Parking and Transportation Demand Management*. The trip reduction benefits of this plan were not available at the time of DEIR preparation. Additionally, natural gas consumption estimated for the proposed boiler at the PCP has been refined, as building design details have been further clarified.

Impact AIR-2: Operation of the proposed project would result in increased long-term emissions of criteria pollutants. (Less than Significant under existing BAAQMD Thresholds. If proposed BAAQMD Thresholds are adopted, Potentially Significant Phase I NO_x emissions under the MOB Concurrent with Phase 1 scenario)

As discussed under the Approach to Analysis above, operational emissions for vehicle trips and area sources were calculated using the URBEMIS2007 computer model while generator emissions were calculating using OFFROAD2007 emission factors. According to traffic data provided by Fehr & Peers, the 2015 intersection impacts analysis studies the potential impacts of the full project, which would include elements of the potential future phases (including the new MOB). This represents a reasonable worst-case analysis of project transportation impacts, and therefore the operational emissions for most of the criteria pollutants discussed below reflect development of the new MOB concurrently with Phase 1 (which would occur prior to 2015).

Phase 1 of the proposed project would result in a net increase of 2,060 trips per day. If the new MOB is developed concurrent with Phase 1, the net increase of trips would be 6,853 trips per day. At buildout the proposed project would result in a net increase of 7,260 trips per day (inclusive of Phase 1). This information was used to supplement default trip

generation rates in the URBEMIS2007 model. Although future phase project elements would increase daily vehicle trips by 407 trips per day over the Phase 1 with the MOB scenario, improvements to the vehicle fleet between 2014¹ (analysis year for Phase 1) and 2030 (analysis year for all phases) results in a net decrease in emissions (i.e., improved emission factors more than compensate for the relatively modest increase in vehicle trips occurring over the six-year span). Generator emissions were calculated assuming that both generators would be tested for one hour on the same day.

As shown in **Table 4.4-4**, the proposed project would not result in an increase in criteria pollutant emissions that would be considered significant under current or proposed BAAQMD thresholds – either in Phase 1 or at buildout. Therefore, impacts would be less than significant. ~~However, a~~ Application of the proposed BAAQMD new thresholds would result in a significant (although temporary) impact from emissions of NOx (64 pounds per day) under the scenario that would develop the new MOB concurrent with Phase 1. However, trip reductions that would occur with application of TDM measures would reduce project emissions for this scenario to 51 pounds per day of NOx, which is below the BAAQMD proposed threshold. At 64 pounds per day of NOx emissions, this scenario would exceed the proposed NOx threshold of 54 pounds per day during Phase 1, after which vehicle emission improvements are anticipated to be sufficient to reduce NOx emissions to a less than significant impact.

In addition, a substantial portion of the NOx emissions is from emergency generator testing. The applicant could reduce the duration of testing by at least 50 percent (i.e., two generators for one-half hour on the same day or alternate day testing), the threshold would not be exceeded; generator emissions would be reduced by 10 pounds per day, for a total of 41 total pounds of NOx under the scenario that would develop the new MOB concurrent with Phase 1 (without the TDM measures). ~~Further, implementation of Standard Condition TRANS-1, *Transportation and Parking Demand Management*, would include measures that would reduce the number of vehicle trips associated with the project, and thereby reduce the mobile sources emissions of NOx to some extent, which could reasonably be expected to reduced NOx emissions by up to 10 pounds per day, especially if combined with modified generator testing operations.~~

Although not required to reduce a significant environmental effect, it is recommended that the City consider the following as a condition of Project approval to further reduce emissions of NOx:

The applicant shall determine and conduct routine testing of the two proposed new emergency generators proposed by the project on separate days or for a shorter duration rather than “both generators tested for one hour on the same day.” The applicant shall prepare and submit to the City of Oakland a Generator Testing and Operations Plan. ~~The Generator Testing and Operations Plan, in combination with~~

¹ For this analysis the construction end date was used. The data for 2014 is more conservative than for 2015, but would still be only marginally different.

**TABLE 4.4-4
ESTIMATED DAILY EMISSIONS FOR THE PROPOSED PROJECT (INCLUDING TDM PLAN)**

Emission Source	Estimated Daily Emissions (pound per day)					
	ROG	NOx	CO	SO ₂	PM10	PM2.5
Phase 1						
Area Sources	<u>12</u>	<u>≤12</u>	<u>21</u>	<1	<1	<1
<u>Boiler</u>	<u>1</u>	<u>7</u>	<u>6</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>
Mobile Sources	<u>912</u>	<u>913</u>	<u>102140</u>	<1	<u>1620</u>	<u>34</u>
Generator Testing	<1	20	4	<1	<1	<1
Total Phase 1	<u>1113</u>	<u>3634</u>	<u>114145</u>	<1	<u>1620</u>	<u>34</u>
<i>Existing BAAQMD Threshold</i>	80	80	550	NA	80	NA
Significant?	No	No	No	No	No	No
<i>Proposed BAAQMD Threshold</i>	54	54	NA	NA	82	54
Significant?	No	No	No	No	No	No
Phase 1 with MOB Concurrent						
Area Sources	3	<u>≤13</u>	<u>32</u>	<1	<1	<1
<u>Boiler</u>	<u>1</u>	<u>7</u>	<u>6</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>
Mobile Sources	<u>2234</u>	<u>2441</u>	<u>246449</u>	<1	<u>3866</u>	<u>813</u>
Generator Testing	<1	20	4	<1	<1	<1
Total Phase 1	<u>2637</u>	<u>5164</u>	<u>259455</u>	<u>≤1</u>	<u>3867</u>	<u>814</u>
<i>Existing BAAQMD Threshold</i>	80	80	550	NA	80	NA
Significant?	No	No	No	No	No	No
<i>Proposed BAAQMD Threshold</i>	54	54	NA	NA	82	54
Significant?	No	No-Yes	No	No	No	No
Future Phases (2030)						
Area Sources	3	<u>≤13</u>	<u>53</u>	<1	<1	<1
<u>Boiler</u>	<u>1</u>	<u>7</u>	<u>6</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>
Mobile Sources	<u>1618</u>	<u>1416</u>	<u>173197</u>	<1	<u>6169</u>	<u>1214</u>
Generator Testing	<1	20	4	<1	<1	<1
Project Buildout	<u>2024</u>	<u>4139</u>	<u>188204</u>	<u>≤1</u>	<u>6170</u>	<u>1214</u>
<i>Existing BAAQMD Threshold</i>	80	80	550	NA	80	NA
Significant?	No	No	No	No	No	No
<i>Proposed BAAQMD Threshold</i>	54	54	NA	NA	82	54
Significant?	No	No	No	No	No	No

NOTE: Emissions shown represent worst case summertime emissions, except for emissions of CO which assume wintertime conditions. Emissions may not appear to add up correctly due to rounding. Although the combined Phase 1 and future phases scenario has an incrementally greater vehicle trip generation than Phase 1 alone, improvements to vehicle emission rates assumed by URBEMIS from 2014 to 2030 more than compensate for these increased trips. Consequently, daily emissions of ROG, NOx and CO will actually decrease in 2030 compared to Phase 1 alone in 2014.

See Appendix E for URBEMIS output sheets and generator emission calculations.
Source: URBEMIS2007

~~implementation of the required Transportation and Parking Demand Management Plan pursuant to Standard Condition TRANS-8, can effectively reduce emission levels to less than significant, according to applicable thresholds. The applicant shall implement the Plan.~~

Impact after Standard Conditions and Mitigation of Approval: Less than Significant.

The following change is made to Mitigation Measure AIR-8 on page 4.4-52 of the DEIR (*deleted text is in strikethrough type, and new text is double underlined*):

Mitigation Measure AIR-8: Implement the Greenhouse Gas Reduction Plan. ~~The applicant shall submit for review and approval by the Planning and Zoning Division a Greenhouse Gases Emissions Reduction Plan (GHG plan) containing strategies to increase energy efficiency and reduce GHG emissions from the proposed project to the greatest extent feasible. The applicant shall implement the approved GHG plan. The GHG plan shall include strategies that exceed those already identified in the Project Description, or that are City Standard Conditions of Approval, and shall particularly include strategies that reduce emissions generated by motor vehicle emissions (which represent the most significant contribution to total project GHG emissions). Strategies in the GHG plan shall include but not be limited to, measures recommended by the BAAQMD (BAAQMD, 2009) and additional potential measures in the Green Guide for Health Care, such as the following:~~

~~BAAQMD Measures~~

- ~~• Number and layout of new/replacement shade trees within 40 feet of the south side or within 60 feet of the west sides of the property;~~
- ~~• Surface area and type of cool roof materials (albedo ≥ 30);~~
- ~~• Number and type of smart meters and programmable thermostats;~~
- ~~• Number and type of solar water heaters;~~
- ~~• Type of HVAC duct sealing;~~

~~Green Guide for Health Care~~

- ~~• Type and area of exceptionally durable and/or reused materials;~~
- ~~• Type and area of materials that avoid toxic emissions;~~
- ~~• Type and number/area of equipment and fixtures that conserve energy;~~
- ~~• Type, number and location of efficient and natural lighting and ventilation;~~
- ~~• Surface areas, type and timing of low emitting materials, paints and coatings; and~~

Detailed construction activities that reduce pollution by controlling soil erosion, sedimentation and airborne dust generation.

Noise (Section 4.5)

The following change is made to the discussion under Impact NOI-1, Noise from Construction Trucks, in Section 4.5.3 on page 4.5-14 of the DEIR (*deleted text is in strikethrough type, and new text is double underlined*):

Inbound trips would primarily use Telegraph Avenue ~~and Webster Street~~ to access Hawthorne Avenue or Summit Campus driveway. Outbound truck trips would primarily use ~~Elm Hawthorne Avenue Street~~, 34th Street and Telegraph Avenue, or Hawthorne Avenue, Broadway, to 27th Street or West Grand Avenue, to the freeway.

Cultural Resources (Section 4.7)

The DEIR states that the property at 418 30th Street would be demolished and replaced with other structures as part of the future phases of the proposed project. The DEIR presumptively considered this property a historical resource for CEQA purposes because it was determined eligible for local listing by the City. The City has since determined that the resource warrants preservation as a Heritage Property, and is considered a CEQA historical resource as the analysis, findings, mitigation measures and applicable Oakland standard conditions of approval in the DEIR conservatively presumed. As presented therein, demolition of this property would have resulted in a significant impact to historical resources, because it would have materially altered those characteristics that justify its eligibility for listing as a historical resource.

As stated on page 4.7-31 of the DEIR, the City's Historic Preservation Element (HPE) Policy 3.8.1 lists several measures to mitigate significant effects of a historic resource, including specifically that "modification of the project design to avoid adversely affecting the character-defining elements of the property" as appropriate mitigation for significant effects to an historic resource." In addition, the DEIR identifies Mitigation Measures CUL-4a through CUL-4b that would also mitigate the demolition of this potentially historic resource. However, application of these measures would still have resulted in a significant and unavoidable (SU) impact to this potentially historical resource.

However, since publication and distribution of the DEIR, the Project Applicant has redesigned the new Future Phase Medical Office Building (MOB) to avoid demolition of the building at 418 30th Street. This scenario was analyzed in Alternative 3.1, *Redesigned New MOB to Avoid Demolition of 418 30th Street* (pages 5-32 through 5-34). Thus there would be less than significant impacts to cultural resources. In order to avoid demolition of the property at 418 30th Street, and yet maintain the same square footage as the proposed project, the Project Applicant would reduce the footprint of the MOB, but increase the building height up to eight stories from five stories. The Project Applicant would not change any portion of the property at 418 30th Street. Therefore, the following changes are made to Impact CUL-4 on pages 4.7-30 – 34 of the DEIR:

Impact CUL-4: Future phases of the proposed project would cast shadows near ~~demolish~~ the potentially-historical resource at 418 30th Street. (Conservatively Assumed to be Significant Less than Significant)

Six buildings located in the future phases of the proposed project were surveyed and evaluated for their historic significance. These are 3232, 3300, and 3318 Elm Street; 3023 and 3043 Summit Street; and 418 30th Street. ~~Only the property at 418 30th Street is presumptively considered a historical resource for CEQA purposes, because it was previously surveyed and listed in the California Register with a National Register status code of "5S" and was determined eligible for local listing by Planning Staff. The City is currently reviewing whether the resource definitely warrants preservation as a Heritage Property. If so, it will be treated as a CEQA Historic Resource. If not, it would not be considered a CEQA Historic Resource and its demolition would result in less than significant impacts. Until the City's evaluation is completed, it is presumptively considered a CEQA Historic Resource, whose demolition is conservatively considered to be Significant and Unavoidable.~~

~~The property at 418 30th Street would be demolished and replaced with other structures as part of the future phases of the proposed project (see **Figure 4.7-1**). Demolition would result in a significant impact to historical resources, because it would materially alter those characteristics that justify its eligibility for listing as an historical resource. While Mitigation Measures CUL 4a through 4 d, described below, would reduce the level of impact, it would not reduce the impact to a less than significant level.~~

~~Policy 3.8.1 of the Historic Preservation Element (HPE) of the City of Oakland General Plan states that measures appropriate to mitigate significant effects to an historic resource may include one or more of the following depending on the extent of the proposed addition or alteration:~~

- ~~1) Modification of the project design to avoid adversely affecting the character defining elements of the property.~~
- ~~2) Relocation of the affected Historical Resource to a location consistent with its historic or architectural character.~~

~~If the above measures are not feasible, then other measures may be considered including, but not limited to the following:~~

- ~~3) Modification of the project design to include restoration of the remaining historic character of the property.~~
- ~~4) Modification of the project design to incorporate or replicate elements of the building's original architectural design.~~
- ~~5) Salvage and preservation of significant features and materials of the structure in a local museum or within the new project.~~
- ~~6) Measures to protect the Historical Resource from effects of on-site or other construction activities.~~

- 7) ~~Documentation in a Historic American Buildings Survey report or other appropriate format: photographs, oral history, video, etc.~~
- 8) ~~Placement of a plaque, commemorative marker, or artistic or interpretive display on the site providing information on the historical significance of the resource.~~
- 9) ~~Contribution to a Facade Improvement Fund, the Historic Preservation Revolving Loan Fund, the Oakland Cultural Heritage Survey, or other program appropriate to the character of the resource.~~

~~Standard Condition of Approval CUL 4 would require, after proper notification, that the building be made available at no cost or a nominal cost for a minimum period of 90 days.~~

Because 3232, 3300, and 3318 Elm Street, and 3023–3043 Summit Street under the future phases of the proposed project are not considered historical resources for CEQA purposes, generally due to lack of historic and architectural significance, their proposed demolition and replacement with new structures would not result in a significant impact to historical resources. No mitigation would be required.

The City has determined that the property at 418 30th Street is a historic resource for CEQA purposes. The property at 418 30th Street and its setting would be located directly south of and adjacent to the MOB. The MOB would cast shadow to the northwest and northeast (as depicted in Figures 4.2-9 through 4.2-20 of the DEIR). Therefore, shadows cast from the MOB would not shade the historic resource or its setting. To the extent that the shadow of the MOB might affect the resources' historic setting, this shadow would not affect the building's eligibility as a local historical resource, particularly since the setting of 418 30th Street is already significantly altered by existing development. No mitigation would be required.

The impacts of the project on this historical resource would be less than significant.

~~**Mitigation Measure CUL 4:** The following mitigation measures would help to reduce the impact of the loss of 418 30th Street.~~

~~**Mitigation Measure CUL 4a:** Archival Documentation. Alta Bates Summit Medical Center shall document the building at 418 30th Street prior to its demolition through the use of large format black and white photography and a brief historical report, meeting the specifications of the Historic American Building Survey (HABS). The historic report should briefly describe the building and its historic significance to the City of Oakland. The documentary photographs and report would be archived locally at the Oakland History Room (OHR) of the Oakland Public Library along with a copy on archival paper. Digital copies of the photographs would be forwarded to the Oakland Cultural Heritage Survey. This mitigation would satisfy Policy 3.8.1 (7) of the Historic Preservation Element of the City of Oakland General Plan (Documentation in a Historic American Building Survey report or other appropriate format: photographs, oral history, video, etc.)~~

~~**Mitigation Measure CUL 4b:** Interpretive Materials: Alta Bates Summit Medical Center shall prepare interpretive materials as directed by the City, including, but not~~

limited to on-site interpretive signage, brochures, or any combination thereof. Planning staff recommends that the project applicant appropriate a dollar amount of approximately \$10,000 for these interpretive materials. This mitigation would satisfy Policy 3.8.1 (8) of the Historic Preservation Element of the City of Oakland General Plan (Placement of a plaque, commemorative marker, or artistic or interpretive display on the site providing information on the historical significance of the resource.)

Mitigation Measure CUL-4c: Salvage Program. The project applicant shall undertake a salvage program to save and reuse historically significant materials and features from the building at 418 30th Street, such as the terra cotta tile roofing, columned porch, or possibly other materials or features not yet identified herein. As such the project applicant shall conduct a full survey of all historic architectural elements and elements suitable for re-use at the site, develop a reuse/salvage plan, whose goal is to maximize reuse of materials at the site, and submit such for the Landmarks Preservation Advisory Board (LPAB) consideration. The LPAB would make advisory recommendations either to the Planning Commission or Development Director. The applicant shall implement the approved plan. Implementation of a salvage program would satisfy Policy 3.8.1 (5) of the Historic Preservation Element of the City of Oakland General Plan (Salvage and preservation of significant features and materials of the structure in a local museum or within the new project).

Mitigation Measure CUL-4d: Financial Contributions: The project applicant shall make a financial contribution to the City of Oakland, which can be used to fund other historic preservation projects at the Project Site or in the immediate vicinity. Contributions to the fund shall be determined by planning staff based on the linear feet of the facades to be demolished. This mitigation would satisfy Policy 3.8.1.(9) of the Historic Preservation Element of the City of Oakland General Plan (Contribution to a Façade Improvement Fund, the Historic Preservation Revolving Loan Fund, the Oakland Cultural Heritage Survey, or other program appropriate to the character of the resource.)

CEQA Guidelines Section 15126.4(b)(2) states that, “In some circumstances, documentation of a historical resource, by way of historic narrative, photographs, or architectural drawings as mitigation for the effects of demolition of the resources will not mitigate the effects to a point where clearly no significant effect on the environment would occur.” In such cases, the demolition or substantial alteration of a historical resource would remain a significant and unavoidable impact on the environment even after the historical documentation has been completed. Implementation of measure CUL-4a through 4b would reduce the potential impacts to historical resources (418 30th Street), but not to a less than significant level. Even with implementation of the above mitigation measures, the demolition of the building would result in the permanent loss of the historical resource. Therefore the impact of demolition would remain significant and unavoidable.

City decision makers would consider all aspects of the proposed project and overall General Plan policies to determine whether or not an affirmative finding could be made, under Policy 3.5 of the General Plan Historic Preservation Element, that “the design quality of the proposed project is at least equal to that of the original structure[s] and is compatible with the

character of the neighborhood” (Finding 1) and that “the public benefits of the proposed project outweigh the benefit of retaining the original structure[s]” (Finding 2).

~~The Historic Preservation Element recommends that a project design should be modified “to avoid adversely affecting the character defining elements” Modifying the project as recommended in the Historic Preservation Element would substantially alter the project as proposed, but it is nevertheless evaluated in the Alternatives Chapter.~~

~~**Significance after Mitigation:** None required Conservatively assumed to be Significant and Unavoidable.~~

The change in construction truck routes would not result in additional noise impacts because the number of trips would remain the same, and the noise levels as analyzed in pages 4.5-12 through 4.5-15 of the DEIR are not a significant contribution to local noise levels. The revised truck routes shown in Figure 4.3-12 in this document differs from that previously analyzed by one block. The implementation of Standard Conditions as outlined in the DEIR would reduce noise impacts to less than significant levels. Therefore, no new analysis is needed.

Utilities, Service Systems, and Energy (Section 4.13)

The following changes are made to the DEIR based on information received from the East Bay Municipal District during the Public Review and Comment period for the DEIR (see Comment Letter A in Chapter 6).

Section 4.13.1 Environmental Setting, Water Supply System, last paragraph on page 4.13-1 of the DEIR (*new text is double underlined*):

Existing water lines serving the project site include lines located along Hawthorne Avenue, Webster Street, Summit Street, Elm Street, 30th Street, and 34th Street. [Comment A-2]

Section 4.13.1 Environmental Setting, Water Service, Recycled Water, the first two paragraphs on page 4.13-3 are revised as follows (*deleted text is in strikethrough text and new text is double underlined*):

The goals of using recycled water are to supplement the existing potable water supply and assist in meeting future water demands. ~~Water for recycling is drawn from water reservoirs containing untreated water, and from wastewater treatment plants.~~ Recycled water, as defined in the California Water Code, is water which, as a result of treatment of wastewater, is suitable for direct beneficial use or controlled use that would not otherwise occur. EBMUD’s Nonpotable Water Policy No. 73 8.01 (19962006) mandates that all customers use recycled water for non-domestic purposes when such water is of adequate

quality and quantity, available at reasonable cost, not detrimental to public health and not injurious to plant life, fish, and wildlife. ~~EBMUD currently supplies almost 6.5 mgd of recycled water and other nonpotable water for irrigation, industrial processes and equipment wash down. In 2008, EBMUD supplied approximately 8.7 mgd of recycled water and other nonpotable water for non-residential landscape irrigation, commercial and industrial processes, and toilet and urinal flushing in commercial buildings. EBMUD's goal is delivery of 14 mgd of nonpotable water, including recycled water, by 2020, for a total of 5.1 billion gallons annually.~~

In January 2002, the City of Oakland adopted a recycled water ordinance that requires new developments within the city to use recycled water provided by EBMUD for common area irrigation, if recycled water is available to the development area. This requires installation of a separate non-potable water distribution system on-site. The project site is ~~not~~ located approximately 1.5 miles north of EBMUD's recycled water main on 10th Street. EBMUD determined that it is not feasible to serve recycled water to this project site due to extensive length of recycled water distribution system required to provide minimal demand, within the service area boundary of EBMUD's East Bayshore Recycled Water Project and would not be served by recycled water [Comment A-4]

Section 4.13.1 Environmental Setting, Sanitary Sewer Service, Inflow/Infiltration Correction Program, the entire section on page 4.13-4 is revised as follows (*deleted text is in strikethrough text and new text is double underlined*):

~~A continuing issue with respect to sanitary sewer collection has been inflow and infiltration of stormwater into the EBMUD and Oakland sewer lines, resulting in high flow levels and overflow of untreated wastewater during wet weather events. Most of the stormwater enters sewer systems by infiltration (stormwater that passes through the soil and into deteriorated sewer pipes). Inflow originates from stormwater inlets and manholes that connect to the sanitary sewer system rather than the stormwater system. In 1986, with EBMUD as the lead agency, the Wet Weather Program was initiated to improve treatment capacity for wet weather flows and reduce the amount of inflow and infiltration throughout the EBMUD collection system. The cities of Alameda, Albany, Berkeley, Emeryville, Kensington, Oakland, Piedmont and portions of El Cerrito and Richmond participate in EBMUD's Wet Weather Program. The program has resulted in four new wet weather treatment facilities, two storage basins, 7.5 miles of new interceptors, and expansion of the main wastewater treatment plant. These new facilities accommodate an increase in peak wet weather treatment capacity from 290 mgd to 775 mgd. The City's long range sewer improvements are anticipated to reduce peak regional flows from 1.1 billion gallons per day to 775 mgd.~~

~~The City of Oakland has a 25 year inflow and infiltration collection maintenance and rehabilitation program that will help eliminate overflow by reducing inflow and infiltration of stormwater to upgrade the existing system. The City's collection system is comprised of local collection mains and a network of trunk systems. The City's system capacity improvements have targeted the trunk network only and assume that the remainder~~

~~of the system, the local mains, has sufficient capacity. The entire system is divided into drainage basins and subbasins. The proposed project is located in Basin 52. Each subbasin has a projected allocation for base flow increase based on an anticipated growth rate during the period of the inflow and infiltration collection maintenance and rehabilitation program. Growth (base flow increase) within each subbasin must not exceed projections. If exceeded, the impact of the additional growth must be analyzed on the entire City collection, and trunk system and additional system improvements would be required. If redirection of allocation from other subbasins is needed to accommodate a development project, further review and approval from the City would be required in order to determine locations and the amount of potential reallocation. If growth does not exceed projection within each subbasin, then impact analysis may be limited to the study of local mains serving the development site.~~

EBMUD's Main Wastewater Treatment Plant (MWWTP) and interceptor system are anticipated to have adequate dry weather capacity to treat the proposed wastewater flows from this project, provided that the wastewater meets the requirements of the current EBMUD Wastewater Control Ordinance. However, wet weather flows are a concern. EBMUD has historically operated three Wet Weather Facilities to provide treatment for high wet weather flows that exceed the treatment capacity of the MWWTP. On January 14, 2009, due to Environmental Protection Agency's and the State Water Resources Control Board's (SWRCB) re-interpretation of applicable law, the Regional Water Quality Control Board (RWQCB) issued an order prohibiting further discharges from EBMUD's Wet Weather Facilities. Additionally, on July 22, 2009, a Stipulated Order for Preliminary Relief issued by the Environmental Protection Agency, the SWRCB, and RWQCB became effective. This order requires EBMUD to begin work that will identify problem inflow/infiltration areas, begin to reduce inflow/infiltration through private sewer lateral improvements, and lay the groundwork for future efforts to eliminate discharges from the Wet Weather Facilities.

Currently, there is insufficient information to forecast how these changes will impact allowable wet weather flows in the individual collection system subbasins contributing to the EBMUD wastewater system, including the subbasin in which the proposed project is located. As required by the Stipulated Order, EBMUD is conducting extensive flow monitoring and hydraulic modeling to determine the level of flow reductions that will be needed in order to comply with the new zero-discharge requirement at the Wet Weather Facilities. It is reasonable to assume that the new regional wet weather flow allocation process may occur in the East Bay, but the schedule for implementation of any new flow allocations has not yet been determined.

Section 4.13.3 Impacts and Mitigation Measures, Utilities Impacts, Water Supply, the second paragraph on page 4.13-2 is revised as follows (*deleted text is in strikethrough text and new text is double underlined*):

EBMUD recommends incorporating water conservation measures into the design and construction of all new development projects to ensure that sufficient water capacity is

available through EBMUD's planning horizon year 2030. EBMUD ~~also recommends~~ requires that the project ~~should~~ comply with Assembly Bill 325, Model Water Efficient Landscape Ordinance. Section 31 of EBMUD's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the Project Applicant's expense. According to EBMUD, the proposed project is not a likely candidate for the use recycled water due to minimal irrigation demands and the distance from the nearest recycled water main (EBMUD, 2009). [Comment A-6]

**TABLE 2-1
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.1 Land Use, Plans and Policies		
Impact LU-1: The project would redevelop and expand buildings at the ABSMC Summit Campus property between Webster Street, 34th Street, Telegraph Avenue, and 30th Street, but would not result in the physical division of an existing community or conflict with nearby land uses. (Less than Significant)	None Required	
Impact LU-2: The project would not conflict with applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)	None Required	
Impact LU-3: The project would not result in a fundamental conflict between adjacent and nearby land uses, particularly with respect to any applicable habitat conservation plan or natural community conservation plan. (Less than Significant)	None Required	
Impact LU-4: The proposed project, combined with cumulative development in the defined geographic area, including past, present, existing, approved, pending, and reasonably foreseeable future development, does not reveal any significant adverse cumulative impacts in the area. (Cumulative Impact: Less than Significant)	None Required	
4.2 Visual Quality and Shadow		
Impact VIS-1: The proposed project would not adversely affect a scenic vista or substantially damage scenic resources within a state or locally designated scenic highway. (Less than Significant)	None Required	
Impact VIS-2: The proposed project would alter the existing visual conditions on the project site, but would not substantially degrade the existing visual character or quality of the site and its surroundings. In addition, it would be consistent with the City of Oakland Design Review criteria for non-Residential projects. (Less than Significant)	None Required	
Impact VIS-3: The proposed project would create a new source light or glare, but would not adversely affect day or nighttime views in the area. (Less than Significant)	Standard Condition of Approval VIS-1, <i>Lighting Plan</i>	Less than Significant
Impact VIS-4: The proposed project would result in additional shadow on adjacent areas. It would not cast shadow that would substantially impair the function of a building using passive solar heat collection, solar collectors for hot water heating, or photovoltaic solar collectors. Nor would it cast shadow that would substantially	None Required	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.2 Visual Quality and Shadow (cont.)		
impair the beneficial use of any public or quasi-public park, lawn, garden, or open space. Finally, although it would cast shadow on an historic resource, it would not do so to an extent that the shadow would materially impair the resource's historic significance. (Less than significant)	None Required	
Impact VIS-5: The proposed project would not require an exception to the policies and regulations in the General Plan, Planning Code, or Uniform Building Code, addressing the provision of adequate light related to appropriate uses. (Less than Significant)	None Required	
Impact VIS-6: Project construction activity and operations, combined with cumulative development in the defined geographic area, including past, present, existing, approved, pending, and reasonably foreseeable future development, would result in cumulative impacts related to visual character, views, aesthetics, shadow, or light and glare. (Less than Significant)	Standard Condition of Approval VIS-1, <i>Lighting Plan</i>	Less than Significant
4.3 Transportation, Circulation and Parking		
Impact TRANS-1: Phase 1 of the proposed project, <u>when added to existing traffic levels</u> , would add more than 10 trips to <i>Intersection #11-Telegraph Avenue / Hawthorne Avenue</i> (Existing), which meets peak-hour volume signal warrants. (Significant)	<p>Mitigation Measure TRANS-1: Implement the following measures at the Telegraph Avenue / Hawthorne Avenue intersection:</p> <ul style="list-style-type: none"> • Signalize the intersection, providing actuated operation, with permitted left turns and communication conduit/cabling connecting the traffic signal to the existing traffic signals on Telegraph Avenue at 30th Street and 34th Street. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should. <u>All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and 	Less than Significant

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-1 (cont.)	<p>State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below:</p> <ul style="list-style-type: none"> - 2070L Type Controller - GPS <u>communication (clock) installation at locations that are not in the City's ITS Master Plan</u> - <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> - <u>City Standard ADA wheelchair ramps</u> - Full actuation (video detection, pedestrian push buttons, bicycle detection) - <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> - Countdown Pedestrian Signals - <u>Fiber Ssignal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet</u> • Signal timing plans for the signals in the coordination group • <u>A complete traffic signal warrant analysis to verify that this location meets MUTCD signal warrants, subject to review and approval of the City.</u> <p>The project sponsor shall fund the cost of preparing and implementing these plans, prepare, and install the approved plans and improvements.</p> <p>Prior to the installation of the traffic signals, a complete traffic signal warrant analysis shall be conducted at this location to verify that this location meets MUTCD signal warrants and be subject to review and approval of the City. After implementation of this measure, the intersection would operate at LOS A during both AM and PM peak hours. No secondary impacts would result from implementation of this measure.</p>	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)	<p>Mitigation Measure TRANS-2: Implement the following measures at the West Grand Avenue / Brush Street intersection:</p> <ul style="list-style-type: none"> • Signalize the intersection providing actuated operation and signal communication with the existing signal interconnect on West Grand Avenue and making other necessary City-approved associated improvements. The project sponsor shall work with the City to perform a detailed intersection/signalization engineering design study to determine the most feasible design to implement, which improves intersection operations and minimizes any potential secondary impacts, in accordance with City standards, which may include measures not specified herein, or even an alternative to signalization of the intersection, but which result from the detailed study. <p>Because several design alternatives may be acceptable, a final, detailed design plan for this intersection improvement shall be prepared, subject to review and approval of the City.</p> <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards, taking into consideration the adjacency with the West Grand/San Pablo intersection and other factors. • The study shall address necessary access improvements (including without limitation signage, signal operations, intelligent transportation systems and employee/patient/visitor education) from the ABSMC campus to southbound I-880 for at least three (3) alternative routes, including without limitation: (a) street closures; (b) queuing impacts of short left turn lane; (c) geometric analysis of new lane configurations and offsets (safety and operations); (d) analysis of cycle length on vehicle, bus, and pedestrian crossings (safety and operations); (e) potential bike lane removal (policy conflict); (f) prohibition of pedestrian crossing; (g) potential parking space removal; and (h) drainage relocation. The study could result in recommendations that would not require the intersection to be signalized. 	<p>Significant and Unavoidable</p> <p>Conservatively deemed to be Significant and Unavoidable because the intersection is complicated, and the specific improvements to be implemented, according to City standards, must be finalized after a detailed intersection/signalization engineering design study is performed and a preferred, detailed design selected by the City.</p>

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-2 (cont.)	<ul style="list-style-type: none"> • Plans, Specifications, and Estimates (PS&E) to modify the intersection. All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for the elements listed below: <ul style="list-style-type: none"> – <u>2070L Type Controller</u> – <u>GPS communication (clock)</u> – <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> – <u>City Standard ADA wheelchair ramps</u> – <u>Full actuation (video detection, pedestrian push buttons, bicycle detection)</u> – <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> – <u>Countdown Pedestrian Signals</u> – <u>Fiber signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.</u> – <u>Signal timing plans for the signals in the coordination group</u> – <u>A final design plan for this intersection improvement, subject to review and approval of the City</u> 	
Impact TRANS-3: Buildout of the proposed project, <u>when added to existing traffic levels</u> , would add more than 10 trips to <i>Intersection #11-Telegraph Avenue / Hawthorne Avenue</i> (Existing), which meets peak hour signal warrants. (Significant)	<p>The project sponsor shall fund, prepare, and install the approved plans and improvements.</p> <p>Mitigation Measure TRANS-3: Implement <u>See</u> Mitigation Measures TRANS-1.</p> <p>After implementation of this measure, the intersection would operate at LOS A and B during the AM and PM peak hours, respectively. No secondary impacts would result from implementation of this measure.</p>	Less than Significant

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
<p>Impact TRANS-4: Buildout of the proposed project, <u>when added to existing traffic levels</u>, would add more than 10 trips to <i>Intersection #44-West Grand Avenue / Brush Street</i> (Existing), which meets peak hour signal warrants. (Significant)</p>	<p>Mitigation Measure TRANS-4: Implement <u>See</u> Mitigation Measure TRANS-2.</p> <p>After implementation of this measure, the intersection would operate at an acceptable LOS C during both AM and PM peak hours. No secondary impacts would result from implementation of this measure. However, because further study is required to determine feasibility of this measure, this impact is conservatively deemed significant and unavoidable at this time. If, after submission of final design plans, these improvements are determined to be feasible, then this impact would be reduced to a less-than-significant level.</p>	<p>Significant and Unavoidable</p> <p>This impact is conservatively deemed significant and unavoidable at this time because further study is required to determine feasibility of this measure. If, after submission of final design plans, these improvements are determined to be feasible, then this impact would be reduced to a less-than-significant level.</p>
<p>Impact TRANS-5: Phase 1 of the proposed project <u>plus the MOB from Future Phases, when added to projected 2015 traffic levels</u>, would add more than 10 trips to <i>Intersection #11-Telegraph Avenue / Hawthorne Avenue</i> (2015), which meets peak hour signal warrants. (Significant)</p>	<p>Mitigation Measure TRANS-5: Implement <u>See</u> Mitigation Measure TRANS-1.</p> <p>After implementation of this measure, the intersection would operate at LOS A and B during the AM and PM peak hours, respectively. No secondary impacts would result from implementation of this measure.</p>	<p>Less than Significant</p>
<p>Impact TRANS-6: Phase 1 of the proposed project <u>plus the MOB from Future Phases, when added to projected 2015 traffic levels</u>, would add more than 10 trips to <i>Intersection #44-West Grand Avenue / Brush Street</i> (2015), which meets peak hour signal warrants. (Significant)</p>	<p>Mitigation Measure TRANS-6: Implement Mitigation Measure TRANS-2, and optimize/adjust signal timing and/or review the adequacy of the measures implemented under TRANS-2, and make necessary adjustments.</p>	<p>Conservatively deemed to be Significant and Unavoidable because the intersection is complicated, and the specific improvements to be implemented, according to City standards, must be finalized after a detailed intersection/signalization engineering design study is performed and a preferred, detailed design selected by the City.</p> <p>This impact is conservatively deemed significant and unavoidable at this time because further study is required to determine feasibility of this measure. If, after submission of final design plans, these improvements are determined to be feasible, then this impact would be reduced to a less-than-significant level.</p>
<p>Impact TRANS-7: Buildout of the proposed project, <u>when added to projected 2015 traffic levels</u>, would add more than 10 trips to <i>Intersection #11-Telegraph Avenue / Hawthorne Avenue</i> (2015), which meets peak-hour signal warrants. (Significant)</p>	<p>Mitigation Measure TRANS-7: Implement <u>See</u> Mitigation Measure TRANS-1.</p> <p>After implementation of this measure, the intersection would operate at LOS B during both the AM and PM peak hours. No secondary impacts would result from implementation of this measure.</p>	<p>Less than Significant</p>

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
<p>Impact TRANS-8: Buildout of the proposed project, <u>when added to projected 2015 traffic levels</u>, would add more than 10 trips to <u>Intersection #44-West Grand Avenue / Brush Street (2015)</u>, which meets peak hour signal warrants. (Significant)</p>	<p>Mitigation Measure TRANS-8: Implement Mitigation Measure TRANS-2, and optimize/adjust signal timing and/or review the adequacy of the measures implemented under TRANS-2, and make necessary adjustments.</p> <p>After implementation of this measure, the intersection would operate at an acceptable LOS D during both AM and PM peak hours. No secondary impacts would result from implementation of this measure.</p>	<p>Conservatively deemed to be Significant and Unavoidable because the intersection is complicated, and the specific improvements to be implemented, according to City standards, must be finalized after a detailed intersection/signalization engineering design study is performed and a preferred, detailed design selected by the City.</p>
<p>Impact TRANS-9: <u>Under 2035 cumulative traffic conditions</u>, Buildout of the proposed project would increase the vehicle delay to a critical movement by more than four seconds during the AM and PM peak hour at <u>Intersection #6-27th Street / Northgate Avenue / I-980 On-Ramps (2035)</u>, which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)</p>	<p>Mitigation Measure TRANS-9: Implement the following measure at the 27th Street / Northgate Avenue / I-980 On-Ramp intersection:</p> <ul style="list-style-type: none"> • Optimize signal timing (i.e., changing the amount of adjust the allocation of green time assigned to each lane of traffic approaching the intersection) <u>for each intersection approach</u> for the AM and PM peak hours. • Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. This intersection is under the jurisdiction of Caltrans so any equipment or facility upgrades must be approved by Caltrans prior to installation. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division and Caltrans for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> 	<p>Significant and Unavoidable</p> <p>This project impact would be significant and unavoidable because it is not certain that the measure could be implemented because the City of Oakland, as lead agency, could not implement Measure TRANS-9 without the approval of Caltrans. However, in the event that Mitigation Measure TRANS-9 could be implemented, the impact would be less than significant.</p>

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-9 (cont.)	<ul style="list-style-type: none"> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal timing changes supporting vehicle travel and alternative modes travel consistent with Caltrans requirements. • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection would operate at LOS E in both the AM and PM peak hours. LOS E is an unacceptable service level, but the vehicle delay during the AM peak hour would be less than under the 2035 Without Project condition, and the PM peak hour condition would improve from LOS F to LOS E. No secondary impacts would result from implementation of this measure.</p>	
Impact TRANS-10: <u>Under 2035 cumulative traffic conditions,</u> Buildout of the proposed project would degrade the vehicle level of service from an acceptable LOS E to an unacceptable LOS F during the PM peak hour at <i>Intersection #7-Telegraph Avenue / Grand Avenue</i> (2035). (Significant)	<p>Mitigation Measure TRANS-10: Implement the following measures at the Telegraph Avenue / Grand Avenue intersection:</p> <ul style="list-style-type: none"> • Provide protected left-turn phase(s) for all approaches • Optimize signal timing (i.e., changing the amount of <u>adjust the allocation of</u> green time assigned to each lane of traffic approaching the intersection for each intersection approach for the AM and PM peak hours. • Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or</u> 	Significant and Unavoidable

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
<p>4.3 Transportation, Circulation and Parking (cont.)</p> <p>Impact TRANS-10 (cont.)</p>	<p><u>upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call among other items for the elements listed below:</p> <ul style="list-style-type: none"> - 2070L Type Controller - GPS <u>communication</u> (clock) installation at locations that are not in the City's ITS Master Plan - <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> - <u>City Standard ADA wheelchair ramps</u> - Full actuation (video detection, pedestrian push buttons, bicycle detection) - <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> - Countdown Pedestrian Signals - <u>Fiber S</u>signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet - <u>Installation of PTZ cameras</u> <ul style="list-style-type: none"> • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund, <u>prepare, and install the approved plans and improvements</u> the cost of preparing and implementing these plans.</p> <p>After implementation of this measure, the intersection would worsen the LOS F conditions over the unmitigated condition during the PM peak hour because the protected left turn phasing mitigation worsens LOS. The protected left turn phasing is necessary because of the high volume of left turning traffic conflicting with both oncoming traffic and pedestrians crossing the street. The protected left turn phasing removes these conflicts but adversely impacts vehicle traffic flow. The impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.</p>	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)	<p>Mitigation Measure TRANS-11: Implement the following measures at the Telegraph Avenue / 27th Street intersection:</p> <ul style="list-style-type: none"> • Provide protected left-turn phase(s) for the northbound and southbound approaches • Optimize signal timing (i.e., changing the amount of <u>adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach</u>) for the AM and PM peak hours. • Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall be designed to City standards in effect at the time of construction and all new or upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below: <ul style="list-style-type: none"> – 2070L Type Controller – GPS <u>communication (clock) installation at locations that are not in the City's ITS Master Plan</u> – <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> – <u>City Standard ADA wheelchair ramps</u> – Full actuation (video detection, pedestrian push buttons, bicycle detection) 	Significant and Unavoidable

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-11 (cont.)	<ul style="list-style-type: none"> - <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> - Countdown Pedestrian Signals - <u>Fiber Signal</u> interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet. • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection operation would worsen the LOS F condition over the unmitigated condition during the AM and PM peak hours because the protected left turn phasing mitigation worsens LOS. The left turn phasing is necessary because of the high volume of left turning traffic conflicting with both oncoming traffic and pedestrians crossing the street. The protected left turn phasing removes these conflicts. The impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.</p>	
Impact TRANS-12: <u>Under 2035 cumulative traffic conditions,</u> Buildout of the proposed project would add more than 10 trips to <i>Intersection #11-Telegraph Avenue / Hawthorne Avenue</i> (2035), which meets peak hour signal warrants. (Significant)	<p>Mitigation Measure TRANS-12: Implement Mitigation Measure TRANS-1.</p> <p>After implementation of this measure, the intersection would operate at LOS A and B during the AM and PM peak hours, respectively. No significant effects would result from implementation of this measure. No secondary impacts would result from implementation of this measure.</p>	Less than Significant
Impact TRANS-13: <u>Under 2035 cumulative traffic conditions,</u> Buildout of the proposed project would degrade PM peak-hour operations from LOS E to LOS F (and increase the average intersection delay by more than two seconds) during the PM peak hour at <i>Intersection #13-Telegraph Avenue / MacArthur Boulevard</i> (2035). In addition, buildout of the proposed project would increase the average intersection vehicle delay by more than four seconds (under prevailing LOS E conditions) during the AM peak hour. (Significant)	<p>Mitigation Measure TRANS-13: Implement the following measures at the Telegraph Avenue / MacArthur Boulevard intersection:</p> <ul style="list-style-type: none"> • Provide protected left-turn phase(s) for the northbound and southbound approaches • Optimize signal timing (i.e., changing the amount of adjust <u>the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach</u>) for the AM and PM peak hours. 	Significant and Unavoidable

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)	<ul style="list-style-type: none"> • Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or upgraded signals should include these enhancements</u>. All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below: <ul style="list-style-type: none"> – 2070L Type Controller – GPS <u>communication (clock)</u> Installation at locations that are not in the City's ITS Master Plan – <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> – <u>City Standard ADA wheelchair ramps</u> – Full actuation (video detection, pedestrian push buttons, bicycle detection) – <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> – Countdown Pedestrian Signals – <u>Fiber S</u>signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet. – <u>Installation of PTZ cameras</u> • Signal timing plans for the signals in the coordination group 	

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-13 (cont.)	<p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection would deteriorate from LOS E to LOS F during the AM peak hour, but PM peak hour operations would improve from LOS F to LOSE. The deteriorated conditions during the AM peak hour are due to the protected left turn phasing mitigation. The protected left turn phasing is necessary because of the high volume of left turning traffic conflicting with both oncoming traffic and pedestrians crossing the street. The protected left turn phasing removes these conflicts. As a result, the impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.</p>	
<p>Impact TRANS-14: <u>Under 2035 cumulative traffic conditions,</u> B<u>uildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the PM peak hour at <i>Intersection #29-Broadway / 27th Street</i> (2035), which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)</u></p>	<p>Mitigation Measure TRANS-14: Implement the following measures at the Broadway / 27th Street intersection:</p> <ul style="list-style-type: none"> • Provide actuated traffic signal operation • Optimize signal timing (i.e., changing the amount of <u>adjust the allocation of green time assigned to each lane of traffic approaching the intersection for each intersection approach</u>) for the AM and PM peak hours. • Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards,</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and 	Less than Significant

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-14 (cont.)	<p>ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below:</p> <ul style="list-style-type: none"> - 2070L Type Controller - GPS <u>communication (clock) installation at locations that are not in the City's ITS Master Plan</u> - <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> - <u>City Standard ADA wheelchair ramps</u> - Full actuation (video detection, pedestrian push buttons, bicycle detection) - <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> - Countdown Pedestrian Signals - <u>Fiber Ssignal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet.</u> <ul style="list-style-type: none"> • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection would maintain LOS F during the PM peak hour; however, the intersection delay would be improved over the unmitigated condition. No secondary impacts would result from implementation of this measure.</p>	
<p>Impact TRANS-15: <u>Under 2035 cumulative traffic conditions,</u> Buildout of the proposed project would increase the average intersection vehicle delay by more than six seconds during the AM peak hour at <i>Intersection #34-Broadway / West MacArthur Boulevard</i> (2035), which would operate at LOS E during the AM peak hour under 2035 Without Project conditions. (Significant)</p>	<p>Mitigation Measure TRANS-15: Implement the following measures at the Broadway / West MacArthur Boulevard intersection:</p> <ul style="list-style-type: none"> • Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the AM peak hour • Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group. 	Significant and Unavoidable

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-15 (cont.)	<p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below: <ul style="list-style-type: none"> – 2070L Type Controller – GPS <u>communication (clock) installation at locations that are not in the City's ITS Master Plan</u> – <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> – <u>City Standard ADA wheelchair ramps</u> – Full actuation (video detection, pedestrian push buttons, bicycle detection) – <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> – Countdown Pedestrian Signals – <u>Fiber S</u>signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet. • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection operations would deteriorate from LOS E to LOS F during the AM peak hour,</p>	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-15 (cont.)	As a result, the impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.	
Impact TRANS-16: <u>Under 2035 cumulative traffic conditions,</u> Buildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the AM peak hour at <i>Intersection #36-Broadway / 51st Street / Pleasant Valley Avenue</i> (2035), which would operate at LOS F during both peak hours under 2035 Without Project conditions. (Significant)	<p>Mitigation Measure TRANS-16: Implement the following measures at the Broadway / 51st Street / Pleasant Valley Avenue intersection:</p> <ul style="list-style-type: none"> • Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the AM peak hour • Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below: <ul style="list-style-type: none"> – 2070L Type Controller – GPS <u>communication</u> (clock) Installation at locations that are not in the City's ITS Master Plan – <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> – <u>City Standard ADA wheelchair ramps</u> – Full actuation (video detection, pedestrian push buttons, bicycle detection) 	Less than Significant

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-16 (cont.)	<ul style="list-style-type: none"> - <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> - Countdown Pedestrian Signals - <u>Fiber Signal</u> interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet. <ul style="list-style-type: none"> • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection would operate at LOS E during the AM peak hour, reducing the project's impact to less than significant. No secondary impacts would result from implementation of this measure.</p>	
Impact TRANS-17: <u>Under 2035 cumulative traffic conditions,</u> B <u>uildout</u> of the proposed project would add more than 10 trips to <i>Intersection #39-Harrison Street / 29th Street</i> (2035), which would meet peak-hour signal warrants under 2035 Without Project conditions. (Significant)	Mitigation Measure TRANS-17: <u>None Recommended.</u> Signalization of this intersection was considered and rejected as a mitigation measure. The 29th Street corridor between Fairmount Avenue and Harrison Street is narrow (less than 30 feet wide) with on-street parking serving residential uses. The corridor, based on its design, was not intended to serve traffic traveling between the commercial corridors of Broadway and Telegraph Avenue and Harrison Street. Signalization could encourage additional traffic through the residential area along 29th Street.	Significant and Unavoidable
Impact TRANS-18: <u>Under 2035 cumulative traffic conditions,</u> B <u>uildout</u> of the proposed project would increase the average intersection vehicle delay by more than two seconds during the PM peak hour at <i>Intersection #41-Oakland Avenue / Perry Place / I-580 Off-Ramp</i> (2035), which would operate at LOS F during both peak hours under 2035 Without Project conditions. (Significant)	<p>Mitigation Measure TRANS-18: Implement the following measure at the Oakland Avenue / Perry Place / I-580 Off-Ramp intersection:</p> <ul style="list-style-type: none"> • Optimize signal timing (i.e., changing the amount of adjust the allocation of <u>adjust the allocation of</u> green time assigned to each lane of traffic approaching the intersection for each intersection approach for the AM and PM peak hours. • Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. This intersection is under the jurisdiction of Caltrans so any equipment or facility upgrades must be approved by Caltrans prior to installation. 	Significant and Unavoidable This project impact would be significant and unavoidable because it is not certain that the measure could be implemented because the City of Oakland, as lead agency, could not implement Measure TRANS-18 without the approval of Caltrans. However, in the event that Mitigation Measure TRANS-18 could be implemented, the impact would be less than significant.

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-18 (cont.)	<p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division and Caltrans for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal timing changes supporting vehicle travel and alternative modes travel consistent with Caltrans requirements. • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection would operate at LOS F during the PM peak hour but reduce the project impact to less than significant levels by improving intersection delay over the unmitigated condition. No secondary impacts would result from implementation of this measure.</p>	
<p>Impact TRANS-19: <u>Under 2035 cumulative traffic conditions,</u> Buildout of the proposed project would increase the average intersection vehicle delay by more than six seconds during the AM peak hour at <i>Intersection #43-Piedmont Avenue / West MacArthur Boulevard</i> (2035), which would operate at LOS E during the AM peak hour under 2035 Without Project conditions. (Significant)</p>	<p>Mitigation Measure TRANS-19: Implement the following measures at the Piedmont Avenue / West MacArthur Boulevard intersection:</p> <ul style="list-style-type: none"> • Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the AM peak hour • Coordinate the signal timing changes at this intersection with the adjacent intersection that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> 	Significant and Unavoidable

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
<p>Impact TRANS-19 (cont.)</p>	<ul style="list-style-type: none"> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below: <ul style="list-style-type: none"> – 2070L Type Controller – GPS <u>communication (clock) installation at locations that are not in the City's ITS Master Plan</u> – <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> – <u>City Standard ADA wheelchair ramps</u> – Full actuation (video detection, pedestrian push buttons, bicycle detection) – <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> – Countdown Pedestrian Signals – <u>Fiber S</u>signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet. • Signal timing plans for the signals in the coordination group <p>The project sponsor shall fund the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>If this measure were implemented, the intersection would worsen the LOS E conditions (increase the vehicle delay) compared to the unmitigated condition during the AM peak hour. No other secondary impacts would result from implementation of this measure.</p>	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
<p>Impact TRANS-20: Buildout of the proposed project would add more than 10 trips to Intersection #44-West Grand Avenue / Brush Street (2035), which would meet signal warrants under 2035 Without Project conditions. (Significant)</p>	<p>Mitigation Measure TRANS-20: Implement Mitigation Measure TRANS-2 and TRANS-6.</p> <p>After implementation of this measure, the intersection would continue to operate at LOS F during the AM and PM peak hours primarily because of the substantial increase in east/west traffic volumes assumed in this study. As a result, the impact remains significant and unavoidable even with the stated mitigation measure. No secondary impacts would result from implementation of this measure.</p>	Significant and Unavoidable
<p>Impact TRANS-21: <u>Under 2035 cumulative traffic conditions.</u> Buildout of the proposed project would increase the v/c ratio at Intersection #45-West Grand Avenue / San Pablo Avenue (2035), which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)</p>	<p>Mitigation Measure TRANS-21: No feasible mitigations have been identified other than Mitigation Measure TRANS-2. The West Grand Avenue / San Pablo Avenue intersection would be combined with the West Grand Avenue intersection at Brush Street (see Mitigation Measure TRANS-20). Intersection operations would remain at LOS F with the stated mitigation measure. This occurs because of the substantial increase in east/west traffic volumes assumed in this study. As a result, the impact remains significant and unavoidable even with the stated mitigation measure.</p>	Significant and Unavoidable
<p>Impact TRANS-22: <u>Under 2035 cumulative traffic conditions.</u> Buildout of the proposed project would increase the average intersection vehicle delay by more than two seconds during the PM peak hour at Intersection #50-17th Street / Castro Street (2035), which would operate at LOS F during the PM peak hour under 2035 Without Project conditions. (Significant)</p>	<p>Mitigation Measure TRANS-22: Implement the following measures at the 17th Street / Castro Street intersection:</p> <ul style="list-style-type: none"> • Optimize signal timing (i.e., adjust the allocation of green time for each intersection approach) for the PM peak hour • Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modifications. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or</u> 	Less than Significant

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-22 (cont.)	<p><u>upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below:</p> <ul style="list-style-type: none"> - 2070L Type Controller - GPS <u>communication</u> (clock) Installation at locations that are not in the City's ITS Master Plan - <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> - <u>City Standard ADA wheelchair ramps</u> - Full actuation (video detection, pedestrian push buttons, bicycle detection) - <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> - Countdown Pedestrian Signals - <u>Fiber S</u>signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet. <ul style="list-style-type: none"> • Signal timing plans for the signals in the coordination group 	
Impact TRANS-23: <u>Under 2035 cumulative traffic conditions,</u> Buildout of the proposed project would increase the v/c ratio at <i>Intersection #52-West MacArthur Boulevard / Market Street</i> (2035), which would operate at LOS F during both peak hours under 2035 Without Project conditions. (Significant)	<p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection would operate at an acceptable LOS D during the PM peak hour. No secondary impacts would result from implementation of this measure.</p> <p>Mitigation Measure TRANS-23: Implement the following measures at the West MacArthur Boulevard / Market Street intersection:</p> <ul style="list-style-type: none"> • Optimize signal timing (i.e., changing the amount of <u>adjust the allocation of</u> green time assigned to each lane of traffic approaching the intersection for each intersection approach) for the AM and PM peak hour. 	Less than Significant

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)	<ul style="list-style-type: none"> • Coordinate the signal timing changes at this intersection with the adjacent intersections that are in the same signal coordination group. <p>To implement this measure, the project sponsor shall submit the following to City of Oakland's Transportation Services Division for review and approval:</p> <ul style="list-style-type: none"> • <u>An assessment of existing traffic signal facilities and coordination with City Transportation Services Division on the scope of improvements necessary to meet City standards.</u> • Plans, Specifications, and Estimates (PS&E) to modify the intersection to accommodate the signal modification. The signal should <u>All elements shall</u> be designed to City standards in effect at the time of construction <u>and all new or upgraded signals should include these enhancements.</u> All other facilities supporting vehicle travel and alternative modes through the intersection should be brought up to both City standards and ADA standards (according to Federal and State Access Board guidelines) at the time of construction. Current City Standards call for among other items the elements listed below: <ul style="list-style-type: none"> – 2070L Type Controller – GPS <u>communication (clock) installation at locations that are not in the City's ITS Master Plan</u> – <u>Accessible pedestrian crosswalks according to Federal and State Access Board guidelines</u> – <u>City Standard ADA wheelchair ramps</u> – Full actuation (video detection, pedestrian push buttons, bicycle detection) – <u>Accessible Pedestrian Signals, audible and tactile according to Federal Access Board guidelines</u> – Countdown Pedestrian Signals – <u>Fiber S</u>signal interconnect for corridors identified in the City's ITS Master Plan for a maximum of 600 feet. • Signal timing plans for the signals in the coordination group 	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.3 Transportation, Circulation and Parking (cont.)		
Impact TRANS-23 (cont.)	<p>The project sponsor shall fund, the cost of preparing and implementing these plans <u>prepare, and install the approved plans and improvements.</u></p> <p>After implementation of this measure, the intersection would operate at LOS E during both the AM and PM peak hours. LOS E is an unacceptable service level, but conditions would be better than the LOS F conditions under the 2035 Without Project condition. No secondary impacts would result from implementation of this measure.</p>	
Impact TRANS-24: Parking Garage Driveways at 30th Street Conflict at Mid-Block Pedestrian Crossing. (Significant)	Mitigation Measure TRANS-24: Close the existing entry driveway to the West Parking Garage. The primary parking ingress and egress would remain at 29th Street for the West Parking Garage.	Less than Significant
Impact TRANS-25: The planned pedestrian pathway connecting 30th Street and Hawthorne Avenue increases the “desire line” for pedestrians to cross 30th Street at the existing Mid-Block Pedestrian Crossing Area. (Significant)	Mitigation Measure TRANS-25: Align the pedestrian paths north and south of 30th Street at the existing midblock crossing area. Install crosswalk ladder striping across 30th Street to make the midblock crossing area more visible. Install curb extensions in the parking lanes to shorten the crossing distance. Install a flashing overhead beacon to alert drivers of the crossing area location.	Less than Significant
Impact TRANS-26: The project will increase auto and bike traffic on Webster Street between the freeway ramp and 30th Street. Because Webster Street will be a bike boulevard, auto traffic and bike traffic will share the same space. (Significant)	Mitigation Measure TRANS-26: Install “sharrow” lane markings in the pavement and appropriate street signs along Webster Street between 30th Street and 34th Street to distinguish this segment as a bike boulevard.	Less than Significant
Impact TRANS-27: Summit Street Closure Conflicts with AC Transit Line 59. (Significant)	Mitigation Measure TRANS-27: <u>Develop a contingency plan for Re-routing</u> line 59/59A from Summit Street (between 30th Street and Hawthorne Avenue) <u>to Webster Street. This measure that</u> would allow AC Transit to continue to <u>provide service to</u> the project site. <u>This contingency plan should include potential re-location of bus stops, bus shelters and way-finding signage for passengers.</u>	Less than Significant
4.4 Air Quality		
Impact AIR-1: Activities associated with demolition, site preparation, and construction would generate short-term emissions of criteria pollutants, including suspended inhalable particulate matter and equipment exhaust emissions. (Less than Significant under existing BAAQMD Thresholds. If proposed BAAQMD Thresholds are adopted, Potentially Significant Phase I NOx emissions under proposed project and under the MOB Concurrent with Phase 1 scenario)	<p>Standard Conditions of Approval AIR-1, <i>Dust Control</i>, AIR-2, <i>Construction Emissions</i>, and AIR-3, <i>Asbestos Removal in Structures</i>.</p> <p>Mitigation Measure AIR-1: Implement Mitigation Measure AIR-8.</p>	<p>Less than Significant under Existing BAAQMD Thresholds</p> <p>Significant and Unavoidable in Phase 1 if Proposed BAAQMD Thresholds are adopted. (See Mitigation Measure AIR-8)</p>

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.4 Air Quality (cont.)		
<p>Impact AIR-2: Operation of the proposed project would result in increased long-term emissions of criteria pollutants. (Less than Significant under existing BAAQMD Thresholds. If proposed BAAQMD Thresholds are adopted, Potentially Significant Phase I NOx emissions under the MOB Concurrent with Phase 1 scenario)</p>	<p>Standard Condition TRANS-1, <i>Transportation and Parking Demand Management</i>.</p> <p>Mitigation Measure AIR-2: <u>None required.</u> The applicant shall determine and conduct routine testing of the two proposed new emergency generators proposed by the project on separate days or for a shorter duration rather than "both generators tested for one hour on the same day." The applicant shall prepare and submit to the City of Oakland a Generator Testing and Operations Plan. The Generator Testing and Operations Plan, in combination with implementation of the required Transportation and Parking Demand Management Plan pursuant to Standard Condition TRANS-8, can effectively reduce emission levels to less than significant, according to applicable thresholds. The applicant shall implement the Plan.</p>	Less than Significant
<p>Impact AIR-3: The proposed project would expose persons to substantial levels of PM2.5 and toxic air contaminants (TACs) which may lead to adverse health effects. (Less than Significant)</p>	None Required	
<p>Impact AIR-4: The proposed project would not frequently create substantial objectionable odors affecting a substantial number of people. (Less than Significant)</p>	None Required	
<p>Impact AIR-5: The proposed project would not contribute to CO concentrations exceeding the State AAQS of 9 ppm averaged over 8 hours and 20 ppm for 1 hour. (Less than Significant)</p>	None Required	
<p>Impact AIR-6: The proposed project would result in a cumulatively considerable contribution to a cumulative air quality impact from criteria pollutant emissions. (Less than Significant under existing BAAQMD Thresholds. If proposed BAAQMD Thresholds are adopted, Potentially Significant Phase I NOx emissions under proposed project and under the MOB Concurrent with Phase 1 scenario)</p>	<p>Standard Conditions of Approval AIR-1, <i>Dust Control</i>, AIR-2, <i>Construction Emissions</i>, and AIR-3, <i>Asbestos Removal in Structures</i>.</p> <p>Mitigation Measure AIR-6: Implement Mitigation Measure AIR-8.</p>	<p>Less than Significant under Existing BAAQMD Thresholds</p> <p>Significant and Unavoidable in Phase 1 if Proposed BAAQMD Thresholds are adopted. (See Mitigation Measure AIR-8)</p>
<p>Impact AIR-7: Cumulative impacts from existing sources of pollution would expose sensitive receptors at the project site to substantial levels of TACs. (Less than Significant)</p>	None Required	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.4 Air Quality (cont.)		
<p>Impact AIR-8: Construction and operation of the project would result in a cumulatively considerable increase in GHG emissions. (Significant if proposed BAAQMD Thresholds are adopted)</p>	<p>Standard Condition TRANS-1, <i>Transportation and Parking Demand Management</i></p> <ul style="list-style-type: none"> • Mitigation Measure AIR-8: Implement the Greenhouse Gas Reduction Plan. 	<p>Significant and Unavoidable if Proposed BAAQMD Thresholds are adopted</p> <p>This cumulative impact would be significant and unavoidable because, while the measures in Mitigation Measure AIR-8, in addition to Standard Condition TRANS-1, <i>Transportation and Parking Demand Management</i>, could reduce the cumulative GHG emissions associated with the project, the actual reduction would depend on the combination and extent of the measures employed. Therefore, the extent of potential reduction cannot be known at this time, and as a result, the residual impact of the proposed project's CO₂e cumulative contribution would continue to be significant and unavoidable. Even if maximum mitigation reductions are assumed for energy-based measures, no other feasible mitigation measures are specified that would reduce GHG emissions to a less-than-significant level.</p>
<p>Impact AIR-9: The project would conflict with an applicable plan, policy or regulation of an appropriate regulatory agency adopted for the purpose of reducing greenhouse gas emissions. (Significant if proposed BAAQMD Thresholds are adopted)</p>	<p>Standard Condition TRANS-1, <i>Transportation and Parking Demand Management</i></p> <p>Mitigation Measure AIR-9: Implement Mitigation Measure AIR-8.</p>	<p>Significant and Unavoidable if Proposed BAAQMD Thresholds are adopted</p> <p>(See Mitigation Measure AIR-8, above)</p>
4.5 Noise		
<p>Impact NOI-1: Construction activities associated with the proposed project would temporarily generate noise levels that could conflict with standards established in the City noise ordinance. (Less than Significant)</p>	<p>Standard Conditions of Approval NOI-1, <i>Days/Hours of Construction Operation</i>, NOI-2, <i>Noise Control</i>, NOI-3, <i>Noise Complaint Procedures</i>, and NOI-5, <i>Pile Driving and Other Extreme Noise Generators</i></p>	<p>Less than Significant</p>
<p>Impact NOI-2: Noise levels from Project generated traffic would increase roadside ambient noise levels. (Less than Significant)</p>	<p>None Required</p>	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.5 Noise (cont.)		
Impact NOI-3: Operational noise sources generated by HVAC equipment, emergency generators, ambulance sirens, proposed parking structures, and truck loading/unloading may impact nearby noise-sensitive receptors. (Less than Significant)	None Required	
Impact NOI-4: The interior noise levels within hospital buildings, especially in rooms used for overnight use such as patient wards, could exceed L _{dn} 45 dBA, the interior noise standard for hospitals according to the City of Oakland General Plan Noise Element. (Less than Significant)	Standard Condition of Approval NOI-4, <i>Interior Noise</i>	Less than Significant
Impact NOI-5: The proposed project, together with past, present, existing, approved, pending, and reasonably foreseeable future development in the area, could result in long-term traffic increases that could cumulatively increase noise levels. (Less than Significant)	Standard Conditions of Approval AIR-1, <i>Dust Control</i> , AIR-2, <i>Construction Emissions</i> , AIR-3, <i>Asbestos Removal in Structures</i> , AIR-4, <i>Indoor Air Quality</i> NOI-1, <i>Days/Hours of Construction Operation</i> , NOI-2, <i>Noise Control</i> , NOI-3, <i>Noise Complaint Procedures</i> , and NOI-5, <i>Pile Driving and Other Extreme Noise Generators</i> .	Less than Significant
4.6 Biological Resources		
Impact BIO-1: The proposed project could result in the take of protected birds or their nests or bats. (Potentially Significant)	Standard Condition of Approval BIO-1, <i>Tree Removal During Breeding Season</i>	Less than Significant
Impact BIO-2: Project construction and operations, as well as the final building structures, have the potential to affect migratory and breeding birds through building collisions. This may occur due to both construction activities and the final building configurations. (Potentially Significant)	Standard Condition of Approval BIO-5, <i>Bird Collision Reduction</i>	Less than Significant
Impact BIO-3: Impacts to migratory or breeding birds and other special-status species due to lighting conditions. (Potentially Significant)	Standard Condition VIS-1, <i>Lighting Plan</i>	Less than Significant
Impact BIO-4: Impacts of noise on migrating and breeding birds, and other special-status species. (Potentially Significant)	Standard Conditions of Approval NOI-1, <i>Days/Hours of Construction</i> , NOI-2, <i>Noise Control</i> , and NOI-5, <i>Pile Driving and Other Extreme Noise Generators</i>	Less than Significant
Impact BIO-5: The proposed project will result in damage to, or removal of, protected trees that are within or adjacent to the project site. (Potentially Significant)	Standard Conditions of Approval BIO-2, <i>Tree Removal Permit</i> , BIO-3, <i>Tree Replacement Plantings</i> , and BIO-4, <i>Tree Protection During Construction</i>	Less than Significant

**TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.6 Biological Resources (cont.)		
Impact BIO-6: Project construction activity and operations, in conjunction with other past, present, existing, approved, pending, and reasonably foreseeable future development in the project area, could result in impacts on special-status species, habitats, wetlands, and other waters of the U.S. (Less than Significant)	None Required	
4.7 Cultural Resources		
Impact CUL-1: Phase 1 of the proposed project would have no significant impact on historic architectural resources. (No Impact)	None Required	
Impact CUL-2: Phase 1 of the project would construct new and substantially larger medical facilities in the vicinity of historical resources, but would not directly affect their historic setting. (Less than Significant)	None Required	
Impact CUL-3: The project would cast new shadow on to the sanctuary windows of the Parks Chapel A.M.E. Church, a City of Oakland Landmark in the project vicinity. (Less Than Significant)	None Required	
Impact CUL-4: Future phases of the proposed project would demolish the potentially historical resource at 418 30th Street. (Conservatively Assumed to be Significant <u>Less than Significant</u>)	<p data-bbox="894 898 1041 919"><u>None Required</u></p> <p data-bbox="894 935 1478 979">Mitigation Measure CUL-4: The following mitigation measures would help to reduce the impact of the loss of 418 30th Street.</p> <p data-bbox="894 995 1499 1352">Mitigation Measure CUL-4a: Archival Documentation: Alta Bates Summit Medical Center shall document the building at 418 30th Street prior to its demolition through the use of large-format black and white photography and a brief historical report, meeting the specifications of the Historic American Building Survey (HABS). The historic report should briefly describe the building and its historic significance to the City of Oakland. The documentary photographs and report would be archived locally at the Oakland History Room (OHR) of the Oakland Public Library along with a copy on archival paper. Digital copies of the photographs would be forwarded to the Oakland Cultural Heritage Survey. This mitigation would satisfy Policy 3.8.1 (7) of the Historic Preservation Element of the City of Oakland General Plan (Documentation in a Historic American Building Survey report or other appropriate format: photographs, oral history, video, etc.).</p> <p data-bbox="894 1369 1499 1409">Mitigation Measure CUL-4b: Interpretive Materials: Alta Bates Summit Medical Center shall prepare interpretive materials as</p>	Conservatively assumed to be Significant and Unavoidable

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.7 Cultural Resources (cont.)		
Impact CUL-4 (cont.)	<p>directed by the City, including, but not limited to on-site interpretive signage, brochures, or any combination thereof. Planning Staff recommends that the project sponsor appropriate a dollar amount of approximately \$10,000 for these interpretive materials. This mitigation would satisfy Policy 3.8.1 (8) of the Historic Preservation Element of the City of Oakland General Plan (Placement of a plaque, commemorative marker, or artistic or interpretive display on the site providing information on the historical significance of the resource.)</p> <p>Mitigation Measure CUL-4c: Salvage Program. The Project Applicant shall undertake a salvage program to save and reuse historically significant materials and features from the building at 418 30th Street, such as the terra cotta tile roofing, columned porch, or possibly other materials or features not yet identified herein. As such the Project Applicant shall conduct a full survey of all historic architectural elements and elements suitable for re-use at the site, develop a reuse/salvage plan, whose goal is to maximize reuse of materials at the site, and submit such for Landmarks Preservation Advisory Board (LPAB) consideration. The LPAB would make advisory recommendations either to the Planning Commission or Development Director. The applicant shall implement the approved plan. Implementation of a salvage program would satisfy Policy 3.8.1 (5) of the Historic Preservation Element of the City of Oakland General Plan (Salvage and preservation of significant features and materials of the structure in a local museum or within the new project).</p> <p>Mitigation Measure CUL-4d: Financial Contributions: The Project Applicant shall make a financial contribution to the City of Oakland, which can be used to fund other historic preservation projects at the Project Site or in the immediate vicinity. Contributions to the fund shall be determined by Planning Staff based on the linear feet of the facades to be demolished. This mitigation would satisfy Policy 3.8.1 (9) of the Historic Preservation Element of the City of Oakland General Plan (Contribution to a Façade Improvement Fund, the Historic Preservation Revolving Loan Fund, the Oakland Cultural Heritage Survey, or other program appropriate to the character of the resource.)</p>	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.7 Cultural Resources (cont.)		
<p>Impact CUL-5: Construction of the project could cause substantial adverse changes to the significance of currently unknown cultural resources at the site, potentially including an archaeological resource pursuant to CEQA Guidelines Section 15064.5 or CEQA Section 21083.2(g), or the disturbance of any human remains, including those interred outside of formal cemeteries. (Significant)</p>	<p>Standard Conditions of Approval CUL-1, <i>Archaeological Resources</i> and CUL-2, <i>Human Remains</i></p>	Less than Significant
<p>Impact CUL-6: The project may adversely affect unidentified paleontological resources at the site. (Potentially Significant)</p>	<p>Mitigation Measure CUL-6: Prior to construction, the applicant will retain a qualified paleontologist to design a monitoring and mitigation program that is consistent with Society of Vertebrate Paleontology Guidelines (SVP, 1995, 1996), and should include:</p> <ol style="list-style-type: none"> 1. a pre-construction assessment to review and refine areas of high paleontological potential; 2. monitoring of all subsurface excavations by one or more paleontological monitors; 3. emergency discovery procedures including specimen significance evaluation, data recovery, and if needed, museum curation; and 4. reporting. <p>The mitigation and monitoring program can be modified to reduce or eliminate construction monitoring if, after 50 percent of the earthwork is complete, the project paleontologist can demonstrate that full-time monitoring is not needed.</p>	Less than Significant
<p>Impact CUL-7: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future development in the project area that would involve demolition of other historical resources, could form a significant cumulative impact to historical resources. (Less than Significant)</p>	None Required	
<p>Impact CUL-8: Construction of the proposed project in combination with construction from other past, present, existing, approved, pending, and reasonably foreseeable future development in the vicinity could cause a significant cumulative impact to currently unknown cultural resources at the site, potentially including an archaeological resource pursuant to CEQA Guidelines Section 15064.5 or CEQA Section 21083.2(g), or the disturbance of any human remains, including those interred outside of formal cemeteries, as well as paleontological resources (Less than Significant)</p>	None Required	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.8 Geology, Soils, and Geohazards		
Impact GEO-1: Redevelopment in the project area could expose people or structures to seismic hazards such as groundshaking or liquefaction. (Less than Significant)	Standard Condition of Approval GEO-4, <i>Geotechnical Report</i>	Less than Significant
Impact GEO-2: Redevelopment in the project area could be subjected to geologic hazards, including expansive soils, subsidence, seismically induced settlement and differential settlement. (Less than Significant)	Standard Condition of Approval GEO-4, <i>Geotechnical Report</i>	Less than Significant
Impact GEO-3: The development proposed as part of the project, when combined with past, present, existing, approved, pending, and reasonably foreseeable future development in the vicinity, would not result in significant cumulative impacts with respect to geology, soils or seismicity. (Less than Significant)	Standard Conditions of Approval GEO-1, <i>Erosion and Sedimentation Control Plan</i> , GEO-2, <i>Vibrations Adjacent to Historic Structures</i> , GEO-3, <i>Soils Report</i> , and GEO-4, <i>Geotechnical Report</i>	Less than Significant
4.9 Hazardous Materials and Hazards		
Impact HAZ-1: Demolition of existing structures that contain hazardous building materials, such as lead-based paint, asbestos, and PCBs could expose workers, the public, or the environment to these hazardous materials and would generate hazardous waste. (Potentially Significant)	Standard Conditions of Approval HAZ-3, <i>Lead-base Paint Remediation</i> , and AIR-3, <i>Asbestos Removal in Structures</i>	Less than Significant
Impact HAZ-2: Implementation of the proposed project would disturb soil and groundwater potentially impacted by historic hazardous material use, which could expose construction workers, the public, or the environment to adverse conditions related to hazardous materials handling. (Potentially Significant)	Standard Conditions of Approval HAZ-5, <i>Best Management Practices for Soil and Groundwater Hazards</i> , and HAZ-6, <i>Radon or Vapor Intrusion from Soil or Groundwater Sources</i>	Less than Significant
Impact HAZ-3: The project would involve the transportation, use, and storage of hazardous chemicals, which could present public health and/or safety risks to facility workers, patients and visitors, and the surrounding area. (Less than Significant)	None Required	
Impact HAZ-4: Hazardous materials used onsite during construction activities (i.e., solvents) could be spilled through improper handling or storage, potentially increasing public health and/or safety risks to ABSMC workers, patients and visitors, and the surrounding area. (Potentially Significant)	Standard Condition of Approval HAZ-1, <i>Hazards Best Management Practices</i>	Less than Significant
Impact HAZ-5: Hazards at the project site in combination with past, present, existing, approved, pending, and reasonably foreseeable future development could contribute to cumulative hazards in the vicinity of the project site. (Less than Significant)	None Required	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.10 Hydrology and Water Quality		
Impact HYD-1: Project construction activities would involve disturbance of site soils from excavation, soil stockpiling, and grading that could come in contact with stormwater causing sedimentation that violates water quality standards or waste discharge requirements or otherwise substantially degrade water quality. (Less than Significant)	Standard Conditions of Approval HYD-1, <i>Erosion and Sedimentation Control Plan</i> , and HYD-2, <i>Stormwater Pollution Prevention Plan</i>	Less than Significant
Impact HYD-2: The project would result in new development that could substantially alter existing drainage pattern of the project site or the surrounding area. (Less than Significant)	Standard Condition of Approval HYD-5, <i>Stormwater and Sewer</i>	Less than Significant
Impact HYD 3: The proposed project would not violate any water quality standards or waste discharge requirements during the operational phase of the project. (Less than Significant)	Standard Conditions of Approval HYD-3, <i>Post-Construction Stormwater Pollution Management Plan</i> , and HYD-4, <i>Maintenance Agreement for Stormwater Treatment Measures</i>	Less than Significant
Impact HYD-4: The increased construction activity and new development resulting from the project, in conjunction with past, present, existing, approved, pending, and reasonably foreseeable future development in the vicinity of the project area, would not result in cumulatively considerable impacts on hydrology and water quality conditions. (Less than Significant)	None Required	
4.11 Population, Housing and Employment		
Impact POP-1: The project would displace existing housing, businesses and jobs, but not in substantial numbers necessitating construction of replacement facilities elsewhere, in excess of that anticipated in the City's General Plan. (Less than Significant)	None Required	
Impact POP-2: The project would not induce substantial population growth in a manner not anticipated by the General Plan, either directly by proposing new housing or businesses, or indirectly through infrastructure improvements. (Less than Significant)	None Required	
Impact POP-3: In combination with other past, present, existing, approved, pending, and reasonably foreseeable future development, the proposed project would not cumulatively induce substantial population growth in a manner not anticipated by the General Plan, either directly by proposing new housing or businesses, or indirectly through infrastructure improvements. (Less than Significant)	None Required	

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.12 Public Services and Recreation		
Impact PUB-1: The proposed project could result in an increase in calls for police protection services, but would not require new or physically altered police facilities in order to maintain acceptable performance objectives. (Less than Significant)	None Required	
Impact PUB-2: The proposed project could increase the number of calls for fire protection services and emergency medical assistance, but would not require new or physically altered fire facilities in order to maintain acceptable performance objectives. (Less than Significant)	None Required	
Impact PUB-3: The proposed project could result in new students for local schools, but would not require new or physically altered school facilities to maintain acceptable performance objectives. (Less than Significant)	None Required	
Impact PUB-4: The proposed project could increase the demand for parks, recreational facilities, and library facilities, but would not result in substantial physical deterioration of such facilities or require new or physically altered facilities in order to maintain acceptable performance objectives. (Less than Significant)	None Required	
Impact PUB-5: The proposed project, when combined with other past, present, existing, approved, pending, and reasonably foreseeable future development in the vicinity, could result in cumulative impacts to the provision of public services. (Less than Significant)	None Required	
4.13 Utilities, Service Systems and Energy		
Impact UTIL-1: The proposed project would not exceed water supplies available to serve the project from existing entitlements and resources, nor require or result in construction of water facilities or expansion of existing facilities, construction of which could cause significant environmental effects. (Less than Significant)	None Required	
Impact UTIL-2: The increased generation of wastewater by the proposed project would not result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)	Standard Condition of Approval HYD-5, <i>Stormwater and Sewer</i>	Less than Significant
Impact UTIL-3: The proposed project would not require or result in construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)	Standard Conditions of Approval HYD-2, <i>Stormwater Pollution Prevention Plan</i> , HYD-3, <i>Post-Construction Stormwater Management Plan</i> , HYD-5, <i>Stormwater and Sewer</i>	Less than Significant

TABLE 2-1 (Continued)
SUMMARY OF IMPACTS, STANDARD CONDITIONS OF APPROVAL, MITIGATION MEASURES, AND RESIDUAL IMPACTS

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after application of Standard Conditions of Approval and Mitigation
4.13 Utilities, Service Systems and Energy (cont.)		
<p>Impact UTIL-4: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs, and would not require or result in construction of landfill facilities or expansion of existing facilities, construction of which could cause significant environmental effects. Additionally, the project would not impede the ability of the City to meet the waste diversion requirements of the California Integrated Waste Management Act or the Alameda County Waste Reduction and Recycling Initiative or cause the City to violate other applicable federal, state, and local statutes and regulations related to solid waste. (Less than Significant)</p>	<p>Standard Condition of Approval UTIL-1, <i>Waste Reduction and Recycling</i></p>	<p>Less than Significant</p>
<p>Impact UTIL-5: The proposed project would not violate regulations relating to energy standards; exceed available capacity of the local energy provider; or require construction or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)</p>	<p>None Required</p>	
<p>Impact UTIL-6: The proposed project in combination with other past, present, existing, approved, pending, and reasonably foreseeable future development, would not result in cumulative impacts on utilities and service systems. (Less than Significant)</p>	<p>None Required</p>	

CHAPTER 4

Commenters on the DEIR

4.1 Agencies, Organizations and Individuals Commenting in Writing

The following lists correspondence received from public agencies, organizations, and individuals, generally in the order it was received by the City of Oakland. Within each chronological listing, correspondence is listed alphabetically.

PUBLIC AGENCIES		
Designator	Agency / Signatory Name	Correspondence Dated
A	East Bay Municipal Utility District (EBMUD), William R. Kirkpatrick, Manager of Water Distribution Planning	1/27/10
B	AC Transit, Nancy Skowbo, Deputy General Manager for Service Development	2/3/10
C	Alameda County Congestion Management Agency (ACCMA), Diane Stark, Senior Transportation Planner	2/3/10
D	CA Department of Transportation (Caltrans), Lisa Carboni, District Branch Chief, Local Development-Intergovernmental Review	2/3/10

ATTORNEYS / ORGANIZATIONS		
Designator	Organization / Signatory Name	Correspondence Dated
E	Barton Mayhew, on behalf of the Harrioak Neighborhood Association Traffic Committee	2/1/10
F	Oakland Heritage Alliance (Naomi Schiff)	2/2/10
G	Gloria D. Smith, on behalf of the California Nurses Association/National Nurses Organizing Committee	2/3/10
H	Alta Bates Summit Medical Center (Shahrokh Sayadi)	2/3/10

INDIVIDUALS		
Designator	Individual's Name	Correspondence Dated
I	Dr. Joy L. Johnson 465 34th St., Oakland	12/24/09
J	Carla Paliaga	2/1/10
K	A.J. Benham 402 36th St., Oakland	2/1/10

INDIVIDUALS		
Designator	Individual's Name	Correspondence Dated
L	Diana Young 36th St., Oakland	2/1/10
M	Jon Stead 451 Rich St., Oakland	2/2/10
N	Gwelen Paliaga 37th St., Oakland	2/2/10
O	Beth McKenna 411 36th St., Oakland	2/2/10
P	Diana Sherman & Dan Bluestein 215 29th St., Oakland	2/2/10
Q	Hannah Kanzell 435 37th St., Oakland	2/3/10
R	Ellen Gierson	2/3/10
S	Gloria Bruce 431 38th St., Oakland	2/3/10
T	Melody Hultgren 29th St., Oakland	2/3/10
U	Matt Chambers 1926 MLK Jr. Wy., Oakland	2/3/10
V	Naomi Schiff 238 Oakland Ave., Oakland	2/3/10

4.2 Commenters at the Planning Commission Public Hearing

The following lists persons who provided verbal comments at the Public Hearing on the DEIR, held at the January 20, 2010, meeting of the Oakland Planning Commission. Speakers are listed generally in order of presentation.

Public Speakers (Listed in Order of Presentation)

- Vic Meinke, ABSMC
- Dr. Steve O'Brien, President of ABSMC Medical Staff
- Viki Ardito, Chief Nursing Executive for ABSMC
- Tao Matthews
- Dr. Joy Johnson
- Jim Ryder, Collective Bargaining Director, Northern California, California Nurses Association
- Naomi Schiff, Oakland Heritage Alliance
- Sanjiv Handa, East Bay News Service

Planning Commissioners

- Commissioner Gibbs
- Commissioner Colbruno
- Commission Truong
- Commissioner Boxer
- Commissioner Galvez
- Commissioner Huntsman (Chair)

4.3 Commenters at the Landmarks Preservation Advisory Board Regular Meeting

The following lists persons who provided verbal comments at the Landmarks Preservation Advisory Board Meeting, held on the February 8, 2010. Speakers are listed generally in order of presentation.

Public Speakers (Listed in Order of Presentation)

- Shahrokh Sayadi, ABSMC
- Tao Matthews
- Naomi Schiff, Oakland Heritage Alliance
- Benjamin Elliott, California Nurses Association

Board Members/Staff

- Joann Pavlinec, Staff, Board Secretary
- Rosemary Muller, Board Member
- Betty Marvin, Staff
- Daniel Schulman, Board Member
- Valerie Garry, Board Member

CHAPTER 5

Master Responses to Recurring Comments

A number of recurring topics emerged from comments received on the DEIR. Although not required by CEQA, this chapter presents Master Responses to address these topics, incorporating responses to many of the individual comments made. The intent of the Master Responses is to avoid repetition and give a more complete and organized response to recurring comments in order to assist the reader and avoid multiple cross-references. Master Responses highlight those issues that were raised most often by the public while at the same time shortening the overall document and making the responses more meaningful. Master Responses are, in some cases, supplemented by individual responses tailored to a distinct or unique aspect raised by a particular commenter. Although individual comments received on any one of the recurring topics may vary in point, taken together, the City determined that the number of similarly-focused comments received on each of these topics warranted a single, comprehensive response. Also, Master Responses can serve to present information in a comprehensive format, such is the case for Master Responses A and B.

The Master Responses presented below in Section 5.1 address the following recurring topics:

- A. Property at 418 30th Street
- B. Greenhouse Gas Emissions and Reduction Plan
- C. Traffic and Pedestrian Concerns in the Vicinity of Oakland Avenue and Harrison Street
- D. Traffic and Pedestrian Concerns in the Vicinity of Webster Street

5.1 Master Response A – Property at 418 30th Street

Several comments received on the DEIR address the property at 418 30th Street. Specific comments are presented throughout Section 6 (Responses to Written Comments Received on the DEIR) and Section 7 (Responses to Comments Received at the Public Hearings on the DEIR). The responses to the individual comments in Sections 6 and 7 refer, all or in part, to this Master Response.

5.1.1 Analysis in the DEIR

The DEIR states that the property at 418 30th Street would be demolished and replaced with other structures as part of the future phases of the proposed project. The DEIR presumptively considered this property a historical resource for CEQA purposes because it was determined eligible for local listing by the City. The City has since determined that the resource warrants preservation as a Heritage Property, and is considered a CEQA historical resource as the analysis,

findings, mitigation measures and applicable Oakland standard conditions of approval in the DEIR conservatively presumed. As presented therein, demolition of this property would have resulted in a significant impact to historical resources, because it would have materially altered those characteristics that justify its eligibility for listing as a historical resource.

As stated on page 4.7-31 of the DEIR, the City's Historic Preservation Element (HPE) Policy 3.8.1 lists several measures to mitigate significant effects of a historic resource, including specifically that "modification of the project design to avoid adversely affecting the character-defining elements of the property" as appropriate mitigation for significant effects to an historic resource." In addition, the DEIR identifies Mitigation Measures CUL-4a through CUL-4b that would also mitigate the demolition of this potentially historic resource. However, application of these measures would still have resulted in a significant and unavoidable (SU) impact to this potentially historical resource.

However, since publication and distribution of the DEIR, the Project Applicant has redesigned the new Future Phase Medical Office Building (MOB) to avoid demolition of the building at 418 30th Street. This scenario was analyzed in Alternative 3.1, *Redesigned New MOB to Avoid Demolition of 418 30th Street* (pages 5-32 through 5-34). Thus, there would be less-than-significant impacts to cultural resources. In order to avoid demolition of the property at 418 30th Street, and yet maintain the same square footage as the proposed project, the Project Applicant would reduce the footprint of the MOB, but increase the building height up to eight stories from five stories. The Project Applicant would not change any portion of the property at 418 30th Street.

Effect on SU Impacts Identified in the DEIR

While the MOB would be redesigned to have a smaller footprint, the square footage would remain the same. Therefore, because the number of daily vehicle trips generated and all other operations would be the same as for the previous design evaluated in the DEIR, this change to the project would not change the environmental effects identified in the DEIR that rely on vehicle trips, construction activities, or building functions. Specifically, the SU cumulative greenhouse gas (GHG) emissions and policy impacts would remain as identified in the DEIR; the SU construction period impacts would remain as identified in the DEIR; and the SU intersection impacts would remain as identified in the DEIR. As noted above, impacts to cultural resources would now be reduced to less-than-significant levels because demolition of 418 30th Street is no longer proposed.

Effect on Less-than-Significant Impacts identified in the DEIR

Compared to the MOB design evaluated in the DEIR, the redesigned building would be three stories taller and potentially more visible from off-site locations. As discussed in the DEIR on page 5-34, the additional height of the building would not substantially degrade the visual character or quality of the site, or adversely affect scenic views or resources, thus the impact would remain less than significant. The redesigned MOB's additional height would make light noticeable from off-site locations, however, it would be absorbed into the overall lighting patterns that already exist in the developed, urban area and the impact would remain less than significant.

The taller MOB would cast shadow to the northwest and northeast (as depicted in Figures 4.2-9 through 4.2-20 of the DEIR). The property at 418 30th Street and its setting would be located directly south of and adjacent to the redesigned MOB. Therefore, shadows cast from the taller building would not shade the historic resource or its setting. To the extent that the longer shadow of the redesigned MOB might affect the resources' historic setting, this shadow would not affect the building's eligibility as a local historical resource, particularly since the setting of 418 30th Street is already significantly altered by existing development, as discussed in the Section 4.7, Cultural Resources, of the DEIR.

5.2 Master Response B – Greenhouse Gas (GHG) Emissions Reduction Plan

This Master Response responds to several comments that address the need for the Project Applicant to implement specific measures to reduce the levels of GHG emissions attributable to the project. Specific comments are presented throughout Section 6 (Responses to Written Comments Received on the DEIR) and Section 7 (Responses to Comments Received at the Public Hearings on the DEIR).

Specifically, this Master Response discusses recent revisions to GHG emissions significance thresholds; refinements to the project's GHG emissions presented in the DEIR; and summarizes the results of the GHG Emissions Reduction Plan (GHG Reduction Plan) prepared pursuant to Mitigation Measure AIR-8 identified in the DEIR. The responses to the individual comments in Sections 6 and 7 refer, all or in part, to this Master Response.

5.2.1 Updated GHG Significance Thresholds

The DEIR discusses the Governor's Office of Planning and Research (OPR) Draft amendments to the CEQA Guidelines, and the role of the Bay Area Air Quality Management District (BAAQMD) and its proposed guidelines and regulations in detail in Section 4.4, Air Quality. Since publication of the DEIR there have been some developments related to both OPR and BAAQMD guidance, regarding the estimation and evaluation of GHG emissions relative to CEQA.

First the OPR amendments to the State *CEQA Guidelines* regarding GHG emissions were adopted and effective as of March 18, 2010. The analysis for the proposed project is evaluated based on the updated CEQA Guidelines, and consistent with OPR's guidance for determining significance of GHG emissions. Second, BAAQMD has not yet formally adopted its December 2009 draft update to its CEQA Air Quality Thresholds and Guidelines (draft Guidelines) (as discussed on page 4.4-13 of the DEIR) and anticipates adoption to occur in mid 2010. However, the refined GHG emissions inventory summarized in this Master Response and detailed in Appendix B to this document considers in greater detail the *sources* of emissions that the December 2009 draft Guidelines indicates should be considered for the CEQA analysis of GHG emissions, and

also applies an efficiency-based threshold. As a result, consistent with BAAQMD guidance, the City of Oakland has also clarified the approach to the GHG emissions analysis with regard to emissions from stationary sources, and has further clarified and refined its approach to evaluating construction emissions. These clarifications are reflected below in the changes to the GHG significance criteria presented on page 4.4-13 of the DEIR (*deleted text is in strikethrough type, and new text is double underlined*):

~~Based on the Governor's Office of Planning and Research (OPR) Draft amendments to the CEQA Guidelines, in the City of Oakland the proposed project would be considered to have a significant cumulative impact regarding GHG emissions if it would:~~

- ~~a) Exceed adopted numeric thresholds of an appropriate regulatory agency, either directly or indirectly, may have a significant impact on the environment; or~~
- ~~b) Conflict with any applicable plan, policy or regulation of an appropriate regulatory agency adopted for the purpose of reducing greenhouse gas emissions.~~

~~The November 2009 Draft BAAQMD Guidelines discussed above identify a project specific threshold of 1,100 metric tons per year as resulting in a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact to global climate change. The analysis in this EIR considers that, because the quantifiable threshold established in the Draft BAAQMD Guidelines was formulated based on AB 32 reduction strategies, a project cannot exceed the numeric threshold without also conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.~~

A project would have a significant impact with regard to climate change if it would generate greenhouse gas (GHG) emissions, either directly or indirectly, that would:

- a. Exceed adopted, numeric thresholds of an appropriate regulatory agency; or
- b. Conflict with any applicable plan, policy or regulation of an appropriate regulatory agency adopted for the purpose of reducing GHG emissions.

The BAAQMD is still in the process of considering revised CEQA Guidelines which include thresholds for assessing the significance of a project's GHG emissions. The most recent draft of the Guidelines was released in December 2009, and BAAQMD's next hearings on the Guidelines are currently scheduled for June 2010. Although no thresholds have been adopted to date and the project will not have an impact with respect to GHG emissions unless the proposed thresholds are in fact adopted, the analysis herein uses the plan-level and project-level thresholds of the draft BAAQMD CEQA Guidelines to determine the project's significance with respect to the issue of climate change assuming the thresholds are adopted as currently proposed.

Specifically, for "a" above, based on the proposed draft BAAQMD Guidelines, a project would have a significant impact on the environment if it would:

Plan-Level Impacts:

1. Produce emissions of more than 6.6 metric tons of CO₂e per service population¹ annually.

Project-Level Impacts (Land Use Development Projects)²:

2. Produce total emissions of more than 1,100 metric tons of CO₂e annually; and³
3. Produce emissions of more than 4.6 metric tons of CO₂e per service population annually.

Project-Level Impacts (Stationary Source Projects)⁴:

4. Produce total emissions of more than 10,000 metric tons of CO₂e annually.

Although the BAAQMD has not proposed a construction-related GHG threshold, the City nevertheless has quantified and disclosed such emissions, and made a significance determination based on the annualized construction emissions compared to the 1,100 metric tons of CO₂e per year threshold (which BAAQMD specifies for operational emissions only) and in relation to meeting AB 32 GHG reduction goals.

The proposed, draft BAAQMD Guidelines state that potential plan-level and project-level impacts would be considered less than significant if the lead agency has adopted a Climate Action Plan that meets certain requirements (referred to as a “Qualified Climate Action Plan”) and the plan or project complies with the Qualified Climate Action Plan. To date, the City has not adopted a Qualified Climate Action Plan. If and when, the City adopts a Qualified Climate Action Plan, the potential impacts of future projects would be considered less than significant if the projects comply with the Qualified Climate Action Plan. [Staff-initiated Revision]

As discussed in the Air Quality Impacts and Mitigation Measures section of the DEIR (pages 4.4-14 through 4.4-53), air quality impacts of the proposed project and its alternatives were analyzed under the existing BAAQMD thresholds as well as the proposed BAAQMD thresholds. The refined analysis presented herein remains consistent with the proposed BAAQMD thresholds, as modified above (and also presented in Chapter 3 [Changes to the DEIR] of this document).

¹ The per service population emissions total includes both the residents and employees of a proposed development project.

² Land Use Development projects are projects (or components of projects) that do not require a BAAQMD permit to operate.

³ The impact is significant if the emissions exceed BOTH of these thresholds. The City of Oakland has determined that, generally, the impact is less than significant if the emissions are below EITHER of these thresholds. However, for a project or plan that is a “very large project”, which the City defines as any plan or project meeting the criteria in CEQA Guidelines section 15206 (Projects of Statewide, Regional, or Area-wide Significance), the impact is only less than significant if below BOTH of these thresholds.

⁴ Stationary Source Projects are projects (or components of projects) that require BAAQMD permit to operate.

5.2.2 Refined Project GHG Emissions with Reduction Measures

Refined Baseline Emissions Compared to the DEIR

Based on application of the Draft BAAQMD CEQA Guidelines (that are anticipated for adoption in June 2010), the DEIR estimates for carbon dioxide equivalents (CO₂e) for operations show that the project would exceed the proposed draft BAAQMD threshold of 1,100 metric tons/year of CO₂e, as detailed in Table 4.4-8 in the DEIR and summarized in the table below.

Since publication of the DEIR and the Public Review and Comment period, a GHG Reduction Plan has been prepared, as required by Mitigation Measure AIR-8 (see page 4.4-52 of the DEIR). The GHG Reduction Plan is included in Appendix B to this document and

- 1) refines the project emissions presented in the DEIR to account for specific Project design features, applicable City Standard Conditions of Approval, regulatory requirements, and general City policies and programs that would reduce GHG emissions from the Project;
- 2) compares the project's refined baseline emissions to the emissions estimated in the DEIR and then against the current draft significance thresholds for GHG emissions; and
- 3) proposes a set of additional measures that the project could implement to further reduced GHG emissions, and quantifies the additional; emissions reductions that could result.

The refined operational emissions for the Project are lower than that reported in the DEIR because project operations and emission sources (particularly for energy use) were refined and analyzed in substantially greater detail. The updated GHG emissions level includes reductions attributable to the implementation of the City's Standard Condition of Approval TRANS-1, which includes preparation of a Transportation Demand Management (TDM) Plan, which includes strategies to reduce onsite parking demand and single occupancy vehicle travel as well as strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use. The refined baseline also considers Standard Conditions of Approval regarding waste reduction and recycling, energy performance standards and design objectives specified in the Green Guide for Healthcare and Sustainability Practices and proposed CALGreen building code standards proposed to take affect in January of 2011, and other measures established by BAAQMD and required by AB 1493 (Pavley GHG Standards). The project's refined baseline emissions analysis also considers General Plan policies from the Land Use and Transportation Element (LUTE) and the Open Space, Conservation and Recreation (OSCAR) Element, as well as the City's sustainability programs for renewable energy and green building strategies. Each of the above is discussed in detail in the GHG Reduction Plan in Appendix B to this document.

As shown in Table 3-1 below, the project's refined baseline GHG emissions from operations of the project at buildout is estimated to be **8,843 MT CO₂e**, which is less than the 10,157 MT CO₂e reported in the DEIR (or the **11,532 MT CO₂e** that would result without factoring in the Project measures discussed above and applying the Project assumptions refined since publication of the DEIR). When the total operational emissions at project buildout is divided by a total service

**TABLE 3-1
REFINED BASELINE ESTIMATED OPERATIONAL GHG EMISSIONS INVENTORY
FOR THE PROPOSED PROJECT**

	Phase 1 CO₂e Emissions (MT per year)	Phase 1 with MOB CO₂e Emissions (MT per year)	Project Buildout CO₂e Emissions (MT per year)	Significant GHG Impact
Emission Sources				
Operational Vehicle Emissions ^a	2,024	4,938	6,731	
Natural gas	-152	81	263	
Indirect Electricity	949	1,530	1,809	-
Water Conveyance	-3	7	9	
Wastewater Treatment and Conveyance	-1	14	16	
Area Sources	0.24	0.49	0.74	
Solid Waste	14	14	14	
Refined Total Baseline Operational Project GHG Emissions^b (Refined from Unadjusted Emissions Reported in the DEIR)	2,831	6,585	8,843^a	Yes
<i>Total Unadjusted Operational Project GHG Emissions Reported in DEIR</i>	<i>3,927</i>	<i>9,635</i>	<i>10,157</i>	<i>Yes</i>
<i>Total Unadjusted Operational Project GHG Emissions Using Same Assumptions applied to the Refined Total Baseline^c</i>	<i>3,793</i>	<i>10,736</i>	<i>11,532</i>	<i>Yes</i>
Proposed BAAQMD Mass Operational GHG Emissions Threshold	1,100	1,100	1,100	-
Refined Total Baseline Operational Project Emissions per Service Population (429 new employees)	NA (No Change in Service Population)	15.3	20.6	Yes
<i>Total Unadjusted Operational Service Population Emissions (Based on Total Emissions Reported in DEIR)</i>	<i>NA (No Change in Service Population)</i>	<i>15.3</i>	<i>23.7</i>	<i>Yes</i>
Proposed BAAQMD Service Population Threshold	4.6	4.6	4.6	-
Permitted Stationary Emissions Sources				
PCP Backup Generators	14			
PCP Boiler	1,356			
Total Permitted Stationary Source Emissions	1,370			No
<i>Not Estimated in DEIR</i>	-			-
BAAQMD Threshold for Operational GHG Emissions	10,000			
Total Construction Emissions - Project Buildout	3,190	3.84	25.3	3,219
Construction Emissions per Year (annualized over 40 years)				80
Construction Emissions per Year (annualized over 6 years to construct the Project)				537

^a Assumes TDM trip reductions at 15percent for all phases. If a 20percent reduction is assumed, total CO₂e emissions at would be reduced by an additional 312 MT CO₂e, or 8,936 at Project Buildout.

^b The City assumes BAAQMD's proposed threshold of 1,100 MT CO₂e emissions annually as a proxy for construction-related emissions since BAAQMD does not propose a specific threshold or methodology for assessing construction-related GHG emissions for CEQA analysis. For informational purposes, if the most conservative annualized construction emissions for each phase (i.e., annualized over the six-year construction period of the Project) are added to the annualized operational emissions, the Refined Total Baseline Project GHG Emissions (construction plus operational) would increase to 3,378 MT CO₂e during Phase 1; 7,311 MT CO₂e for Phase 1 with MOB; and 9,376 MT CO₂e for Project Buildout. Total emissions by service population would not increase for Phase 1 with MOB, but would increase to 20.6 for Project Buildout.

^c Excludes emissions reductions from Project design features, applicable City SCAs (including TDM), and regulatory requirements that are considered in the refined baseline, but assumes the same updated assumptions and inputs used in the refined baseline but not reflected in the emissions "reported in the DEIR". Implementation and application of Project design features, applicable City SCAs (including TDM), and regulatory requirements results in a reduction of approx. 2,689 MT CO₂e per year (23percent) from the Project's unadjusted emissions estimates (see Table 6, below).

population of 429 net new employees, this results in service population emissions of **20.6 MT CO₂e per year per capita of service population**.⁵ Compared to the applicable significance thresholds discussed above (and shown in the table), the project's total annual GHG emissions of 8,843 MT CO₂e continues to exceed the 1,100 MT CO₂e per year threshold and would also exceed the 4.6 MT CO₂e per year threshold. Thus, as discussed above and consistent with BAAQMD, the City indicates that a project must exceed **both** thresholds for it to be considered a significant CEQA impact. Therefore, the proposed Project would result in a significant cumulative GHG impact, consistent with the significance determination presented in the DEIR.

Regarding GHG emissions from permitted stationary sources, which are evaluated separately from the other operational sources, per BAAQMD, the project would result in emissions would be **1,370 MT CO₂e per year**, which is less than the 10,000 MT CO₂e per year BAAQMD threshold for stationary sources. Thus, the project's GHG emissions specifically from permitted stationary sources would be less than significant, as shown in the table below.⁶

The table also shows that the project's annualized GHG emissions from construction-related activities would be approximately **80 MT CO₂e** emissions annually, when considered over a 40-year life of the project, or **537 MT CO₂e** when annualized over the six-year construction period of the project. Adding the 80 MT CO₂e annualized over the 40-year life of the project to the refined baseline operational emissions of 8,843 MT CO₂e represents a marginal (less than one percent) increment to baseline emissions. Comparing the 537 MT CO₂e annualized over the six-year construction period to the BAAQMD proposed threshold of 1,100 MT CO₂e emissions annually (which the City has applied as a proxy threshold for construction-related emissions, since BAAQMD does not propose a specific threshold or methodology for assessing construction-related GHG emissions for CEQA analysis) would be less than significant.

Recommended GHG Reduction Plan

A GHG Reduction Plan has been prepared for the Project (see Appendix B). To implement this GHG Reduction Plan, prior to operation of the first phase of the Project, and every two years, coinciding with annual monitoring of the ABSMC TDM monitoring and Program, the applicant shall:

1. Prepare and submit to the City for review and approval a refined GHG emissions inventory, and a draft GHG Reduction Plan mitigation program for the specific project phase. The draft mitigation program shall, in order of priority:
 - a. specify and quantify reduction measures identified in, but not limited to, the GHG Reduction Plan (Table 10), excluding Offset Purchase (CAPCOA Mitigation Measure M-2), to reduce the Project's operational emissions to the greatest extent feasible,
 - b. specify and quantify reduction measures from the State of California's Climate Change Scoping Plan, the State Attorney General's web site, the California Air

⁵ Total Service Population is calculated as the sum of additional net new residents (zero) and 429 net new employees associated with the Project.

⁶ Permitted stationary source emissions are associated with the backup diesel generators and a boiler to support the new Patient Care Pavilion in Phase 1 of the project.

Pollution Control Officer Association's (CAPCOA) white paper on CEQA and Climate Change, the Green Guide for Health Care (version 2.2), Sutter Health's Green Guide for Healthcare and Sustainability Practices, Reference Guides on Leadership in Energy and Environmental Design (LEED) published by the US Green Building Council, and BAAQMD's Draft CEQA Air Quality Guidelines that are to be implemented elsewhere within the ABSMC campus (i.e., not as part of the Project) and/or elsewhere (preference shall be first for implementation in the City of Oakland, then the jurisdiction of the BAAQMD, and then within the State of California, and finally, elsewhere) to off-set operational emissions of the Project. To the extent reasonable and feasible, the reduction measures incorporated into the Project or implemented elsewhere shall be capable of reducing the equivalent of 7 percent of the emissions from that phase that exceeds the significance threshold,

- c. establish a one-time fee (e.g., an escrow account or endowment fund) to offset the costs associated with implementation of certain City-wide GHG reduction strategies as may be identified in the City of Oakland's Climate Action Plan, once such Plan has been adopted. The amount of offset "credits" achieved under this fund are to be determined once such a fund has been offered or proposed, and then,
 - d. quantify the annual residual operational GHG emissions from that Project phase, if any, for which the applicant shall implement offset measures to reduce the residual to less than the applicable CEQA significance threshold. The preference for Offset Purchases shall first be for offsets that can be achieved within the City of Oakland, then for offsets that can be achieved within the jurisdiction of the BAAQMD, then for offsets achieved within the State of California, and finally for offsets achieved elsewhere. The cost of Offset Purchases shall be based on current market value at the time purchased and shall be based on the Project's operational emissions estimated in this DEIR (of which the GHG Reduction Plan is incorporated) or subsequent approved emissions inventory, which may result in emissions that are higher or lower for than those estimated in the GHG Reduction Plan for any particular phase of the Project. In any case, the applicant shall implement a mitigation program to reduce emissions to the levels specified above.
2. Upon City review and approval of the phased mitigation program, the applicant shall implement the measures and provide the City appropriate documentation of all measures implemented, estimated emissions reductions compared to the performance standard of 7 percent reduction, and proof of an offset program or purchase of registered offset credits to achieve 100 percent emissions reduction to the applicable CEQA threshold.
 3. The applicant shall reimburse City for all staff time involved in review and approval of each phased mitigation program, and/or shall pay for an independent reviewer by an outside party of the City's choosing.

The GHG Reduction Plan was prepared with the City and discusses a comprehensive set of measures, proposing those that the City determines may be feasible for practical implementation consistent with the intent of Mitigation Measure AIR-8 to identify a set of emissions reduction measures for the proposed project to implement to increase energy efficiency and reduce GHG emissions to the greatest extent practical and feasible. City staff reviewed and approved the GHG Reduction Plan for approach, accuracy, feasibility and compliance with Mitigation Measure AIR-8. The City's decision making body will consider final approval of the GHG Reduction Plan prior to taking action on the EIR or the proposed project.

Changes to Significant Criteria Pollutant Impacts Identified in the DEIR

In addition, as a result of refined inputs available to conduct the refined baseline emissions analysis of the proposed project, the potentially significant impact associated with NO_x emissions (criteria pollutant) under the “MOB Concurrent with Phase 1” scenario (under proposed BAAQMD Thresholds) is avoided. This is due to emissions reductions resulting from vehicle trip reductions identified in the TDM Plan, and refined estimates of natural gas consumption from the proposed boiler in the PCP, neither of which were available at the time the DEIR was prepared. As detailed in Chapter 3 (Changes to the DEIR) in this document, the NO_x emissions under the MOB Concurrent with Phase 1 scenario would be reduced from 64 pounds per day of NO_x to 41 pounds per day of NO_x, which is below the BAAQMD proposed threshold of 54 pounds per day.

Although not required to reduce a significant environmental effect, it is recommended that the City consider the following as a condition of Project approval to further reduce emissions of NO_x:

The applicant shall determine and conduct routine testing of the two proposed new emergency generators proposed by the project on separate days or for a shorter duration rather than “both generators tested for one hour on the same day.” The applicant shall prepare and submit to the City of Oakland a Generator Testing and Operations Plan. ~~The Generator Testing and Operations Plan, in combination with implementation of the required Transportation and Parking Demand Management Plan pursuant to Standard Condition TRANS-8, can effectively reduce emission levels to less than significant, according to applicable thresholds. The applicant shall implement the Plan.~~

In summary, the information provided in this Master Response summarizes the GHG Reduction Plan (Appendix B)(, which details GHG reduction measures that are factored in the Proposed Project, as well as a set of additional measures that the Project could implement to increase energy efficiency of the Project and reduce GHG emissions from the Project to the greatest extent practical and feasible.

5.3 Master Response C – Traffic and Pedestrian Concerns in the Vicinity of Oakland Avenue and Harrison Street

This Master Response responds to multiple comments that address potential traffic and pedestrian effects in the vicinity of Oakland Avenue and Harrison Street. Specific comments are presented throughout Section 6 (Responses to Written Comments Received on the DEIR and refer, all or in part, to this Master Response.

5.3.1 Harrison-Oakland Avenue Study and Nearby Effects

City of Oakland staff and transportation consultants involved in preparation of this EIR are fully aware of the Harrison-Oakland Avenue Community-Based Transportation Plan (CBTP) Study and its potential implication on changed circulation patterns. However, the Harrison-Oakland

Avenue Study was not included in the Draft EIR's assumptions of planned transportation network changes. As indicated on page 4.3-26 of the DEIR, the Harrison-Oakland couplet has not undergone environmental review, has not been approved by the City, is not a funded project, and did not have final designs at the time of preparation of the DEIR. Consistent with City practice, this study was therefore not assumed as part of the planned transportation network changes and was not assumed in the analysis. The study is further discussed in Appendix B.5 of the DEIR.

However, in response to public comments on this issue the City has examined the potential effects of the proposed ABSMC Project on a street network that would include the Harrison-Oakland couplet scheme. Those results and conclusions are as follows:

The DEIR evaluated four intersections that were also evaluated in the Harrison and Oakland Avenue study. These intersections include: Harrison Street / 29th Street (Intersection #39), Harrison Street/West MacArthur Boulevard/ Santa Clara Avenue (Intersection #40), Oakland Avenue/Perry Place/I-580 EB Off-Ramp (Intersection #41), and Oakland Avenue/West MacArthur Boulevard/Santa Clara Avenue (Intersection #42). Both studies evaluated the Year 2035.

Harrison Street/29th Street (Intersection #39)

The Harrison/Oakland Avenue Study recommended changes at this intersection include reducing the one-directional southbound travel lanes on Harrison Street from three lanes to two lanes by converting a current through lane to a left-turn only lane. Other recommended improvements include pedestrian bulb-outs, and moving the Harrison Street crosswalk to the south side of the intersection. The Study recommended maintaining the current side-street stop controls on 29th Street. These modifications would worsen delay for the stop-controlled movement, which would operate at LOS F with or without these modifications.

Page 4.3-72 of the ABSMC DEIR identifies that ABSMC traffic, when added to other cumulative traffic by year 2035, would adversely impact the Harrison Street/29th Street intersection (Intersection #39). Mitigation including signalization of the intersection was considered, but ultimately not recommended since signalization could encourage additional traffic along 29th Street, a potentially significant secondary effect. Thus, the Draft EIR made no recommendations for improvements at this intersection and assumed retention of the current side-street stop controls on 29th Street.

As shown on the table below, both studies conclude that this intersection would operate at LOS F in both the AM and PM peak by Year 2035. Without installation of a traffic signal, the proposed ABSMC Project would add about 11 trips to 29th Street during the morning peak hour and 17 trips during the evening peak hour, which is about five percent of existing traffic volumes on 29th Street.

Harrison Street/West MacArthur Boulevard/Santa Clara Avenue (Intersection #40)

The Harrison/Oakland Avenue Study recommended changes at this intersection to include converting Harrison Street north of the West MacArthur Boulevard - Santa Clara Avenue intersection from one-way southbound to two-way travel. The two-way conversion allows for a center median island with a pedestrian refuge at the Santa Clara intersection. The Study also recommended increasing the signal cycle length at this intersection to 100 seconds, which would improve the LOS in the AM from LOS E to LOS D.

Page 4.3-62 of the ABSMC DEIR identifies that ABSMC traffic would not increase the average delay at this intersection by more than two seconds, would not increase delay at critical turn movements by more than four seconds, and would not increase the v/c ratio by more than 3 percent. Thus, the Draft EIR found that the Project would not have an adverse effect at this location and no mitigation measures were required.

As shown on the table below, both studies indicate that this intersection will operate well within acceptable levels (LOS C) during the PM peak hour. During the AM peak hour the Draft EIR found that the intersection would operate at LOS E with a delay of 77 seconds, primarily due to the assumed volume of eastbound traffic on MacArthur Boulevard making a right turn onto Harrison. The Harrison/Oakland Avenue Study concluded that the intersection could operate at LOS D with a delay of 44 seconds if the signal timing were adjusted.

I-580 Eastbound Off-Ramp/Oakland Avenue/Perry Place (Intersection #41)

The Harrison/Oakland Avenue Study recommended changes at this intersection to include reducing the one-directional northbound travel lanes on Oakland Avenue from three lanes to two lanes by converting a current through lane to a right-turn only lane. Other recommended improvements include construction of a new pedestrian staircase connecting Harrison Street to Oakland Avenue and a new pedestrian refuge island on Perry Place. The Study also recommended increasing the signal cycle length at this intersection from 80 seconds to 120 seconds, which would improve the delay time in the PM.

Page 4.3-75 of the ABSMC DEIR identifies that ABSMC traffic, when added to other cumulative traffic by year 2035, would adversely impact the I-580 Eastbound Off-Ramp/Oakland Avenue/Perry Place intersection. Recommended mitigation measures including optimizing the signal timing for the PM, and coordinating the signal timing change with the adjacent intersections that are in the same signal coordination group. Signal optimization at this location would require approval of the change by Caltrans. The DEIR concluded that this mitigation would reduce project impacts to less than significant, but implementation is uncertain because of the required Caltrans approval.

Both studies indicate that this intersection will operate at LOS F during the PM peak hour, but the Harrison/Oakland Avenue Study shows a longer delay at the intersection based on the assumption that vehicles would make the right turn movement onto Perry Place at a slow speed, resulting in a lower capacity for that movement.

Oakland Avenue/West MacArthur Boulevard/Santa Clara Avenue (Intersection #42)

The Harrison/Oakland Avenue Study recommended changes at this intersection to include converting Oakland Avenue north of the West MacArthur Boulevard - Santa Clara Avenue intersection from one-way northbound to two-way travel. The two-way conversion requires a median on Oakland Avenue north of the intersection to facilitate the 1-way to 2-way conversion, widening of Oakland Avenue under the I-580 overpass to accommodate the 2-way conversion and bicycle lanes, and improved sidewalks. The Study also recommends a split-phase intersection signal to direct the new traffic movements. These modifications would degrade intersection operations to LOS D during both peak hours.

As shown on the following table, the Draft EIR found that this intersection would operate well within acceptable levels (LOS B) during the AM and PM peak hour. No mitigation measures were required of the ABSMC project in the Draft EIR as this intersection would not be adversely affected.

29th Street/Fairmount Avenue (Intersection #38)

The DEIR also evaluated the 29th Street/Fairmount Avenue (Intersection #38) and determined that the intersection would operate at Level of Service (LOS) A under all study scenarios. Based on the City's adopted significance criteria the proposed project's impact was determined to be less than significant. The LOS results for this intersection are shown in Appendix B.3 LOS Summary Table in the DEIR.

The table below provides a comparison of the four common studied intersections. Differences for each intersection are summarized below:⁷

HARRISON/OAKLAND CORRIDOR YEAR 2035 LOS COMPARISON

Intersection	Traffic Control	Peak Hour	ABSMC Cumulative LOS		Harrison/Oakland Cumulative LOS	
			Delay(s) ¹	LOS	Delay(s) ¹	LOS
Harrison Street/29th Street	SSSC	AM	>120	F	143193	F
		PM	>120	F	134139	F
Harrison Street/West MacArthur Boulevard/Santa Clara Avenue	Signal	AM	77 ²	E	56 44 ²	D
		PM	23	C	1822	C
I-580 Eastbound Off-Ramp/Oakland Avenue/Perry Place	Signal	AM	59	E	3253	C
		PM	117 ³	F	176138 ³	F
Oakland Avenue/West MacArthur Boulevard/Santa Clara Avenue	Signal	AM	15	B	4815	D
		PM	17	B	3721	D

NOTES:

¹ LOS assuming optimized signal timing.

² The difference in intersection delay (77 seconds versus 4456 seconds) occurs because the ABSMC Study assumed a greater proportion of drivers would turn right on MacArthur Boulevard.

³ The difference in intersection delay (117 seconds versus 13876 seconds) occurs because the Harrison/Oakland Study assumed that the right turn movement onto Perry Place was a slow speed right turn.

SOURCES: Dowling Associates, Harrison Street/Oakland Avenue Corridor CBTP (P08-090) Concept Plan Analysis Memorandum, September 2009;; Design, Community and Environment, Harrison Street/Oakland Avenue Corridor CTP, February 2010; Fehr & Peers, 2010.

⁷ There are several reasons that the two studies would have different results. The 2035 traffic forecasts for the two studies were developed using similar methodologies and tools. While the processes and the tools are consistent, the inputs were different. Specifically:

- The Harrison-Oakland Avenue Study has assumed fundamental shifts in traffic patterns by converting one-directional traffic flow on Harrison Street and Oakland Avenue to two-way traffic flow north of I-580 and reduced travel lane capacity on these streets south of I-580.
- The two studies collected existing traffic data at different times. The existing traffic data is used as the basis for developing the 2035 traffic forecasts. So, using different existing traffic assumptions will result in different forecasts.
- The signal timing parameters between the two studies were different in the 2035 scenarios. The ABSMC EIR analysis held existing signal timing unchanged under future scenarios (as is proper), whereas the Harrison-Oakland corridor study optimized the timing for their future scenarios. The technical analyst doing the intersection analyses must make determinations regarding several signal timing parameters such as green time allocation to each traffic movement. These parameters are different between the two studies but both are within standard engineering practice.

Even with these differences the intersection analysis results are similar, indicating that conclusions drawn from the Harrison Street/Oakland Avenue Corridor Study would also be applicable to the ABSMC study.

- It is also particularly important to note that the proposed project is expected to contribute less than 20 peak hour vehicle trips to the Harrison Street and Oakland Avenue corridors. This represents less than one percent of change in the total traffic using these corridors. This level of change is negligible compared to the overall change in traffic patterns which the Harrison Oakland Avenue Study is based.

In conclusion, while the two studies have different intersection analysis results, traffic generated by the proposed project would not substantially change the characterization of traffic operations in Year 2035 as presented in the Harrison/Oakland Avenue Study. Furthermore, this project is not responsible for implementing any of the Harrison/Oakland Avenue Study improvements for the reasons stated above.

5.4 Master Response D – Traffic and Pedestrian Concerns in the Vicinity of Webster Street

This Master Response responds to multiple comments that address potential traffic and pedestrian effects and recommend related improvements along Webster Street. Specific comments are presented throughout Section 6 (Responses to Written Comments Received on the DEIR and refer, all or in part, to this Master Response.

5.4.1 Recommended Traffic and Pedestrian Measures along Webster Street

The DEIR (Appendix FigureB-9) illustrates that nine vehicles from the proposed project would use Webster Street north of 34th Street during the morning peak hour, and 13 vehicles during the evening peak hour. These volumes represent less than three percent of the current traffic volumes on Webster Street. The DEIR considered intersection operations at Webster Street / 34th Street (Intersection #26) and Webster Street / MacArthur Boulevard (Intersection #27) and determined that the proposed project would have a less-than-significant impact at both intersections under all analysis scenarios.

The DEIR (Appendix B.4 Collision Data) summarizes the accident records for a five-year period between 2003 and 2007. In that period of time, seven collisions were reported along Webster Street from the 34th Street intersection to south of the MacArthur Boulevard intersection. Two were intersection collisions, both broadsides at the Webster Street / 37th Street intersection. The other five collisions involved a motorist hitting a parked car. No injuries were associated with any of the collisions. These accident records do not indicate that this segment of Webster Street is unsafe.

With respect to installation of stop signs or traffic signals, the City of Oakland follows the guidelines described in the California Manual on Traffic Control Devices (MUTCD), which establishes warrants for installing traffic control devices such as stop signs or traffic signals. These warrants consider the traffic volumes, pedestrian volumes, and accident rates. Traffic volumes and pedestrian volumes on the corridor are substantially below the warrant thresholds for installing

traffic control devices. Similarly, the accident characteristics for the corridor do not meet the minimum thresholds. Thus, based on the City's use of the California MUTCD, neither stop signs nor traffic signals are warranted on Webster Street between 34th Street and MacArthur Boulevard.

There are no CEQA thresholds for the installation of traffic calming measures or route signage. The small number of trips that the Project would add to the Webster Street corridor (fewer than 15 trips during the peak hour) north of 34th Street is not expected to cause safety or quality of life impacts that would justify the installation of traffic calming measures. Route signage is an effective tool for directing large volumes of traffic to and from special events, but would have less effect on employees and regular visitors to the Summit campus using Webster Street, who are familiar with the area. In addition to traffic calming measures or route signage, there are no CEQA thresholds that direct the provision of off-street pedestrian lighting, sidewalk repair, or trash clean-up, which are mentioned in various comments. While there are no CEQA thresholds for these recommended measures, the City will consider the commenter's recommendation prior to taking action on the EIR.

The installation of a new speed limit sign on northbound Webster Street under the I-580 overpass may be appropriate, as it may not be readily apparent to drivers on this segment that they are entering a residential and park area. The City may consider this measure as a condition of approval for the project.

CHAPTER 6

Responses to Written Comments Received on the DEIR

This chapter includes copies of the written comments received by hand-delivered mail or electronic mail during the public review period on the DEIR. Specific responses to the individual comments in each correspondence follow each letter or email. Consistent with the list of commenters presented in Chapter 4, correspondence received from public agencies is presented first, followed by those received from organizations and individuals.

Each correspondence is identified by an alpha designator (e.g., “Letter A”). Specific comments within each correspondence are identified by an alphanumeric designator that reflects the alphabetic correspondence designator and the numeric sequence of the specific comment within the correspondence (e.g. “A-1” for the first comment in Letter A). The set of responses immediately follows the correspondence.

Responses to several comments presented in this chapter are addressed within the Master Responses presented in Chapter 5 (Master Responses to Recurring Comments) and direct the reader directly to the applicable Master Response. Responses may also reference a response to a comment presented in Chapter 7 (Responses to Comments Received at the Public Hearings on the DEIR).

Responses specifically focus on comments that pertain to the adequacy of the analysis in the DEIR or other aspects pertinent to the environmental analysis of the proposed project pursuant to CEQA. Comments that address topics beyond the purview of the DEIR or CEQA are noted as such for the public record. Where comments and/or responses have warranted changes to the text of the DEIR, these changes appear as part of the specific response and are repeated in Chapter 3 (Changes to the DEIR), where they are listed generally in order of where the revision would appear in the DEIR document.

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January 27, 2010

Scott Gregory, Contract Planner
City of Oakland
Community and Economic Development Agency
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612

Re: Notice of Release and Availability of Draft Environmental Impact Report –
Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and
Master Plan Project, Oakland (Case No. ER09-0001)

Dear Mr. Gregory:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan Project located in the City of Oakland (City). EBMUD has the following comments.

GENERAL

EBMUD’s April 13, 2009 response to the Notice of Preparation of a Draft EIR for the subject project stated that Senate Bill 1953 requires that every hospital must have integrated into its plumbing system an on-site water supply sufficient for 72-hours of emergency operations based on 50 gallons per day per bed by 2030. The Draft EIR does not identify how this requirement will be addressed as part of the overall project development and should be included in the Final EIR.

A-1

On page 4.13-1, under Water Supply System, the second paragraph should be revised to read “Existing water mains serving the project site are located along Hawthorne Avenue, Webster Street, Summit Street, Elm Street, 30th Street and 34th Street.”

A-2

WATER SERVICE

EBMUD’s Aqueduct Pressure Zone, with a service elevation between 100 and 200 feet, serves the existing parcels. If additional water service is needed, the project sponsor should contact EBMUD’s New Business Office and request a water service estimate to determine costs and conditions for providing additional water service to the existing parcels. Engineering and installation of water services requires substantial lead-time, which should be provided for in the project sponsor’s development schedule.

A-3

The project sponsor should be aware that EBMUD will not inspect, install or maintain pipeline in contaminated soil or groundwater (if groundwater is present at any time

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during the year at the depth piping is to be installed) that must be handled as a hazardous waste or that may pose a health and safety risk to construction or maintenance personnel wearing Level D personal protective equipment. Nor will EBMUD install piping in areas where groundwater contaminant concentrations exceed specified limits for discharge to sanitary sewer systems or sewage treatment plants. Applicants for EBMUD services requiring excavation in contaminated areas must submit copies of existing information regarding soil and groundwater quality within or adjacent to the project boundary. In addition, the applicant must provide a legally sufficient, complete and specific written remedial plan establishing the methodology, planning and design of all necessary systems for the removal, treatment, and disposal of all identified contaminated soil and/or groundwater.

A-3
cont.

EBMUD will not design the installation of pipelines until such time as soil and groundwater quality data and remediation plans are received and reviewed and will not install pipelines until remediation has been carried out and documentation of the effectiveness of the remediation has been received and reviewed. If no soil or groundwater quality data exists or the information supplied by the applicant is insufficient the EBMUD may require the applicant to perform sampling and analysis to characterize the soil being excavated and groundwater that may be encountered during excavation or perform such sampling and analysis itself at the applicant's expense.

WATER RECYCLING

On page 4.13-3, under Recycled Water, the second sentence of the first paragraph should be revised to read "Recycled water, as defined in the California Water Code, is water which, as a result of treatment of wastewater, is suitable for direct beneficial use or controlled use that would not otherwise occur."

On page 4-13-3, under Recycled Water, the third sentence of the first paragraph, EBMUD's Non-Potable Water Policy number should be changed to No. 8.01 (November 2006).

On page 4.13-3, under Recycled Water, the fourth sentence of the first paragraph should be revised to read "In 2008, EBMUD supplied approximately 8.7 mgd of recycled water and other nonpotable water for non-residential landscape irrigation, commercial and industrial processes, and toilet and urinal flushing in commercial buildings."

On page 4.13-3, under Recycled Water, the fifth sentence of the first paragraph should be revised to read "EBMUD's goal is delivery of 14 mgd of nonpotable water, including recycled water, by 2020, for a total of 5.1 billion gallons annually."

A-4

Scott Gregory, Contract Planner
January 27, 2010
Page 3

On page 4.13-3, under Recycled Water, the last sentence of the second paragraph should be revised to read “The project site is located approximately 1.5 miles north of EBMUD’s recycled water main on 10th Street. EBMUD determined that it is not feasible to serve recycled water to this project site due to extensive length of recycled water distribution system required to provide minimal demand.”

↑
A-4
cont.

WASTEWATER

On page 4.13-4, under Inflow/Infiltration Correction Program, language used in the entire section is no longer valid and should be replaced with the following:

“EBMUD’s Main Wastewater Treatment Plant (MWWTP) and interceptor system are anticipated to have adequate dry weather capacity to treat the proposed wastewater flows from this project, provided that the wastewater meets the requirements of the current EBMUD Wastewater Control Ordinance. However, wet weather flows are a concern. EBMUD has historically operated three Wet Weather Facilities to provide treatment for high wet weather flows that exceed the treatment capacity of the MWWTP. On January 14, 2009, due to Environmental Protection Agency’s and the State Water Resources Control Board’s (SWRCB) re-interpretation of applicable law, the Regional Water Quality Control Board (RWQCB) issued an order prohibiting further discharges from EBMUD’s Wet Weather Facilities. Additionally, on July 22, 2009 a Stipulated Order for Preliminary Relief issued by Environmental Protection Agency, the SWRCB, and RWQCB became effective. This order requires EBMUD to begin work that will identify problem inflow/infiltration areas, begin to reduce inflow/infiltration through private sewer lateral improvements, and lay the groundwork for future efforts to eliminate discharges from the Wet Weather Facilities.

↑
A-5

Currently, there is insufficient information to forecast how these changes will impact allowable wet weather flows in the individual collection system subbasins contributing to the EBMUD wastewater system, including the subbasin in which the proposed project is located. As required by the Stipulated Order, EBMUD is conducting extensive flow monitoring and hydraulic modeling to determine the level of flow reductions that will be needed in order to comply with the new zero-discharge requirement at the Wet Weather Facilities. It is reasonable to assume that a new regional wet weather flow allocation process may occur in the East Bay, but the schedule for implementation of any new flow allocations has not yet been determined. In the mean time, it would be prudent for the lead agency to require the project applicant to incorporate the following measures into the proposed project: (1) replace or rehabilitate any existing sanitary sewer collection systems to reduce inflow/infiltration and (2) ensure any new wastewater collection systems for the project are constructed to prevent inflow/infiltration to the maximum extent feasible. Please include such provisions in the environmental documentation for this project.”

Scott Gregory, Contract Planner
January 27, 2010
Page 4

WATER CONSERVATION

On page 4.13-12, the second paragraph discusses water conservation measures. The language should be revised to reflect that the project is **required** to comply with Assembly Bill 325 and Section 31 of EBMUD's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense.

A-6

EBMUD staff would appreciate the opportunity to meet with the project sponsor to discuss water conservation programs and best management practices applicable to the integrated projects. A key objective of this discussion 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 project.

A-7

If you have any questions concerning 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:AMW:sb
sb10_011.doc

Letter A Response – East Bay Municipal Utility District

A-1: The proposed patient care tower would comply with all applicable requirements of the California Office of Statewide Health Planning and Development (OSHPD) and the California Building Standards Code. Specifically, the patient care tower has been designed to meet the requirements for integrated plumbing and water supply to meet emergency operations, and therefore would satisfy these requirements in advance of the 2030 requirements.

A-2: New text is added to Section 4.13.1 Environmental Setting, Water Supply System, last paragraph on page 4.13-1 of the DEIR (*new text is double underlined*):

Existing water lines serving the project site include lines located along Hawthorne Avenue, Webster Street, Summit Street, Elm Street, 30th Street, and 34th Street.

A-3: The Project Applicant will adhere to all standard requirements for EBMUD service requests for the proposed project when development plans for the proposed project are finalized. As noted on Page 4.9-17 of the DEIR, Impact HAZ-2, “Standard Condition HAZ-5, *Best Management Practices for Soil and Groundwater Hazards*, and Standard Condition HAZ-6, *Radon or Vapor Intrusion from Soil or Groundwater Sources*, would ensure that any potential impacts [to construction workers, the public, or the environment] are less than significant.”

A-4: New text is added to Section 4.13.1 Environmental Setting, Water Service, Recycled Water, the first two paragraphs on page 4.13-3 of the DEIR are revised as follows (*deleted text is in strikethrough text and new text is double underlined*):

The goals of using recycled water are to supplement the existing potable water supply and assist in meeting future water demands. ~~Water for recycling is drawn from water reservoirs containing untreated water, and from wastewater treatment plants.~~ Recycled water, as defined in the California Water Code, is water which, as a result of treatment of wastewater, is suitable for direct beneficial use or controlled use that would not otherwise occur. EBMUD’s Nonpotable Water Policy No. 73 8.01 (1996/2006) mandates that all customers use recycled water for non-domestic purposes when such water is of adequate quality and quantity, available at reasonable cost, not detrimental to public health and not injurious to plant life, fish, and wildlife. ~~EBMUD currently supplies almost 6.5 mgd of recycled water and other nonpotable water for irrigation, industrial processes and equipment wash-down.~~ In 2008, EBMUD supplied approximately 8.7 mgd of recycled water and other nonpotable water for non-residential landscape irrigation, commercial and industrial processes, and toilet and urinal flushing in commercial buildings. EBMUD’s goal is delivery of 14 mgd of nonpotable water, including recycled water, by 2020, for a total of 5.1 billion gallons annually.

In January 2002, the City of Oakland adopted a recycled water ordinance that requires new developments within the city to use recycled water provided by EBMUD for common area irrigation, if recycled water is available to the development area. This requires installation of a separate non-potable water distribution system on-site. The project site is ~~not~~ located approximately 1.5 miles north of EBMUD's recycled water main on 10th Street. EBMUD determined that it is not feasible to serve recycled water to this project site due to extensive length of recycled water distribution system required to provide minimal demand. within the service area boundary of EBMUD's East Bayshore Recycled Water Project and would not be served by recycled water

- A-5: New text is added to Section 4.13.1 Environmental Setting, Sanitary Sewer Service, Inflow/Infiltration Correction Program, and replaces the entire section on page 4.13-4 as follows (*deleted text is in strikeout text and new text is double underlined*):

~~A continuing issue with respect to sanitary sewer collection has been inflow and infiltration of stormwater into the EBMUD and Oakland sewer lines, resulting in high flow levels and overflow of untreated wastewater during wet weather events. Most of the stormwater enters sewer systems by infiltration (stormwater that passes through the soil and into deteriorated sewer pipes). Inflow originates from stormwater inlets and manholes that connect to the sanitary sewer system rather than the stormwater system. In 1986, with EBMUD as the lead agency, the Wet Weather Program was initiated to improve treatment capacity for wet weather flows and reduce the amount of inflow and infiltration throughout the EBMUD collection system. The cities of Alameda, Albany, Berkeley, Emeryville, Kensington, Oakland, Piedmont and portions of El Cerrito and Richmond participate in EBMUD's Wet Weather Program. The program has resulted in four new wet weather treatment facilities, two storage basins, 7.5 miles of new interceptors, and expansion of the main wastewater treatment plant. These new facilities accommodate an increase in peak wet weather treatment capacity from 290 mgd to 775 mgd. The City's long range sewer improvements are anticipated to reduce peak regional flows from 1.1 billion gallons per day to 775 mgd.~~

~~The City of Oakland has a 25-year inflow and infiltration collection maintenance and rehabilitation program that will help eliminate overflow by reducing inflow and infiltration of stormwater to upgrade the existing system. The City's collection system is comprised of local collection mains and a network of trunk systems. The City's system capacity improvements have targeted the trunk network only and assume that the remainder of the system, the local mains, has sufficient capacity. The entire system is divided into drainage basins and subbasins. The proposed project is located in Basin 52. Each subbasin has a projected allocation for base flow increase based on an anticipated growth rate during the period of the inflow and infiltration collection maintenance and rehabilitation program. Growth (base flow increase) within each subbasin must not~~

exceed projections. If exceeded, the impact of the additional growth must be analyzed on the entire City collection, and trunk system and additional system improvements would be required. If redirection of allocation from other subbasins is needed to accommodate a development project, further review and approval from the City would be required in order to determine locations and the amount of potential reallocation. If growth does not exceed projection within each subbasin, then impact analysis may be limited to the study of local mains serving the development site.

EBMUD's Main Wastewater Treatment Plant (MWWTP) and interceptor system are anticipated to have adequate dry weather capacity to treat the proposed wastewater flows from this project, provided that the wastewater meets the requirements of the current EBMUD Wastewater Control Ordinance. However, wet weather flows are a concern. EBMUD has historically operated three Wet Weather Facilities to provide treatment for high wet weather flows that exceed the treatment capacity of the MWWTP. On January 14, 2009, due to Environmental Protection Agency's and the State Water Resources Control Board's (SWRCB) re-interpretation of applicable law, the Regional Water Quality Control Board (RWQCB) issued an order prohibiting further discharges from EBMUD's Wet Weather Facilities. Additionally, on July 22, 2009, a Stipulated Order for Preliminary Relief issued by the Environmental Protection Agency, the SWRCB, and RWQCB became effective. This order requires EBMUD to begin work that will identify problem inflow/infiltration areas, begin to reduce inflow/infiltration through private sewer lateral improvements, and lay the groundwork for future efforts to eliminate discharges from the Wet Weather Facilities.

Currently, there is insufficient information to forecast how these changes will impact allowable wet weather flows in the individual collection system subbasins contributing to the EBMUD wastewater system, including the subbasin in which the proposed project is located. As required by the Stipulated Order, EBMUD is conducting extensive flow monitoring and hydraulic modeling to determine the level of flow reductions that will be needed in order to comply with the new zero-discharge requirement at the Wet Weather Facilities. It is reasonable to assume that the new regional wet weather flow allocation process may occur in the East Bay, but the schedule for implementation of any new flow allocations has not yet been determined.

As part of the project's construction activities, any existing sanitary sewer collection systems that need to be replaced will be designed to reduce inflow and infiltration. Any new wastewater collection lines will be constructed to prevent inflow and infiltration to the maximum extent feasible.

- A-6: New text is added to Section 4.13.3 Impacts and Mitigation Measures, Utilities Impacts, Water Supply, the second paragraph on page 4.13-12 is revised as follows (*deleted text is in strikeout text and new text is double underlined*):

EBMUD recommends incorporating water conservation measures into the design and construction of all new development projects to ensure that sufficient water capacity is available through EBMUD's planning horizon year 2030.

EBMUD ~~also recommends~~ requires that the project ~~should~~ comply with Assembly Bill 325, Model Water Efficient Landscape Ordinance. Section 31 of EBMUD's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense.

According to EBMUD, the proposed project is not a likely candidate for the use of recycled water due to minimal irrigation demands and the distance from the nearest recycled water main (EBMUD, 2009).

- A-7: The Project Applicant is aware of this request and has indicated it will adhere to all EBMUD requirements for information.



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

Nancy Skowbo
Deputy General Manager - Service Development

February 3, 2010

Mr. Scott Gregory, Contract Planner
C/O Mr. Gary Patton, Deputy Director of Planning and Zoning;
City of Oakland
Community and Economic Development Agency
250 Frank Ogawa Plaza, Suite 3315
Oakland, CA 94612

Subject: Draft Environmental Report for Alta Bates Summit Medical Center, Summit Campus
Seismic Upgrade and Master Plan

Dear Mr. Gregory:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan. This EIR concerns replacement of buildings which do not meet current seismic standards for hospitals and expansion of space for medical offices, Samuel Merritt College, and associated retail space.

Participation in Preparing Planned Transportation Demand Management (TDM) Plan

Mitigation Trans-1 in the EIR (p. 4.3-31) requires that a TDM Plan be reviewed and approved by the City's Planning and Zoning Division prior to final approval of the project's building permit. The TDM Plan is designed to increase the use of travel modes other than driving alone, such as transit. AC Transit requests the ability to participate in the formulation of the TDM Plan and the ability to review and comment on the Plan before it is submitted to the City. This approach would assure that the District's knowledge of transit service and marketing is incorporated into the TDM Plan.

B-1

As of March, 2010, AC Transit will discontinue line 59 and service on Summit Street. If you have questions about this letter, contact Nathan Landau, Senior Transportation Planner at 510-891-4792.

B-2

Yours Truly,

Nancy Skowbo
Deputy General Manager for Service Development

- Cc: Tina Spencer
- Cory LaVigne
- Jim Cunradi
- Will Buller
- Nathan Landau
- Ajay Martin

Letter B Responses – AC Transit

B-1: A TDM Plan was prepared pursuant to the City’s Standard Conditions of Approval TRANS-1 (described on page 4.3-31 of the DEIR). The TDM Plan is included as Appendix A to this document. City staff reviewed and approved this document for approach, accuracy, and feasibility, and to assess whether the Project Applicant has satisfied relevant components of the Standard Condition of Approval. The City’s decision making body will consider final approval of the TDM Plan prior to taking action on the EIR and the proposed project. AC Transit has the right and opportunity to comment on the TDM Plan.

B-2: The following text is added to the DEIR:

The following sentence is added to the end of Section 4.3.1, Existing Setting, Existing Transit Service, AC Transit (*deletions are in strikeout text and additions are double underlined*):

As of March 28, 2010, as part of major system-wide service changes independent of the project, AC Transit has discontinued Line 59 and service on Summit Street.

Section 4.3.3 Impacts and Mitigation Measures, Construction Impacts, Project Construction Truck Traffic, Transit Circulation (page 4.3-88 of the DEIR) is revised as follows (*deletions are in strikeout text and additions are double underlined*):

AC Transit Route 59, which formerly served the Summit Campus at stops on Hawthorne Avenue and Summit Street, has been discontinued as of March 28, 2010. Discontinuation of this service is not related in any manner to the proposed project, but is an independent determination made by AC Transit based on existing ridership levels. The proposed project would have no impact on transit circulation. ~~need to be rerouted to Webster Street or Telegraph Avenue during construction of Phase 1. Coordination with AC Transit is required to manage the relocation of stops and changes in routing. This is considered significant. To accommodate potential restoration of AC Transit service on Hawthorne Avenue and Summit Street after completion of Phase 1 of the Project, proposed bus stop locations are shown on Figure 3-8d of the DEIR.~~

The second to last paragraph on page 4.3-90 of the DEIR, Section 4.3.3 Impacts and Mitigation Measures, Vehicle and Bicycle Safety is revised as follows (deletions are in strikeout text and additions are double underlined):

Buildout of the proposed project also calls for the closure of Summit Street between 30th Street and Hawthorne Avenue to enhance pedestrian safety. The segment near 30th Street would remain open to serve the Providence Pavilion entrance and an adjacent commercial property that is not part of the proposed project. ~~The closure would require AC Transit to re-route the 59 line.~~

Impact TRANS-27 is revised as follows:

Impact TRANS-27: Summit Street Closure Conflicts with AC Transit Line 59. (Significant)

~~AC Transit operates a~~ AC Transit has discontinued Line 59/59A, the bus route that formerly operated along Broadway and transitioned to Summit Street to serve the project site, as of March 28, 2010, as part of major service changes unrelated to the project. Once Summit Street is closed, the route will no longer be able to use Summit Street, should AC Transit decide at a later date to rehabilitate this route. This impact is considered significant.

Mitigation Measure TRANS-27: Develop a contingency plan for re-routing ~~Re-route~~ line 59/59A from Summit Street (between 30th Street and Hawthorne Avenue) to Webster Street that ~~This measure would~~ allow AC Transit to provide service ~~continue~~ to the project site. This contingency plan should include relocation of potential bus stops, bus shelters and way-finding signage for passengers.

Significance after Mitigation: Less than Significant.

February 3, 2010

Scott Gregory
Contract Planner
c/o Gary Patton
Deputy Director of Planning and Zoning
City of Oakland
Community & Economic Development Agency
Planning Division
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612
sgregory@lamphier-gregory.com

SUBJECT: Comments on the Draft Environmental Impact Report (DEIR) for Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan Project, Case No. ER 09-001

Dear Mr. Gregory:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Alta Bates Summit Medical Center (ABSMC), Summit Campus Seismic Upgrade and Master Plan Project. Phase 1 of the project includes the demolition of the existing Bechtel Hall building with classroom space and vacant student dormitories and three other small buildings and associated surface parking lots on the campus, followed by construction of a new 230,000 square foot, 11-story, acute care hospital plus a new approximately 1,067 space, 7-level parking garage. Future phases include longer-term campus-wide improvements including a new medical office building along Summit Street, a new Samuel Merritt University classroom expansion building on Elm Street, a fitness center, and closure of a portion of Summit Street between 30th Street and Hawthorne Avenue to create a new campus plaza. The 20.4 acre project site includes the ABSMC Summit Campus, generally located between Telegraph Avenue and Webster Street, and between 30th Street and 34th Street, Oakland.

The ACCMA respectfully submits the following comments:

- Transportation-Related Impacts, p. 4-3-44, #2) The Alameda County Congestion Management Agency (ACCMA)'s required Congestion Management Program (CMP) analysis does not have a standard for roadway level of service as it applies to the Land Use Analysis Program. The ACCMA does not have a policy for

↓
C-1
↓

Mr. Scott Gregory
Page 2

determining a threshold of significance. References to ACCMA level of service or other significance criteria standards should be deleted. Rather, it is expected that professional judgment will be applied to determine project level impacts. Also, please note that even though a roadway is operating at LOS F, this does not preclude the project from identifying feasible mitigation for those routes.

↑
C-1
cont.

Thank you for the opportunity to comment on this DEIR. Please do not hesitate to contact me at 510.836.2560 if you require additional information.

Sincerely,

Diane Stark
Senior Transportation Planner

file: CMP - Environmental Review Opinions - Responses - 2010

Letter C Response – Alameda County Congestion Management Agency (ACCMA)

- C-1: The City recognizes that the ACCMA does not have a significance threshold. The significance criteria used in the DEIR (pages 4.3-44 to 4.3-46) were established by the City of Oakland’s CEQA Thresholds / Criteria of Significance Guidelines to determine if a project has an impact on ACCMA facilities. The EIR did not intend to imply that these significance criteria have been established by ACCMA. These criteria have been established by City of Oakland to ensure that all projects in the City are analyzed in a consistent manner.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

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February 3, 2010

ALA580849
ALA-580-44.79
SCH#2009012067

Mr. Scott Gregory
City of Oakland
Community and Economic Development Agency
Planning and Zoning Services Division
250 Frank H. Ogawa Plaza, Suite 3300
Oakland, CA 94612

Dear Mr. Gregory:

**Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan –
Draft Environmental Impact Report**

Thank you for including the California Department of Transportation (Department) in the environmental review process for the Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan. The following comments are based on the Draft Environmental Impact Report (DEIR).

Highway Operations

On page 4.3-62, the DEIR indicates that the level of service (LOS) at Intersections 6, 41, and 50 will not worsen further since they already operate at LOS F. However, the proposed project will increase the volume to capacity ratio (V/C) to unacceptable saturation levels. Please provide additional mitigation measures to address these impacts.

D-1

On page 4.3-24, the DEIR indicates that the freeway mainline already operates at LOS F. However, the proposed project would contribute and increase delays at these freeway segments. The Department recommends the City of Oakland develop a regional transportation impact fee (RTIF) program to mitigate the impacts of future growth on regional corridors. These fair share fees would be used to fund regional transportation programs that add capacity and/or improve efficiency to the transportation system and reduce delays.

D-2

Comment Letter D

Sent By: CALTRANS TRANSPORTATIO PLANNING; 510 286 5560;

Feb-2-10 2:34PM;

Page 2/2

Mr. Scott Gregory/ City of Oakland
February 3, 2010
Page 2

Should you have any questions regarding this letter, please call Yatman Kwan of my staff at (510) 622-1670.

Sincerely,



LISA CARBONI
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

"Caltrans improves mobility across California"

Letter D Responses – California Department of Transportation (Caltrans)

- D-1: The DEIR does not state that conditions at the cited intersections would not worsen due to increased traffic volumes generated by the proposed project. The DEIR identifies significant impacts and mitigation measures for Intersection #6 (page 4.3-65), Intersection #41 (pages 4.3-72 and 4.3-73), and Intersection #50 (page 4.3-75). The mitigation measures call for signal timing optimization to address the expected changes to traffic patterns through the intersection, and signal coordination with adjacent signals in the coordination group to ensure efficient traffic flow within the group.
- D-2: The page of the DEIR cited in the comment is the second page of text (started on page 4.3-21) in the Setting that describes the results of the most recent level of service (LOS) monitoring based on peak-period travel time surveys, conducted by the Alameda County Congestion Management Agency (ACCMA). Analysis of potential freeway impacts associated with the proposed project, based on vehicle density (presented on pages 4.3-77 to 4.3-80), shows that project traffic would not cause any mainline segments to worsen from an acceptable LOS to an unacceptable LOS, and while the project would contribute to some unacceptable LOS conditions that are expected to occur in 2035 without or with the proposed project, the project traffic would represent an increase in traffic volume that would not be perceived by the average motorist. However, the City of Oakland residents, through passage of Measure B, support measures to construct regional transportation improvements including freeway projects. Development of a regional transportation impact fee program would require close coordination with other local, county, and regional agencies, and a more appropriate venue for such a discussion would be through the ACCMA or the Metropolitan Transportation Commission. The issue is beyond the scope of this project and the analysis in the DEIR.

Scott Gregory

From: Barton Mayhew [bmayhew03@yahoo.com]
Sent: Monday, February 01, 2010 10:24 PM
To: sgregory@lamphier-gregory.com
Cc: harrioak@yahoogroups.com; harpo@yahoogroups.com; NNadel@oaklandnet.com; cstarks@oaklandnet.com
Subject: OAKLAND SUMMIT EIR / TRAFFIC IMPACT MITIGATION

Mr. Gregory, I have recently received the EIR re Oakland Summit project. I seek advice regarding opportunity to address oversight in this review. There is absence of any mitigation for the significant traffic impact upon our community: Exceptional *addition of vehicle traffic expected to impact our streets*, especially 29th Street, connecting the overused neighborhood streets, Harrison and Oakand Avenue, and a major artery, Broadway. A \$200,000. study/draft "plan" was concluded this past week - which should be of interest to any and all responsible for the results of this Summit EIR. **No passage of the EIR should be allowed** until there is evaluation of the updated, and startling increases of traffic volume here. It would be major negligence to not incorporate mitigation requirements within the Summit EIR. The Caltrans-City of Oakland sponsored Harrison-Oakland Avenue Study (coordinated by Oakland Community Economic Development Agency Planners) accentuates a need for local and state officials to be accountable. Your advice is sought. Are the right and left hands of government connected in Oakland, or California? Should a \$200,000. Study be wasted?!

E-1
E-2

Respectfully, Barton Mayhew, on behalf of the Harrioak Neighborhood Association Traffic Committee.

Letter E Responses – Harrioak Neighborhood Association Traffic Committee (Barton Mayhew)

E-1: See Master Response C, *Traffic and Pedestrian Concerns in the Vicinity of Oakland Avenue and Harrison Street*.



February 2, 2010

Scott Gregory
Lamphier Gregory
Re: Summit/Alta Bates project

Dear Mr. Gregory,

Oakland Heritage Alliance finds that the DEIR is inadequate and insufficient in addressing potential reuse of older buildings now in the area. We request further work to address alternatives that would incorporate extant historic buildings in the Summit Hospital project area into the project design. It seems to us that there has been insufficient attempt to integrate the development's design into the surrounding neighborhood.

F-1

In particular, the property discussed at the meeting, at 418 30th Street, seems a good prospect for reuse, as it is currently in use for medical offices and shows up on the plans as an area proposed for medical offices again. It is worth investigating whether some of the other older buildings such as those on Elm might be reused as well, or perhaps relocated within the area, to give some visual variety and relief from the very large structures planned.

F-2

Surely with a little creative thinking the modestly-sized and handsome 30th Street property can be incorporated and help the project turn a face toward the neighborhood. One risk of "campus" style development is that many medical campuses turn their backs on the surrounding area. This project is not sufficiently integrated with Broadway, Webster St., and in its proposal to shut off through traffic may not address very well the ongoing use of the neighborhood by people who are not necessarily connected with the medical facility.

We look forward to seeing an improved EIR with some alternatives that address historic preservation in a more complete way.

Thank you,

Sincerely,

Naomi Schiff
Oakland Heritage Alliance, Preservation Committee

Letter F Responses – Oakland Heritage Alliance

- F-1: CEQA Guidelines Section 15064.5 does not require reuse of older buildings. Nor does the City of Oakland require reuse of older buildings. However, consistent with the requirements of CEQA, the DEIR provides a comprehensive assessment of historic resources in the project area to assess whether the project would adversely affect any historic resources as defined for CEQA. This is presented in Sections 4.7.2 and 4.7.4 of the DEIR. Overall, comments regarding the project's integration into the surrounding neighborhood address the design merits of the project, including the potential to relocate older buildings to provide visual relief and variety, which the City will consider prior to taking action on the EIR and the proposed project.
- F-2: See Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document, to address comments regarding that property. Overall, comments regarding the project's integration into the surrounding neighborhood address the design merits of the project, including the potential to relocate older buildings to provide visual relief and variety, which the City will consider this prior to taking action on the EIR and the proposed project.

The Law Offices of Gloria D. Smith

48 Rosemont Place
San Francisco, CA 94103
(415) 308-9124
gloria@gsmithlaw.com

February 3, 2010

Mr. Scott Gregory
Contract Planner (ER 09-0001)
sgregory@lamphier-gregory.com

**Re: Preliminary Comments on the Alta Bates Summit Medical Center, Summit Campus
DEIR (Clearing House No. 20090112067)**

Dear Mr. Gregory:

On behalf of the California Nurses Association/National Nurses Organizing Committee (“CNA”), this letter provides preliminary comments on the Alta Bates Summit Medical Center Summit Campus DEIR (“Project”). These comments are preliminary as CNA understands that the public and various local agencies have expressed concern regarding some aspects of the Project. Should the City of Oakland provide additional information regarding the Project, or modify the Project in any way, CNA reserves the right to supplement its comments as the Project moves through the CEQA process.

CNA’s preliminary comments are comprised of three expert letters from Mr. Tom Brohard, Mr. Matt Hagemann, and Dr. Petra Pless. The technical comments of each of these experts along with their *curriculum vitae* are attached here.

Sincerely,



Gloria D. Smith

GDS/vl
Attachments



Technical Consultation, Data Analysis and
Litigation Support for the Environment

3110 Main Street, Suite 205
Santa Monica, California 90405
Fax: (949) 717-0069

Matt Hagemann
Tel: (949) 887-9013
Email: mhagemann@swape.com

February 2, 2010

Gloria D. Smith
The Law Offices of Gloria D. Smith
48 Rosemont Place
San Francisco CA 94103

**Subject: Preliminary Comments on the Alta Bates Medical Center Summit
Campus Seismic Upgrade**

Dear Ms. Smith:

We have reviewed the December 2009 Alta Bates Medical Center Summit Campus Seismic Upgrade and Master Plan Draft Environmental Impact Report (DEIR). The proposed project, located in Oakland, California, would develop the existing 20.4-acre ABSMC Summit Campus (project site) by demolishing an existing medical office and classroom and constructing an 11-story hospital tower, a parking structure, a medical office building, a fitness center, and facilities for Samuel Merritt University.

PRELIMINARY COMMENTS

- 1. Undisclosed hydrocarbon soil contamination at the project site may be a source of groundwater contamination and may pose risks to worker health**

For our review of the DEIR we obtained files from the Alameda County Department of Health website¹ for the property at 365 Hawthorne Ave., Oakland, California. This address is part of the area being considered for the project which is generally bounded by 30th Street, Telegraph Avenue, 34th Street, and Webster Street (DEIR, p. 1-1).

G-1
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¹ <http://www.acgov.org/aceh/lop/findsite.htm>

The property at 365 Hawthorne Street was the subject of a closure report² written by the Alameda County Environmental Health on August 29, 1994 for the removal of a 400-gallon underground storage tank used for heating oil (Attachment 1). The tank was removed in June 1989. In October 1989, a pit where the underground storage tank had been located was excavated to a depth of 24 feet, removing approximately 90 cubic yards of contaminated soil.

The County’s closure report documents contamination at the project site in soil at concentrations above action levels established by the San Francisco Bay Regional Water Quality Control Board (RWQCB) to protect groundwater resources.³ The report documents the removal of the 400 gallon heating oil underground tank and residual contamination, as follows:

“The pit was overexcavated to 24’ depth, removing most of the contaminated soil. A small pocket of residual contamination remains at 24-26’ depth.” (p. 3)

The report documents total petroleum hydrocarbons (TPH) at the following concentrations (p. 3):

TPH (diesel)
Before excavation: 4,600 ppm
After excavation: 2,000 ppm

TPH (kerosene)
Before excavation: 1,900 ppm
After excavation: NA

The RWQCB environmental screening level (“ESL”) concentration for diesel and kerosene (middle distillates) in deep soils where groundwater is a source of drinking water is 83 mg/kg.⁴ Groundwater is identified as a potential source of drinking water in the area of the project.⁵ At the time of site closure, in 1989, the RWQCB had not yet established ESLs. According to the RWQCB, contamination above this ESL warrants further evaluation (including the residual diesel concentrations at the project site) to ensure protection of groundwater resources.⁶

The County’s 1989 closure report concludes:

² Remedial Action Completion Certification, 365 Hawthorne Ave., Oakland, CA, August 29, 1994, Alameda County Health Care Services Agency

³ Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater. California Regional Water Quality Control Board San Francisco Bay Region. Interim Final November 2007, Revised May 2008. http://www.swrcb.ca.gov/rwqcb2/water_issues/available_documents/ESL_May_2008.pdf

⁴ Ibid., Summary Table 3

⁵ Existing and Potential Beneficial Uses in Groundwater in Identified Basins. http://www.swrcb.ca.gov/rwqcb2/water_issues/programs/planningtmdls/basinplan/web/tab/tab_2-02.pdf

⁶ Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater. California Regional Water Quality Control Board San Francisco Bay Region. Interim Final November 2007, Revised May 2008. http://www.swrcb.ca.gov/rwqcb2/water_issues/available_documents/ESL_May_2008.pdf, p. 1-

G-1
cont.

“Should corrective action be reviewed if land use changes? YES.”

The DEIR did not mention this report nor was it disclosed in any of the DEIR’s supporting documentation. Finally, the DEIR omitted consideration of the County Environmental Health recommendation to review corrective action if land use were to change. The DEIR states only, with respect to the heating oil underground storage tank at 365 Hawthorne Ave:

This site that had a reported diesel leak that was remediated through excavation and offsite disposal of soils. The case was CLOSED in 1994. (DEIR, p. 4.9-4).

No mitigation measures in the DEIR consider the known contamination beneath the project site at 365 Hawthorne Ave. The DEIR only states in Mitigation Measure HAZ-1 (DEIR, p. 4.9-11):

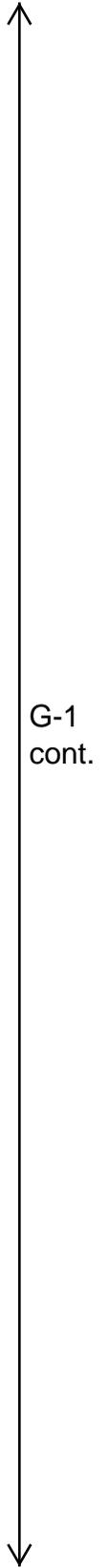
If soil, groundwater or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums or other hazardous materials or wastes are encountered), the applicant shall cease work in the vicinity of the suspect material, the area shall be secured as necessary, and the applicant shall take all appropriate measures to protect human health and the environment. Appropriate measures shall include notification of regulatory agency(ies) and implementation of the actions described in the City’s Standard Conditions of Approval, as necessary, to identify the nature and extent of contamination.

Mitigation Measure HAZ-2 states (DEIR, p. 4.9-12):

Prior to the issuance of demolition, grading or building permit the project applicant shall submit plans for site review and approval to the Fire Prevention Bureau Hazardous Materials Unit. Property owner may be required to obtain or perform a Phase II hazard assessment.

A Phase II hazard assessment involves the collection of samples to determine the extent of contamination and the potential for any sources of contamination to remain at a site. Because contamination is known to exist at the project site, and because the contamination was not acknowledged in the DEIR, the Phase II should be done now, not later as planned. Waiting as the DEIR recommends may unnecessarily put workers at risk of exposure to hazardous materials. The DEIR should be revised once it obtains the results of a Phase II report and then include all necessary protective mitigation measures to ensure construction worker safety and the safety of future hospital workers and patients.

Further, the existing mitigation measures in the DEIR are inadequate and do not fully address the residual contamination at the project site by failing to acknowledge:



1. contamination is known to exist at concentrations that exceed the RWQCB ESLs;
2. contamination above ESLs warrant further investigation; and
3. the County's closure plan stated that the 1989 corrective action should be revisited if land use were to change.

The DEIR should be revised to investigate and document the current extent of the ESL exceedences, and to include the results of a Phase II investigation, to incorporate sampling as recommended in the ESL guidance.⁷ The RWQCB ESL guidance recommends that the following compounds be sampled and evaluated when evaluating TPH diesel and kerosene contamination, broadly classified as "middle distillates":

Monocyclic Aromatic Compounds (primarily gasolines and middle distillates)

- benzene
 - ethylbenzene
 - toluene
 - xylene
- Fuel additives (primarily gasolines)
- MtBE
 - other oxygenates as necessary

Polycyclic Aromatic Compounds (primarily middle distillates and residual fuels)

- methylnaphthalene (1 - and 2 -)
- acenaphthene
- acenaphthylene
- anthracene
- benzo(a)anthracene
- benzo(b)fluoranthene
- benzo(g,h,i)perylene
- benzo(a)pyrene
- benzo(k)fluoranthene
- chrysene
- dibenz(a,h)anthracene
- fluoranthene
- fluorene
- indeno(1,2,3 - c,d)pyrene
- naphthalene
- phenanthrene
- pyrene

We recommend a program to sample soil in the vicinity of the TPH-d soil contamination to ensure protection of underlying groundwater resources and the health of construction

⁷ Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater. California Regional Water Quality Control Board San Francisco Bay Region. Interim Final November 2007, Revised May 2008, p. 1-1

G-1
cont.

workers and future hospital workers and patients. Sampling should be conducted under the oversight of Alameda County Environmental Health to ensure the adequacy of the sampling program and to gain regulatory approval for any contamination that may be identified in soil and groundwater beneath the project site.

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G-1
cont.
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2. Removal of existing underground storage tanks may pose a risk to workers

Four underground storage tanks are currently located at the project site at two locations. West of the “West Wing” a 12,000-gallon diesel underground storage tank is used for fueling emergency generators. South of the proposed Phase 2 South Wing, three 10,000-gallon USTs are also used for fuel storage (DEIR, p. 4.9-4). The DEIR states that removal of all of the underground storage tanks may be required upon project construction (DEIR, p. 4.9-8).

G-2

These existing fuel storage tanks may be subject to leaks and spills. Sampling will likely be necessary when these facilities are demolished. The demolition of the current fuel storage facilities will require the oversight of Alameda County Environmental Health to ensure that soil or groundwater contamination is not associated with the underground storage tanks. The DEIR should be revised to document that Alameda County Environmental Health has been notified and to include plans for soil sampling if contamination is encountered during excavation.

3. Asbestos-containing material has not been adequately addressed

Several buildings, possibly containing asbestos materials will be demolished in association with project construction (DEIR, p. 4.915). The DEIR provides for mitigation in AIR-3 as follows (p. 4.4-10):

Prior to issuance of a demolition permit. If asbestos-containing materials (ACM) are found to be present in building materials to be removed, demolished and disposed, the Project Applicant shall submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health & Safety Code 25915-25919.7; and Bay Area Air Quality Management District, Regulation 11, Rule 2, as may be amended.

G-3

This mitigation is inadequate. Asbestos is a deadly pollutant. The DEIR must fully identify any potential presence of asbestos in the buildings well before demolition activities begin in order to ensure worker safety, consistent with agency regulations and guidance. For example, the Bay Area Air Quality Management District (BAAQMD) has identified procedures for handling asbestos during demolition in order to control

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emissions of asbestos and to ensure appropriate waste disposal.⁸ The DEIR, in mitigation measure AIR-3, only identifies the BAAQMD regulation, but does not include the specific requirements of the regulation, such as

- an estimate of the approximate amount of regulated asbestos-containing material to be removed from the structures in terms of length of pipe in linear feet, surface area in square feet, or volume in cubic feet;
- a listing of the procedures used, including the analytical laboratory methods, to locate and identify the presence of asbestos-containing material; and
- a description of the procedures to be followed in the event that unexpected asbestos-containing material is found.

G-3
cont.

This potentially significant impact and any proposed mitigation measures must be fully disclosed in the DEIR. The DEIR should be revised to fully evaluate the extent of the asbestos-containing material at the project site, consistent with BAAQMD Regulation 11, Rule 2. If asbestos is found through this evaluation, an abatement plan must be prepared to describe activities and procedures for removal, handling, and disposal of asbestos containing materials using the most protective procedures, work practices, and engineering controls.

The project may pose significant risks to worker safety from asbestos during demolition. The DEIR did not include adequate analysis of this impact or identify appropriately protective mitigation. A revised DEIR should include all feasible mitigation measures to safeguard the health of workers and nearby residents.

Sincerely,



Matt Hagemann, P.G.

⁸ Bay Area Air Quality Management District, Regulation 11 Hazardous Pollutants Rule 2 Asbestos Demolition, Renovation and Manufacturing. October 7, 1998.
<http://www.baaqmd.gov/dst/regulations/rg1102.pdf>

Attachment 1

Remedial Action Completion Certification, 365 Hawthorne Ave., Oakland, CA, August 29, 1994, Alameda County Health Care Services Agency



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4320

REMEDIAL ACTION COMPLETION CERTIFICATION

StID 4474 - 365 Hawthorne Ave, Oakland 94609

August 29, 1994

Mr. Frank Clemens
Merritt Hospital, Cardio-Pulmonary
350 Hawthorne Ave
Oakland, CA 94609

Dear Clemens:

This letter confirms the completion of site investigation and remedial action for the 400 gallon home heating fuel tank removed from the above site on June 12, 1989.

Based upon the available information and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground tank release is required.

This notice is issued pursuant to a regulation contained in Title 23, Division 3, Chapter 16, Section 2721(e) of the California Code of Regulations. Please contact Ms. Eva Chu at (510) 567-6700 if you have any questions regarding this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Rafat A. Shahid'.

Rafat A. Shahid
Assistant Agency Director

cc: Edgar B. Howell, Chief, Hazardous Materials Division
Kevin Graves, RWQCB
Mike Harper, SWRCB (with attachment)
files (merritt.2)

ALCO
HAZMAT
CASE CLOSURE SUMMARY
Leaking Underground Fuel Storage Tank Program
94 AUG 26 PM 3:50

I. AGENCY INFORMATION

Date: August 18, 1994

Agency name: Alameda County-HazMat Address: 1131 Harbor Bay Pkwy
City/State/Zip: Alameda, CA 94502 Phone: (510) 567-6700
Responsible staff person: Eva Chu Title: Hazardous Materials Spec.

II. CASE INFORMATION

Site facility name: Merritt Hospital, Cardio Pulmonary
Site facility address: 365 Hawthorne Ave, Oakland 94609
RB LUSTIS Case No: N/A Local Case No./LOP Case No.: 4474
URF filing date: 6/20/89 SWEEPS No: N/A

<u>Responsible Parties:</u>	<u>Addresses:</u>	<u>Phone Numbers:</u>
Merritt Hosp, Cardio Pulmonary Attn Frank Clemens, Admin.	350 Hawthorne Ave Oakland, CA 94609	(510) 420-6072

<u>Tank No:</u>	<u>Size in gal.:</u>	<u>Contents:</u>	<u>Closed in-place or removed?:</u>	<u>Date:</u>
1	400	Home heating oil	Removed	6/12/89

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and type of release: Unknown, possible overfilling
Site characterization complete? YES
Date approved by oversight agency: August 12, 1994
Monitoring Wells installed? No Number:
Proper screened interval? NA
Highest GW depth below ground surface: Lowest depth:
Flow direction:
Most sensitive current use: Unknown
Are drinking water wells affected? No Aquifer name:
Is surface water affected? No Nearest affected SW name:
Off-site beneficial use impacts (addresses/locations): None
Report(s) on file? YES Where is report(s) filed? Alameda County
1131 Harbor Bay Pkwy
Alameda, CA 94502

Comment Letter G

Treatment and Disposal of Affected Material:

<u>Material</u>	<u>Amount (include units)</u>	<u>Action (Treatment or Disposal w/destination)</u>	<u>Date</u>
Tank Piping	1 UST	Disposed by Erickson	6/18/89
Free Product	240 gal rinsate	Bayside Oil, Santa Cruz	6/13/89
Soil	90 cy	Chem Waste, Kettleman City	10/12/89
Groundwater Barrels			

Maximum Documented Contaminant Concentrations - - Before and After Cleanup

Contaminant	Soil (ppm)		Water (ppb)	
	Before	After	Before	After
TPH (Gas)				
TPH (Diesel)	4,600	2,000		
Benzene	NA	NA		
Toluene	NA	NA		
Ethylbenzene	NA	NA		
Xylenes	NA	NA		
Oil & Grease				
Heavy metals				
Other TPH-kerosene	1,900	NA		

Comments (Depth of Remediation, etc.):

The pit was overexcavated to 24' depth, removing most of the contaminated soil. A small pocket of residual contamination remains at 24-26' depth.

IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? **YES**

Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? **YES**

Does corrective action protect public health for current land use? **YES**

Site management requirements: **None**

Should corrective action be reviewed if land use changes? **YES**

Monitoring wells Decommissioned: **NA**

Number Decommissioned: **NA** Number Retained:

List enforcement actions taken: **None**

List enforcement actions rescinded: **None**

V. LOCAL AGENCY REPRESENTATIVE DATA

Name: Eva Chu Title: Haz Mat Specialist

Signature: *Eva Chu* Date: 8/18/94

Reviewed by

Name: Barney Chan Title: Haz Mat Specialist

Signature: *Barney Chan* Date: 8/18/94

Name: Tom Peacock Title: Supervising HMS

Signature: *Tom Peacock* Date: 8-18-94

VI. RWQCB NOTIFICATION

Date Submitted to RB: 8/19/94 RB Response: *Approved*

RWQCB Staff Name: Kevin Graves Title: AWRCE

Signature: *Kevin Graves* Date: 8/24/94

VII. ADDITIONAL COMMENTS, DATA, ETC.

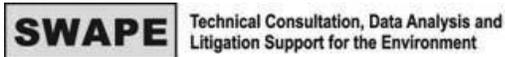
On June 12, 1989 a 400 gallon home heating fuel UST was removed. A soil sample collected "showed high levels of contamination at the bottom of the excavation." Laboratory analytical results were not provided.

Three soil borings were advanced through and around the former tank pit to delineate the vertical and lateral extent of soil contamination due to the unauthorized fuel release at the site. The northwest boring exhibited 2,900, 4,600, and 4,200 ppm TPH-D at 11, 16, and 21' depth, respectively. Soil contamination was not detected at 26' depth.

In October 1989 the pit was overexcavated to a depth of 24', removing approximately 90 cy of contaminated soil. Confirmatory soil samples collected at 24.5' depth exhibited 2,000 ppm TPH-D. The pit has been backfilled with clean fill material.

The former heating fuel tank serviced a private residential home. The house was relocated when Merritt Hospital purchased the property to construct a medical office building. The site is located on top of a moderately steep hill. Groundwater is believed to be in excess of 50' depth. Currently, remediation policy pertaining to home heating fuel tanks is to remove to the extent possible any obviously contaminated soil. Residual contaminated soil at 24-26' depth does not pose a significant risk to human health. It does not appear this contamination has migrated beyond 26' depth, as soil samples collected from 26', 31', and 35' depths did not detect levels of TPH-D or kerosene. Potential impact to groundwater appears to be minimal. A groundwater monitoring well is not warranted.

(merritt.1)



2503 Eastbluff Dr.
Suite 206
Newport Beach, California 92660
Tel: (949) 887-9013
Fax: (949) 717-0069
Email: mhagemann@swape.com

Matthew F. Hagemann, P.G.

**Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Regulatory Compliance
CEQA Review
Expert Witness**

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certification:

California Professional Geologist, License Number 8571.

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Senior Environmental Analyst, Komex H2O Science, Inc (2000 -- 2003);
- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);

- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Lead analyst in the review of numerous environmental impact reports under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions and geologic hazards.
- Lead analyst in the review of environmental issues in applications before the California Energy Commission.
- Technical assistance and litigation support for vapor intrusion concerns.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of

wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.
- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.

- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Pless Environmental, Inc.

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petra@ppless.com

January 29, 2010

Gloria D. Smith
The Law Offices of Gloria D. Smith
48 Rosemont Place
San Francisco, CA 94103

Re: Comments on Draft Environmental Impact Report for Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, Oakland, CA

Dear Ms. Smith,

Per your request, I have reviewed the Draft Environmental Impact Report (“Draft EIR”) for the Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan (“Project”)¹ for potential impacts on air quality and public health and welfare. My findings are summarized below.

My qualifications as an environmental expert include a doctorate in Environmental Science and Engineering (“D. Env.”) from the University of California Los Angeles. In my professional practice, I have reviewed and commented on hundreds of CEQA documents including several hospitals. My résumé is attached to this letter.

In general, the Draft EIR’s air quality section is fairly well-documented. However, the content and language of the proposed mitigation to address significant impacts from emissions of criteria air pollutants and greenhouse gases should be improved. To the maximum extent feasible, the City must reduce the Project’s significant emissions, and guarantee implementation of all feasible mitigation measures.

The Draft EIR finds that the Project would result in significant impacts due to cumulative considerable emissions of criteria air pollutants and greenhouse gases.² These significant emissions are mostly attributable to vehicle emissions (83%), indirect electricity consumption (11%), and space and water heating (6%).³ According to the Draft EIR, these air quality impacts will conflict with applicable plans, policies, or

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¹ City of Oakland, Draft Environmental Impact Report, Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, SCH # 2009012067, December 2009.

² Draft EIR, p. 2-4.

³ Estimates of CO₂-equivalent emissions at buildout based on Draft EIR, Table 4.4-8, p. 4.4-49.

regulations adopted for reducing greenhouse gas emissions.⁴ As mitigation for these impacts, the Draft EIR proposes to implement a transportation measure to signalize the Telegraph Avenue/Hawthorne intersection (Mitigation Measure TRANS-1). It also vaguely requires review and approval by the Planning and Zoning Division a Greenhouse Gas Emissions Reduction Plan (“GHG Plan”) to reduce criteria pollutant and greenhouse gas emissions to the greatest extent feasible (Mitigation Measure AIR-8 and Mitigation Measures AIR-6 and AIR 9 citing to Mitigation Measure AIR-8).⁵ Mitigation Measure AIR-8 specifies that the GHG Plan shall include but not be limited to, measures recommended in the Final Draft CEQA Guidelines published by the Bay Area Air Quality Management District (“BAAQMD”) in November 2009 and the Green Guide for Health Care. While this mitigation measure is well-intended and commendable, its effectiveness and successful implementation is questionable.

Rather than deferring the development of the GHG Plan to the future and thereby removing it from public review, the Draft EIR should be revised to contain a detailed GHG Plan that specifies each measure to be implemented and discusses why other measures proposed in the BAAQMD’s Final Draft CEQA Guidelines, the Green Guide for Health Care, and other documents, *e.g.*, the Attorney General’s recommendations for reducing GHG emissions and the documents cited therein⁶, are not feasible.

Measures that are feasible for this Project and should be required in the GHG Plan include, but are not limited to:

- Surpass California Title 24 energy efficiency building code by at least 15%.
- Install energy-efficient lighting (*e.g.*, light emitting diodes, heating and cooling systems, appliances, equipment and control systems.
- Use passive solar design, *e.g.*, orient buildings and incorporate landscaping to maximize passive solar heating during cool seasons, minimize solar heat gain during hot seasons, and enhance natural ventilation. Design buildings to take advantage of sunlight.
- Install efficient lighting, (including LEDs) for traffic, street and other outdoor lighting.
- Install light colored “cool” roofs and cool pavements.

⁴ Draft EIR, p. 2-4.

⁵ Draft EIR, pp. 2-29 – 2-30 and p. 4.4-53.

⁶ California Attorney General’s Office, Addressing Climate Change at the Project Level, Rev. January 6, 2010; http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf.



G-4
cont.

- Install solar panels on unused roof and ground space and over carports and parking areas.
- Provide easy and convenient recycling opportunities.
- Use combined heat and power to capture waste heat.
- Use only adhesives, sealants, paints and coatings with volatile organic compound (“VOC”) content of South Coast Air Quality Management District (SCAQMD) Rule #1168 and Rule #1113 limits.
- Obtain ENERGY STAR certification.
- Obtain LEED or Build It Green’s GreenPoint certification.

The Attorney General’s office recommends that “[i]f, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing greenhouse gas-related impacts, the lead agency determines that additional mitigation is required, the agency may consider additional off-site mitigation. The project proponent could, for example, fund off-site mitigation projects that will reduce carbon emissions, conduct an audit of its other existing operations and agree to retrofit, or purchase verifiable carbon “credits” from another entity that will undertake mitigation.

- Offsite mitigation measures that could be funded through mitigation fees include, but are not limited to, the following:
- Energy efficiency audits of existing buildings.
- Energy efficiency upgrades to existing buildings not otherwise required by law, including heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization (perhaps targeted to specific communities, such as low-income or senior residents).
- Programs to encourage the purchase and use of energy efficient vehicles, appliances, equipment and lighting.
- Programs that create incentives to replace or retire polluting vehicles and engines.
- Programs to expand the use of renewable energy and energy storage.
- Preservation and/or enhancement of existing natural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.
- Improvement and expansion of public transit and low- and zero-carbon transportation alternatives.”⁷



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cont.

⁷ *Ibid.*

Comment Letter G

Pless, Comments on Draft Environmental Impact Report for Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, Oakland, CA, January 29, 2010

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I recommend that the GHG Plan not be improperly deferred and the Draft EIR be revised to include such a plan that discusses the feasibility and applicability of the above cited sources. This would provide the City of Oakland and the public with the opportunity to review a comprehensive mitigation plan and potentially provide additional input.

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cont.

Sincerely,

A handwritten signature in black ink, appearing to read "Petra Pless". The signature is written in a cursive, flowing style with a large loop at the top.

Dr. Petra Pless

Enclosure

Petra Pless, D.Env.

440 Nova Albion Way
San Rafael, CA 94903
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Dr. Pless has over 10 years of experience in environmental consulting conducting and managing interdisciplinary environmental research projects and preparing and reviewing environmental permits and other documents for U.S. and European stakeholder groups. This broad-based experience includes air quality and air pollution control; water quality, water supply, and water pollution control; biology; public health and safety; and noise studies. National Environmental Policy Act (“NEPA”), California Environmental Quality Act (“CEQA”), and Clean Air Act (“CAA”) review; industrial ecology and risk assessment; and use of a wide range of environmental software.

EDUCATION

Doctorate in Environmental Science and Engineering (D.Env.), University of California, Los Angeles, 2001

Master of Science in Biology, Technical University of Munich, Germany, 1991

PROFESSIONAL HISTORY

Pless Environmental, Inc., Principal, 2008–present

Environmental consultant, Sole Proprietor, 2006–2008

Leson & Associates (previously Leson Environmental Consulting), Kensington, CA,
Environmental Scientist/Project Manager, 1997–2005

University of California Los Angeles, Graduate Research Assistant/Teaching Assistant, 1994–1996

ECON Research and Development, Environmental Scientist, Ingelheim, Germany, 1992–1993

Biocontrol, Environmental Projects Manager, Ingelheim, Germany, 1991–1992

REPRESENTATIVE EXPERIENCE

Air Quality and Pollution Control

Projects include CEQA/NEPA review; attainment and non-attainment new source review (“NSR”), prevention of significant deterioration (“PSD”) and Title V permitting; control technology analyses (BACT, LAER, RACT, BARCT, MACT); technology evaluations and cost-effectiveness analyses; criteria and toxic pollutant emission inventories; emission offsets; ambient

and source monitoring; analysis of emissions estimates and ambient air pollutant concentration modeling. Some typical projects include:

- Critically reviewed and prepared technical comments on the air quality, biology, noise, water quality, and public health and safety sections of CEQA/NEPA documents for numerous commercial, residential, and industrial projects (*e.g.*, power plants, airports, residential developments, retail developments, hospitals, refineries, slaughterhouses, food processing facilities, printing facilities, quarries, and mines).
- Critically reviewed and prepared technical comments on the air quality and public health sections of the Los Angeles Airport Master Plan (Draft, Supplement, and Final Environmental Impact Statement/Environmental Impact Report) for the City of El Segundo. Provided technical comments on the Draft and Final General Conformity Determination for the preferred alternative submitted to the Federal Aviation Administration.
- For several California refineries, evaluated compliance of fired sources with Bay Area Air Quality Management District Rule 9-10. This required evaluation and review of hundreds of source tests to determine if refinery-wide emission caps and compliance monitoring provisions were being met.
- Critically reviewed and prepared technical comments on Draft Title V permits for several refineries and other industrial facilities in California.
- Evaluated the public health impacts of locating big-box retail developments in densely populated areas in California and Hawaii. Monitored and evaluated impacts of diesel exhaust emissions and noise on surrounding residential communities.
- In conjunction with the permitting of several residential and commercial developments, conducted studies to determine baseline concentrations of diesel exhaust particulate matter using an aethalometer.
- For an Indiana steel mill, evaluated technology to control NO_x and CO emissions from fired sources, including electric arc furnaces and reheat furnaces, to establish BACT. This required a comprehensive review of U.S. and European operating experience. The lowest emission levels were being achieved by steel mills using selective catalytic reduction (“SCR”) and selective non-catalytic reduction (“SNCR”) in Sweden and The Netherlands.
- For a California petroleum coke calciner, evaluated technology to control NO_x, CO, VOCs, and PM₁₀ emissions from the kiln and pyroscrubbers to establish BACT and LAER. This required a review of state and federal clearinghouses, working with regulatory agencies and pollution control vendors, and obtaining and reviewing permits and emissions data from other similar facilities. The best-controlled facilities were located in the South Coast Air Quality Management District.
- For a Kentucky coal-fired power plant, identified the lowest NO_x levels that had been permitted and demonstrated in practice to establish BACT. Reviewed operating experience of European, Japanese, and U.S. facilities and evaluated continuous emission monitoring data. The lowest NO_x levels had been permitted and achieved in Denmark and in the U.S. in Texas and New York.
- In support of efforts to lower the CO BACT level for power plant emissions, evaluated the contribution of CO emissions to tropospheric ozone formation and co-authored report on same.

Petra Pless, D.Env.

- Critically reviewed and prepared technical comments on applications for certification (“AFCs”) for numerous natural-gas fired, solar, and geothermal power plants in California permitted by the California Energy Commission. The comments addressed construction and operational emissions inventories and dispersion modeling, BACT determinations for combustion turbine generators, etc.
- Critically reviewed and prepared technical comments on draft PSD permits for several natural gas-fired power plants in California, Indiana, and Oregon. The comments addressed emission inventories, greenhouse gas emissions, BACT, case-by-case MACT, compliance monitoring, cost-effectiveness analyses, and enforceability of permit limits.
- For a California refinery, evaluated technology to control NO_x and CO emissions from CO Boilers to establish RACT/BARCT to comply with BAAQMD Rule 9-10. This required a review of BACT/RACT/LAER clearinghouses, working with regulatory agencies across the U.S., and reviewing federal and state regulations and State Implementation Plans (“SIPs”). The lowest levels were required in a South Coast Air Quality Management rule and in the Texas SIP.
- In support of several federal lawsuits filed under the Clean Air Act, prepared cost-effectiveness analyses for SCR and oxidation catalysts for simple cycle gas turbines and evaluated opacity data.
- Critically reviewed draft permits for several ethanol plants in California, Indiana, Ohio, and Illinois and prepared technical comments.
- Reviewed state-wide average emissions, state-of-the-art control devices, and emissions standards for construction equipment and developed recommendations for mitigation measures for numerous large construction projects.
- Researched sustainable building concepts and alternative energy and determined their feasibility for residential and commercial developments, *e.g.*, regional shopping malls and hospitals.
- Provided comprehensive environmental and regulatory services for an industrial laundry chain. Facilitated permit process with the South Coast Air Quality Management District. Developed test protocol for VOC emissions, conducted field tests, and used mass balance methods to estimate emissions. Reduced disposal costs for solvent-containing waste streams by identifying alternative disposal options. Performed health risk screening for air toxics emissions. Provided permitting support. Renegotiated sewer surcharges with wastewater treatment plant. Identified new customers for shop-towel recycling services.
- Designed computer model to predict performance of biological air pollution control (biofilters) as part of a collaborative technology assessment project, co-funded by several major chemical manufacturers. Experience using a wide range of environmental software, including air dispersion models, air emission modeling software, database programs, and geographic information systems (“GIS”).

Water Quality and Pollution Control

Experience in water quality and pollution control, including surface water and ground water quality and supply studies, evaluating water and wastewater treatment technologies, and identifying, evaluating and implementing pollution controls. Some typical projects include:

- Evaluated impacts of on-shore oil drilling activities on large-scale coastal erosion in Nigeria.
- For a 500-MW combined-cycle power plant, prepared a study to evaluate the impact of proposed groundwater pumping on local water quality and supply, including a nearby stream, springs, and a spring-fed waterfall. The study was docketed with the California Energy Commission.
- For a 500-MW combined-cycle power plant, identified and evaluated methods to reduce water use and water quality impacts. These included the use of zero-liquid-discharge systems and alternative cooling technologies, including dry and parallel wet-dry cooling. Prepared cost analyses and evaluated impact of options on water resources. This work led to a settlement in which parallel wet dry cooling and a crystallizer were selected, replacing 100 percent groundwater pumping and wastewater disposal to evaporation ponds.
- For a homeowner's association, reviewed a California Coastal Commission staff report on the replacement of 12,000 linear feet of wooden bulkhead with PVC sheet pile armor. Researched and evaluated impact of proposed project on lagoon water quality, including sediment resuspension, potential leaching of additives and sealants, and long-term stability. Summarized results in technical report.

Applied Ecology, Industrial Ecology and Risk Assessment

Experience in applied ecology, industrial ecology and risk assessment, including human and ecological risk assessments, life cycle assessment, evaluation and licensing of new chemicals, and fate and transport studies of contaminants. Experienced in botanical, phytoplankton, and intertidal species identification and water chemistry analyses. Some typical projects include:

- For the California Coastal Conservancy, San Francisco Estuary Institute, Invasive Spartina Project, evaluated the potential use of a new aquatic pesticide for eradication of non-native, invasive cordgrass (*Spartina spp.*) species in the San Francisco Estuary with respect to water quality, biological resources, and human health and safety. Assisted staff in preparing an amendment to the Final EIR.
- Evaluated likelihood that measured organochlorine pesticide concentrations at a U.S. naval air station are residuals from past applications of these pesticides consistent with manufacturers' recommendations. Retained as expert witness in federal court case.
- Prepared human health risk assessments of air pollutant emissions from several industrial and commercial establishments, including power plants, refineries, and commercial laundries.
- Managed and conducted studies to license new pesticides. This work included the evaluation of the adequacy and identification of deficiencies in existing physical/chemical and health effects data sets, initiating and supervising studies to fill data gaps, conducting environmental fate and transport studies, and QA/QC compliance at subcontractor laboratories. Prepared licensing applications and coordinated the registration process with German licensing

agencies. This work led to regulatory approval of several pesticide applications in less than six months.

- Designed and implemented database on physical/chemical properties, environmental fate, and health impacts of pesticides for a major European pesticide manufacturer.
- Designed and managed toxicological study on potential interference of delta-9-tetrahydrocannabinol in food products with U.S. employee drug testing; co-authored peer-reviewed publication.
- Critically reviewed and prepared technical comments on applications for certification for several natural-gas fired, solar, and geothermal power plants and transmission lines in California permitted by the California Energy Commission. The comments addressed avian collisions and electrocution, construction and operational noise impacts on wildlife, risks from brine ponds, and impacts on endangered species.
- For a 180-MW geothermal power plant, evaluated the impacts of plant construction and operation on the fragile desert ecosystem in the Salton Sea area. This work included baseline noise monitoring and assessing the impact of noise, brine handling and disposal, and air emissions on local biota, public health, and welfare.
- Designed research protocols for a coastal ecological inventory; developed sampling methodologies, coordinated field sampling, determined species abundance and distribution in intertidal zone, and analyzed data.
- Designed and conducted limnological study on effects of physical/chemical parameters on phytoplankton succession; performed water chemistry analyses and identified phytoplankton species; co-authored two journal articles on results.
- Conducted technical, ecological, and economic assessments of product lines from agricultural fiber crops for European equipment manufacturer; co-authored proprietary client reports.
- Developed life cycle assessment methodology for industrial products, including agricultural fiber crops and mineral fibers; analyzed technical feasibility and markets for thermal insulation materials from plant fibers and conducted comparative life cycle assessments.
- Conducted and organized underwater surveying and mapping of plant species in several lakes and rivers in Sweden and Germany as ecological indicators for the health of limnological ecosystems.

PRO BONO ACTIVITIES

Founding member of “SecondAid,” a non-profit organization providing tsunami relief for the recovery of small family businesses in Sri Lanka. (www.secondaid.org.)

PROFESSIONAL AFFILIATIONS

Association of Environmental Professionals

SELECTED PUBLICATIONS

- Leson G. and Pless P., Hemp seeds and hemp oil, in: Grotenhermen F. and Russo E. (Eds.), *Cannabis und Cannabinoids, Pharmacology, Toxicology, and Therapeutic Potential*, The Haworth Integrative Healing Press, New York, 2002.
- Leson G., Pless P., Grotenhermen F., Kalant H., and ElSohly M., Evaluating the impact of hemp food consumption on workplace drug tests, *Journal of Analytical Toxicology*, Vol. 25, No. 11/12, pp. 1-8, 2001.
- Leson G. and Pless P., Assessing the impact of THC uptake from hemp oil cosmetics on workplace drug testing, Report to the Agricultural Research and Development Initiative, Morris, MB, 2001.
- Pless P., Technical and environmental assessment of thermal insulation materials from fiber crops, doctoral dissertation in Environmental Science and Engineering, University of California, Los Angeles, 2001.
- Center for Waste Reduction Technologies in the American Institute of Chemical Engineers, Collaborative Biofilter Project, Technical Report, co-author with Leson G. of sections 'Compound Database,' 'Design Manual,' and 'Literature Database,' 1998.
- Hantke B., Domany I., Fleischer P., Koch M., Pless P., Wiendl M., and Melzer M., Depth profiles of the kinetics of phosphatase activity in hardwater lakes of different trophic level, *Archives Hydrobiologia*, vol. 135, pp. 451-471, 1996.
- Hantke B., Fleischer P., Domany I., Koch M., Pless P., Wiendl M., and Melzer M., P-release from DOP by phosphatase activity in comparison to P-excretion by zooplankton: studies in hardwater lakes of different trophic level, *Hydrobiologia*, vol. 317, pp. 151-162, 1996.
- Pless P., Untersuchungen zur Phytoplanktonentwicklung im Herrenalpsee (investigations on phytoplankton succession in an oligotrophic hardwater lake), Master of Science thesis in biology with focus on botany/ecology/limnology, Technical University of Munich, Germany, 1991; graduated with first class honors.

Tom Brohard and Associates

February 2, 2010

Ms. Gloria Smith
The Law Offices of Gloria D. Smith
48 Rosemont Place
San Francisco, CA 94103

SUBJECT: Draft Environmental Impact Report for the Alta Bates Summit Medical Center Project in the City of Oakland – Preliminary Review

Dear Ms. Smith:

At your request, I have conducted a preliminary review of the December 2009 Draft Environmental Impact Report (Draft EIR) prepared by ESA for the Alta Bates Summit Medical Center (ABSMT) Summit Campus Seismic Upgrade and Master Plan Project in the City of Oakland. I have also reviewed various technical documents prepared by Fehr & Peers included in Appendix B of the Draft EIR. As described in this letter, my preliminary review disclosed issues and concerns involving non-ambulatory access within the Proposed Project and for shuttle services serving the Proposed Project.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 40 years of professional engineering experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and now serve as the City Traffic Engineer for the City of Indio and as Consulting Transportation Engineer for the City of Big Bear Lake and the City of San Fernando. I have extensive experience in traffic engineering and transportation planning. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects. Several recent assignments are highlighted in the enclosed resume.

Proposed Project

Page 3-12 of the Draft EIR indicates Phase 1 of the Project is planned to include "...constructing a new 11-story approximately 230,000 square-foot Patient Care Pavilion on Hawthorne Avenue; a new seven-level, 1,067 space, 392,800 square-foot parking garage; a new temporary surface parking lot; two new generators to serve the new Patient Care Pavilion; and demolition of six existing buildings." Future phases of the Project are planned to include a 32,000 square-foot fitness center; a five-story 175,000 square-foot Medical Office Building

*81905 Mountain View Lane, La Quinta, California 92253-7611
Phone (760) 398-8885 Fax (760) 398-8897
Email tbrohard@earthlink.net*

Ms. Gloria Smith

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(MOB); a 72,500 square-foot building for use by Samuel Merritt University; and possible closure of Summit Street between 30th Street and Hawthorne Avenue.

Regarding the possible closure of Summit Street, Pages 3-23 and 3-24 of the Draft EIR state “Summit Street runs north-south and connects 30th Street to Hawthorne Avenue. It provides access to Providence Pavilion and Providence Pavilion South. ABSMC proposes to create a circular drive at the southern end of Summit Street providing access to Providence Pavilion South and to a building at the corner of Summit and 30th Streets owned by an unrelated private party, and closing off the rest of the street to provide a landscaped pedestrian area. If this closure occurs, the corridor would remain accessible for emergency vehicles and ABSMC would construct an additional entrance from 30th Street to the fourth floor of the new parking structure.”

Issues and Concerns

My preliminary review of the Draft EIR disclosed two primary issues and concerns involving non-ambulatory access within the Proposed Project and for shuttle services serving the Proposed Project as follows:

- 1) Non-Ambulatory Access Within the Project – Figure 3-8c on Page 3-28 of the Draft EIR identifies Proposed Pedestrian Paths of Travel to be implemented with Phase 1 of the Proposed Project. The completion of future phases of the Proposed Project will create a unique complex with perimeter roadways as shown on Figure 3-5 on Page 3-14 of the Draft EIR. Furthermore, according to Page 3-8 of the Draft EIR, “The project site has varying topography with buildings, parking structures, and surface parking lots at different levels. The site slopes up approximately 30 feet from Telegraph Avenue (west edge of the project site) to Webster Street (east edge of the project site).”

G-5

In comparison to the existing site, access for non-ambulatory patients that are transported by private vehicles will be reduced by Phase 1 of the Proposed Project. Access within ABSMC for private vehicles dropping off and picking up patients will be eliminated with future phases. While ABSMC intends to upgrade pedestrian facilities within the complex, it will be difficult for non-ambulatory patients to reach certain areas, especially with the varying topography and elimination of private vehicle access. ABSMC should improve non-ambulatory patient access in all phases of the Proposed Project.

- 2) Shuttle Services for the Project – Figure 3-8a on Page 3-26 of the Draft EIR identifies Existing Bicycle, Pedestrian, and Bus Circulation, and Figure 3-8b on Page 3-27 of the Draft EIR identifies these facilities after completion of Phase 1 of the Proposed Project. Within the complex, no changes are

G-6

Ms. Gloria Smith
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proposed for either the routing of or the stops for the Alta Bates Shuttle, Kaiser Medical Center Shuttle, and the AC Transit Route 59.

Figure 3-8d on Page 3-29 of the Draft EIR identifies the Proposed Bicycle and Pedestrian Improvements. The routing of and stops for the ABSMC Shuttle and AC Transit Route 59 are also shown on Figure 3-8d following completion of future phases of the Proposed Project. While Summit Street is planned to be closed between 30th Street and Hawthorne Avenue, an ABSMC shuttle stop is remains within the closed portion of Summit Street. The Draft EIR should clarify if shuttles can continue to use Summit Street after it is closed and show the shuttle stops accordingly. The routing and stops for the Kaiser Medical Center Shuttle should also be added to Figure 3-8d. ABSMC should also be required to periodically monitor, evaluate, and adjust shuttle routes, stops, and frequencies as may be necessary to optimize these services in concert with future phases of the Proposed Project.

G-6
cont.

My preliminary review of the Draft EIR for the Alta Bates Summit Medical Center Project in the City of Oakland disclosed issues and concerns involving non-ambulatory access within and shuttle service for the Proposed Project. These should be analyzed and evaluated through additional study. If you should have any questions regarding these preliminary comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard and Associates



Tom Brohard, PE
Principal

Enclosure



Tom Brohard, PE

Licenses: 1975 / Professional Engineer / California – Civil, No. 24577
1977 / Professional Engineer / California – Traffic, No. 724
2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education: 1969 / BSE / Civil Engineering / Duke University

Experience: 40 Years

Memberships: 1977 / Institute of Transportation Engineers – Fellow, Life
1978 / Orange County Traffic Engineers Council - Chair 1982-1983
1981 / American Public Works Association - Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. Since May 2005, he has served as Consulting City Traffic Engineer three days a week to the City of Indio. He also currently provides “on call” Traffic and Transportation Engineer services to the Cities of Big Bear Lake and San Fernando. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower 1997 - 1998
- Bell Gardens..... 1982 - 1995
- Huntington Beach 1998 - 2004
- Lawndale 1973 - 1978
- Los Alamitos..... 1981 - 1982
- Oceanside 1981 - 1982
- Paramount..... 1982 - 1988
- Rancho Palos Verdes..... 1973 - 1978
- Rolling Hills..... 1973 - 1978, 1985 - 1993
- Rolling Hills Estates..... 1973 - 1978, 1984 - 1991
- San Marcos 1981
- Santa Ana..... 1978 - 1981
- Westlake Village..... 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over \$5 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.

Tom Brohard and Associates

In his service to the City of Indio since May 2005, Tom has accomplished the following:

- ❖ Oversaw preparation and adoption of the Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain constraints
- ❖ Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installation in Caltrans District 8 in Riverside County; oversaw preparation of plans and provided assistance during construction of a \$1.5 million project to install traffic signals and widen three of four ramps at the I-10/Jackson Street Interchange under a Caltrans encroachment permit issued under the Streamlined Permit Process
- ❖ Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Monroe Street over I-10 as well as striping plans to install left turn lanes on Monroe Street at the I-10 Interchange under a Caltrans encroachment permit
- ❖ Oversaw preparation of traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvement of the I-10/Monroe Street and the I-10/Golf Center Parkway Interchanges
- ❖ Oversaw preparation of plans, specifications, and contract documents and provided assistance during construction of 22 new traffic signal installations
- ❖ Oversaw preparation of plans and provided assistance during construction for the conversion of two traffic signals from fully protected left turn phasing to protected-permissive left turn phasing with flashing yellow arrows
- ❖ Reviewed and approved over 450 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects
- ❖ Oversaw preparation of a City wide traffic safety study of conditions at all schools
- ❖ Prepared over 350 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping
- ❖ Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 125 street segments
- ❖ Reviewed and approved traffic impact studies prepared for more than 16 major development projects

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.

Letter G Responses – Gloria D. Smith on behalf of California Nurses Association

- G-1: The commenter raises concerns regarding previously identified contamination at a site referred to as 365 Hawthorne Avenue. As stated in the DEIR on page 4.9-2, the case was closed in 1994 following completion of remediation to the satisfaction of the Alameda County Health Care Services Agency. As also mentioned in the DEIR on this page, “Typically, sites are closed once it has been demonstrated that existing site uses combined with the levels of identified contamination present no significant risk to human health or the environment.” The existing land uses at the project site will not change with the proposed project. In addition, none of the elements of the proposed project would affect the building at this address. 365 Hawthorne Avenue would continue to exist without significant alteration through the final proposed phases of the project. Consequently, none of the residual contamination that may still remain after natural attenuation would be exposed to workers, the public, or the environment beyond what is currently occurring under existing conditions. The regulatory screening levels that are referenced in the comment are not considered cleanup requirement levels. These ESLs are only screening levels used in the preliminary stages of an investigation and final cleanup requirements are determined on a case by case basis taking into consideration the specific site parameters that affect potential pathways of exposure. Therefore, no further work including future phases work is warranted or required at this location.
- G-2: As stated in the DEIR on page 4.9-17, the proposed project would be required to adhere to the requirements of Standard Condition HAZ-5, *Best Management Practices for Soil and Groundwater Hazards*, and Standard Condition HAZ-6, *Radon or Vapor Intrusion from Soil or Groundwater Sources*. These required measures include the involvement of the RWQCB or the Alameda County Health Care Services Agency for any confirmation sampling that may be required in association with the removal of the existing USTs. The Standard Conditions are provided beginning on page 4.9-11 of the DEIR.
- G-3: The paragraph cited in the comment is not a mitigation measure, but a Standard Condition of Approval for the City of Oakland (see page 4.4-10 of the DEIR). As stated there, the Standard Condition of Approval provides for the safety of workers by requiring the project to conform to all pertinent regulations “prior to issuance of a demolition permit” as a condition of approval of the project. The Condition further states that the Project Applicant “shall submit specifications signed by a certified asbestos consultant for the removal encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8: Business and Professions Code; Division 3; California Health & Safety Code 25915-25919.7; and the Bay Area Air Quality Management District, Regulation 11, Rule 2, as may be amended.” In other words, the detailed information the commenter seeks is required prior to issuance of a demolition permit and is built into the regulations cited in the Condition of Approval.

G-4: Mitigation Measure AIR-8 which requires preparation of the GHG Emissions Reduction Plan (GHG Reduction Plan) is specific, directive and measurable, and presumes that the GHG Reduction Plan (which is included as Appendix B to this document) will be approved with certification of the EIR. In accordance with Mitigation Measure AIR-8, the GHG Reduction Plan prepared for the project considers a wide range of emission reductions measures found feasible for the project, including several suggested by the commenter. See Master Response B, *Greenhouse Gases Emissions and Reduction Measures*, in Chapter 5 of this document. The GHG Plan as presented in its entirety in Appendix B to this document.

In addition, for clarification, the comment mistakenly indicates that the DEIR proposes implementation of Mitigation Measure TRANS-1 (*signalize the Telegraph Avenue/Hawthorne intersection*) as mitigation to reduce the significant impacts due to cumulatively consideration emissions of criteria pollutants and greenhouse gases emissions. The DEIR indicates on page 4.4-51 that the project would be required to implement Standard Condition of Approval TRANS-1, *Parking and Transportation Demand Management* (as initially identified on page 4.3-31 of the Transportation, Circulation and Parking analysis in the DEIR), which is one of the several project elements (as a Standards Condition of Approval) that would help reduce the amount of GHG emissions from the project.

G-5: Project site access and circulation, including passenger loading and unloading, is discussed on pages 4.3-110 to 4.3-114 of the DEIR. The proposed project would provide three locations for private vehicles to drop off non-ambulatory patients. A drop-off loop is proposed on Hawthorne Avenue near Summit Street. A second drop-off is proposed in the existing parking garage located on 34th Street. A third drop-off is provided at the new Emergency Department. Each of these drop-off areas would provide direct access to the building. They also would be wheelchair accessible and sheltered from the weather. As part of the project, an accessible pedestrian path of travel is provided from Telegraph Avenue to the Patient Care Pavilion main entrance. As stated in the DEIR, the proposed access and circulation system for people using the proposed project site (including non-ambulatory patients) is generally acceptable. Recommendations to improve that system are included in the DEIR.

G-6: ABSMC provides a shuttle system for its patients and employees. This existing program has been incorporated into the TDM Plan pursuant to the City's Standard Conditions of Approval (described on page 4.3-31 of the DEIR). The TDM Plan includes a requirement for monitoring and adjustment of shuttle service with implementation of the Project, and is included as Appendix A to this document. City staff have reviewed and approved this document for approach, accuracy, and feasibility, and to assess whether the Project Applicant has satisfied relevant components of the Standard Condition of Approval. The City's decision making body will consider final approval of the TDM Plan prior to certification of the EIR. Regarding stop locations, please refer to Figure 3-8c of the DEIR for proposed ABSMC shuttle stop locations without the potential closure of Summit

Street. If the Summit Street closure is implemented in Future Phases, shuttles would provide service at either end of the closure. In response to this comment, Kaiser shuttle stop locations, which will not be affected by the Project, have been added to the figure.



Alta Bates Summit
Medical Center

A Sutter Health Affiliate

350 Hawthorne Avenue
Oakland, CA 94609
510.655.4000

VIA EMAIL AND U.S. MAIL

February 3, 2010

Scott Gregory - Contract Planner Re: Case No. ER 09-001
c/o Mr. Gary Patton, Deputy Director of Planning & Zoning
City of Oakland, Community and Economic Development Agency, Planning Division
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612

Re: **Draft Environmental Impact Report ("DEIR") for Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan; State Clearinghouse #2009012067**

Dear Mr. Gregory,

Thank you for the opportunity to comment on the recently issued DEIR for the Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan. The purpose of this letter is to provide our limited comments on the Transportation, Circulation, and Parking section (§3.4) of the DEIR. As we have previously stated, we appreciate the thoroughness of the DEIR, and we also appreciate the attention that you, City staff and ESA have paid to the document and the underlying analyses. Nonetheless, we do have certain comments on the DEIR which we believe should be addressed as part of the Final EIR, as further described below.

1. Intersections #44 and #45 – West Grand Avenue, Brush Street and San Pablo Avenue (Mitigation Measures TRANS-2, TRANS-4, TRANS-8 and TRANS-20)

Mitigation Measure TRANS-2 would require ABSMC to implement a number of improvements at the intersection of West Grand Avenue and Brush Street, including installation of a new signal tied into the existing signalized intersection of West Grand and San Pablo Avenues (Mitigation Measures TRANS-4, TRANS-8 and TRANS-20 require essentially the same improvements). According to the DEIR, this mitigation measure is required to accommodate the addition of Phase 1 traffic to existing traffic levels at West Grand/Brush. For a number of reasons, we believe it is inappropriate to require ABSMC to implement any improvements to this intersection, let alone to bear the full cost of any required improvements.

First, as noted in the DEIR (pages 4.3-50 - 4.3-52), the West Grand/Brush intersection already meets peak hour volume signal warrants. Under the City's applicable threshold of significance, a project is deemed to cause a significant impact even if it adds only 10 additional trips to an intersection which meets this signal warrant. Use of this low threshold effectively shifts the entire burden of correcting preexisting deficiencies from the City onto the first project that by happenstance trips the threshold, even if, as here, the project's impact is relatively minimal and attenuated.

Additionally, it should be recognized that the West Grand/Brush/San Pablo intersection configuration serves a confluence of traffic flowing to and from downtown Oakland and areas north of the downtown core. West Grand Avenue is a major artery connecting I-80 and the Bay Bridge to downtown Oakland. Similarly, San Pablo Avenue serves as an important north/south corridor for traffic coming into downtown. Traffic from numerous approved, reasonable foreseeable and potential future development projects in Oakland (including those listed on pages 4-6 - 4-7 of the DEIR) will contribute to these corridors and cause a degradation in intersection operations. As such, it is not appropriate to assign to the Project the full burden of any required improvements at these intersections.

The third factor to keep in mind is the fact that the authors of the EIR cannot determine at this point whether the proposed mitigation measure is even feasible, as noted on page 4.3-51 of the DEIR. As a result of this uncertainty, the Project's impact on existing traffic is presumed to be significant and unavoidable – yet this mitigation measure requires ABSMC to undertake time-consuming and expensive detailed plans for the requested intersection and signal modifications before the City finally determines if the mitigation is even feasible.

H-1

Mr. Scott Gregory
February 3, 2010
Page 2

Finally, as noted on page 4.3-74 of the DEIR, even if the mitigation measure is actually implemented, it would not be sufficient to accommodate the "substantial increase in east/west traffic volumes" which are expected to occur whether or not the Project is implemented. This means that the combined West Grand/Brush/San Pablo intersection would operate at LOS F in 2035 even if the intersection is signalized pursuant to the mitigation measure.

H-1
cont.

For all of the above-cited reasons, we believe that these mitigation measures should be deleted from the DEIR as infeasible and unreasonable. However, if they must remain, either the measures themselves should be revised or appropriate project conditions of approval formulated to provide that ABSMC's obligation for the combined West Grand/Brush/San Pablo intersection is limited to bearing its fair share of the cost of the improvements when implemented by the City or by a project with a more direct and significant effect on the intersection.

**2. Intersection #34 – Broadway and West MacArthur Boulevard
(Mitigation Measure TRANS-15)**

We have similar concerns regarding the intersection of Broadway and West MacArthur Boulevard. Under Mitigation Measure TRANS-15, ABSMC is required to upgrade and optimize the existing signal at this intersection. Again, this is an intersection of major roadways which each facilitate access to numerous neighborhoods and districts within Oakland, and an intersection that will be significantly affected by many approved, reasonably foreseeable and potential future developments throughout downtown and north Oakland. In fact, the EIR for the Kaiser Hospital Oakland Medical Center (OMC) project now under construction immediately adjacent to the intersection contains a similar mitigation measure for this intersection. The DEIR should be revised to properly account for mitigation measures imposed on other projects at the same intersection. Additionally, this mitigation measure should be revised or appropriate project conditions of approval formulated to provide that ABSMC's obligation for the Broadway and West MacArthur Boulevard intersection is limited to bearing its fair share of the cost of the improvements required to be implemented by the Kaiser Hospital OMC project.

H-2

**3. Intersection #36 – Broadway, 51st Street and Pleasant Valley Avenue
(Mitigation Measure TRANS-16)**

Our last issue relates to the intersection of Broadway, 51st Street and Pleasant Valley Avenue, another intersection of major roadways facilitating access to numerous neighborhoods and districts within Oakland, and an intersection that will be significantly affected by many approved, reasonably foreseeable and potential future developments throughout downtown and north Oakland. Under Mitigation Measure TRANS-16, ABSMC is required to upgrade and optimize the existing signal at this intersection. As with the Broadway / West MacArthur intersection, the Kaiser Hospital OMC EIR contains a similar mitigation measure. As above, the ABSMC DEIR should be revised to properly account for mitigation measures imposed on other projects, and either this mitigation measure should be revised or appropriate project conditions of approval formulated to provide that ABSMC's obligation for this intersection is limited to bearing its fair share of the cost of the improvements required to be implemented by the Kaiser Hospital OMC project.

H-3

Thank you in advance for your consideration of these comments.

Sincerely,



Shahrokh Sayadi
Sutter Health-Facility Planning and Development

cc: Oakland Planning Commission
Gary Patton
Mark Wald, Esq.
ESA
David L. Preiss, Esq.

Letter H Responses – Alta Bates Summit Medical Center

H-1: The comment writer correctly notes that the West Grand/Brush intersection meets the peak hour volume signal warrant without the ABSMC Project. The writer also correctly interprets the DEIR text (pages 4.3-50 to 4.3-52) which identifies a significant impact at the West Grand/Brush intersection due to the project because the project adds more than 10 additional trips to the intersection which already meets the peak hour volume signal warrant. This methodology is a consistent application of the City's significance criteria as used in the City's environmental documents since at least 2002. Moreover, this is consistent with Caltrans' warrants.

The comment writer subsequently notes that the West Grand Avenue corridor connects Downtown Oakland with the Bay Bridge via Interstate 80 and that road improvements along this corridor benefit many existing and future users. The writer then concludes that because of the importance of this corridor to the area, it is an unfair burden for the ABSMC Project to fund the full extent of the mitigation at the West Grand/Brush intersection. This argument fails to recognize that the ABSMC Project traffic (alone) triggers a significant impact to intersection operations under the Existing Condition. The City acknowledges that existing and future road users will benefit from the West Grand/Brush intersection mitigation measure required to off-set the ABSMC Project impact, just as traffic from the ABSMC Project will benefit from mitigation measures installed by other prior and subsequent development projects.

The DEIR (page 4.3-51) does indicate, as the comment writer notes, that further study is needed to address the West Grand/Brush intersection mitigation measure. This is because of the relatively close intersection spacing to West Grand/San Pablo Avenue intersection. The DEIR identified a mitigation measure, but because it requires complicated signal timing and geometric parameters that will be addressed later as part of the detailed intersection engineering study, the DEIR conservatively considers that this measure may not be feasible and determined that the impact should remain significant and unavoidable. Thus, recirculation of the DEIR would not be required if the subsequent engineering studies determine infeasibility, or the City decides to approve a design that may improve intersection operations, but not reduce impacts to less-than-significant levels.

The comment writer correctly notes that the mitigation measure for West Grand/Brush will be insufficient in 2035 when the intersection will operate at LOS F. This fact is no reason not to install the mitigation measure to address both existing and 2015 traffic conditions. Even if the future 2035 condition returns to LOS F, the recommended mitigation will still reduce the impacts, just not to less than significant levels.

For these reasons the City disagrees with the conclusions made by the comment writer. The stated mitigation measure to address intersection impacts at West Grand/Brush should be recommended as revised in the FEIR and this recommendation provided to the

decision makers to fully disclose the ABSMC Project impacts and possible remedies to address deficient intersection operations caused by the Project. The environmental document is intended to identify Project impacts and feasible mitigation measures necessary to reduce or eliminate such impacts. The EIR is not the appropriate venue for discussing possible fair share responsibility or potential reimbursement agreements for the installation of mitigation measures.

H-2: The comment writer correctly notes that the stated mitigation measures for Intersection #34 and #36 are similar to measures identified in the Kaiser Oakland Medical Center EIR. It is likely that these measures will be fully implemented prior to the ABSMC Project being constructed, thus relieving the ABSMC Project from the obligation to implement the stated mitigation measure. In other words, the ABSMC Project may benefit from mitigation measures implemented by the Kaiser Oakland Medical Center Project. However, if the Kaiser Hospital Project were to stop construction (unlikely), the mitigation measure responsibility would fall upon the ABSMC Project. The EIR is not the appropriate venue for discussing possible fair share responsibility or potential reimbursement agreements for the installation of mitigation measures.

Comment Letter I

Scott Gregory

From: Joy L Johnson [joyljohnson@prodigy.net]
Sent: Thursday, December 24, 2009 12:27 PM
To: sgregory@lamphier-gregory.com
Subject: Alta Bats/Summit EIR

Follow Up Flag: Follow up
Flag Status: Completed

Hello Mr Gregory,

I am the owner of the building located at 465 34th street, a total of ten Psychotherapy Offices. I am writing because I reviewed the draft EIR for the above named project and noted the proposed removal of the building directly adjacent to my building at 461 34th Street and the proposed placement of two generators in this space.

I am wanting to be in touch with someone about the size, noise levels, planned placement and possible bio hazards of the proposed generatos so I might assess the impact, if any, on our practice of Psychotherapy at our location. I would like to speak to someone before the meeting on January 20th if possible. Please let me know who I should contact.

Thank you and happy holidays!
Joy

Dr. Joy L. Johnson Ph.D./LCSW Psychotherapy and Consultation: 510. 658.1966 // fax: 510. 658.2788 email: JoyLJohnson@prodigy.net
website: www.JoyLJohnson.com

I-1

Letter I Response – Joy Johnson

I-1: The comment is noted. The Project Applicant has been in contact with the commenter and has answered all her questions to her satisfaction as she stated at the Public Hearing on January 20 (see Public Hearing transcript, pages 27 and 28). As discussed in Section 4.5.3, Impacts and Mitigation Measures, Impact NOI-3 (page 4.5-15 through 4.5-17 of the DEIR), the two generators would be used only in an emergency power outage. Further, the generators would be enclosed and designed to be compliant with the Oakland noise ordinance.

Figure 3-4, Phase 1 Site Plan, in the DEIR, shows the placement of the generators on the west side of the existing parking garage near 34th Street.

The generators would be housed in separate enclosures. Each enclosure would be 29.25 feet long, 10 feet wide, and 12 feet high. As discussed in Section 4.4.3, Impacts and Mitigation Measures, Impact AIR-2 (page 4.4-19 of the DEIR) and Impact AIR-3 (page 4.4-21 of the DEIR), with the application of Mitigation Measure AIR-2, the impact of emissions of criteria pollutants, PM_{2.5}, and toxic air contaminants would be less than significant.

Scott Gregory

From: Carla Paliaga [carlapaliaga@yahoo.com]
Sent: Monday, February 01, 2010 9:10 PM
To: sgregory@lamphier-gregory.com
Cc: Greater Mosswood
Subject: Alta Bates - Draft EIR - Webster St.

Dear Mr. Scott Gregory,

I am very concerned about the proposed mitigation for the increased traffic on Webster St. that will surely ensue with the new Alta Bates hospital.

J-1

Here is what is proposed:

=====

Draft EIR text below

Impact TRANS-26: The project will increase auto and bike traffic on Webster Street between the freeway ramp and 30th Street. Because Webster Street will be a bike boulevard, auto traffic and bike traffic will share the same space. (Significant)

Mitigation Measure TRANS-26: Install “sharrow” lane markings in the pavement and appropriate street signs along Webster Street between 30th Street and 34th Street to distinguish this segment as a bike boulevard.

=====

I do not think that is enough and I propose the following:

1. Speed limit signage under the freeway
2. Stop signs at 36th and/or 37th.
3. Traffic calming
4. Signage to direct traffic to other routes

Thank you for your concern for pedestrian and bicycle safety on this route.

Carla Paliaga

Letter J Response – Carla Paliaga

J-1: See Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard, and the requests for all-way stop control at 36th and 37th Street and traffic calming measures. Regarding speed limit signage, the installation of a new speed limit sign on northbound Webster Street under the I-580 overpass may be appropriate, as it may not be readily apparent to drivers on this segment that they are entering a residential and park area. The City may consider this measure as a condition of approval for the project.

Scott Gregory

From: A.J. Benham [ajbenham@me.com]
Sent: Monday, February 01, 2010 10:15 PM
To: sgregory@lamphier-gregory.com
Subject: Alta Bates Draft EIR: Webster St. & Mosswood Park

Dear Mr. Gregory

The following comments are made in response to the DRAFT Alta Bates/Summit EIR in consideration of your February 3 deadline.

I believe the draft EIR minimizes the impact of the Alta Bates/Summit project with regard to traffic on Webster Street, and projected effects on Mosswood Park.

Regarding the former, the report states:

Impact TRANS-26: The project will increase auto and bike traffic on Webster Street between the freeway ramp and 30th Street.

Because Webster Street will be a bike boulevard, auto traffic and bike traffic will share the same space. (Significant)

Mitigation Measure TRANS-26: Install "sharrow" lane markings in the pavement and appropriate street signs along Webster Street between 30th Street and 34th Street to distinguish this segment as a bike boulevard.

My experience as a driver who frequently uses the Webster St off ramp, and as a resident whose property has been damaged by motorists coming off that ramp, is that drivers tend to make the right turn onto Webster at freeway rather than residential street speeds.

Please note that there is presently a private school operating at Mosswood Park. Classes start at about the same time as the hospital's change of shift in the morning. Morning traffic on Webster is already significant with hospital workers accessing Webster from both MacArthur and the freeway. Increased traffic on Webster without appropriate calming measures may place many pedestrians on their way to the Park, to school, or to public transportation on Broadway - at significant risk

Suggestions in addition to those noted in the EIR:

Well marked stop signs at the end of the freeway off ramp for both motorists



K-1

crossing Webster and those turning right onto Webster

Speed limit signs under the freeway

Stop signs on Webster at 36th and 37th

Lighted pedestrian walkway to Mosswood Park entrance

Signage directing traffic south on Webster, away from residential areas and Mosswood Park's main entrance

↑
K-1
cont.

With regard to Mosswood Park, the EIR has this to say:

Parks and Recreation and Library Facilities

Impact PUB-4: The proposed project could increase the demand for parks, recreational facilities, and library facilities, but would not result in substantial physical deterioration of such facilities or require new or physically altered facilities in order to maintain acceptable performance objectives. (Less than Significant)

The proposed project's effect on parks, recreation facilities, and library facilities would be indirect, resulting from the provision of additional employment opportunities, which could increase the resident population in Oakland and surrounding communities.

Increases in the number of employees and visitors at the project site could result in an increased use of Mosswood Park given its proximity to the ABSMC Summit Campus. However, use of the park by new employees and hospital visitors would not significantly increase above existing levels. In addition, these park users would be engaged primarily in passive recreational activities that would not have as much effect on park facilities in comparison to active recreational uses, such as organized team sports. Therefore, the proposed project would not result in increased use to levels that would result in substantial physical deterioration of Mosswood Park or other recreational or library facilities in the vicinity of the ABSMC Summit Campus.

Mitigation: None required.

↑
K-2

As both a resident with an unobstructed view of the park and a former employee of Summit, I know that some hospital staff will opt not to pay for parking, and will look for nearby alternatives. Many of the local streets are already slated for two hour parking limits, which will further diminish options for those who prefer not to park at the hospital. We have already seen Kaiser trying to use the Mosswood parking lot as a result of their construction project. Policing the Mosswood parking lot has become a bit of a burden for park staff, and could become an even larger problem, especially during the overlap in Kaiser and Summit's construction schedules.

As the owner of a property with a birds-eye view of Mosswood Park, I frequently see hospital employees and ambulance drivers using the park for their breaks, which is a perfectly natural and appropriate use. It seems likely that an expanded hospital facility will generate more such activity, and it's unclear why the author of the EIR assumes that this would not naturally progress to hospital staff using the park for organized team sports or other activities..

↓

Suggestions:

Parking and shuttles for Summit employees and patients could be subsidized to the point of being free in order to keep motorists from spilling out into surrounding neighborhoods in search of parking.

Alta Bates/Summit project planners could meet with Mosswood staff and Advisory Council to assess current use and more accurately project potential future increases.

It might be appropriate for Alta Bates/Summit to consider underwriting the maintenance or replacement of some facilities frequently used - "passively" - by hospital staff (and ambulance drivers) such as picnic tables, water fountains, parking lots and lawns.

Updating the "fitness course" in the park might prove to be a boon to both hospital employees and the general community.

Providing a community bulletin board might make hospital staff more aware of facilities and programs (such as summer camps and after school programs) that might be of value to hospital employees and their families. An on-going relationship between park and Alta Bates/Summit, similar to that currently being developed with Kaiser, would be beneficial to all parties concerned and create a greater sense of community between the hospital and the neighborhood.

Thank you for your time and consideration.

AJ Benham

402 36th St.

Oakland CA 94609

510-759-7078

K-2
Cont.

Letter K Responses – A.J. Benham

- K-1: Refer to the response to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard, and the requests for all-way stop control at 36th and 37th Street and traffic calming measures. As discussed there, the proposed project would not add traffic to the right turn from the Webster Street off-ramp, as that traffic movement is headed northbound, away from the Summit Campus. Clear stop control signage already exists on the other approaches to this intersection. There are no CEQA thresholds for the installation of route signage or off-street pedestrian lighting. Prominent signage identifying the Summit Campus to the south of 34th Street is currently visible to inbound drivers on the Webster Street off-ramp. However, the City will consider the commenter's recommendation prior to taking action on the EIR.
- K-2: The EIR does not assume that the project would not result in potential new users of the park as a result of new employees or visitors. In considering the project's impacts against the applicable CEQA significance criteria, the EIR analysis considers that the projected increase in onsite population resulting from the project is approximately 429 employees, as shown in DEIR Table 3-3 and discussed on page 4.11-15 of the DEIR. The increase in population would occur incrementally between 2015 (no new employment would occur in Phase 1, prior to 2015) and 2035. The analysis also considers the existing physical condition, capacity and amenities of Mosswood Park, as well as the availability of other local-serving parks in the area that may be used by the public other than employees and visitors to ABSMC. This information is reported starting on page 4.12-4, and on page 4.12-8 of the DEIR, and the analysis is summarized by the commenter at the beginning of Letter K.

Comments regarding alleged unauthorized construction period parking at Mosswood park due to the current construction at Kaiser Medical Center Oakland, and the difficulty of park staff to police such parking, does not address the potential environmental effects of the proposed project. While ABSMC has no authorization to control unauthorized parking at Mosswood Park, it will provide adequate offsite parking within walking distance of the campus for construction personnel and employees during construction of the Phase 1 parking garage.

Also, see response to Comment L-3 regarding existing on-street parking availability within one to two blocks of the campus for ABSMC employees and visitors.

Comment Letter L

Scott Gregory

From: Diana Young [dyoung@sfo.com]
Sent: Monday, February 01, 2010 10:27 PM
To: sgregory@lamphier-gregory.com
Cc: greater Mosswood Group; housemates:
Subject: comments re Webster St. impacts in Alta Bates EIR

TO: Scott Gregory

I live on 36th Street near Webster with four other adults. We are all concerned about the impacts from the hospital expansion and replacement project. Three of us travel exclusively by bicycle and public transport, and two of us do so occasionally. Although Webster is designated as a bicycle route, the portion between West MacArthur and 30th is often dangerous and difficult to navigate by bicycle, car, or on foot due to the high speed and volume of traffic and difficulty of seeing cars travelling through the darkness under the freeway. Furthermore the portion of Webster along the west side of Mosswood Park is often dangerous to cross due to non-existent, insufficient or impossible-to-read signage. The expected increase in traffic during and after the construction will surely exacerbate these already dangerous conditions.

If Webster St. bicycle traffic is diverted to Telegraph, the dangerous potholes on that street need to be repaired.

L-1

I fear for the safety of the many pedestrians who travel along 36th Street between the AC Transit #1 line bus stop at Telegraph and the park. These are primarily families or day care providers with young children, teenagers, and groups of developmentally disabled adults --all en route to enjoy various recreational opportunities in the park.

I hope that you will recommend --more visible speed limit signage, especially under the freeway; --a stop sign at 36th and Webster; and --other traffic calming measures. It would be helpful to encourage the Alta Bates/Summit departments and affiliates to direct staff and patients to approach the hospital from Telegraph or Broadway rather than Webster and to take the 27th Street exit off Hwy. 980 rather than the narrow and already dangerous Broadway Auto Row/Webster exit off Hwy. 580.

L-2

Finding a parking place for the one car among the five of us on our block is already a big challenge since Kaiser and Alta Bates hospital employees and BART commuters park their cars here during work day hours. I would like the hospital to provide sufficient parking for employees and to incentivize their use of public transportation.

L-3

Finally I suggest that, as a gesture of good will toward neighborhood residents, the hospital provide the public service of sweeping the sidewalks of Webster Street under the freeway once a week and removing the rubbish and trash that tend to collect there. It seems that the city does not have resources to do this., and there could be a sign acknowledging this gift of service from the hospital to the community.

L-4

Thank you for your consideration.
Diana Young

Letter L Responses – Diana Young

L-1: The proposed project would not direct bicycle traffic away from the Webster Street corridor to Telegraph Avenue. Automobile traffic, however, would be oriented toward Telegraph Avenue with the construction of the new parking garage, which would have direct access to/from that corridor.

Mitigation Measure TRANS-26 (page 4.3-92 of the DEIR) addressed the need for “sharrows” and appropriate signage to facilitate bicycle traffic on Webster Street in the area most affected by the proposed project (between 34th and 30th Streets).

L-2: Refer to the response to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard. As discussed there, there are no CEQA thresholds for the installation of traffic calming measures, route signage, or speed limit signage. The small number of trips that the Project would add to the Webster Street corridor north of 34th Street (fewer than 15 trips during the peak hour) is not expected to cause safety or quality of life impacts that would justify the installation of traffic calming measures. Route signage is an effective tool for directing large volumes of traffic to and from special events, but would have less effect on employees and regular visitors to the Summit campus using Webster Street, who are familiar with the area. Speed limit signage inform drivers of the appropriate speed when conditions are not readily apparent. Conditions on Webster Street such as residential uses, a neighborhood park, and on-street parking are clear indicators to drive with caution. The suggested speed limit sign would not likely change driver behavior given the indicators mentioned. However, the City will consider the commenter’s recommendation prior to taking action on the EIR.

L-3: The DEIR (page 4.3-13 through 4.3-19) addresses existing on- and off-street parking conditions. Parking conditions with the proposed project are discussed in the DEIR (pages 4.3-102 to 4.3-110). The commenter is specifically directed to Table 4.3-37 (page 4.3-108), which highlights the key parking supply and demand conclusions. As indicated in the table, there is generally adequate parking within one to two blocks of the campus for ABSMC employees and visitors. After Phase 1, there would be a 374-parking space surplus at the campus, while buildout of the proposed project would result in a 624-space deficit. The City requires as a condition of approval that ABSMC develop and implement a TDM Plan (described on page 4.3-31). That Plan is included as Appendix A, and will be available for review prior to the Planning Commission taking action on the proposed project.

L-4: The comment suggests a measure that does not address the adequacy of the DEIR or potential environmental effects of the project. The City will consider this input prior to taking action on the EIR and the proposed project.

Scott Gregory

From: Jonathan Stead [steadje@yahoo.com]
Sent: Tuesday, February 02, 2010 9:12 AM
To: sgregory@lamphier-gregory.com
Subject: Comment on Alta Bates Draft EIR Impact TRANS-26

Dear Mr. Scott Gregory,

I am very concerned about the inadequate proposed mitigation for the increased traffic on Webster St. that will come with the new Alta Bates hospital.

Here is what is proposed in the Draft EIR:

Impact TRANS-26: The project will increase auto and bike traffic on Webster Street between the freeway ramp and 30th Street. Because Webster Street will be a bike boulevard, auto traffic and bike traffic will share the same space. (Significant)

Mitigation Measure TRANS-26: Install "sharrow" lane markings in the pavement and appropriate street signs along Webster Street between 30th Street and 34th Street to distinguish this segment as a bike boulevard.

M-1

I do not think that is enough and I propose the following:

- 1. Traffic calming between
- 2. Stop signs at 36th and/or 37th.

Thank you for your concern for pedestrian and bicycle safety on this route.

Jon Stead
451 Rich Street
Oakland, CA 94609

Letter M Response – Jon Stead

M-1: Refer to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard.

Scott Gregory

From: Gwelen Paliaga [GPaliaga@taylor-engineering.com]
Sent: Tuesday, February 02, 2010 9:34 AM
To: sgregory@lamphier-gregory.com; greatermosswood@yahoogroups.com
Cc: Diana Young
Subject: RE: comments re Webster St. impacts in Alta Bates EIR

To: Scott Gregory

I strongly agree with Diana young's letter below. I've lived on 37th st, just west of Webster for 6 years and have always felt that Webster St. between pill hill and W.Macarthur is a dangerous corridor and inappropriate route for the heavy traffic it sees. I cannot cross Webster street to Mosswood park with my 3 year old daughter without flagging down cars traveling at 40 to 50 mph. This stretch of Webster needs traffic calming, speed limit signage, and a stop sign at 36th St.

N-1

More importantly, pill hill traffic and freeway off ramp traffic should be directed to Broadway or Telegraph, not a residential street next to a community park. The EIR should consider an alternative that re-directs traffic away from Webster St.

Thank you,

Gwelen Paliaga

Gwelen Paliaga
Senior Mechanical Designer, Taylor Engineering, LLC
1080 Marina Village Parkway, Suite 501, Alameda CA 94501
(510) 263-1546 direct, (510) 749-9135 office
(510) 749-9136 fax, (510) 852-1565 mobile

gpaliaga@taylor-engineering.com
www.taylor-engineering.com

From: greatermosswood@yahoogroups.com [mailto:greatermosswood@yahoogroups.com] **On Behalf Of** Diana Young
Sent: Monday, February 01, 2010 10:27 PM
To: sgregory@lamphier-gregory.com
Cc: greater Mosswood Group
Subject: [greatermosswood] comments re Webster St. impacts in Alta Bates EIR

TO: Scott Gregory

I live on 36th Street near Webster with four other adults. We are all concerned about the impacts from the hospital expansion and replacement project. Three of us travel exclusively by bicycle and public transport, and two of us do so occasionally. Although Webster is designated as a bicycle route, the portion between West MacArthur and 30th is often dangerous and difficult to navigate by bicycle, car, or on foot due to the high speed and volume of traffic and difficulty of seeing cars travelling through the darkness under the

freeway. Furthermore the portion of Webster along the west side of Mosswood Park is often dangerous to cross due to non-existent, insufficient or impossible-to-read signage. The expected increase in traffic during and after the construction will surely exacerbate these already dangerous conditions.

If Webster St. bicycle traffic is diverted to Telegraph, the dangerous potholes on that street need to be repaired.

I fear for the safety of the many pedestrians who travel along 36th Street between the AC Transit #1 line bus stop at Telegraph and the park. These are primarily families or day care providers with young children, teenagers, and groups of developmentally disabled adults --all en route to enjoy various recreational opportunities in the park.

I hope that you will recommend
--more visible speed limit signage, especially under the freeway;
--a stop sign at 36th and Webster; and
--other traffic calming measures. It would be helpful to encourage the Alta Bates/Summit departments and affiliates to direct staff and patients to approach the hospital from Telegraph or Broadway rather than Webster and to take the 27th Street exit off Hwy. 980 rather than the narrow and already dangerous Broadway Auto Row/Webster exit off Hwy. 580.

Finding a parking place for the one car among the five of us on our block is already a big challenge since Kaiser and Alta Bates hospital employees and BART commuters park their cars here during work day hours. I would like the hospital to provide sufficient parking for employees and to incentivize their use of public transportation.

Finally I suggest that, as a gesture of good will toward neighborhood residents, the hospital provide the public service of sweeping the sidewalks of Webster Street under the freeway once a week and removing the rubbish and trash that tend to collect there. It seems that the city does not have resources to do this., and there could be a sign acknowledging this gift of service from the hospital to the community.

Thank you for your consideration.
Diana Young

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Letter N Response – Gwelen Paliaga

N-1: Refer to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard. There are no CEQA thresholds for the installation of traffic calming measures, speed limit signage, or route signage. The small number of trips that the Project would add to the Webster Street corridor north of 34th Street (fewer than 15 trips during the peak hour) is not expected to cause safety or quality of life impacts that would justify the installation of traffic calming measures. Route signage is an effective tool for directing large volumes of traffic to and from special events, but would have less effect on employees and regular visitors to the Summit campus using Webster Street, who are familiar with the area. Speed limit signage inform drivers of the appropriate speed when conditions are not readily apparent. Conditions on Webster Street such as residential uses, a neighborhood park, and on-street parking are clear indicators to drive with caution. The suggested speed limit sign would not likely change driver behavior given the indicators mentioned. However, the City will consider the commenter's recommendation prior to taking action on the EIR.

Comment Letter O

Scott Gregory

From: Beth McKenna [beth.mckenna@gmail.com]
Sent: Tuesday, February 02, 2010 10:07 AM
To: sgregory@lamphier-gregory.com
Subject: comments for DRAFT EIR for Alta Bates Construction at 34th Street and Webster

Dear Mr. Gregory:

I own a house on the corner of Webster and 36th Streets. My house backs on to 580 freeway and the tunnel/underpass that takes Webster over to your hospital site. My side yard runs the length of Webster from the corner of 36th St to the Webster underpass.

I believe the draft EIR minimizes the impact of the Alta Bates/ Summit project with regard to traffic on Webster Street, and projected effects on Mosswood Park.

My experience in living in this spot for the last 6 years is that drivers fly off the 580 freeway at full speed, and then turn right onto Webster (heading north, toward MacArthur) at freeway speed.

There is no traffic calming in place at the corners of 36th & Webster or 37th & Webster even though such measures are desperately necessary.

These intersections face entrances to Mosswood Park, and currently pedestrians cross Webster Street here at their peril. Also, traffic coming south down Webster from MacArthur typically flies down Webster toward 34th Street without regard to the speed limit, again because there are no traffic calming measures in place.

My suggestions in addition to those noted in the EIR:

-post a required stop for traffic coming off the freeway and turning right onto Webster.

-construct a better stop sign for the existing stop at the end of the freeway ramp; cars knock that stop sign down on a regular basis

-Speed limit signs under the freeway

-Stop signs on Webster at 36th and 37th

-Lighted pedestrian walkway to Mosswood Park entrance

-Signage directing traffic south on Webster, away from residential areas and Mosswood Park's main entrance

-Posted signs under the freeway stating "No Overnight Parking." There are currently a set of buses and RVs that literally camp out there for weeks at a time. This adds to a sense of creepiness (and possibly the trash) in the underpass.

Thank you for your consideration of our neighborhood's needs.

-Beth McKenna
411 36th St, Oakland
(510) 594-0571

O-1

O-2

Letter O Responses – Beth McKenna

- O-1: Refer to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, and Responses to Letter K (A. J. Benham) for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard, and the proposed project's effect on the uncontrolled right turn from the Webster Street off-ramp. There are no CEQA thresholds for the installation of reinforced stop signage, additional speed limit signage or pedestrian lighting. However, the City will consider the commenter's recommendation prior to taking action on the EIR.

Scott Gregory

From: Diana Sherman [diana.sherman@gmail.com]
Sent: Tuesday, February 02, 2010 10:27 AM
To: sgregory@lamphier-gregory.com
Cc: NNadel@oaklandnet.com; CLStarks@oaklandnet.com
Subject: Comments on Summit EIR from 29th Street residents (Case No. ER 09-0001)

February 2, 2010

Dear Mr. Gregory:

I am writing on behalf of the residents of the 200 block of 29th Street (and specifically, the homeowners at 215, 218, 221, 222, and 226 29th Street) to express our deep concerns about the Alta Bates Summit Medical Center Draft EIR.

We live on 29th Street near Harrison Street. You might be familiar with our intersection—it's the only one of the 52 studied as part of the Alta Bates Summit Medical Center EIR where the report found significant impact from the project, but proposed no mitigation measures at all. As residents of this area, we are extremely concerned about this.

We request that the Final EIR include: 1) Residential Permit Parking on 29th Street (following the Kaiser PRPP model) and 2) volume and speed control measures at the intersection of Fairmount and 29th to reduce eastbound through traffic as mitigation for the project's expected impact on traffic, parking, and health in our neighborhood.

We agree with the EIR findings that peak traffic flow on our otherwise quiet residential street does not warrant a traffic signal—and we share the project team's concerns that a light at Harrison and 29th might encourage more through traffic, making existing traffic delays worse. We also agree with that our narrow block is neither designed nor intended to serve traffic traveling between the Broadway, Telegraph Avenue, and Harrison/Oakland corridors.

However, we do not agree that the impact of the Summit project on our intersection is unavoidable. In fact, there are some simple, relatively inexpensive mitigation measures that can vastly reduce this project's impact on our intersection.

In recent years, 29th Street has become increasingly popular as a cut-through between I-580/SR-24 and Pill Hill destinations. This will be exacerbated by new trips to Alta Bates Summit's expanded campus, as the EIR documents. As traffic delays grow at the Harrison/29th intersection, the backup of rush hour traffic extends further down our residential street, dramatically affecting our quality of life.

Because there are few engineering solutions that will allow 29th Street—a narrow residential street with many young children living, playing, and walking to school along it—to accommodate the projected traffic volumes, we feel the appropriate mitigation measures are those that will reduce through traffic and overall vehicle trips on the street while preserving essential access for residents and emergency vehicles en route to area hospitals.

As residents of the impacted area, we would like to see the following measures added to the mitigation program to address impacts to the 29th/Harrison intersection and 29th Street between Harrison and Fairmount, the block that will bear the brunt of the environmental and quality of life impacts if peak hour

P-1

P-2

eastbound backups worsen.

1. Implement Preferential Residential Permit Parking (PRPP) on 29th Street between Broadway and Harrison following the model established by the Kaiser Medical Center project as mitigation to the residential streets near that campus.

When Kaiser’s PRPP program goes into effect later this spring, 29th Street between Broadway and Harrison will be the *only* remaining through street in the Pill Hill area with free, unrestricted on-street parking. Street parking is already extremely difficult on 29th Street, and will get worse when our street becomes the only “free” alternative to metered or garage parking on Pill Hill, particularly given its close proximity to the renovated Summit campus.

Adding 29th Street to the Preferential Residential Permit Parking program will have two key benefits:

- PRPP will prevent Alta Bates Summit staff and visitors from parking in a residential neighborhood to avoid congested or costly parking on Pill Hill. (29th Street already has problems with hospital staff and other employees of Pill Hill businesses parking for extended periods of time, making spaces unavailable to residents.)
- PRPP will reduce the total number of trips on 29th Street by eliminating trips made by Summit employees, visitors, and others circling or searching for parking spots. If drivers know that daytime parking is resident-only, they may instead choose to use 27th Street or West MacArthur Boulevard, major arterial streets equipped to handle the additional traffic.

2. Reduce eastbound through traffic on 29th through a traffic circle, half closure, or other traffic calming solution at the intersection of Fairmount Avenue and 29th Street.

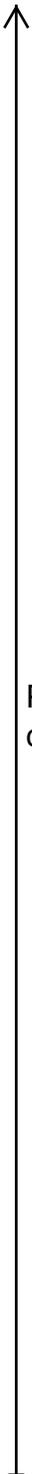
Because eastbound trips are the primary source of the congestion at the 29th and Harrison intersection, two potential volume control solutions could include:

- a) Installing a traffic circle at 29th Street and Fairmount Avenue to discourage through traffic on both residential streets and slow speeds; or*
- b) Closing 29th Street to eastbound traffic at Fairmount through a half closure that would preserve two-way flow on the street itself but limit eastbound access on the Fairmount end.*

Traffic calming measures would have several key benefits for residents and users of this intersection:

- With reduced through trips on 29th Street, Level of Service at the 29th/Harrison intersection would be significantly improved, and collisions at the 29th and Harrison intersection may be reduced. This would also prevent idling cars from backing up on 29th at peak hours, adversely affecting residents’ air quality.
- Ongoing problems with off-peak eastbound traffic speeding on 29th Street between Fairmount and Harrison due to the street’s steep grade and lack of speed humps or other traffic calming interventions would also be addressed as a benefit to the neighborhood.

Either solution should be designed to avoid simply redirecting traffic onto Fairmount Avenue—although notably, Fairmount is the wider of the two streets and will be better suited to handle eastbound traffic once the Harrison/Oakland Community Transportation Plan is implemented. Ideally, however, traffic should be redirected to 27th Street and West MacArthur—two arterial streets that *are* equipped to handle



P-2
cont.

Comment Letter P

added traffic flow while maintaining acceptable levels of service, based on the EIR projections. Moreover, because neither 27th nor West MacArthur is primarily residential in this area, added vehicle trips on these corridors have a less significant impact on area residents and community health.

We are excited to see many changes afoot in our community, and welcome the benefits that the new Summit campus will bring to our city. However, we want to ensure that these improvements do not come at the cost of our neighborhood. These proposed mitigations will ensure that the renovations to the Summit campus do not have a significant negative impact on our residential neighborhood. We respectfully request that these mitigations be added to the Alta Bates Summit EIR before the City approves this plan.

Sincerely,

Diana Sherman, 215 29th Street
Dan Bluestein, 215 29th Street

On behalf of our neighbors at 218, 221, 222, and 226 29th Street

Letter P Responses – Diana Sherman

- P-1: A parking analysis was completed for the ABSMC campus (DEIR pages 4.3-13 through 4.3-19 and pages 4.3-102 through 4.3-110). The analysis concluded that with Phase 1 there would be a surplus of parking for the ABSMC campus while a 624-space parking demand deficit would occur at campus buildout. Typical acceptable walking distance for on-street parkers who choose to park farther away in unrestricted on-street spaces rather than pay for off-street parking is one quarter of a mile (about 1,300 feet). The walking distance to 29th Street at Fairmont Avenue is about 2,200 feet depending on destination. The City requires as a condition of approval that ABSMC develop and implement a TDM Plan (included in Appendix A of this document), which would reduce the percentage of Summit Campus employees who drive to the campus from 80 percent to 64 percent. This mode shift requirement is designed to eliminate any future parking deficit at campus buildout.
- P-2: The DEIR also evaluated the 29th Street / Fairmont Avenue (Intersection #38) and determined that the intersection would operate at Level of Service (LOS) A under all study scenarios. Based on the City's adopted significance criteria the proposed project's impact was determined to be less than significant. The LOS results for this intersection are shown in Appendix B.3 LOS Summary Table of the DEIR. In addition, changes to traffic flow through the Fairmont Avenue intersection such as half closures, full closures or other diversion measures would, as noted by the commenter, redirect traffic to other streets with residential development. Also see Master Response C, *Traffic and Pedestrian Concerns in the Vicinity of Oakland Avenue and Harrison Street*, which addresses 29th Street / Fairmont Avenue (Intersection #38).

Scott Gregory

From: hannah kanzell [hkanzell@yahoo.com]
Sent: Wednesday, February 03, 2010 7:46 AM
To: sgregory@lamphier-gregory.com
Subject: Alta Bates/Summit EIR comments

Dear Mr Gregory,
i have lived on 37th street for the past 12years. I, along with many of my neighbours, frequently utilize my bicycle to commute to work, own a plot in our community garden, and almost daily walk across webster, through the park to local shops. Since Kaiser has begun its work we have seen a significant increase in traffic and it leaves many of us wary to cross the road. I often have to step out into the crosswalk further than is recommended just to see if any cars are coming.

I have always enjoyed our webster exit from 580 as it is so convenient for me to get home and yet i recognize that diverting more traffic our way toward residential streets is less than ideal. What with Kaisers reconstruction efforts, we already have been more than impacted and quite frankly cant handle any more. Our bike paths were taken from us when two streets between webster and broadway along mccarthur boulevard were cut off, leading to the increase in webster traffic.

As others have suggested, a solid stop sign at the off ramp opposite the hospital for anyone approaching webster seems to be the easiest and most impactful solution to many of our concerns. I would prefer not to have to be redirected far out of my way to get home, to be penalized further. Perhaps if there is a way to redirect most traffic in alternate directions is possible i am unsure but i urge you to examine all possibilities.

Q-1

Thank you for your consideration
Sincerely,

Hannah Kanzell
435 37th street

Letter Q Response – Hannah Kanzell

Q-1: Refer to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, and Responses to Letter K (A. J. Benham) for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard, and the proposed project's effect on the uncontrolled right turn from the Webster Street off-ramp.

Comment Letter R

Scott Gregory

From: Ellen Gierson [ellenrocs@gmail.com]
Sent: Wednesday, February 03, 2010 8:14 AM
To: sgregory@lamphier-gregory.com
Subject: Alta Bates EIR

Please have stop signs at 36th& 37th St. We need to have the freeway exit rerouted to Broadway. We need reduce your speed sign before and under the underpass. Since Mosswood Park will be impacted, by this upgrade, I request that Alta Bates be required to help maintain the park, add new picnic tables, and plants trees and shubbery around the park.
Thank you,
Ellen Gierson

R-1
R-2

Sent from my iPod

Letter R Responses – Ellen Gierson

- R-1: Refer to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, and Responses to Letter K (A. J. Benham) for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard, and the proposed project's effect on the uncontrolled right turn from the Webster Street off-ramp.
- R-2: The comment suggests measures that do not address the adequacy of the DEIR or potential environmental effects of the project. The City will consider this input prior to taking action on the EIR and the proposed project.

Scott Gregory

From: Gloria Bruce [gloriabruce00@gmail.com]
Sent: Wednesday, February 03, 2010 8:36 AM
To: sgregory@lamphier-gregory.com
Subject: Comment on bicycle and pedestrian concerns - Alta Bates DEIR

Scott Gregory
Contract Planner
Case No.ER 09-0001
c/o Gary Patton,
Deputy Director of Planning and Zoning
City of Oakland

Dear Mr. Gregory:

I am a resident of the Mosswood neighborhood affected by the proposed Alta Bates construction. I also serve on the board of Walk Oakland Bike Oakland, an advocacy group working to neighborhood quality of life by making biking and walking safe, easy, accessible and fun. WOBO maintains relationships with the City's Bicycle and Pedestrian Advisory Committee, the Greater Mosswood Neighborhood Association and other local bodies concerned with the cumulative impact of development in this area, and we will continue to monitor resident concerns.

I share the concerns of several neighbors about the impacts of the project on traffic, pedestrian and cyclist safety, and usage of Mosswood Park. While the DEIR does briefly address project integration with Oakland's Bicycle and Pedestrian Master Plans, bicycle and pedestrian access must be more fully considered this area is transit rich, adjacent to several resident, commercial and transportation hubs. Ensuring safe and enhanced bicycle and pedestrian access will help to mitigate traffic and parking impacts and allow for safe passage to and from North Oakland and downtown Oakland.

Mitigation measures that must be seriously considered include:

- In addition to the installation of "sharrows" from 30th and 34th Streets, consideration of traffic flow and clear detour signage for cyclists must be analyzed all the way north to MacArthur - including alternative safe biking and pedestrian routes, if the heavily used Webster bike route is closed while Broadway is also closed for Kaiser construction. Consider separating detour of auto traffic from detour of bicyclist and pedestrians during construction phases on Hawthorne and Webster
- Lighting, sidewalk improvements, signage and periodic street and sidewalk cleaning installed in the underpass on Webster under the 580
- Improved signage and calming measures for auto traffic exiting 580 and turning onto Webster street, especially traffic turning to the North that is currently not slowed
- Repair of deep potholes on Webster Street, especially between MacArthur and 36th Streets
- Stop signs installed at 36th and 37th Streets on Webster
- Signage to direct traffic to other routes, and staff of Alta Bates encouraged to approach the campus from Telegraph rather than the Webster/Auto Row offramp from 580
- Improved signage for shuttle stops

S-1

Thank you for your consideration of these matters, which are crucial to ensure safety and access for residents, commuters, employees and patients.

Comment Letter S

-Gloria Bruce
431 38th Street
Oakland, CA 94609
510-597-0843

Letter S Response – Gloria Bruce

S-1: Refer to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, and Responses to Letter K (A. J. Benham) for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard, and the proposed project's effect on the uncontrolled right turn from the Webster Street off-ramp. Pedestrian and bicycle detour plans for each stage of construction will be included in the required Construction Management Plan for the project. The city's Transportation Services Division (TSD) will review the detour plans and supporting technical documentation (as well as the traffic control plans) to ensure safe and efficient flow of pedestrians and bicyclists as well as vehicles during all construction phases.

There are no CEQA thresholds for the underpass improvements, traffic calming measures, pothole repair, routing signage, or shuttle stop signage requested in the comment. The small number of trips that the Project would add to the Webster Street corridor north of 34th Street (fewer than 15 trips during the peak hour) is not expected to cause safety or quality of life impacts that would justify the installation of traffic calming measures, nor appreciably accelerate pavement deterioration. Route signage is an effective tool for directing large volumes of traffic to and from special events, but would have less effect on employees and regular visitors to the Summit campus using Webster Street, who are familiar with the area. Improved wayfinding signage across the Summit Campus is included in the project description. However, the City will consider the commenter's recommendation prior to taking action on the EIR.

Comment Letter T

Scott Gregory

From: Melody Hultgren [mhultgren@mcguire.com]
Sent: Wednesday, February 03, 2010 11:49 AM
To: sgregory@lamphier-gregory.com
Cc: CLStarks@oaklandnet.com; NNadel@oaklandnet.com
Subject: RE: Case No. ER 09-0001

Importance: High

Follow Up Flag: Follow up
Flag Status: Red

Hello,

My name is Melody & I own a home on 29th Street near the intersection of 29th & Harrison.

I am DEEPLY concerned that the Draft EIR for the Alta Bates Summit Medical Center project does not include any solutions to address the project's significant impacts on my neighborhood, specifically 29th Street. Before the City approves this EIR, Summit must add mitigations to address the negative impacts of this project on the intersection of 29th and Harrison and the adjacent residential neighborhood.

The projected backups on 29th Street will make our residential block more dangerous for bicyclists and pedestrians, and idling vehicles will affect the air we breathe in our homes. The increased traffic will also make existing rush hour congestion and bicycle/pedestrian safety issues on Harrison Street worse.

Currently, during rush hour, it can take as long as 2 minutes to back out of my driveway onto 29th Street. Further, I walk my dog daily & as it stands now it is VERY dangerous crossing 29th Street due to speeding cars on their way to the 580/24 on-ramps. With the proposed project, it will become even more dangerous.

These impacts are not unavoidable, and they can and should be mitigated.

I invested in this community with the hope of making it a better, safer, more pedestrian-friendly environment. If these changes take place without mitigations, our Oakland neighborhood will become increasingly polluted and dangerous. This is not the direction Oakland needs.

Please make sure that the Summit improvements do not come at the cost of our neighborhood.

Thank you,
Melody Hultgren

--

Melody Hultgren
Realtor
Senior Sales Associate
2006, 2008 UBP Top Producer
Urban Bay Properties, a McGuire Company
email: mhultgren@mcguire.com
phone/text: 415.601.6915
<http://www.ubayp.com/agents/AgentDetailsView.aspx?AgentID=14>
<<http://www.ubayp.com/agents/AgentDetailsView.aspx?AgentID=14>>

T-1

Letter T Response – Melody Hultgren

T-1: Refer to Master Response C, *Traffic and Pedestrian Concerns in the Vicinity of Oakland Avenue and Harrison Street* for a discussion of transportation impacts on 29th Street and through the Harrison Street and Oakland Avenue Corridors.

Comment Letter U

Scott Gregory

From: Matt [yes.chambers@gmail.com]
Sent: Wednesday, February 03, 2010 3:39 PM
To: sgregory@lamphier-gregory.com
Cc: gpatton@oaklandnet.com
Subject: Alta Bates Expansion

Follow Up Flag: Follow up
Flag Status: Red

Hi Scott,

I have two concerns for Oakland regarding the Alta Bates med complex expansion EIR.

My first concern is about taxes. The medical facility expansions on Pill Hill and north have eradicated large swaths of residential homes.

I appreciate the work of these institutions, but they contribute \$0 to property tax revenue or to any other tax to pay for the upkeep of the immediate area. I think these hospitals are good for the community, in moderation, but Oakland and Pill Hill clearly already have their moderate share.

U-1

The second issue is about community and the environment. As I mentioned the ever expanding facilities have removed block-upon-block of dense walkable residential homes. In doing so hundreds of heritage properties are gone for good. For nearly half a century these expansions have been done without any regard to the street scape or neighborhood leaving the area feeling fragmented and undesirable. The latest plans for Alta Bates seem to only throw crumbs of retail to satiate the communities need for healthy street scapes.

U-2

I propose the city limit the footprint of these facility expansions. That they figure out a way to save heritage buildings like the house at 418 30th. Most importantly, they demand these expansions be designed to encourage a healthy walkable community.

U-3

Thank you.

Sincerely,
Matt Chambers
1926 MLK Jr. Wy.
Oakland, CA 94612

Letter U Responses – Matt Chambers

U-1: Regarding the suitability of the “medical facility expansions on Pill Hill and north” (presumably Kaiser Medical Center Oakland) cited by the commenter: these projects have been or are currently being reviewed and considered by the City through both the environmental review process under CEQA, as well as its discretionary review process that considers the suitability of each project in terms of its physical setting and a wide range of City policies and considerations. Further, no residential uses are proposed to be demolished as part of the ABSMC project. Taxes are not considered a CEQA issue and are not addressed in the EIR, however, the City will consider the comment prior to taking action on the proposed project.

For ABSMC specifically, as discussed in Section 4.1, Land Use, Plans and Policies, the project site is zoned “S-1 Medical Center” and the General Plan land use designation is “Institutional.” Thus, the proposed project is an appropriate use for this area, as discussed in detail starting on page 4.1-21. After taking action on the EIR, the City will consider the proposed project.

U-2: See response to Comment U-1 regarding the effects of ABSMC expansion of past years, but that do not relate to the proposed project. Also see responses to Comments F-1 and F-2 regarding the proposed project’s effect on surrounding areas and historic resources. As discussed in Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document, the project would not adversely affect any historic resources defined for CEQA.

To the extent that the approximately 10,000 square feet of street level retail proposed along Summit Street in the new Future Phase MOB is appropriate for the project and the area given its use and location, the City will consider this as it considers the proposed project prior to taking action on the EIR and the proposed project.

U-3: See responses to Comments U-1 and U-2. Also see Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document.

Scott Gregory

From: Naomi Schiff [Naomi@17th.com]
Sent: Wednesday, February 03, 2010 3:56 PM
To: Scott Gregory
Subject: Schiff comment on Summit project ER09-0001
Follow Up Flag: Follow up
Flag Status: Red

Dear Mr. Gregory,

These comments are my own, as a resident of a nearby area.

1) This project does not seem to be connected in any way to the planning process for upper Broadway. It seems a lost opportunity to take advantage of synergies between the medical center development and the city's attempts to plan for the future use of Broadway. As we briefly discussed verbally, I am particularly concerned that the transportation study is inadequate in this regard. V-1

a) It does not take into enough consideration the impacts on neighborhoods adjoining, such as Richmond Boulevard, Harrison/Oakland Corridor, 29th and 30th Streets on the other side of Broadway, and effects on residential areas on the Telegraph-Martin Luther King areas. V-2

b) Located as it is, midway between two BART stations, there should be much closer coordination with AC Transit, and perhaps some subsidy of its operation, so that it will better serve patients, staff, and visitors to the medical center. V-3

c) Webster Street should be opened up for better through usage by bicycles and pedestrians, if not automobiles, and the medical center should be coordinating with the city to this end. V-4

d) If the project is really going to close off Summit Street, how can it be better designed to seem less of an enclave and more part of the city? It seems a rather suburban concept that closes the area off from interaction with its neighborhood. V-5

2) The project appears to sprawl far more than is necessary. The proposed demolition of the historic building on 30th is an example of overreach. Clearly this is two blocks away from the area requiring seismic replacement. There is no necessity to scrape off so much of the extant urban fabric in order to build speculatively for future office leasing. Office leasing is far beyond what seismic replacement requires. Keying phasing to actual requirements instead of real estate investment is what I would hope for. It seems disingenuous to use seismic safety as an excuse for overexpansion. V-6

Thank you,

Naomi Schiff
Resident, 238 Oakland Avenue

Naomi Schiff
Seventeenth Street Studios
410 12th Street, Suite 300

Oakland, CA 94607

510-835-1717

fax: 510-835-1820

<http://www.17th.com>

Letter V Responses – Naomi Schiff

- V-1: The comment does not address issues relevant to the environmental analysis in the DEIR, but addresses planning considerations and process conducted by the City. The City will consider this input prior to taking action on the EIR and the proposed project. Regarding the adequacy of the transportation study's consideration of the City's upper Broadway planning process, the land use development associated with the planned Broadway/Valdez commercial corridor, as described in that projects' Specific Plan, was assumed in the DEIR cumulative traffic analysis. Additionally, the TDM Plan (attached in Appendix A) requires ABSMC to explore coordinating shuttle service with the Broadway/Valdez corridor.
- V-2: With respect to the extent of the study area, refer to DEIR page 4.3-4 (Figure 4.3-2), which identifies the roads that would experience traffic increases attributable to the proposed project. Of the corridors referenced by the commenter, only the 29th Street corridor would experience traffic increases by the project that would require study in the environmental document.
- V-3: As described on page 4.3-6 of the DEIR, the ABSMC already operates a regularly scheduled free shuttle connecting the campus to the nearby MacArthur BART Station. In addition, the proposed project would incorporate pedestrian corridor improvements connecting the campus to the adjacent transit corridors on Telegraph Avenue and Broadway. Further strategies to encourage transit use to and from the Summit Campus are included in the TDM Plan for the Project (see Appendix A)
- V-4: Refer to Master Response D, *Traffic and Pedestrian Concerns in the Vicinity of Webster Street*, for a discussion of transportation impacts on Webster Street between 34th Street and MacArthur Boulevard.
- V-5: The comment does not address the adequacy of the EIR under CEQA Guidelines, which does not address design issues. The City will consider this input on the proposed project prior to taking action on the EIR and the proposed project.
- V-6: The comment does not address the adequacy of the EIR, but instead addresses the merits of a project. The City will consider this input on the proposed project after taking action on the EIR. As clarification, the Project no longer proposes demolition of the historic building on 30th Street. See Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document.

CHAPTER 7

Responses to Comments Made at the Public Hearings on the DEIR

The Planning Commission held a Public Hearing on the DEIR on January 20, 2010, and the Landmarks Preservation Advisory Board held a Public Hearing on the DEIR on February 8, 2010. This chapter presents the transcripts of each Public Hearing, followed by the responses to each speaker's comments. Reference may be made to a master response presented in Chapter 5, Master Responses to Recurring Comments, or to a response to an individual written comment presented in Chapter 6, Responses to Written Comments Received on the DEIR.

As in Chapter 6, responses presented in this chapter specifically focus on comments that pertain to the adequacy of the analysis in the DEIR or other aspects pertinent to the environmental analysis of the proposed project pursuant to CEQA. Comments that address topics beyond the purview of the DEIR or CEQA are noted as such for the public record and may be taken into consideration by the Planning Commission and the City Council prior to acting on the EIR or the proposed project.

7.1 Responses to Comments Received at the Planning Commission Public Hearing

The transcript that follows only includes that portion of the Public Hearing that is relevant to the DEIR. Proceedings of the full Planning Commission meeting that includes discussion not pertinent to the public hearing on the ABSMC DEIR is available for review at the City of Oakland Planning and Zoning Division.

HEAR0120

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OAKLAND PLANNING COMMISSION HEARING
ALTA BATES - ITEM # 6



HEARING
250 Frank H. Ogawa Plaza
Oakland, California 94612
Wednesday, January 20, 2010

Reported by:
Bobbie Jo Harr
CSR No. 6090
Job No. 129210

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1 APPEARANCES OF COUNSEL :

Comment Letter PH

5 HEAR0120
9:08 p.m. - 10:06 p.m.

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SPEAKERS

SCOTT GREGORY	5
VIC MEINKE	15
STEVE O'BRIEN	22
VIKI ARDITO	24
TAO MATTHEWS	27
JOY JOHNSON	30
JIM RYDER	31
NAOMI SCHIFF	34
SANJIV HANDA	36
COMMISSIONER GIBBS	38
COMMISSIONER COLBRUNO	40
COMMISSIONER TRUONG	42
COMMISSIONER BOXER	43
COMMISSIONER GALVEZ	44
COMMISSIONER HUNTSMAN	44
MR. PATTON	45

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1 COMMISSIONER HUNTSMAN: Call the next item,
2 please.

3 MR. MILLER: The next item is the public hearing
4 on the draft EIR for Alta Bates Summit Medical Center.
5 And Gary Patton, major projects director, is going to give
6 a few words.

7 MR. PATTON: Mr. Chair, members.

Comment Letter PH

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8 Happy New Year, first of all, to all of you.

9 COMMISSIONER HUNTSMAN: Thank you, Mr. Patton.

10 MR. PATTON: Nice to see you. Although I
11 thought it would be earlier in the evening.

12 I wanted to just take a moment briefly to introduce
13 the item. This is the seismic upgrade project in the
14 master plan for the Alta Bates Summit Medical Center on
15 Pill Hill. We've been at work on this project well over a
16 year now and are happy to bring it to you this evening.

17 For the benefit of the new commissioners, I want to
18 introduce the project planner, Scott Gregory. Scott is a
19 contract planner. I know some of our more seasoned
20 veterans here have seen Scott before. He was the contract
21 planner for the Kaiser project. And as you know, over the
22 last five years when we've been extremely busy, I haven't
23 been able to staff these major projects with city staff.
24 I have -- we've had to have agreements so that we can have
25 contract planners come in.

□

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1 So he's on a contract with Alta Bates, but he reports
2 to the city, me directly. I edit everything he does, and
3 all the work he prepares is the city's information. So
4 Scott Gregory is going to make a presentation.

5 MR. GREGORY: Thank you.

6 Good evening, chairman and planning commissioners.
7 The item before you tonight at this point is a public
8 hearing to receive comments, your comments and comments
9 from the public on the draft Environmental Impact Report
10 for the Alta Bates Summit seismic upgrade and master plan

HEAR0120

11 project.

12 The draft EIR was released for public review on
13 December 21st and it will go through a 45-day public
14 review period that will end, excuse me, on February 3rd.
15 So during that time, we're taking comments tonight, we'll
16 be accepting all written comments, e-mail comments, phone
17 call comments, however comments come in to us. The intent
18 is to be able to respond to all of those comments in a
19 final Environmental Impact Report and a final document.

20 So where we want to hear comments tonight, we don't
21 intend to necessarily try to respond to those comments.
22 We would like to be able to take the time to think about
23 those comments and provide a -- you know, a thoughtful
24 response in a written form as part of the final EIR. So
25 if you have questions about the process or the document

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1 that's in front of you, we'll be glad to answer those
2 questions tonight. But in terms of responding to
3 comments, we'll do that as part of the final Environmental
4 Impact Report that is prepared at the end of the process.

5 In terms of the project moving forward, we do
6 anticipate going -- bringing the project back before the
7 design review committee again, hopefully in February.
8 That process will continue through and it will merge with
9 the Environmental Impact Report process that hopefully
10 will be in the spring, March, April, back before this
11 commission to consider certification of the final
12 Environmental Impact Report in consideration of final
13 project approvals.

HEAR0120

14 So quickly to the point. I know you've had a long
15 evening. I'd like to just give you a quick rundown of the
16 project description that is analyzed in the Environmental
17 Impact Report. It is the seismic upgrade for the Alta
18 Bates Summit campus, the current Merritt Pavilion. And I
19 believe there's diagrams that are in the book or that may
20 be even shown by some representatives later. The current
21 acute care facilities in the Merritt Pavilion do not meet
22 the state-mandated seismic requirements. And so the
23 project is intended to replace those facilities with a new
24 acute care patient tower or new hospital of approximately
25 309 beds.

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1 That new hospital would be located at the present
2 site of Bechtel Hall. Bechtel Hall would be -- would be
3 removed to make room for the new acute care tower that
4 would be located adjacent to and connected to the Merritt
5 Pavilion. The vacated -- once the new tower is built, the
6 acute care facilities in the existing Merritt Pavilion
7 would move in and the space would be backfilled with other
8 non-acute care medical care office uses. And as well the
9 emergency department would be located from the one portion
10 of the building that it is now, closer to the new acute
11 care patient pavilion so that all those functions are much
12 closer in proximity.

13 Also as part of this current Phase 1 project which
14 are the more current and foreseeable future projects is a
15 new seven-level parking garage that would be able to both
16 offset current deficits and to serve the projected demand

HEAR0120

17 for new parking within the campus. It's about a
18 1,000-space parking garage but would also be a new
19 temporary surface parking lot, two new emergency
20 generators, and on-site circulation improvement. Those
21 are a list of the type of the improvements that are
22 anticipated to happen by year 2015. So those are the
23 near-term project.

24 The Environmental Impact Report also analyzes a
25 number of future phase improvements that are designed to

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8

1 provide overall increases in capacity and aesthetics
2 within the campus. Those longer-term projects include a
3 new fitness center that would be located on the top of the
4 proposed parking garage; a new five-story medical office
5 building that would be located at the corner of
6 Hawthorne -- at the corner of 30th and Summit Street; a
7 new four-story building to be used for the Samuel Merritt
8 University teaching college at the corner of Hawthorne and
9 Elm; and then the potential for closure of a one-block
10 section of Summit Street from 30th to Hawthorne to be
11 instead redesignated as a pedestrian plaza to provide more
12 open space and kind of amenity to the overall campus.

13 It's a quick overview of the project. I believe that
14 the Alta Bates Summit Medical Center folks are here
15 tonight. They have a very brief presentation that, if at
16 your pleasure, you'd like to see that. It gives you some
17 graphic images and explanations, perhaps in a little bit
18 more detail about what it is that their project is and why
19 they are putting it together that they are.

HEAR0120

20 The real purpose of my staff report tonight is to
21 talk briefly about the Environmental Impact Report and its
22 process. The Environmental Impact Report was prepared by
23 the city's consultants, ESA. It's a very thorough and
24 comprehensive document, in scope. It addresses all of the
25 environmental issues that are required to be addressed

□

9

1 under the California Environmental Quality Act.

2 In most cases throughout the Environmental Impact
3 Report there are identified either less than significant
4 impacts or potential impacts that can be mitigated with
5 either application of the City's standard conditions of
6 approval or mitigation measures that are recommended in
7 that document.

8 There are, however, a number of environmental topic
9 categories for which we -- which have been identified as
10 having significant and unavoidable environmental effects.
11 I'd like to just kind of touch briefly on those
12 significant and unavoidable effects because those are the
13 issues that will need to be considered for statements of
14 overriding consideration at the end of this process.

15 The first category of significant and unavoidable
16 effects is air quality and greenhouse gas. As many of you
17 I presume have been aware, the Air District has been
18 looking at adopting new thresholds of significance for
19 some time. Over the past year, they have published three
20 or four different versions of CEQA guidelines and CEQA
21 thresholds. We have used their latest draft, their
22 December draft guidelines as a basis for comparing the

HEAR0120

23 environmental effects of the project in terms of its air
24 quality emissions as a threshold number.

25 We think that that's a conservative approach and

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1 consistent with the CEQA practice and is the way that this
2 document should have been done.

3 By doing that, we're using a standard that is not yet
4 adopted by the district but that is out and available for
5 our information.

6 Applying those new thresholds to the project, we've
7 identified a significant and unavoidable impact related to
8 the emission of criteria pollutants during construction.
9 It's also identified a significant and unavoidable effect
10 of the emission of criteria pollutants during operations,
11 primarily related to both stationary sources and vehicles.
12 And we've also identified a cumulatively considerable
13 increase in greenhouse gas emissions related to the
14 project.

15 So there's three significant and unavoidable effects
16 that are identified in the Environmental Impact Report.
17 There are a number of mitigation measures that are
18 attended to address those issues but none that could bring
19 them below these new thresholds of significance.

20 The second topic of significant and unavoidable
21 effects is cultural resource impacts. There is a current
22 building at -- located at 418 30th Street that's used as a
23 medical office building. It is designated in the Oakland
24 Cultural Heritage Survey with a rating of DC-3, which
25 means it's of a minor significance.

HEAR0120

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1 However, as part of the state forms that the City
2 filled out and submitted to the state as part of the
3 California Register and National Register, it was
4 identified with the status code of S-5, which indicates
5 that it's an individual property that is eligible for
6 local listing. So we have a condition where it's both
7 identified as insignificant but then eligible for local
8 listings.

9 So what we propose to do is bring these two criteria
10 to the Landmarks Board together with specific information
11 about this particular site and talk to them about whether
12 or not it should be specifically designated as a city
13 landmark.

14 In the meantime, we have conservatively assumed that
15 it is, that it is a significant culture -- cultural
16 resource under CEQA and identified that under the proposed
17 project, the project has intended to remove that building
18 to make room for a future medical office building, but if
19 that were to be the case, it would be a significant and
20 unavoidable effect of the project.

21 There are mitigation measures and conditions of
22 approval in the Environmental Impact Report that say
23 first, seek to avoid that impact. Second, look to
24 opportunities to potentially relocate that structure to an
25 appropriate and suitable site. And third, if those -- if

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HEAR0120

1 those prove infeasible, look to other types of mitigation
2 measures. So those are also spelled out in the
3 Environmental Impact Report.

4 And then finally, as in almost every Environmental
5 Impact Report, there's a number of traffic impacts that
6 are significant and unavoidable. In the short term --
7 most of all, in the short term, both existing plus project
8 and year 2015 plus project, most of the -- most of the
9 traffic impacts can be mitigated with measures that are
10 identified in the document. Most of those measures have
11 to do with improving the timing and signal coordination up
12 and down major corridors within the city.

13 However, by year 2035, traffic tends to do what it
14 does and grows and grows and grows, and overall cumulative
15 traffic levels begin to cause failures throughout the
16 system at a number of significant intersections throughout
17 the city. And the project's traffic, though frequently a
18 small contribution, does add to those significant and
19 unavoidable traffic impacts at numerous intersections
20 throughout the city, primarily on the corridors of
21 Telegraph Avenue, MacArthur Boulevard, Grant and Harrison.

22 So we've identified a number of mitigation measures
23 that should be applied at each of those intersections and
24 locations throughout the city. Those mitigation measures
25 would reduce impacts, it would help alleviate traffic

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13

1 congestion, but they would not bring traffic conditions
2 down to the point where they would be within what the city
3 considers acceptable levels of service.

HEAR0120

4 So at the end of the day, we'd be looking at as part
5 of the final Environmental Impact Report and
6 considerations of the project, considering statements of
7 overriding significance for a number of these impacts.

8 while I'm on the topic of traffic, both air quality,
9 I would also like to mention that the environmental
10 document identifies as a condition of approval and as a
11 mitigation measure the preparation of a transportation
12 demand management plan. The intent of that plan is to
13 look at strategies to help reduce the number of
14 single-occupancy vehicles that are associated with the
15 project.

16 A number of strategies include increasing and
17 enhancing the shuttle service, flexible work hours,
18 guaranteed-ride-home programs. There's a number of long
19 lists that are included in the draft as suggested
20 mitigation measures. We are working now to create a more
21 finalized transportation demand management plan that would
22 become a condition of approval for the project with the
23 specific intent of trying to reduce single-occupancy
24 vehicles. So that would work hand in hand with another
25 mitigation measure that is included in the document, and

□

14

1 that is a greenhouse gas emission reduction plan.

2 So Alta Bates Summit has already done a -- has done
3 several steps forward in the preparation of sustainable
4 development strategies for their program. I believe
5 they've provided handouts or there's information that is
6 available about their sustainable strategies. We'll be

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7 working with them in the future to develop sustainable
8 strategies, strategies for greenhouse gas reduction, and
9 strategies for vehicle reduction. And those things will
10 come together as conditions of the project's approval
11 through the Environmental Impact Report process.

12 As part of the staff report, there's also included
13 some tables and some information about current parking
14 conditions within the site, about projected conditions
15 under the project, and then the resulting cumulative
16 parking conditions at the site. Part of the reason that
17 we wanted to put this information in front of you is A,
18 there's a lot of numbers and it tends to be complex and
19 there's lots of different scenarios that are out there.
20 But also at the end of the process, it is likely that the
21 project will need a variance from the city's off-street
22 parking requirements. So we wanted you to at least be
23 aware of the magnitude of that variance and the potential
24 magnitude of what we're talking about, in terms of parking
25 conditions.

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15

1 I think with that much information, I'd only like to
2 add to that on -- starting on page 11 of the staff report
3 there are a number of things that we have noticed as we
4 flurried to get the document prepared. There's a number
5 of very minor corrections that we've already identified as
6 part of the draft Environmental Report. We'll be working
7 to make sure that those are solved and resolved in the
8 final, but we just wanted to make a note for you as you
9 run through that.

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Comment Letter PH

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10 So as I said, the real purpose of tonight's meeting
11 is to take your comments or comments from the public about
12 the information that's included in the Environmental
13 Impact Report. I'd be happy to try to address any
14 questions that you may have at your pleasure. I know that
15 Alta Bates Summit folks have a short presentation that
16 they would like to make, and we'll go from there.

17 COMMISSIONER HUNTSMAN: Are there any questions
18 for staff?

19 Okay. Please have the presentation.

20 MR. MEINKE: Good evening. My name is Vic
21 Meinke. My position at Alta Bates Summit is strategy and
22 business development. I've been working on this project
23 in the development of this plan for quite awhile, so it's
24 good to see it be at this level of development for today,
25 so we appreciate your time tonight.

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1 We have about eight slides for you. We'll go through
2 this fairly quickly. Before I start, though, I would like
3 to thank a couple of people who have been very active in
4 helping us involved in this. Obviously Scott has been
5 very helpful to us. Mark Wald and Gary Patton throughout
6 this process, and then the representatives of ESA,
7 Crescentia Brown and Reema Mahamood as well. It's been
8 very helpful to us as we've approached this.

9 And one other introductory remark as well. Warren
10 Kirk, who's the Chief Executive Officer of Alta Bates
11 Summit would like be here tonight. Tonight is the night
12 of the annual medical staff meeting on the Summit Campus.

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13 And if you know anything about hospitals, there's lots of
14 medical staff meetings, but the annual meeting is one that
15 he couldn't miss. So he just wanted to let you know that
16 he's very actively involved in this process and will be
17 participating as this goes forward.

18 So, again, I appreciate the opportunity to present a
19 very quick overview for you. I will keep this very brief.

20 My level at this is to tell you a little bit about
21 the plans and the ideas around the facilities. We do have
22 representatives here who can answer any detailed questions
23 you may have. I have Shahrokh Sayadi, who is an internal
24 consulting architect for us. Sean Kirton from Devenney
25 Group, who is the architect for this particular project.

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17

1 And David Preiss is the attorney. So if you do have any
2 detailed questions and I can't handle it on a more general
3 basis, we do have staff here.

4 So to the presentation. Again, I think we all know
5 the reason for this, under SB 1953 and the need to make
6 compliance available for this hospital. So I think we'll
7 dispense with this. You've probably heard it before, so
8 we'll do that.

9 One of the things we like to say about this project
10 is safer sooner. By doing the project that we're doing at
11 Alta Bates Summit, we will be meeting the 2030
12 requirements in 2015. So once this project is done, not
13 only will we be meeting the requirements that are required
14 of us by 2013, but we will also be building these
15 facilities such that they surpass 2030 requirements for

Page 15

HEAR0120

16 this particular facility. So we're very happy with that.

17 In your handout you may be able to see this a little
18 bit better, but I want to give you a sense of the
19 facilities that we're talking about. Excuse again the
20 pointer. The facilities at Alta Bates Summit are really
21 comprised of what used to be three acute care hospitals
22 throughout the campus, which was on this corner. This, by
23 the way, is Telegraph. Broadway is down at the southern
24 end of the picture. Peralta Hospital was here, Providence
25 Hospital was in this location, and Merritt Hospital was

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18

1 this location. All these hospitals came together as a
2 single entity in about 19 -- during the 1990s.

3 Today all the acute care services, meaning basically
4 patients that are in beds with acute illnesses or
5 surgeries, those types of services are all performed in
6 this building here in the Merritt -- in what we call the
7 Merritt Pavilion. SB 1953, the seismic requirements apply
8 to the patients who are basically acute patients in beds.
9 So what we're talking about is solving the issues, the
10 seismic issues that are associated with this building.
11 And basically what the issues with these buildings are is
12 everything -- if you can follow my pointer here --
13 everything within this box is -- basically fails to meet
14 seismic requirement.

15 This building, which is this triangular-shaped
16 building, does meet seismic requirements past 2030, so
17 it's in very, very good shape. The problem for us is that
18 these buildings within this box, the ones that do not meet

Page 16

HEAR0120

19 requirements, house about 90 percent of all the patient
20 beds that we have on -- in this facility.

21 However, this building, the one that's going to
22 continue to remain, has essentially all the technology.
23 It has all the surgeries, it has the cath labs for cardiac
24 patients, it has the imaging services, it has diagnostic
25 services, and it does have about 71 patient beds, but

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19

1 nowhere near as many as in these particular areas.

2 As well, the emergency room is also in this building
3 on this side of the campus, and again, as part of the
4 requirements, needs to be in a seismically safe building.
5 The problem with this is even though the building might
6 meet seismic standards, trans -- transporting a patient
7 into the -- into a compliant building through a
8 non-compliant building is something that we can't do. So
9 we have to solve that problem as we go.

10 Again, I just want to point out one other thing.
11 You'll see there's a relatively large parking area out
12 here. Just kind of keep that in your mind as we go to the
13 next slides, and we'll talk to you about at least the
14 first phase of the project.

15 So the first phase of the project is -- like Gary
16 said, is the construction of what we call a new patient
17 care pavilion. And, again, like I said before, basically
18 what that building is is basically a new bed. The
19 technology side of it, the surgeries, cath labs, those
20 types of things, will remain in the triangular-shaped
21 building I said earlier. we'll also relocate the

Page 17

HEAR0120

22 emergency department, we'll build a new parking structure,
23 and we'll build related pedestrian and landscape
24 improvement with an expected completion date by 2015.

25 So if we go to the next slide, again, same

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20

1 orientation, Telegraph up here, Broadway would be down to
2 the south of this. This building, the new facility that
3 is being built is this building right here, which again
4 will connect into this triangular-shaped building which
5 does meet seismic requirements. So this building becomes
6 the new patient care pavilion. We'll have approximately
7 about -- I think it's 238 beds in that building to replace
8 beds that are in this facility.

9 In addition to that, the emergency room currently
10 located here will be relocated to the ground floor of this
11 building with new egress and exits for emergency room
12 patients and ambulances within that facility. And then
13 the next phase of it would be the development of the
14 parking garage which was in that large area that we talked
15 about up in this area.

16 And the only thing I'd want to point out, and, again,
17 it's graphically represented by the green areas, is one of
18 the intents we have for this project is to try to develop
19 much more of a green, pedestrian friendly, cohesive campus
20 than what existed in the past. And, again, I'll go back
21 to the three legacy campuses that existed here who didn't
22 really relate to each other that well back in the '50s and
23 '60s and '40s, when all these places were built. And now
24 we're going to take this opportunity to try to pull this

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25 campus together in a way that hasn't existed in the past.

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21

1 The second phase of future phases of this project
2 would include the new medical office building, a fitness
3 center that's going to be placed on top of the garage.
4 Samuel Merritt University, which is a very unique program
5 for a lot of hospitals to actually have a college
6 university associated with it which we have for health
7 training. Nurses, physical therapy, podiatry, and any
8 other number of a -- a few other types of health-related
9 services will have a new building as well. And then we're
10 hopeful of being able to close Summit Street and also
11 again continue that development of a pedestrian area that
12 helps link the campuses together.

13 So on the next slide, again, you will see the
14 depiction of those three buildings. The area on top of
15 the parking garage is the fitness center that I was
16 talking about. This facility on Hawthorne and Elm Street
17 would be the college -- new college facilities for
18 classrooms and expansion. And then this facility located
19 on 30th and Summit would be the -- would be the new
20 medical office building as well.

21 And, again, take the green depictions as areas of --
22 again, this is Summit Street, so our intent and hope would
23 be that we could close Summit Street, work through a
24 number of issues. And we know there's bus lines and
25 there's several other things that have to be worked on

□

1 through that. But, again, to create a much more
2 centralized core to the entire campus that is much more
3 pedestrian friendly and less car invasive from what we
4 have today. And that's it.

5 Again, hopefully that gives you a quick summary at
6 least from our vantage point of what it is. And again we
7 thank you for the opportunity.

8 COMMISSIONER HUNTSMAN: Mr. Miller, could you
9 call the speakers?

10 MR. MILLER: There are a couple names associated
11 with Alta Bates. I don't know if their intent was to
12 speak, but I'll just read them off. Viki Ardito and Steve
13 O'Brien.

14 COMMISSIONER HUNTSMAN: Thank you, Mr. Miller.

15 MR. MILLER: Next -- I'm sorry. If you want to
16 speak, could you come forward?

17 COMMISSIONER HUNTSMAN: would the first speaker
18 please take the mic.

19 MR. O'BRIEN: Hi. Thank you, commissioners. My
20 name is Steve O'Brien. I'm a physician. I'm president of
21 the medical staff at Alta Bates. I'm also director of the
22 East Bay AIDS Center, which is the largest provider of HIV
23 services in Alameda County, and we are a department of
24 Alta Bates Summit Medical Center. I'm here to speak in
25 favor of this tower and of the new emergency department,

PH-1

1 on behalf of the physicians at Alta Bates Summit Medical

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2 Center. It's a fabulous thing that this hospital and this
3 campus is expanding and developing new resources here in
4 the community. It's a great commitment on the part of
5 Sutter and Alta Bates Summit Medical Center to the
6 community and citizens of Oakland.

7 I'm particularly thrilled as a not-for-profit medical
8 center and as a director of a community service program
9 serving primarily poor and indigent people that there is
10 an ongoing commitment to provide these kind of services in
11 our community. It's terrific.

12 The current space, as you know, is not seismically
13 sound but also it's just medically inadequate. We run,
14 for example, an emergency room HIV testing program in the
15 Summit emergency room through the mayor's Get Screened
16 Oakland campaign. And working in that emergency room is
17 very difficult. I describe it as being like in an old
18 Victorian with a lot of little individual rooms where
19 you're kind of going through corridor through corridor to
20 see people -- see different things. You can't see
21 everybody all in the same space. You can't clinically
22 evaluate people.

23 The new emergency room at Alta Bates which took 15
24 years to build is an entirely different sort of setting
25 and I think the sort of setting they're looking for at

PH-1
cont.

24

1 Summit, where you can see people, you have a better chance
2 of getting around and looking at the different patients.
3 Flow is much better, and patient satisfaction has
4 skyrocketed in the last several months because of changes

Comment Letter PH

HEAR0120

5 in that emergency room.

6 There's going to be better flow, private rooms for
7 patients, which is the state of the art, and those private
8 rooms available to all patients including my poor AIDS
9 patients. And the new facility is also going to be ready
10 for the new electronic health record, which we'll be
11 converting to over the next several years as part of the
12 Sutter system. And then finally, it's going to help draw
13 in new physicians and new medical providers to our
14 community, which is extremely important since we're
15 competing with other facilities for those same doctors.

16 So thank you very much.

17 COMMISSIONER HUNTSMAN: Thank you, sir.

18 Next speaker.

19 MS. ARDITO: Hi. I'm Viki Ardito, I'm the chief
20 nursing exec for Alta Bates Summit. I have been providing
21 health care in this community for about 33 years, and I
22 again am very supportive of this project. It's really
23 meant to provide a healing environment for our staff and
24 for our patients. It's for years to come. We need some
25 changes, we need to make things better and we need it to

1 flow.

2 As you heard, we have a new state of the art ED.
3 we're really focusing around patient and family-centered
4 care, so it allows us to better provide that kind of care
5 which supports the family and the patient and their social
6 and emotional needs, not just their clinical needs.
7 Single patient rooms help us to do that. They give us

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PH-1
cont.

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PH-2

HEAR0120

8 flexibility. They accommodate the needs of the acute care
9 patients that we have now. Ultimately, though, it's
10 really providing better safety for our staff and our
11 patients, obviously, with the seismic issues. So clearly
12 it puts us in a facility that's much more safer for our
13 staff and for our patients.

14 I have been involved from the inception in the
15 development of the actual physical rooms with every
16 clinician that I could get in the room to talk about it.
17 so we have staff nurses, we have managers, we have
18 respiratory therapists, we have a variety of folks that
19 have sat down, looked at these rooms. We were just
20 earlier today walking through a mockup room that we've
21 developed with clinical input from the staff to say how
22 does this work? How should it work? Does this make sense
23 for you about how you work in your day? Does this
24 computer monitor work and how we can get, you know,
25 different equipment in the room.

PH-2
cont.

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1 Staff has been very involved, they're very excited
2 about it, they've given us a lot of good input. It's
3 really been sized for the kind of care that we'll be
4 giving in the future. If you think about it, it's health
5 care, it's not sick care. And health care is where we
6 need to focus, and that's prevention.

7 So with our focus on prevention and as we get better
8 at keeping people out of the hospital and keeping them
9 well and cared for at home, the number of inpatients that
10 we'll see will decrease because prevention keeps them out

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11 and that should be the name of the game for us.

12 So, again, size to support family center care, size
13 to look at all the new technology. And as it transforms
14 in the future, we've tried to put this together to say
15 here's what it's going to look like in ten years. We know
16 it's out there, it's not ready for primetime yet, but when
17 it comes, we have a space and a way and a way to flex in
18 it with the units.

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PH-2
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19 COMMISSIONER HUNTSMAN: Thank you, ma'am.

20 MS. ARDITO: Thanks.

21 COMMISSIONER HUNTSMAN: Appreciate it.

22 MR. MILLER: Well, I see Tao Matthews is up.
23 Marina Carlson has ceded time to Tao.

24 And if I could, Ms. Matthews, before you start I'll
25 name a few more names: Naomi Schiff, Dr. Joy Johnson.

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27

1 And Benjamin Elliott has ceded time to Jim Ryder.

2 MS. MATTHEWS: Yes. Good evening,
3 commissioners.

4 I'm very concerned about a few things. What I heard
5 about Summit is that they're interested in seismic
6 upgrading, that's what I heard the need was. But what I'm
7 feeling is there's -- sounds like there's just a desire to
8 overbuild and build and build and build, and also it
9 sounds like they want to keep up with Kaiser. I'm just
10 really concerned about this.

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PH-3
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11 My main reason for speaking, however, tonight is that
12 we're all extremely concerned about a locally designated
13 historic house at 418 30th, which is now housing doctors'

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PH-4
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HEAR0120

14 offices. After speaking with Dr. Irv Johnson, he asked me
15 to make a plea to you for the rescinding of any plans by
16 Alta Bates to tear this structure down. In the past seven
17 years, Northgate has suffered severe losses of historic
18 pieces of property within a four-block radius. These
19 losses seem really unnecessary and very, very
20 nonproductive.

21 Our proposal from Northgate Neighbors for Historic
22 Preservation to Alta Bates which is already very large as
23 it is, is to please consider going around 418 30th. On
24 the north -- or the east and west sides of 418 30th, there
25 is not a lot of space, there is not a lot of driveway.

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PH-4
cont.

1 The back end of it, as I looked at it, is not very large
2 either. It does not take up a very big footprint. And
3 its south side faces the street, so I think it could be
4 spared.

5 It's a very beautiful old house. It has very little
6 excessive footprint in terms of being in the way of Alta
7 Bates Hospital. Its east and west sides, as I said, are
8 narrow. And Alta Bates may want to consider also the
9 purchase as an alternative of things that are very
10 mitigated -- you know, need to be dealt with in terms of
11 mitigation, of 2935 Telegraph and may consider relocating
12 the few old houses and buildings that are now in their
13 way, so to speak, or that are owned by Alta Bates, to
14 relocate these to this site which now houses an empty
15 vacant lot and which recently lost a very precious piece
16 of historic property.

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17 One of our landmark board members seems to feel that
18 buying 2935 Telegraph from Ellis Corporation and making a
19 preservation park out of this lot would greatly enhance
20 the quality of life and character of that area. It would
21 also make Alta Bates look really good in the community as
22 well and look very, very green and concerned about what we
23 all are concerned about over there, about our properties
24 being historic.

25 Part of the Alta Bates requirement -- part of the

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1 requirement in dealing with historic properties includes
2 the honest attempt to relocate -- first of all, to go
3 around it, and then secondly to relocate it. And it's
4 just that Northgate at this point as a Level 2 historic
5 district really cannot afford to lose any more pieces of
6 our Heritage property here.

7 So I'm very concerned about -- as I said about trying
8 to take care of this property, looking at what is really
9 going on here. Is this just a question of A, we want to
10 build -- is it just about a seismic upgrade or is it an
11 excuse to build big and compete with Kaiser? I mean, it
12 just seems like the whole thing got completely out of hand
13 really quickly here.

14 So the whole neighborhood is concerned about the
15 historic properties, the properties that may not have
16 great historic status but really are important to the
17 character of the area.

18 But we're also concerned about the interruption of
19 life over there, like the bus routes, the shuttles that we

PH-4
cont.

PH-5

HEAR0120

20 all use, and the things that -- how to get through there.
 21 And already the campus is -- Alta Bates is already 20
 22 point something acres. So we're really concerned about,
 23 you know, how big can you go and why is this big --
 24 bigness so -- so -- why is this being so emphasized? I
 25 mean, I don't really get it at all.

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 PH-5
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1 All right. Thank you.

2 COMMISSIONER HUNTSMAN: Thank you.

3 Next speaker?

4 MS. JOHNSON: Thank you. I'm Dr. Joy Johnson.

5 And I own a historical property that is directly next to
 6 Alta Bates at 465 30th Street. My property there is used
 7 as a psychotherapy office. And I just came tonight to
 8 comment on the process that I've had with the people --
 9 with the people in this project since they have announced
 10 that they were going to be trying to expand on their
 11 project.

12 Anyway, being in a psychotherapy office requires a
 13 lot of quiet and confidentiality and all of that sort of
 14 thing. And I would like for you to know that I have
 15 received nothing but good news, in terms of my association
 16 with the people from Alta Bates regarding this project. I
 17 was very concerned because I'd learned pretty early in
 18 looking at the EIR, that my property was located directly
 19 next to -- well, a property that was going to house the
 20 two -- possibly house -- if this project goes forward, it
 21 will house the two generators that are going to be the
 22 backup for the hospital. And I was really concerned and

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 PH-6
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HEAR0120

23 wondered about things like emissions, things like noise
24 levels, that sort of thing.

25 And I just want to say that all of my questions have

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1 really been answered very extensively. I have -- I didn't
2 expect to meet with all of the people that I've been able
3 to meet with so far regarding this project. I've talked
4 to Scott Gregory on the phone, the planner. And I've
5 talked -- I've actually met with the project architect and
6 I've met -- architect designer, and I've met with the
7 project architect. And I really appreciate this kind of
8 outreach because I do consider myself a real staunch
9 member of the community. I've owned my property since
10 1993. It's important to me. It's a historical property,
11 I appreciate it, and I really do appreciate the effort
12 that they've made to stay in contact with me and I will
13 really do expect the same from them.

PH-6
cont.

14 Thank you.

15 COMMISSIONER HUNTSMAN: Thank you, Dr. Johnson.

16 Next speaker, please.

17 MR. RYDER: My name is Jim Ryder. I'm the
18 Collective Bargaining Director for Northern California for
19 the California Nurses Association. Not competing with
20 Ms. Ardito, but I've been spending the last 33 years of my
21 life providing union representation, as opposed to nursing
22 care, to people in the immediate Bay Area.

23 The fact is that this new hospital is necessary.
24 Equally the fact is that this new hospital as it's
25 designed today is inappropriate. It's a hospital that

PH-7

HEAR0120

32

1 will be more than twice the size of the current Summit
2 Hospital and it will hold 36 fewer beds than the current
3 hospital.

4 The fact is that we have been asking for over a year
5 in the collective bargaining and representational process
6 to understand what beds are going to be eliminated, and we
7 have not been able to get an answer. It's simply that
8 there will be at least 36 fewer beds.

PH-7
cont.

9 Additionally, for this commission, I think that you
10 are responsible for Oakland, but there is something that's
11 much broader, and this is the way in which Sutter is
12 operating in all of its communities. And the fact remains
13 that at Alta Bates they're about to withdraw use of or
14 close the cardiac cath lab. Those labs will be existing
15 at Summit, but Kaiser is also going to close those labs.
16 And everybody in the Kaiser system will end up having to
17 go to San Francisco, which means that Summit will have
18 Berkeley, Oakland and the Kaiser Oakland cardiac cath
19 labs, all with traffic going to Summit in an emergency
20 circumstance.

PH-8

21 Herrick Hospital is closing, that's the pavilion of
22 Alta Bates. And you have adult and pediatric or juvenile
23 psych, and they're closing some 36 beds there, that's
24 moving to the Providence Pavilion. We don't know
25 precisely what's going to happen to other services that

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HEAR0120

1 are in Herrick, but we know that we're looking at a
2 process that Sutter has consistently used in every
3 community in which it resides. And that is the closure of
4 and reduction of hospital access, hospital services. The
5 size of the hospitals are growing but the services are
6 being reduced.

7 I'm sure that this planning commission is familiar
8 with what's going on in the Eden San Leandro corridor of
9 Alameda County where San Leandro Hospital is being closed,
10 or the attempt to close it. And the reality again will
11 come back to what are we going to do in Oakland with
12 regard to the reduction in beds and reductions in services
13 that this enormous corporation in northern California is
14 committing with regard to its plans and designs and
15 hospital reconstruction.

16 CNA plans to provide additional comments in writing.
17 I think I had time ceded, so I'll be shockingly short,
18 give you a break from item number 1 to item number 2. But
19 I believe that it is significant that this planning
20 commission look at the way in which the design is taking
21 place and the reductions in services and the reductions in
22 beds and capacity in the Summit Campus, as well as what's
23 happening in Sutter at large.

24 Thank you very much.

25 COMMISSIONER HUNTSMAN: Thank you, Mr. Ryder.



PH-8
cont.

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1 And for the -- just before you come up, Ms. Schiff.
2 For the benefit of Mr. Ryder, this is strictly about the
3 environmental impact. There will be continued

HEAR0120

4 conversations. So, you know, we look forward to seeing
5 you again.

6 But for everyone, if you could just speak to the
7 draft Environmental Impact Report, that's the scope of
8 this meeting, this conversation tonight.

9 Thank you.

10 MS. SCHIFF: Okay. From the global back to the
11 very specific. Naomi Schiff, Oakland Heritage Alliance.
12 We will be putting in a letter concerning 418 30th Street
13 which, while not a city landmark, is some kind of cultural
14 resource. And I would like to sidestep the technical
15 issue of what kind of historic resource it is and speak
16 rather to the planning issue that it represents. which
17 is, it should be seen as an opportunity rather than a
18 liability to have a valuable piece of local character two
19 blocks away from any seismic work, on a street face that
20 could tie the neighborhood in with this hospital.

PH-9

21 The thing I noticed in the slide presentation, and
22 maybe you noticed it too, is that campus thing. Well,
23 it's fine to have a campus. But one thing about a campus
24 is it turns inward, it does not turn outward. The
25 opportunity that this little historic building which is

35 PH-10

1 now in full use as a medical office building presents is
2 that it can help tie the street face into the surrounding
3 neighborhood which will still exist, even in Phase 2 or
4 whatever phase they intend for its demolition.

5 It is not needed to do the Phase 1 seismic repair
6 that they demolish this building. It is simply something

HEAR0120

7 to put in the plans as a place holder for a medical office
8 building which presumably does not need to rise to the
9 acute care seismic standards of the hospital tower. So
10 you are talking about replacing a medical office building
11 with a medical office building.

12 Granted, probably the new one would be way bigger,
13 but probably it can indeed jump around this historic
14 building or incorporate it, either of which would be
15 easier to do than moving it, although I like that idea,
16 too.

17 I do think that it would be excellent to look at this
18 in a slightly less technical way and say what opportunity
19 does this historic resource two blocks away from anything
20 seismically necessary present to incorporate this hospital
21 site into its community rather than turning its back on
22 its surroundings?

23 And last, if you will indulge me for one more remark.
24 When you cut off a street and turn it into a pedestrian
25 mall, there are many wonderful things that can happen.

PH-10
cont.

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1 But it does not tend to integrate the development of its
2 surroundings. Again, it tends to make it more of a
3 private preserve. So in cutting off Summit Street, it
4 seems to me that that also has an environmental effect
5 beyond traffic effects, it has a neighborhood effect. And
6 we really want to look at whether we could use the
7 opportunity that 418 30th Street might present to remedy
8 that.

9 Thank you.

Comment Letter PH

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10 COMMISSIONER HUNTSMAN: Thank you, Ms. Schiff.

11 MR. MILLER: Sanjiv Handa is our last speaker.

12 COMMISSIONER HUNTSMAN: Mr. Handa.

13 MR. HANDA: For the record, Sanjiv Handa, East
14 Bay News Service.

15 Obviously the process of hospitals takes a lot longer
16 than anything else. You'll recall that Kaiser Hospital
17 first approached Oakland in 1991 regarding their
18 rebuilding, and it was not until 2007 that they actually
19 completed the proposal, and the building's going to take
20 another 15 to 20 years for complete build-out.

21 It should be noted for the benefit of the viewing
22 public that the seismic retrofitting's mandated by state
23 law that all medical facilities, and particularly
24 hospitals, must meet much higher seismic standards by
25 specified deadlines. And between Alta Bates Summit,

PH-11

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1 Kaiser and Highland Hospitals there's going to be a
2 staggering amount of construction money pouring into the
3 Oakland economy, creating jobs and its benefits.

4 That contrasts with the take-away of industrial land
5 that the city council championed under Jerry Brown because
6 their key donors for Mr. Brown, Mr. De La Fuente, Mr. Reed
7 and others, were more interested in short-term profits,
8 which is why we have so much housing stock like the Uptown
9 Project that is nowhere near its limit that was reduced to
10 three phases.

PH-12

11 The second part is that this will be an opportunity
12 when it comes back for the certification of the EIR to

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HEAR0120

13 visit these points.

PH-12
cont.

14 But three things need to be looked at. The first is
15 public transportation. Line 59 is the only bus line that
16 actually goes into the heart of this campus. On
17 Telegraph, various bus lines come and go, the numbers have
18 changed over the years, and the 51 runs along College.
19 That is proposed to be terminated and broken into two,
20 with the dividing line at the Rockridge BART station.

21 And that is all going to create hardship,
22 particularly for the seniors and people who are dependent
23 on AC transits. Because three times in the last five
24 years AC has proposed to take away the 59 line. So that
25 should be analyzed as to what the long-term prognosis is

PH-13

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1 for that particular line.

2 Secondly, looking at the city's own paratransit
3 program, taxis, scripts and those sorts of things, what --
4 it is projected as it was a couple years ago on the
5 decline and so -- as the population of seniors and
6 disabled in Oakland grows.

PH-14

7 And the third and final point within that context is
8 looking at -- it was referenced by the gentleman from the
9 nurses association, that the difficulty is that you're
10 getting much more complicated, complex equipment, and it's
11 like Pixar. They're in Emeryville but their big computer
12 center is in Oakland, nondescript. And they couldn't fit
13 that into Emeryville.

PH-15

14 So that kind of outsourcing is happening. People are
15 going to Korea, as the New York Times noted last week.

HEAR0120

16 Previous articles about people going to Vietnam and India
17 to get medical care, partly because of the malpractice
18 premiums here, partly because doctors aren't going to take
19 the kind of risks, without fear of lawsuits. And so
20 you're getting an outsourcing of medical jobs as well.

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PH-15
cont.
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21 Thank you.

22 COMMISSIONER HUNTSMAN: Thank you, Mr. Handa.
23 At this time we'll bring it back to the commission.
24 Mr. Gibbs?

25 COMMISSIONER GIBBS: I'll try to limit my

□

39

1 comments to EIR-specific issues.

2 One of the things that I noticed was the new Bay Area
3 quality standards, there were going to be significant
4 impacts, that there didn't appear to be a mitigation
5 strategy that met those thresholds. So I'd like to see
6 those addressed in more detailed in the next draft.

↑
PH-16
↓

7 There were mentions of transit initiatives which --
8 it might be my assumption, but I assume that they would
9 also help address some of the greenhouse gas issues as
10 well. So I'd like that to be definitely a part of that
11 analysis.

↑
PH-17
↓

12 To those who spoke on the historical building, I do
13 recall that there were alternatives that included building
14 around or potentially -- no, I don't believe that there
15 was one that actually advocated moving it or even explored
16 that. So -- is that correct? Okay. So that would be one
17 that I would ask that it get studied as well.

↑
PH-18
↓

18 And -- well, this -- and I struggled with whether

↓ PH-17

HEAR0120

19 this is actually a EIR-related issue, but it -- it could
 20 be, from the standpoint of public safety. And that is the
 21 doubling of size of the campus and a reduction in beds. I
 22 understand that there will be some private rooms that will
 23 be, you know, part of this new strategy or this new
 24 development. But I would like to see some study done
 25 around the feasibility of adding more beds with the larger

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 PH-19
 cont.

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1 size that you guys proposed.

2 So those are my comments, those are things that I'd
 3 like to see incorporated in the final.

4 COMMISSIONER HUNTSMAN: Thank you, Commissioner
 5 Gibbs.

6 Commissioner Colbruno.

7 COMMISSIONER COLBRUNO: Couple things. Since
 8 we're just commenting on the EIR tonight, this will be
 9 coming back to us, a comment on the project. First I
 10 wanted to commend Alta Bates for keeping the Samuel
 11 Merritt name involved in this as part of Oakland history.

↑
 PH-20

12 The thing that jumps out at me in the EIR kind of
 13 cumulatively is the whole traffic management plan. With
 14 everything, I think the AC transit bus issue's real. The
 15 shuttles, I think it says in the report they run every 15
 16 minutes now, which right now seems to me to be adequate.
 17 However, with the additional parking, and it seems like
 18 there's -- when I read it, it looks like there's more
 19 traffic coming into there with more density.

↑
 PH-21

20 And so the whole issue of the off-street parking
 21 variance, the number of busses running, the thing I really

HEAR0120

22 couldn't figure out, although I kept looking at it, was
23 the bicycle management plan. I mean, our bike paths in
24 Oakland run down Webster and there's access, but I
25 couldn't quite see how it integrates into the Plan, I

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41

1 couldn't quite figure it out.

2 And I know a lot of people who work at hospitals live
3 close to the hospitals, and it seems like we could prevent
4 people from driving if we had a clear bike and pedestrian
5 plan. I couldn't quite figure it out.

PH-21
cont.

6 So kind of the traffic mitigation which to me
7 includes bikes and pedestrians and bus ridership and
8 shuttles, I couldn't quite put it all together to figure
9 out how that's going to work in relationship to what seems
10 to be more density. I have no problem as we move forward
11 with the towers and certain aspects of it. But that to me
12 is critical because when I look at it, it seems like a lot
13 of cars kind of pouring in. And if we could control that
14 a little bit in the EIR, I think that would be a good
15 thing.

16 I'm glad to hear the discussion about the 418 30th
17 Street. I was a little surprised in the EIR that there
18 wasn't more information. I was kind of fascinated by who
19 the architect might be. And it says in there "Architect
20 unknown." It looks like a Matthews building to me, when I
21 look at it, which would be significant. And if not, I
22 mean there's certain features on that building including
23 on the roof that I haven't seen before. So I'd like to
24 know, moving forward a little bit more, personally I think

PH-22

HEAR0120

25 it would be -- if there was a way to work around it and



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1 incorporate it into the design, I think it's a nice
2 gateway, it preserves a little touch of that kind of Sam
3 Merritt period history coming into the campus, and I think
4 it would be a nice touch for Alta Bates.

PH-22
cont.

5 so I'd like to be a little bit more aggressive on 418
6 30th. And I've heard it brought up a number of times
7 tonight, which I think is really encouraging.

8 And those are really for me the only real shortfalls
9 that I saw in the EIR. I think you guys did a good job,
10 and I think the project's moving ahead nicely. And I look
11 forward to coming back to the commission.

12 COMMISSIONER HUNTSMAN: Commissioner Truong?

13 COMMISSIONER TRUONG: I'd like to thank the
14 planner on this, Gregory Scott -- Scott Gregory, and all
15 the folks who've worked on Alta Bates. It's a lot of
16 great work and the project looks fantastic.

17 I second and support the things that I've heard
18 before, especially the comments I've heard about let's
19 figure out how we can best mitigate some of the cumulative
20 damages caused by transportation. Let's try to figure out
21 how we can bridge the gap between the CO2 emissions at
22 build-out and the expected thresholds of the Bay Area Air
23 Quality Management District, which right now is quite a
24 gap. And so let's see in the final EIR how we can bridge
25 those things.

PH-23

1 And the historic preservation, I'd like to see in the
2 final EIR the best way we can protect the building and
3 explore some areas and ways we can do that.

PH-24

4 COMMISSIONER HUNTSMAN: Thank you.

5 Commissioner Boxer - Vice Chair Boxer.

6 COMMISSIONER BOXER: That's okay. Thank you,
7 and -- thank you. I'll be brief.

8 My principal area of concern will be the TDM. I
9 think this commission learned a tremendous lot, and
10 Mr. Gregory probably did as well, during our Kaiser
11 experience about a TDM. If I were to handicap or provide
12 any criteria -- critique of Kaiser now that we're seeing
13 it built, is we probably didn't push them hard enough on
14 the parking or garage issue attached to the medical office
15 building that's been built.

16 And I think Alta Bates is a little different in that
17 the garages aren't along one of our major thoroughfares so
18 we won't have that issue, per se. But I'm going to
19 really -- when this comes back, I'm going to challenge
20 Alta Bates on their demand, their parking demand. We're
21 actually an environment of reducing parking and not
22 encouraging car trips. So push real hard, Mr. Gregory, on
23 a TDM which really focuses on reducing SOV,
24 single-occupancy vehicles, promotes the use of transit,
25 promotes the use of shuttles, bikes, as Mr. Colbruno

PH-25

□

1 mentioned, and walking and any number of strategies that

HEAR0120

2 we can avoid that, and see how we do on our greenhouse gas
3 profile. That's really my principal concern. And green
4 building techniques, which I'm sure we'll hear more about
5 when you come back. But I'll also ask Alta Bates when you
6 do come back to really flesh out in great detail with us,
7 and I'm sorry I wasn't available to meet with them, the
8 kind of techniques you're going to utilize in the
9 build-out of this particular facility.

PH-26

10 Thank you.

11 COMMISSIONER HUNTSMAN: Thank you.

12 Commissioner Galvez?

13 COMMISSIONER GALVEZ: I would just echo the
14 comments that have been made. I do want to commend you
15 on, you know, using the new Bay Area quality management
16 standards because I know they haven't been formally
17 adopted. And in particular, I want to echo the comment
18 that Commissioner Boxer just made that we need to really
19 look at how we can reduce the use of single-use cars.

PH-27

20 COMMISSIONER HUNTSMAN: Thank you.

21 My fellow commissioners have captured my concerns. I
22 feel like it was a well-written draft, but I would echo
23 the same points. And I commend Mr. Patton and -- and
24 Mr. Gregory. I really -- I really appreciate this body of
25 work. We will have many opportunities to talk about this

PH-28

45

1 project moving forward. We're looking forward to seeing
2 an EIR that suits us. Thank you.

3 MR. PATTON: I wanted to add just one comment
4 for benefit of Mr. Boxer and those concerned with the TDM.

HEAR0120

5 We fully intend to push them on the TDM plan. In fact,
6 we've asked them to look at -- since all of our hospitals
7 are part of the mayor's health initiative and they've been
8 meeting over the last few years and talking about ways
9 they can work together, we're going to encourage Alta
10 Bates Summit to talk to Kaiser and perhaps we can work out
11 some joint TDM program where not only Alta Bates Summit
12 and Kaiser, perhaps Children's, can all look at routes,
13 shared modes of transit. They all have a common interest.
14 They're not logistically that far apart. And so we're
15 hopeful we will be able to push them to cooperate in some
16 way that is beneficial for all of our medical providers.

17 COMMISSIONER HUNTSMAN: Thank you.

18 (Proceedings concluded at 10:06 p.m.)

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REPORTER'S CERTIFICATE

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I, BOBBIE JO HARR, CSR No. 6090, Certified Shorthand
5 Reporter, certify:

6

That the foregoing proceedings were taken before me
7 at the time and place therein set forth, at which time the

HEAR0120

8 witness was put under oath by me;

9 That the proceedings were were recorded
10 stenographically by me and were thereafter transcribed;

11 That the foregoing is a true and correct transcript
12 of my shorthand notes so taken.

13 I declare under penalty of perjury under the laws of
14 California that the foregoing is true and correct.

15
16 Dated: _____

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18 _____

19 BOBBIE JO HARR, CSR No. 6090.

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Responses to Comments Received at the Planning Commission Public Hearing

Public Hearing Commenters

Steve O'Brien, President of Medical Staff, ABSMC

PH-1: The comments describing existing conditions and in favor of the new hospital tower and emergency department are noted. The City will consider this input on the project merits prior to taking action on the EIR and the proposed project.

Viki Ardito, Chief Nursing Executive, ABSMC

PH-2: The comments regarding the proposed project's design process, existing conditions and in favor of the new hospital tower and emergency department are noted. The City will consider this input on the project merits prior to taking action on the EIR and the proposed project.

Tao Matthews

PH-3: A primary objective of the proposed project is to replace the acute care patient facilities with a new Patient Care Pavilion prior to the January 1, 2015 to comply with Senate Bill (SB) 1953. According to SB 1953, the Merritt Pavilion (existing hospital) is not eligible to be licensed as an acute care hospital after January 1, 2013, and would have to close because in its currently condition, it will not meet future State-mandated earthquake-resistant standards for hospitals. This is discussed in detail starting on page 3-9 of the DEIR. ABSMC's master plan also incorporates development components that are not required to comply with SB 1953 but that are intended to enhance the capacity of ABSMC campus to serve the community and improve aesthetics through a number of improvements and new facilities (see *Objectives of the Proposed Project*, bullet 7, on page 3-11 of the DEIR). Regarding the comment regarding the "overbuilding" that would result with the project, the City will consider this input prior to taking action on the EIR and the proposed project. The analysis in the DEIR analyzes the environmental effects of the ABSMC project, which will inform the City in its assessment of the project.

PH-4: Since publication of the DEIR, the Project Applicant has decided to redesign the MOB to avoid demolition of that property, as described in Alternative 3.1 (pages 5-32 through 5-34 of the DEIR). Also see Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document.

The comments recommending ABSMC acquire offsite property along Telegraph Avenue for development as a park does not address any environmental effects of the project. The City will consider this input prior to taking action on the EIR and the proposed project.

PH-5: AC Transit will discontinue its Line 59 bus route that serves the ABSMC Summit Campus as of March 2010 (see Comment Letter B, AC Transit). This decision was made by AC Transit independently of the proposed project. ABSMC will continue to provide its shuttle service during construction of the project. Also, regarding site access, circulation and shuttle circulation comments, see responses to Comments G-5 and G-6 in Chapter 6 of this document.

As stated in response PH-3, the City will consider comments regarding the expansion of ABSMC prior to taking action on the EIR and the proposed project.

Dr. Joy Johnson

PH-6: The comments are consistent with those provided by the commenter in Comment Letter I. See response to Comment I-1 in Chapter 6 of this document.

Jim Ryder, Collective Bargaining Director for Northern California for the California Nurses Association

PH-7: The comment questions the appropriateness of a hospital that “will be more than twice the size of the current Summit Hospital and...hold 36 fewer beds than the current hospital.” First, as shown in Table 3-3 on page 3-15 of the DEIR, there will be 28 fewer beds at the ABSMC Summit Campus after the new hospital tower is completed.

Second, the new Patient Care Pavilion (hospital) will be approximately 26 percent larger (in total square footage) than the existing hospital (see DEIR Table 3-3). The comment suggests that a reduction in beds will equate to a reduction of services. While not an environmental issue under CEQA, this topic is addressed in the DEIR starting on page 3-10 (footnote 2) under the topic of “Project Objectives.” To summarize from the DEIR, part of the applicant’s project objectives include the use of single patient rooms provide numerous direct benefits to patient safety and satisfaction, as well as operational and operational cost efficiencies. Moreover, ABSMC has indicated that use of single patient rooms allows ABSMC to serve a larger number of patients than a comparable hospital with shared patient rooms. ABSMC concludes that the proposed reduction in bed count would increase occupancy to approximately 78 percent, while maintaining adequate capacity for peak utilization periods.

PH-8: The comment also addresses broader changes in specific health services throughout the area. These issues pertain to business decisions made by ABSMC and do not concern the adequacy of the DEIR analysis or environmental effects of the project and addressed under CEQA. The City will consider this input prior to taking action on the EIR and the proposed project.

Naomi Schiff, Oakland Heritage Alliance

PH-9: See Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document and response to Comment F-2 in Chapter 6 of this document.

PH-10: In addition to the response provided to Comment F-2, the DEIR assesses the environmental effects of the possible creation in the Future Phase (after 2015) of a circular drive at the southern end of Summit Street to provide access to adjacent buildings, and closing off the rest of the street to provide for a landscaped pedestrian area. The DEIR assesses the environmental implications of the proposed street closure as well as non-closure, since the closure of a public street requires major discretionary approval. As such, the City will consider the proposal prior to taking action on the EIR and the proposed project although an application for public street closure, if ABSMC decides to pursue the Summit Street closure in a Future Phase, would be submitted later, as part of the Future Phase entitlements process.

Sanjiv Handa, East Bay News Service

PH-11: See response to Comment PH-3 regarding state law (SB 1953). Comments regarding the economic merits of constructing this Oakland project are beyond the scope of CEQA and are noted. The City will consider this input prior to taking action on the EIR and the proposed project.

PH-12: The comment does not address the adequacy of the DEIR. The project does not affect industrial lands or proposed to add to the City's housing stock.

PH-13: See responses to Comments PH-3 and PH-5 above. The comment suggests that AC Transit's proposed change in existing bus lines would result in hardship for transit users. The DEIR discusses proposed changes in AC Transit facilities, and assess the potential non-CEQA effects.

PH-14: The project proposes to maintain its existing shuttle services, and the degree to which the shuttle system may be expanded to enhance service (including services to seniors and the disabled) are addressed in the TDM Plan prepared and included in Appendix A.

PH-15: The comment does not address the adequacy of the EIR or topics addressed within the scope of CEQA. The City will consider this input prior to taking action on the EIR and the proposed project.

Planning Commission Discussion

Commissioner Gibbs

PH-16: See Master Response B, *Greenhouse Gas Emissions Reduction Measures*, in Chapter 5 of this document.

PH-17: See Master Response B, *Greenhouse Gas Emissions Reduction Measures*, in Chapter 5 of this document. That response indicates that the TDM measures are considered as part of the GHG emissions reductions applied to the proposed project. The TDM measures are detailed in the TDM Plan in Appendix A to this document, and the emissions reductions are reflected in the GHG Plan in Appendix B to this document.

PH-18: See Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document. Given the Project Applicant's choice to redesign the new Phase 2 MOB and avoid the historic resources impact identified in the DEIR, an alternative to relocate this property is no longer warranted.

PH-19: See response to Comment PH-8 above.

Commissioner Colbruno

PH-20: The comment commends ABSMC for keeping the Samuel Merritt name as part of the Master Plan. The comment is noted.

PH-21: The Project Applicant has prepared a TDM Plan in accordance with the City's Standard Condition of Approval TRANS-1 (see page 4.3-31 of the DEIR). The TDM Program addresses the integration of the multiple travel modes (bicycles, pedestrian, bus riders). Also see response to Comment G-6 in Chapter 6 of this document.

PH-22: See Master Comment A, *Property at 418 30th Street*, in Chapter 5 of this document. The DEIR discusses the property in some detail starting on page 4.7-16. The analysis moreover conservatively presumes the building is an historic resource for CEQA purposes.

Commissioner Truong

PH-23: See Master Response B, *Greenhouse Gas Emissions Reduction Measures*, in Chapter 5 of this document, as well as the detailed GHG Plan in Appendix B to this document.

PH-24: See Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document.

Commissioner Boxer, Vice-Chair

PH-25: The Project Applicant has prepared a TDM Plan in accordance with the City's Standard Condition of Approval TRANS-1 (see page 4.3-31 of the DEIR). The TDM Program addresses the integration of the multiple travel modes (bicycles, pedestrian, bus riders). Also, see response to Comment G-6 in Chapter 6 of this document.

PH-26: See Master Response B, *Greenhouse Gas Emissions Reduction Measures*, in Chapter 5 of this document. Also, see the detailed GHG Plan in Appendix B to this document, which outlines the green building techniques to be incorporated into the proposed project through the project's adherence to energy performance standards in the *Green Guide for Health Care* and the proposed CALgreen building code requirements.

Commissioner Galvez

PH-27: See response to comment PH-25.

Commissioner Huntsman, Chair

PH-28: The comments addresses the merits of the project, and the City will consider this input prior to taking action on the EIR and the proposed project.

7.2 Responses to Comments Received at the Landmarks Preservation Advisory Board Public Hearing

The transcript that follows only includes that portion of the Public Hearing that is relevant to the DEIR. Proceedings of the full Landmarks Preservation Advisory Board meeting that includes discussion not pertinent to the public forum on the DEIR is available for review at the City of Oakland.

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City of Oakland
Landmarks Preservation Advisory Board Regular Meeting
Monday, February 8, 2010

Item #2

Alta Bates Summit Medical Center Summit Campus Seismic Upgrade and Master Plan

Speakers:

- Joann Pavlinec, Secretary
- Scott Gregory, Staff (Contract Planner)
- Shahrokh Sayadi (Applicant)
- Rosemary Muller, Board Member
- Betty Marvin, Staff
- Valerie Garry, Board Member
- Daniel Schulman, Board Member
- Tao Matthews
- Naomi Schiff
- Benjamin Elliott

Transcribed by ESA from KTOP DVD of proceedings.

1 Scott Gregory: Good evening my name is Scott Gregory, I'm a contract planner
2 for the city, um, on the Alta Bates Summit project. I've got a brief staff report that I'd
3 like to share with you just to give you an overview, a little bit of an overview of where
4 we stand on the process and the project itself. Uh, we've prepared a Draft Environmental
5 Impact Report for the entire, um, Alta Bates Summit medical center project that was
6 released for public review on December 21st. The 45 day public review comment period
7 on that Draft EIR actually ended on, um, February 3rd – last week – but the staff decided
8 to extend that comment period to include the comments that may be made on the project,
9 on the Environmental Impact Report at this hearing because we wanted to get your
10 comments and feedback. Um, if the staff report suggests that we want you to take any
11 kind of official action, we're really not asking for that tonight. What we wanted to do is
12 ask the Board for your comments and thoughts particularly as it pertained to the, um, the
13 presumed – as we call it in the Draft EIR – historic resource of 418 30th Street. Um, the
14 reason that we wanted to talk about that specifically is because we went through a, we
15 went through a rating criteria under the city's, um, heritage survey ratings, and, you
16 know, concluded that the property of 418 30th Street was not listed or determined eligible
17 to be listed on the California Register of Historic Resources. It was not included the
18 Register of the Oakland's local Register of Historic Resources. It's not a designated
19 historic property. It's PDPH rating was neither an 'A' or a 'B'. It's not with an area of
20 primary importance, and the Council hadn't made any motion to designate it as
21 significant. However, it did meet one of the criteria for consideration as a historic
22 resource under the Oakland criteria in that it had a DPR form life 23 rating of '5-S'. So,
23 we presumed as we prepared the Environmental Impact Report that that criteria, being on
24 the DPR form, qualified as a historic resource. We've had one public hearing before the
25 planning commission on the Draft Environmental Impact, and we've had a number of
26 comments that have been received to date, all of them suggesting and, and concluding
27 that, or agreeing with the staff's recommendation that this building be designated, or
28 considered as a historic resource for purposes of CEQA. So what we wanted to do tonight
29 is to tell you that our recommendation is to remove the presumed designation as a historic
30 resource, identify the building as a historic resource, and to just verify that with you. Um,
31 talk with you about whether or not you felt there was any reason that we shouldn't

1 proceed in that direction. So, whether that's an official action of the Board, or just
2 comments, we'd be happy to just take comments. I believe we're planning to proceed
3 ahead presuming that it is a historic resource, pursuant to the California Environmental
4 Quality Act. Um, there's a number of cultural resource and historical resource issues that
5 are discussed in the Draft Environmental Impact Report pertaining to archaeology and
6 paleontology, shadows and adjacent historic resources, um, impacts of demolition of
7 buildings that we have identified as being non-historic, and then the larger issue of the, of
8 the um, potential demolition of the building at 418 30th Street. We'd be interested in any
9 comments that the Board, Board members, have about any of those issues. Um, we did
10 want to get your about how we have treated 418 30th Street. Perhaps before we get into
11 too many comments about 418 30th Street, it might be useful and beneficial to have the
12 project applicants from Alta Bates Summit give you kind of a quick overview of some of
13 their changes and plans for that site, and that may help you with some of your comments.
14 So with that, if it's alright with you, I'd ask Mr. Sayadi from Alta Bates medical center to
15 just give the very briefest of comments about that issue and it may help clarify some
16 things.

17

18 Shahrokh Sayadi: Good evening. my name is Shahrokh Sayadi and I'm with Alta
19 Bates Summit, and, uh, basically based on the planning staff that has determined the
20 building at 418 on 30th Street to be eligible for the local listing and the CEQA historical
21 resources, we will redesign the new MOB to avoid the demolition of 418 on 30th Street,
22 and maintain the same square footage. So, uh, there is no impact on this presumed
23 historical resource as is identified as one of the alternatives in EIR. Okay?

24

25 Scott Gregory: Alright. So, uh, as Mr. Sayadi mentioned the Environmental
26 Impact Report does include evaluation of alternatives. One of the alternatives that was
27 studied was a historic resource avoidance alternative that would seek to design a building
28 that would work around the site that contains the 418 30th Street. Um, as you've heard,
29 the applicants are willing to pursue that alternative to avoid impacting that building. Um,
30 we still would be interested in your comments as to whether you concur with staff's, um,
31 perspective that the building to be considered a historic resource, but we're gonna pursue

1 as though it is and work with them to design a master plan for their campus that seeks to
2 avoid that impact. So, that's, concludes the staff report.

3
4 Rosemary Muller: I have a question. Um, Betty, maybe you can answer this. Is,
5 what in the world is 5-S, and who gave it that rating? And why did they have a right to?

6
7 Betty Marvin: 5-S is one of the National Register status codes that the State
8 Office of Historic Preservation uses in their historic properties directory. We had some of
9 this about the estuary plans use of the State numbers last time or the time before. The
10 numbers start with 1 – Is on the National Register, 2 – Officially determined eligible, 3 –
11 Appears Eligible, 4 – Potentially eligible under some condition (when older, if restored,
12 whatever), 5 – Is not, does not appear eligible for the National or California Register but
13 deserves consideration in local planning because it appears eligible for local designation
14 or some other reason. Then there's 6 – Doesn't appear eligible, and 7 – Not evaluated.
15 Because a PDHP is – what does it stand for – Potential Designated historic Property –
16 potentially designated. Therefore, that translates pretty directly, to the language
17 for a 5: could be eligible for a local designation. So when we said in the inventory forms,
18 the PDHPs have the National Register status code 5. That's a sort of second tier, below
19 the National and California register gems and jewels. Then later, along came this
20 definition of thresholds out, out of a lot of – and based on language in the CEQA
21 guidelines, the city attorney's interpretation was that a 5 was eligible, was presumed a
22 historic resource for CEQA. Now, the weird thing about this is that that's only ones that
23 have an inventory form, and – that's mostly buildings on the reinforced masonry list
24 because in the survey phases before the URM survey, in the early 90's, Sacramento only
25 wanted forms on things that appeared eligible for the National or California register. So
26 there's this abhorrent little group of several hundred PDHPs that aren't A's, B's, primary
27 district, potential A's, B's, that have the forms sitting out there that give them this
28 special consideration under the CEQA thresholds. So that's what a '5' is.

29
30 Rosemary Muller: I guess my concern about that is that there are four five
31 hundred – is that what you said there are? – building owners who have, who are owning

1 potentially historic buildings and don't know it. And so, unless there on a list somewhere
2 or we could publish the fact that they have this rating, it seems like that ought to be a
3 little more transparent to everybody, that they're on this list.

4
5 Daniel Schulman: Um, I agree with Rosemary, I think it kinda snuck up there, this
6 5 – thank you for asking that question succinctly. Um, I also have some specific
7 comments about the building itself. Um, we have it listed as a, uh, big D, little C so, it's
8 supposedly that so with some rehabilitation it could move up to a C category, and I was
9 wondering if with your new plans of keeping it in place, if part of the project there's
10 going to be some money and planning to actually do some work on the structure. I went
11 up there, I noticed that the uh, the brick façade is, is cracked in several places and
12 separated. Um, some of the uh, modernizations, particularly in the back of it with the
13 little pop-out extension, the glass brick wall that doesn't fill the original, uh, window area
14 – it looks, looks pretty horrible, um...to stay the least. I mean, there's some very nice
15 things about the structure, mostly the roof and the front, uh, elevation are very nice. But
16 the sides and the back in particular, um, don't – don't look so great. And so I don't know
17 if with, you building around it, if you're going to build close to it so those will be less
18 apparent or if there's, um, ability to actually do some restoration on, on the uh, building.
19 Um, so, that – that...

20
21 Shahrokh Sayadi: Well, uh, our current plans, uh, basically we would not be
22 going around it – we would just not – our building would just stop our new MOB right at
23 the property line. And, uh, we have not really looked at it, or make an evaluation about...

24
25 Daniel Schulman: So then the, uh, existing parking in the back of it and the, uh,
26 will – won't be touched either?

27
28 Shahrokh Sayadi: Everything will remain the same.

29
30 Daniel Schulman: Okay, alright...thank you. Um, and then a general kind of, uh,
31 comment about our process where we – the Board's been very big on, uh, moving

1 buildings that, instead of demolishing them which, in general I think's a good idea, but –
2 I was wondering if this building itself kind of points out some short-sided thinking there
3 that it seemed that we were kind of assuming that the buildings would have some type of
4 wood siding or what-not whereas this building has this brick façade which has already
5 been cracking, and I don't even know if you can move such a structure without more
6 damage to the, uh, the brick facing. And I believe the windows themselves are all brick,
7 um, around there. And, and even if it could be moved I'd assume it'd have to be moved
8 somewhere else that's kind of a firm, granite area. Otherwise, if it's a softer foundation
9 then, uh, it would just crack more. And so, that's the general kind of question to the
10 Board or at least who's here that maybe we kinda missed that when we talked about um,
11 uh, moving structures as mediation instead of demolition.

12

13 Valerie Garry: Well, it sounds like moving this building is, um, not really on the
14 table as a – an, and really, they – in terms of moving buildings – they can move and
15 maintain just about any kind of building if it's done properly but, um, I...I, uh, I guess
16 I'm, I'm happy to hear that the building you're proposing to maintain, um, to keep it, um.
17 I'm a little confused over what it's current – it's, it's uh leased from the uh, um...the
18 California agency, you know the report here that – it was, I don't know when this was
19 done. looks like sometime in the last, uh, looks like '94 perhaps? Um, what it's current
20 use is, and does that use – is the? It was being used as a, uh, medical dental office. Is it
21 occupied? Is it being used? What – does it have – I mean, 'cause it seems to me
22 ultimately the question's gonna be what happens to this building in terms of its use if it
23 just is main-, if it just is left there and then it proceeds to deteriorate then...I don't see
24 that as being a particularly beneficial outcome to the whole process but I'm just
25 wondering whether, whether at this stage there's any thought to how this building would
26 be either reused in a way that's compatible with all of the uh, proposed, um, seismic...

27

28 Scott Gregory: sure, the building is currently used as a medical office building. So
29 there's both medical and I think dental offices that are in there. And, I believe under the
30 plan that's proposed now is that that building would continue to be used as a medical
31 office building. And the property is owned by Alta Bates Summit medical center, um, so,

1 it would be part of their continuing properties and fit within the context of that medical
2 center.

3

4 Valerie Garry: and I um, I did read this report but I need to have my, my memory
5 refreshed. Is the, uh, one of the ways to offset retaining this building to put, to make the,
6 um, the MOB several stories higher? Is that the plan? Or is that what the anticipa-, or the
7 expectation is?

8

9 Scott Gregory: I believe that that's the expectation. The Environmental Impact
10 Report looked at a way to, basically to contain the same amount of program space within
11 the medical building, but just in a different configuration. So in order to have the same
12 amount of space, with a smaller footprint, it would need to go a couple stories taller. So
13 that's what we looked at. We looked at the shadows, we looked at aesthetics, we looked
14 at other potential effects related to making that building taller – didn't identify any. So,
15 but that would be the plan, is to have the building be taller.

16

17 Valerie Garry: And then – the \$64,000 question – does making it taller, how does
18 that impact, if any the shadow, um, issue with the church? And I know it was addressed.

19

20 Scott Gregory: Correct. So, the shadow from this building would be on the far
21 opposite end of the campus from where the church is, so it would not affect that church at
22 all. And in fact most of the shadows from this building would fall the opposite direction
23 from 418 30th Street as well, so. And we have done a study to determine whether building
24 around the 418 30th Street would materially alter the historic settings, and concluded not
25 as long as the building was remained intact.

26

27 Valerie Garry: Okay, thank you.

28

29 Scott Gregory: Mm-hm.

30

1 Joann Pavlinec: Um, we do have several speakers on this item, um, if the Board's
2 ready for that?

3
4 Rosemary Muller: Okay.

5
6 Joann Pavlinec: Uh, Tao Matthews, Naomi Shiff, and Benjamin Elliot.

7
8 Tao Matthews: Good evening, Board members. My name's Tao Matthews and,
9 um, I'm a nearby neighbor of 481 30th. I want to congratulate Alta Bates on, on doing the
10 best they could to preserve this building, and I, I really appreciate that. And if – and I'm a
11 nearby neighbor, if you folks want somebody to, make sure that the property is free of
12 debris, I'm, I'm looking for work. I'd be glad to take care of it. I love historic property.
13 And um, but I do want to say this – I'm, I'm truly concerned with the scope of what Alta
14 Bates is proposing to be, uh, proposing. To begin to redo 20+ acres is, it seems, way over
15 and above what really and truly is needed here. As a nearby neighbor, I question Alta
16 Bates on staying close and true to what seismic upgrading actually means. I favor the
17 most conservative upgrading of the area. Certainly retrofitting has to be in place. But I
18 also seriously question what is, behind the State agenda enforcing hospitals to meet such
19 seemingly extensively, excessively, monumental standards for uh, 2035. The buildings
20 have already stood the test of time, and one good-sized earthquake. Is – is this, um,
21 seismic, you know – kind of an excuse to develop the area into a closed up kinda, closed
22 off, closed in, quasi industrial park of sorts, and I'm really concerned about that. I don't
23 really get it, is what I'm saying. I don't get it and I, kind of, I don't support tearing up
24 20+ acres when it appears that actually what really needs to be done can be done to
25 retrofit and safety – make the building safe, without such unavoidable environmental
26 impacts. Going green, which is what the President's asking us to do, means saving and
27 updating properties which are already good and useful. Also someone last time said
28 there's going to be 36 fewer beds, and I, I didn't quite understand well, if it's new
29 buildings, why would there be less patient beds...I didn't quite get that. Now onto 418
30 30th, I'm glad you found that it does have local historic status. And I'm also concerned,
31 once we – try to save these other two small ones, these two small pink buildings that are

LH-1
LH-2
LH-3

1 off of Elm near 34th. There's also – they also very dear little cherished and presser-, um,
2 interesting buildings. When I walk by them they appear to be full of , of storage and junk,
3 and, I think once that stuff's cleared out, you may have something that's – maybe it could
4 be relocated. They're very, they're very interesting. Right now, they're being neglected
5 and ignored but I think that they have definitely potential in , potential relocation or using
6 them in , for some other use on that property to, to keep Alta Bates from looking like this,
7 like I say, an industrial park. Um, keep Alta Bates 20 acres open. As it is now, it is truly,
8 it really is lovely. It's got the trees, the openness, the camaraderie. And it's well-
9 connected through and in our area so that people who live near feel very comfortable
10 going in and out of there. There's just something about it that's very appealing and I
11 really hate to see that lost in all this – let's re-do everything kind of mode right now. Um,
12 so, the doctors, Dr. Irv Johnson – I spoke with him. They do wanna stay there, they do
13 like the building very much themselves. And um, I – someone's mentioned the area's not
14 one of primary importance but if you've got a hospital that takes up 20 acres, you've got
15 the highway patrol down the street, you've got, you've got, the Fire Department on 27th,
16 you got a post office on West Grand – I think the area is an area of importance. I thin it's,
17 you know, it can be – it needs to be reevaluated as far as what kind of area it is. Thank
18 you.

LH-3
cont.

19
20 Naomi Schiff: Naomi Schiff, Oakland Heritage Alliance. I want to thank Alta
21 Bates for um, reconsidering the building on 30th Street which I think is imminently
22 reusable, apparently in the same use at the new structure that would be built. Uh, I also
23 think that it provides an opportunity, uh, to tie the campus into its neighborhood, and that
24 wherever there are opportunities as Alta Bates moves into the design phase – and I hope
25 you'll get to look at it again – uh, that, they really need to think about connecting to the
26 surrounding community because the danger of large campuses is that they turn their
27 backs on their neighborhoods, uh, and uh, become fortress-like – and we see this in, in
28 many other, uh, such situations and I hope this won't be one of them. I do think the little
29 buildings on Elm Street might be good candidates for, um, moving, and uh, perhaps
30 reusable. And uh, I also, uh, um, did wanna note that it uh, what the previous speaker
31 said, uh, does in one way coincide with what I was thinking, in which is that the- seismic

LH-4

1 aspect of this project is the acute hospital. And the other stuff is built, as I understand it,
2 to a different standard so that wha-, you do have a large campus proposal here of which
3 the seismic – the required seismic work is only a small part. Not such a small part, a big
4 part, but not the full 20 acres. And so that the 30th Street building that we are speaking of
5 is actually quite far away from the acute tower, uh discussed, uh, under the State laws for
6 seismic replacement. And that’s what makes it feasible to retain that building but it also
7 provides some design opportunities to connect the hospital area in with the historic street
8 grid and the surrounding neighborhood. Thank you.

LH-5

9
10 Benjamin Elliott: Hello? Hi, how y’all doing? Thank you for indulging us here.
11 My name’s Benjamin Elliot. Uh, I’m the Labor Representative for the California Nurses’
12 Association. I represent the registered nurses and the technical employees at Summit
13 Medical Center. Uh, I spend uh much of my time on this site, uh, addressing issues that
14 affect the members as they care for and advocate for the patients of this community. Um,
15 I’m here to speak briefly against Sutter’s plan. Uh, we see their plan, uh, to double in size
16 while reducing beds, as a major concern. Uh, we see Sutter’s regional strategy which has
17 been, uh, reduction in services, attempts to close hospitals, and abandoning communities,
18 particularly, um, communities consisting largely of working class people and people of
19 color. Uh, as they have attempted to do this in Santa Rosa, in San Leandro, and in San
20 Francisco. Uh, we feel Sutter has not proven to be a good corporate neighbor anywhere
21 they operate, uh, and we ask you – this Board – to use all due diligence and to take the
22 opportunity to hold Sutter accountable, to use every tool available to act in the interest of
23 the public good so that access to vital healthcare resources for those in need and those in
24 this community do not simply become a historic remnant of what used to exist in
25 Oakland. Thank you.

LH-6

26
27 Daniel Schulman: Um, so I’d just like to kind of clarify my comment a little bit
28 more based on what Board member Gary and Naomi Schiff said a little bit. Um, well – I,
29 I don’t wanna see Alta Bates, uh, kick out necessarily the current tenants. Um, I think just
30 building that, the new project, around – while that’s fantastic and so, and much much
31 better than demolishing it or trying to move it, it’s not quite as good as integrating with

LH-7

1 the structure itself. ‘Cause right now it is separate from, from the rest of the campus by
 2 two black-top allies and a parking lot in the back and so, my concern is a little bit if the
 3 plan is just to build around it and leave it as is, and just lease it out to the four doctors
 4 who currently occupy, then Alta Bates has little incentive to maintain the structure, and to
 5 upgrade it and to rehabilitate it. and so, if you could incorporate it more fully into the
 6 plan and let it speak to the rest of the campus, um, and perhaps intensify the use, and use
 7 the structure in a way that’s part of the larger Alta Bates project – I mean, whether it
 8 becomes, I don’t know, ground floor retail, dining, um, you know, an office for the
 9 security patrol. Something that’s part of the project itself, and then there would be
 10 incentive to integrate the building, the structure and the walkway, rather than just
 11 encircling it, maybe an improvement but by and large, keeping the building is much
 12 much better than losing it so, thank you.

LH-7
cont.

13
 14 Rosemary Muller: I have to say something about the need for seismic upgrade.
 15 Um, I was on the California Safety Seismic commission from 1983 to 1985 so you can
 16 partly blame me for the law that requires hospitals to do seismic upgrade. Um, but I’d just
 17 like to say two things – first of all, in no way has the campus stood the test of time. the
 18 big earthquake has not hit, not – the Loma Prieta earthquake of 1989 was not the major
 19 earthquake for the city of Oakland. And so we have to plan for a major quake that’s going
 20 to be much more devastating to buildings in the city of Oakland, and we can’t just stick
 21 our heads in the sand and pretend it isn’t going to happen because at some point, it’s
 22 fairly certain that it will. Um, and, the fact that acute care hospitals to a higher standard
 23 than other buildings, that the reason for that is, those are the places where people who are
 24 injured in a big earthquake that’s going to come are going to need to go to to be cared for.
 25 And we certainly don’t want hospitals that are all collapsed on the ground and are
 26 unavailable as we all have seen on the news about Haiti, that uh, happened there. Um,
 27 this building, the one that’s a landmark would probably continue to be an office building
 28 and so, it would – Naomi is right – it would not be at the same standards for hospital
 29 would not pertain to that building, but it is an unreinforced masonry building, and it does
 30 have significant dangers to it. As a historic structure, I have to sort of encourage the
 31 owner to face up to the fact that it has problems and whatever can be done to strengthen

LH-8

LH-9

1 that building, I hope would be before it does get knocked down in the next major
2 earthquake.

↑ LH-9
| cont.

3

4 Joann Pavlinec: Are there any more comments from the Board? Or questions? I, I
5 guess that concludes this item.

Responses to Comments Received at the Landmarks Preservation Advisory Board Public Hearing

Public Forum Commenters

Tao Matthews

LH-1: See responses to Comments PH-3 and PH-4. The City will consider this input prior to taking action on the EIR and the proposed project.

LH-2: See response to Comment PH-8 above.

LH-3: As stated on page 4.7-33 of the DEIR, the two buildings on Elm Street (#3232 and #3300) that are slated for demolition are not considered historical resources for CEQA purposes due to lack of historic and architectural significance. Their proposed demolition and replacement with new structures would not result in a significant impact to historical resources. However, the City will consider this input prior to taking action on the EIR and the proposed project.

Naomi Schiff, Oakland Heritage Alliance

LH-4: Comments regarding the project's integration into the surrounding neighborhood address the design merits of the proposed project, which the City will consider on the project merits prior to taking action on the EIR and the proposed project. LH-5: See response to Comment PH-8 above.

Benjamin Elliott, Labor Representative for California Nurses Association

LH-6: See response to Comment PH-8 above.

Board Discussion

Board Member Daniel Schulman

LH-7: Comments regarding the project's integration into the surrounding neighborhood and possible functions for 418 30th Street, which is not currently part of the project, address the design merits of the project, which the City will consider prior to taking action on the EIR and the proposed project.

Board Member Rosemary Muller

LH-8: The comment does not address the adequacy of the EIR. The City will consider this input on the project merits prior to taking action on the EIR and the proposed project.

LH-9: The property at 418 30th Street is not part of the proposed project, given the redesign of the Future Phase MOB discussed in Master Response A, *Property at 418 30th Street*, in Chapter 5 of this document. There are no regulatory requirements for ABSMC to upgrade

the property, and the action is not warranted to address environmental effects of the proposed project. The City will consider this input on the project merits prior to taking action on the EIR and the proposed project.

APPENDIX A

Transportation Demand Management (TDM) Plan

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ABSMC Summit Campus TDM Plan

Prepared by: Jessica ter Schure and Francesca Napolitan, Nelson Nygaard Consulting Associates

Date: April 26, 2010

Introduction

The City of Oakland has prepared a Draft Environmental Impact Report for the proposed Alta Bates Summit Medical Center (ABSMC) Seismic Upgrade and Master Plan. Changes proposed as part of that Master Plan in Phase 1 include a new patient care hospital tower and parking garage. The location of these facilities would be along Hawthorne Avenue between Webster Street and Elm Street, Oakland, CA. The hospital tower is proposed at the site of the current Samuel Merritt University classrooms and dormitory, which would be demolished. The parking garage would be located on a site that currently contains two small medical related buildings and surface parking.

Additional elements of the ABSMC project would occur over several phases. In future phases a one story fitness center will be constructed on top of the new parking structure, buildings at 3023 and 3043 Summit Street will be demolished to make way for a new five-story medical office building, and a new four-story building will be constructed on Hawthorne Ave., across from the new parking structure, for use by Samuel Merritt University.

The new development will result not only in an increase in total square footage but in the number of employees. Total employees (full time equivalent) will increase from 2,812 to 3,241 at buildout of future phases, or a net increase of 429 new employees and an approximate increase of 100 students at Samuel Merritt University.

The Draft EIR for this project identifies a standard City of Oakland condition of approval that requires preparation of a Transportation Demand Management (TDM) program. Nelson\Nygaard Consulting Associates has been retained by ABSMC to work with the City of Oakland to develop a Transportation Demand Management Program that addresses projected parking shortfalls and serves to reduce identified environmental impacts related to traffic and transportation, and air quality and greenhouse gas emissions resulting from the ABSMC campus expansion project.

The recommendations contained in this TDM program are based on communication with city officials, ABSMC, and Fehr & Peers as well as a review of the Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, Environmental Impact Report.

Goals

The TDM program sets the following goals:

In the short-term, through construction and operation of Phase 1:

- Reduce Single Occupancy Vehicle (SOV) trips by 10% from the current baseline mode split.
- Mitigate the potential parking shortfall if the West Garage is no longer available to ABSMC.
- Promote the City of Oakland's Transit First policies.
- Mitigate construction-period vehicle trips and parking impacts.

In the long-term, pursuant to operation of Future Phases through buildout:

- Reduce Single Occupancy Vehicle (SOV) trips by 20% from the current baseline mode split.
- Reduce the parking demand generated by future phases..
- Promote the City of Oakland's Transit First policies.

The proposed TDM plan is designed to reduce trip generation, parking demand, and air quality and greenhouse gas emissions. Although it is not feasible for this plan to fully mitigate these impacts to less than significant levels, the TDM Plan is intended to assist in reducing these impacts to the extent reasonable and feasible.

Baseline Mode Split

Summit Medical Center conducted a Baseline Employee Transportation Survey in December 2009 and 3,170 surveys were distributed and 614 responses were collected, yielding a representative response rate of 19%. The current employee mode split is shown in Figure 1.

In addition to the employee survey, a patient/visitor transportation survey was also conducted in December 2009 and approximately 200 patients/visitors were surveyed. The current visitor and patient mode split is shown in Figure 2. The drive alone rate for visitors and patients is significantly lower than employees, 56% and 79.5% respectively. However, the carpool rate for visitors and patients is 31.2% compared to 4.6% for employees. This is likely due to the fact that a greater percentage of patients are driven to ABSMC by either a family member or friend than are employees.

Figure 1 Existing Employee Mode Spilt

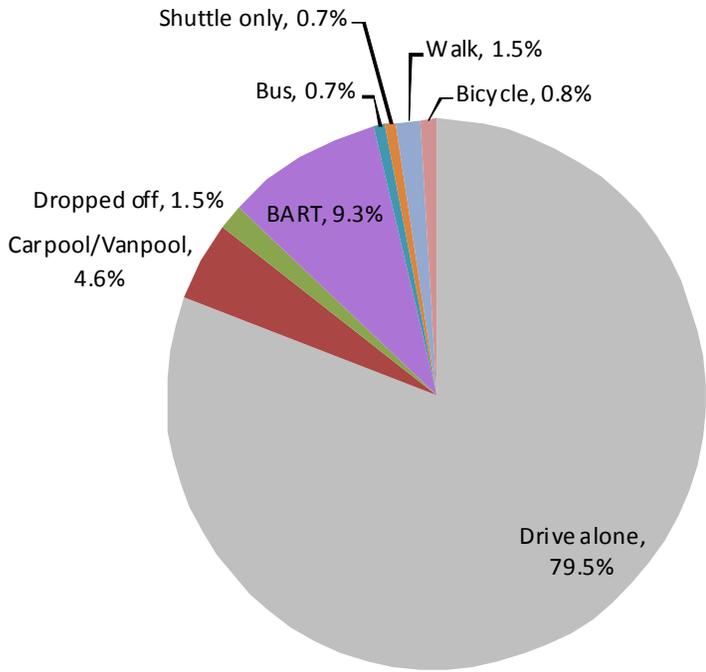
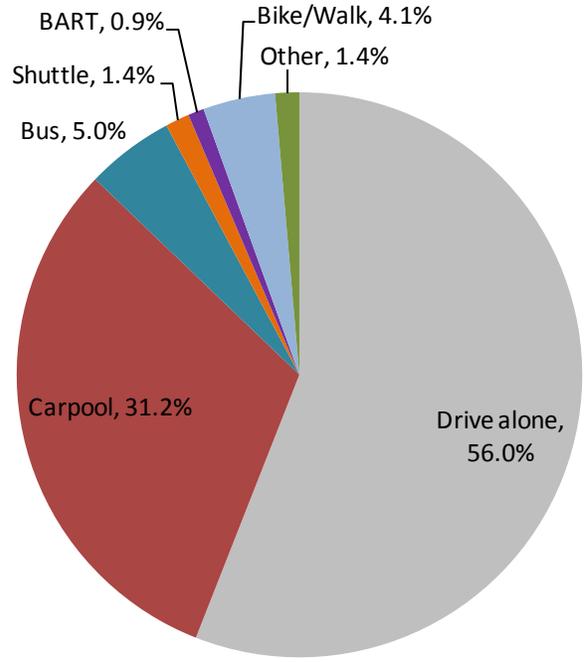


Figure 2 Visitor/Patient Mode Spilt



Reduce SOV Rate & Parking Demand

Phase 1 Impacts

The total current peak mid-day parking demand at the ABSMC campus is estimated at 2,856 spaces.¹ The total current parking supply, including all off-street spaces, leased spaces, on-street spaces and use of the City-owned West Garage, is 2,729 spaces,² resulting in a current deficit of 127 spaces compared to effective peak mid-day demand.

Given that there is no projected increase in the number of employees during Phase 1, if the current mode split remains the same, the construction of a new parking structure will provide ample parking to meet the projected parking demand. However, should the West Garage facility be no longer available to ABSMC in whole, there would be a loss of 477 parking spaces, which would result in a deficit of 103 parking spaces³, assuming the current employee mode split.

In order to reduce the potential parking shortage in Phase 1, begin to prepare for the expected parking shortage in Future Phases, and to reduce traffic, air quality and greenhouse gas emission impacts to the extent feasible, the current employee SOV rate of 79.5% should be reduced by 10% to 71.5% during initial operation of Phase 1.

Future Phases and Full Build-Out Impacts

At full build-out, the project will not meet Municipal Code requirements, with a deficit of 358 spaces. Buildout of the project will also not meet expected peak mid-day parking demand, with an expected deficit of 685 spaces. If the West Garage facility is no longer available to ABSMC the parking demand deficit would increase to 1,101 parking spaces.

In order to fully mitigate the projected parking shortage in Future Phases (assuming that the West Garage remains available for use by ABSMC), as well as to reduce the traffic, air quality and greenhouse gas emission impacts associated with the Future Phases, the current employee SOV rate of 79.5% should be reduced by 20% to 63.6% during initial operations of Future Phases. This reduction in the employee SOV rate is considered to be the maximum feasible trip reduction for the campus.

Existing TDM Program

Summit Medical Center currently offers the following TDM services:

- ***Shuttles to the MacArthur BART station*** – ABSMC operates three free shuttle routes from the Summit Campus in Oakland to either the Alta Bates and Herrick Campuses in Berkeley or the MacArthur BART station.
 - Routes 3 and 4 provide service between the Summit campus and MacArthur BART station and operate on 15 and 20 minute headways, respectively. Route 3 is in operation between the hours of 4:30 am and 9:00 pm, and Route 4 provides service between 6:30 am and 12:30 am.
 - The Bullet route runs between the Summit campus and the Alta Bates campus and operates on 30 minute headways between the hours of 6:30 am and 6:00 pm.
 - Each shuttle has a capacity of 15 seated passengers, and currently the shuttles transport 1,500 people per day.

¹ Fehr & Peers, March 15, 2009

² ABSMC Summit Campus Seismic Upgrade and Master Plan Draft EIR, December 2009, pg 4.3-108

³ Total on and off-street parking supply for Phase 1 not including the West Garage is 3,051 and effective on and off-street parking demand is 3,154, resulting in a deficit of 103 parking spaces.

- The shuttle is available to non-Sutter Health affiliated persons.
- *Valet/Attendant Parking Services* - utilized at each of the Summit campus garages throughout the day based on parking demand.
- *Parking Pricing* – both union and non-union employees may purchase monthly parking passes for \$35.
- *Discounted Transit Passes* – Employees may purchase BART, AC Transit, Vallejo Transit, and Fairfield and Suisun Transit (FAST) tickets through the parking department at a 50% discount. For agencies that offer unlimited monthly passes, the limit is one pass per employee and for BART, which charges per ride, the limit is up to three BART books per employee and month depending on where they reside.
- *Carpool Program* – ABSMC reserves preferentially located parking spaces for employees who are participants in registered carpools. Currently, there are 45 registered carpools at the Summit campus and registration is two times a year.
- *Vanpools* – ABSMC recently started a vanpool program with four vanpool vehicles and each employee who participates receives a \$100 subsidy per month for the vanpool service.
- *Monthly Newsletter* – All employees receive an electronic newsletter monthly that provides information on a variety of topics, including transportation services and options.
- *Bicycle Parking* – ABSMC provides bicycle lockers and bicycle racks that can accommodate up to 50 bikes.

Existing and Planned Parking Facilities

The current total available parking supply on campus is 2,729 parking spaces. Of the total number of parking spaces, 1,523 spaces are owned by ABSMC, 189 spaces are leased by ABSMC, 477 spaces are located in the West Garage (which is owned by the City of Oakland and operated by ABSMC), and 540 spaces are located on the street.

Currently, the ABSMC campus does not provide the number of off-street parking spaces required under the City of Oakland Municipal Code, with a current deficit of 186 spaces, pursuant to the Municipal Code requirements.

Parking occupancy counts found that peak parking demand for all campus users (employees, students and visitors) occurs at mid-day (11:00 am). The peak parking demand is estimated at 2,856 spaces (on-street and off-street), accounting for all campus users and using a 90% efficiency factor. While there are currently vacant spaces during the peak period, there is currently insufficient parking supply to meet effective peak mid-day parking demand, and an additional 127 spaces (2,856 space demand less 2,729 space supply) would be needed to fully meet existing peak mid-day demand.

According to on-street parking studies conducted in January 2008 and March 2009, there are 540 on-street parking spaces located in the area bounded by Telegraph Avenue, Broadway, 34th Street and 29th Street. The midday parking occupancy was approximately 84% with parking on streets adjacent to the project site nearly 100% occupied.⁴ A visitor intercept survey conducted in December 2009, found that 36% of visitors parked on-street, and of those visitors, 76% parked within two blocks of their destination.

⁴ Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, EIR pg. 4.3-17.

Phase 1

Based on Municipal Code parking requirements, Phase 1 would require an additional 298 new off-street parking spaces. As proposed in Phase 1, a new 1,067-space parking garage will be constructed and a new surface lot will provide 69 parking spaces. As some parking will be lost with the demolition of a number of buildings, Phase 1 will result in a net increase of 814 new off-street spaces, well exceeding the Code requirement.

Based on effective mid-day parking demand analysis, 366 new parking spaces would be required for Phase 1.⁵ As proposed in Phase 1, there will be a net increase of 814 off-street spaces, but a net loss of 15 on-street parking spaces. This results in a net increase of 799 total parking spaces in Phase 1, well exceeding the parking demand, with a resulting total supply of 3,528 spaces.

With the construction of a new parking garage and lot, ABSMC will meet both Municipal Code parking requirements as well as expected parking demand and will have a surplus of 330 and 374 parking spaces, respectively. However, if the entire West Garage facility is no longer available to serve effective parking demand at ABSMC, there would be a loss of 477 parking spaces, which will result in a deficit of 103 parking spaces compared to effective parking demand⁶, assuming the current employee mode split.

Future Phases and Project Build-Out

The project is currently not proposing to construct any additional off-street parking for future phases of development. Furthermore, there will be a loss of 5 additional on-street parking spaces as well as 109 off-street parking spaces. This results in a net decrease of 114 parking spaces, resulting in a total supply of 3,414 spaces at buildout.

Based on Municipal Code parking requirements, future phases will require an additional 579 off-street parking spaces. Combined with the 298 off-street spaces required under Phase 1, this results in a total Code requirement of an additional 877 off-street parking spaces required at project build-out. Since the project will only result in an increase of 705 net new off-street spaces at buildout (an increase of 814 off-street spaces under Phase 1, less 109 off-street spaces removed under future phases), the project at buildout will have a parking shortfall of 172 spaces compared to Code requirements. Added to the current Code deficit of 186 spaces, the campus will have a total deficit of 358 off-street spaces at buildout compared to Municipal Code requirements.

Construction of additional facilities in future phases will result in an effective peak mid-day parking demand for an additional 1,243 parking spaces⁷, or a total parking demand at buildout of 4,099 spaces.⁸ Based on parking demand analysis, future phases plus Phase 1 will require a total of an additional 1,250 parking spaces at project build-out.

At full build-out, the project will not meet expected peak mid-day parking demand and there will be a deficit of 685 spaces. Additionally, if the entirety of the West Garage facility is no longer

⁵ Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, EIR pg. 4.3-108. This number includes an effective parking supply of 0.90 for off-street parking and an effective parking supply of 0.85 for on-street parking.

⁶ Total on and off-street parking supply for Phase 1, not including the West Garage, is 3,051 and effective on and off-street parking demand is 3,154, resulting in a deficit of 103 parking spaces.

⁷ Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, EIR pg 4.3-108. This number includes an effective parking supply of 0.90 for off-street parking and an effective parking demand of 0.85 for on-street parking.

⁸ The project buildout parking demand has been updated from the buildout demand of 4,038 spaces shown on Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, EIR pg. 4.3-108, based on the December 2009 Baseline Employee Transportation Survey of the Summit Campus. This parking demand includes an effective parking supply of 0.90 for off-street parking and an effective parking supply of 0.85 for on-street parking.

available to ABSMC, the peak mid-day parking deficit would increase to 1,162 parking spaces. This would be a worst case condition. While the EIR evaluates a number of project alternatives that may be capable of increasing the total parking supply at buildout (including adding more parking to the future phase construction), no additional parking supply is currently proposed.

Mandatory Components to Reduce SOV Rate in Phase 1

For Phase 1, a recommended 10% reduction in the current SOV rate would result in the drive alone mode share being reduced from 79.5% to 71.5%. Ten percent of that shift is assumed to be to carpooling/ vanpooling, the rest to other modes (transit, walking or biking). The table below shows how this shift affects the number of vehicles on the campus each day.

Figure 3 Vehicles on the Summit Campus during the day - Phase 1

Phase 1	Vehicles ¹
Existing vehicles per 100 employees/students	81
Total vehicles on campus at Phase 1	2,237
Vehicles per 100 employees/students with 10% TDM	73
Total vehicles on campus at Phase 1 with 10% TDM	2,024
Net change in vehicles	-214

1. Includes vehicles driven by both drive-alone and carpool commuters

Generally, it can be assumed that for each reduction in total vehicles on campus, there would be a commensurate reduction in parking demand, plus a 90% efficiency factor. Therefore, a reduction in 214 vehicles on campus during the day would result in a reduction in parking demand of approximately 235 parking spaces. Given the potential Phase 1 deficit of 103 parking spaces compared to effective parking demand should the West Garage no longer be available for use by ABSMC, a 10% reduction in the current SOV rate would fully compensate for these potentially lost spaces and make up the remaining deficit. If the West Garage does remain available for continued ABSMC use, there would be no effective parking deficit under Phase 1.

Each of the 214 vehicles removed from the campus would also remove one inbound and one outbound daily trip (total of 428 trips). In addition some off-campus trips would be made during the day i.e., meetings, lunch, errands. The number of midday vehicle trips removed is estimated to be about 52 trips, based on survey responses, and assuming that employees who switch to an alternative mode were less likely to be making off-campus trips by car before implementation of the TDM program. Thus, a total of 480 vehicle trips would be removed through the TDM program at completion of Phase 1. These trip reductions would serve to reduce, but not fully mitigate the projected Phase 1 impacts on traffic and circulation, air quality and greenhouse gas emissions.

In order to reduce the SOV rate attributable to Phase 1 by 10% less than the current baseline, the following TDM actions are required:

- BART Shuttle – ABSMC shall evaluate the need to expand the current shuttle service to serve the facilities constructed in Phase 1 prior to occupancy. The evaluation shall be reviewed by a qualified independent professional and submitted to the City for review and approval. If the City determines it necessary to increase shuttle service,

ABSMC shall submit a plan for City review and approval and implement the approved plan.

- TDM Coordinator – ABSMC shall retain a full-time experienced TDM coordinator to coordinate, monitor and publicize TDM activities for the campus.
- Commuter Tax Incentive – Employees shall have the option to deduct a predetermined amount up to \$230 from their paychecks to be used for transit-related expenses.
- Transit Facilities – ABSMC shall coordinate with city officials and AC Transit in the design of bus stops, pedestrian access, shelters, signage and lighting associated with the impacts of new development, as indicated in the EIR. ABSMC shall construct and maintain all necessary improvements.
- Coordinated Shuttle Program – ABSMC shall use good faith efforts to coordinate with nearby hospitals, including Kaiser and Children's Hospital, to explore the potential value of shuttle coordination from MacArthur BART to and between each of their respective facilities prior to occupancy of Phase 1 facilities. ABSMC shall include in their Annual Report documentation of efforts to coordinate.
- Broadway/Valdez Shuttle Service – ABSMC shall coordinate with the City of Oakland's planning efforts for the Broadway/Valdez Specific Plan to explore the potential value of a coordinated shuttle service to serve between the campus and the Broadway/Valdez commercial corridor. ABSMC shall include in their Annual Report documentation of efforts to coordinate.
- Shower Facilities – Showers and changing facilities shall be included in the all new buildings or facilities for employees who bike or walk to work.
- Tele-Commute Policy and Program – ABSMC shall establish a tele-commute policy and program
- Carpool Parking - The number and location of preferential carpool parking shall be monitored annually and increased as necessary. Preferential carpool parking shall be provided at the new garage once it has been constructed.
- Bicycle Parking – The number and location of bicycle racks, lockers, and shower facilities shall be monitored annually and increased as necessary.
- Vanpool Program – ABSMC shall annually monitor participation in the vanpool program and if demand exists expand the program. ABSMC shall aggressively market the vanpool program to employees via the monthly newsletter, website, and other appropriate channels.
- Valet Parking – ABSMC shall continue to provide valet parking at existing parking garages and lots and shall offer this service at the new parking garage once it has been constructed.
- Guaranteed Ride Home Program (GRH) – ABSMC shall implement a GRH program for employees who take alternative forms of transportation to work. Alameda County has a GRH program that is free to all employers in the county.
- Transit Information Center – An adequately sized, full-time, on-site transit information center shall be developed and staffed to serve employees, patients and visitors in a central and visible location.
- Wayfinding and Signage – ABSMC shall provide on-site signage for patients and visitors identifying the locations of bicycle parking, vehicular parking, and shuttle stops. At, shuttle stops, where feasible, shuttle maps and schedules should also be posted.

- Expanded TDM Outreach and Marketing Program:
 - Improved Transportation Website – A new transportation website for ABSMC employees emphasizing TDM programs and options shall be developed. Safe walking and biking routes will be posted on this website.
 - ABSMC shall review their existing public website and modify it to better publicize alternative transportation options to visitors and patients. The visitor and patient portion of the website should be updated to provide information on biking to the campus as well as taking AC Transit.
 - Monthly newsletter – Continue to provide information on and aggressive marketing of TDM programs in the monthly newsletter.
 - Marketing Campaign – An outreach program shall be designed emphasizing the time savings, reduction in greenhouse gas emissions, health benefits, and other positive outcomes of adopting alternative transportation modes.
 - Adjacent Hospital Discussion – ABSMC shall work with adjacent hospitals to address common TDM challenges and solutions and shall include in their Annual Report documentation of efforts to increase joint TDM programs.
 - TDM Operation and Maintenance Budget Development – ABSMC shall establish a fully funded budget for the TDM program and reporting out of results on an annual basis.

Mandatory Components to Reduce SOV Rate in Future Phases

For Future Phases, a 20% reduction in the current SOV rate would result in the drive alone mode share being reduced from 79.5% to 63.5%. Ten percent of that shift is assumed to be to carpooling/ vanpooling, the rest to other modes (transit, walking or biking). The table below shows how this shift affects the number of vehicles on the campus each day.

Figure 4 Vehicles on the Summit Campus during the day¹ - Project Buildout

Buildout	Vehicles ¹
Existing vehicles per 100 employees/students	81
Total vehicles on campus at Buildout	2,736
Vehicles per 100 employees/students with 20% TDM	66
Total vehicles on campus at Buildout with 20% TDM	2,214
Net change in vehicles	-552

1. Includes vehicles driven by both drive-alone and carpool commuters

A reduction in 522 vehicles on campus during the day would result in a commensurate reduction in the demand of approximately 580 peak mid-day parking spaces. Given the identified deficit of 358 parking spaces at buildout as compared to Municipal Code requirements, a 20% reduction in the current SOV rate would fully compensate for the campus-wide Municipal Code deficit. While the EIR evaluates a number of project alternatives that may be capable of increasing the total parking supply at buildout by adding more parking to the future phase construction (thus also

compensating for the projected parking deficit), no additional parking supply is currently proposed.⁹

The projected deficit of 685 parking spaces compared to effective peak mid-day parking demand (assuming the West Garage continues to be made available for use by ABSMC) would not be fully compensated for by a 20% reduction in the current SOV rate, with a remaining deficit of 105 spaces. Should the West Garage no longer be available for use by ABSMC, this remaining deficit would increase to 582 spaces, even with a 20% reduction in the SOV rate.

In order to fully mitigate the peak mid-day effective parking demand, the TDM program would have to result in a drive alone mode split of 60.6%, or a reduction in the current SOV rate by an additional approximately 24%. However, based on the list of mandatory and additional TDM strategies provided in this plan, a reduction in the employee SOV rate of 20% is considered to be the maximum feasible trip reduction for the campus.

Using the methodology described above for Phase 1, by removing 522 vehicles from the campus, a total of 1,175 daily vehicle trips would be removed through the TDM program at project buildout (one inbound and one outbound trip for each vehicle, plus 154 total midday trips). These trip reductions would serve to reduce, but not fully mitigate, the project buildout impacts on traffic and circulation, air quality and greenhouse gas emissions.

In order to reduce the SOV rate attributable to buildout by 20% less than the current baseline mode split, the following additional TDM strategies are recommended.

- BART Shuttle – ABSMC shall evaluate the need to expand the current shuttle service to serve the facilities constructed in Future Phases prior to occupancy. The evaluation shall then be reviewed by a qualified independent professional and submitted to the City for review and approval. If the City determines it is necessary to increase shuttle service, ABSMC shall submit a plan for City review and approval and ABSMC shall implement the approved plan.
- Parking Pricing – Parking fees have perhaps the largest impact on SOV rate compared to any other TDM program. However, raising parking fees is a very delicate subject in a hospital environment where many people work irregular hours and have to work evenings and nights. Also, parking fees are for a large share of the employee population bound by union agreement. ABSMC shall evaluate and then increase employee parking prices as needed to achieve the trip reduction goals. The current \$35 monthly parking fee will likely have to be increased significantly in order to have an impact on the SOV rate. The evaluation of parking fees shall be performed by a qualified independent professional and submitted to the City for review and approval as part of the Annual Report. If the City determines it is necessary to increase parking fees, ABSMC shall submit a plan for City review and approval and ABSMC shall implement the approved plan.
- Coordinated Shuttle Program – ABSMC shall use good faith efforts to coordinate with nearby hospitals, including Kaiser and Children's Hospital, to explore the potential value of shuttle coordination from MacArthur BART to and between each of their respective facilities prior to occupancy of Future Phase facilities. The results of the coordination shall be submitted in writing to the City for review and approval as part of the Annual Report. If the City determines that such a shuttle coordination effort is feasible, valuable and effective, then ABSMC together with other participating

⁹ The campus-wide Municipal Code parking requirement could also be met if ABSMC either acquired the West Garage or otherwise contracted for the West Garage to be made permanently available and maintained for utilization by ABSMC activities,

hospitals shall submit a plan for City review and approval and ABSMC shall implement their portion of this coordinated plan.

- Broadway/Valdez Shuttle Service – ABSMC shall arrange with the City of Oakland's planning efforts for the Broadway/Valdez Specific Plan to explore the potential value of a coordinated shuttle service to serve the Broadway/Valdez commercial corridor as described in the Broadway/Valdez Specific Plan. If the City determines coordination feasible and effective, ABSMC shall submit a plan for City review and approval and ABSMC shall implement the approved plan.
- Marketing and Outreach – ABSMC shall continue the TDM and Outreach program detailed above and shall investigate and implement methods for improving marketing materials and outreach methods.

Additional Strategies that can be used to Reduce SOV Rate

Nelson\Nygaard believes that the above presented mandatory TDM Program components will reduce SOV rate by 20%. If ABSMC cannot achieve the 10% decrease in SOV rate attributable to Phase 1, and/or the 20% decrease in SOV rate attributable to buildout, ABSMC shall, in addition to the monitoring/evaluation/enforcement recommendations that follow later in this report, prepare a report for City review and approval, which proposes additional TDM measures to achieve the TDM goals. This report shall include without limitation a discussion on the feasibility and effectiveness of the following programs and ABSMC shall implement the approved plan:

- Eco Pass Program – ABSMC is currently providing a 50% subsidy on transit passes. Another option would be to implement an Eco Pass program, which would cover the full cost of transit to employees. For instance, AC Transit provides employers the option to invest in an EcoPass program, where the employer bulk purchases transit passes for all employees at a significantly reduced cost per rider. The City of Berkeley is currently an EcoPass member, providing free transit passes to all city employees. According to the City of Berkeley, if the EcoPass were not available 59% of respondents would reduce their use of AC Transit Service and 25% would stop using AC Transit entirely.⁴ In the coming years, the AC Transit Pass may be replaced by a TransLink EcoPass, which would provide free or highly subsidized traveling in the entire Bay Area.
- Transit Subsidies - Increase transit subsidies to further encourage the use of transit to help achieve the SOV target.
- Carsharing - Carsharing operators such as City CarShare and ZipCar, using telephone and Internet-based reservation systems, allow their members a hassle-free way to rent cars by the hour, with members receiving a single bill at the end of the month for all their usage. This strategy has proven successful in reducing both household vehicle ownership and the percentage of employees who drive alone because of the need to have a car for errands during the workday. As a result, car sharing can be an important tool to reduce parking demand. A car-sharing program will thus enable ABSMC commuters to carpool, take transit, bike, or walk to work by ensuring that a shared car will be available for work and/or personal trips when needed. In order to help establish the car sharing service, ABSMC should consider replacing existing under-utilized ABSMC-owned fleet vehicles with fewer carsharing vehicles and even partially or fully subsidize operation costs for a specified term.

Construction Period TDM Program

Subject to City review and approval, prior to start of construction, a construction period transportation demand management (TDM) program shall be implemented to encourage construction workers to carpool or use alternative transportation modes in order to reduce the overall number of vehicle trips associated with construction workers, and to address any construction-period parking availability issues.

During the construction of Phase 1, 248 parking spaces would be unavailable due to demolition or construction staging. In addition, there will be a demand for 64 construction worker parking spaces during Phase 1, before completion of the new garage.¹⁰ In order to address this 312-space parking shortfall, in addition to a construction worker TDM program, ABSMC has secured off-site parking for construction workers, staff, patients and visitors at 3001 Broadway Street. At 3001 Broadway Street approximately 425 parking spaces will be available for use by construction workers, staff, patients and visitors, sufficiently addressing construction worker parking demand and the loss of parking due to demolition. Given that the lot is within walking distance of ABSMC, no shuttle service between the off-site parking location and work site is needed. ABSMC shall maintain the 3001 Broadway Street parking spaces, or equivalent spaces located elsewhere in walking distance, throughout the demolition/construction period prior to completion and opening of the new parking garage.

TDM Implementation Timeline

The following table lists all the TDM measures described above and locates them on a timeline. The symbol “→” represents that the specific TDM measure shall be maintained into the future. Subject to City review and approval, any strategy can be discontinued if it can be proven that it is not effective; however, the strategy shall be replaced by either a new strategy or improvements of an already existing and effective measure.

¹⁰ Alta Bates Summit Medical Center, Summit Campus Seismic Upgrade and Master Plan, EIR pg 4.3-83

Program Components	In Existing Program	Phase 1	Future Phases	Full Build Out
Existing Mandatory Measures				
BART Shuttles	Yes	Expand as needed	Expand as needed	→
Valet/Attendant Parking	Yes	Expand as needed	→	→
Parking Pricing	Yes	Increase as needed	Increase as needed	Increase as needed
Discounted Transit Passes	Yes	→	Increase as needed	Increase as needed
Carpool Program	Yes	Increase as needed	→	→
Vanpools	Yes	Increase as needed	→	→
Monthly Newsletter	Yes	→	→	→
Bicycle Parking	Yes	Increase as needed	Increase as needed	increase as needed
Mandatory Measures to Reduce SOV				
TDM Coordinator		Yes	→	→
Commuter Tax Incentive		Yes	→	→
Shower Facilities		Yes	→	→
Tele-Commute Policy and Program		Yes	→	→
Guaranteed Ride Home Program		Yes	→	→
Expanded TDM Outreach & Marketing Program:		Yes	→	→
Improved Transportation Website		Yes	→	→
Marketing Campaign		Yes	→	→
Adjacent Hospital Discussion		Yes	→	→
TDM Operation & Maintenance Budget		Yes	→	→
Transit Facilities		Yes	→	→
Transit Information Center		Yes	→	→
Coordinated Shuttle Program Efforts		Yes	→	→
Broadway/Valdez Shuttle Service Efforts		Yes	→	→
Additional Measures to Reduce SOV Rate				
Eco-Pass Program		TBD	TBD	TBD
Carsharing		TBD	TBD	TBD

Funding, Monitoring, Evaluation, and Enforcement

This TDM program requires regular periodic evaluation over the life of the Project (estimated to be at least 50 years) to determine how the program is achieving required SOV reductions over time, as well as the efficacy of the specific TDM measures.

Implementation of the mandatory TDM measures and related requirements shall be ensured through ABSMC compliance with the Mitigation Monitoring and Reporting Program, as will be implemented through Conditions of Approval adopted for the project. The following are recommended to ensure compliance with the approved ABSMC TDM Program:

1. ABSMC shall prepare each year for the useful life of the buildings, subject to City review and approval, an Annual TDM Report that summarizes ABSMC's transportation program over the preceding year, intended upcoming changes, and compliance with the conditions of this program. The reports shall be submitted to an independent reviewer of the City's choosing, to be paid for by ABSMC, every February, based upon surveys done in December, as detailed below.
2. The Annual Report shall include a comparison to historical findings. If participation rate has changed significantly, a detailed description as to why the rate has changed is required. Each Annual Report shall consist of the following:
 - o Annual Employee Transportation Survey – Shall be conducted annually and distributed to approximately half the employee population. Preferably the same survey template and method shall be used every year to avoid incomparable survey results, which shall be subject to review and approval by the City. The response rate shall be a minimum of 30%. If a 30% response rate cannot be obtained, a non-response survey shall be conducted. A survey response database shall be created with audit trail (each entry has a separate ID number, but without link to each individual). If a survey shows that the SOV rate has dropped by more than 10% during Phase 1 operations as compared to the 2009 baseline survey, or by 20% during Future Phase operations as compared to the 2009 baseline survey, ABSMC shall not be required to conduct the following two annual Transportation Surveys. Upon the celebration of the third year of the previous Transportation Survey a new Survey shall be conducted. During years without an Employee Transportation Survey, the Annual Report will include a brief summary of the last survey results.
 - o Triennial Patient/Visitor Transportation Survey – Shall be conducted every three (3) years by interviewing a representative sample of patients/visitors, with the sample size being no less than 300 and increasing with the increasing patient/visitor population, about their travel behavior on the day of the survey. The patient/visitor survey shall be carried out at the same time as the employee survey is conducted, and shall be subject to review and approval by the City. If there is no employee survey, then the patient/visitor survey will be postponed until the first year of a new employee survey. The Annual Report will during these years include a brief summary of the last survey results.
 - o Triennial Parking Utilization Study – Shall be conducted every three (3) years by studying both on-street and off-street ABSMC facilities. The parking utilization survey shall be carried out at the same time as the employee survey is conducted, and shall be subject to review and approval by the City. If there is no employee survey, then the parking utilization survey will be postponed

until the first year of a new employee survey. The Annual Report will during these years include a brief summary of the last survey results.

- o Annual Process Evaluations – ABSMC shall on an annual basis report major accomplishments achieved for and changes made to each of the measures in operation as well as participation in each measure (e.g. number of participants in Commuter Tax Incentive, carpool program) and actual number of Full Time Equivalent staff (both am/pm peak and non-peak).
3. ABSMC shall, upon adoption of the EIR, fund an escrow-type account to be used exclusively for preparation of future Annual Reports and review and evaluation by the City, or its selected peer reviewers. The escrow-type account shall be initially funded by ABSMC in an amount determined by the City and shall be replenished by ABSMC so that the amount does not fall below an amount determined by the City. The mechanism of this account shall be mutually agreed upon by ABSMC and the City, including the ability of the City to access the funds if ABSMC is not complying with the TDM requirements, and/or to reimburse the City for its monitoring and enforcement costs.
 4. If the third Annual Report, or any report thereafter, indicates that, in spite of the changes in the final TDM plan, ABSMC is not achieving the TDM goals, ABSMC shall prepare a report for City review and approval, which proposes additional TDM measures to achieve the TDM goals, including without limitation a discussion on the feasibility and effectiveness of the menu of other strategies (Corrective Action Plan). ABSMC shall then implement the approved Corrective Action Plan.
 5. If, one year after the Corrective Action Plan is implemented, the required SOV reduction target is still not being achieved, or if ABSMC fails to submit a report at the times described above, or if the reports do not meet City requirements outlined above, the City may, in addition to its other remedies, (a) assess ABSMC a financial penalty based upon actual percentage reduction in SOV use as compared to the percent reduction in SOV use established in this TDM program; or (b) refer the matter to the City Planning Commission for scheduling of a compliance hearing to determine whether ABSMC's approvals should be revoked, altered or additional conditions of approval imposed. The penalty as described in (a) above shall be determined by translating the percentage SOV reduction not achieved up to 10% in Phase 1 and 20% in Future Phases, into number of employees by multiplying the difference in SOV reduction with the most recent employee FTE count. Assuming the cost per new alternative commuter is \$20/day¹¹ and that there are 261 workdays per year, the annual cost per new alternative commuter is \$5,220. ABSMC shall therefore pay a penalty of \$5,220 per year for each employee that should have been using an alternative mode if the 10% reduction in SOV rate had been achieved by the end of Phase 1 or if a 20% reduction in SOV rate had been achieved prior to the project approvals for Future Phases.
 6. In determining whether a financial penalty or other remedy is appropriate, the City shall not impose a penalty if ABSMC has made a good faith effort to comply with the TDM program. The City would only have the ability to impose a monetary penalty after a reasonable cure period and in accordance with the enforcement process outlined in Planning Code Chapter 17.152. If a financial penalty is imposed, such penalty sums shall be used by the City solely toward the implementation of the TDM plan.

¹¹ MTC's *Transportation Blueprint for the 21st Century* (2000) and Alameda Contra Costa Transit District's *AC Transit Berkeley/Oakland/San Leandro Corridor MIS, Final Report Volume 3: Evaluation of Alternatives* (2002) are two studies that indicate that the cost per new transit rider varies from \$6 per boarding to \$100 per boarding (in 1999-2001 dollars). For each commuter, this equals a daily cost of between \$12 and \$200 (in 1999-2001 dollars). It is therefore assumed that each new alternative commuter would cost ABSMC \$20 per day in 2010 dollars at the low end of the range, or \$5,220 per year, based on 261 workdays per year.

APPENDIX B

Greenhouse Gas Emissions Reduction Plan

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Greenhouse Gas Emissions Reduction Plan

date May 5, 2010

to Scott Gregory, City of Oakland Contract Planner

from Reema Mahamood, ESA, Project Manager
Crescentia Brown, AICP, ESA Project Director

subject ABSMC Summit Campus Master Plan – Greenhouse Gas Emissions Reduction Plan

This memo presents the Greenhouse Gas (GHG) Emissions Reduction Plan (Plan) for the ABSMC Summit Campus Master Plan (“Project” or “proposed Project”) and is presented in three sections: **1) Refinement of Baseline Emissions Inventory, 2) Assessment of GHG Emissions Reduction Measures, and 3) Recommended GHG Reduction Plan Mitigation Program.** The information and technical analysis presented herein has been prepared by Chris Sanchez, ESA Senior Technical Associate, Air Quality/GHG; and Jeff Caton, P.E., LEED AP, Director, ESA Renewable Resources, under direction of the City.

Section 1. Refinement of Baseline Emissions Inventory

This section of the GHG Emissions Reduction Plan presents a refined greenhouse gas (GHG) emissions inventory estimate for the ABSMC Summit Campus Master Plan (“Project” or “proposed Project”) and two Phase 1 scenarios (“Phase 1 [without Medical Office Building][MOB]” and “Phase 1 with MOB”), consistent with the Draft EIR (DEIR) analysis. The refinement is to the emissions inventory presented in the DEIR. Pursuant to City staff direction, this section of the Plan presents the following:

1. Identifies the emission sources that are included in the inventory, as well as other sources that are not included.
2. Identifies Project design features, applicable City Standard Conditions of Approval (SCAs), regulatory requirements, and General Plan policies and programs that would reduce GHG emissions from the Project.
3. Refines the Project’s unadjusted GHG emissions inventory (as presented in the DEIR, which did not factor all emissions reductions that are part of the Project) in carbon dioxide equivalents (CO₂e) for construction and operations, incorporating the emissions reductions resulting from the considerations in 2, above.
4. Evaluates the Project’s unadjusted and refined baseline GHG emissions against the current draft CEQA thresholds of significance for GHGs.

1.0 Background: Changes to CEQA Context

Just prior to publication of the DEIR in December of 2009, there were changes to guidance on the estimation and evaluation of GHG emissions relative to CEQA, as well as post-publication changes to statewide guidance that inform what should be included in an adequate GHG emission inventory.

The first of two predominant changes is the amendments to the state *CEQA Guidelines* regarding GHG emissions that were adopted on March 18, 2010. No significance threshold is included in the amendments. The *CEQA Guidelines* afford the customary deference provided to lead agencies in their analysis and methodologies. The Governor's Office of Planning and Research (OPR) emphasizes the need for a consistent threshold to analyze projects, specifies that the analyses should be performed based on the best available information, and that if a lead agency determines that a project may generate GHGs, the agency is responsible for quantifying estimated GHG emissions by type and source. The analysis in this technical memo is consistent with this guidance.

The second predominant change is the December 2009 Proposed Air Quality CEQA Thresholds of Significance from the Bay Area Air Quality Management District (BAAQMD). While these thresholds are not yet formally adopted (to be considered in June 2010), they represent the only quantitative thresholds formally proposed by a regulatory agency with jurisdiction over the Project. In its December 2009 *CEQA Air Quality Guidelines*, BAAQMD is specific as to what sources of emissions should be considered relative to proposed CEQA GHG thresholds¹ (Table 4-3: GHG Quantification Guidance Standard, page 4-6). As such, the refined Project GHG emissions inventory presented in this Technical Memo provides emissions data for the sources identified by BAAQMD in its draft Guidelines. The revised December draft Guidelines also allow an efficiency-based threshold previously proposed only for mixed-use development and that is estimated in this memo.

2.0 GHG Emission Sources

2.1 GHG Emission Sources Included in the Inventory

Emissions included in the BAAQMD draft Guidelines for land use development projects (defined as projects or components of projects that do not require a BAAQMD permit to operate) are included in the refined baseline GHG emissions inventory for the Project as applicable:

- Construction Emissions. These are direct stationary source emissions and are included in the draft Guidelines though BAAQMD is not proposing a specific threshold for construction-related GHG emissions.
- Area Source Emissions. These are direct emissions from sources that include natural gas combustion for heating, cooking, fireplaces, or boilers, as well as emissions from landscape maintenance equipment.
- Operational Fleet Emissions. These are direct emissions from mobile sources including automobiles, trucks, motorcycles, buses and ambulances.
- Operational Electricity Consumption. These are indirect emissions emitted off-site via non-renewable, non-nuclear electricity generators as a result of increased electrical demand.

¹ Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, Table 4-3: GHG Quantification Guidance Standard, pages 4-6.
http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/Draft%20BAAQMD%20CEQA%20Guidelines_Dec%20%202009.ashx

- **Operational Purchased Steam Emissions.** These are emissions generated at an off-site location and purchased for the creation of steam to heat or otherwise facilitate operations of a proposed project. It is not anticipated that the purchase of off-site steam would result from the proposed project and as such, no Project-related emissions are anticipated from this type of source or included in the inventory.
- **Operational Process Emissions.** These are direct emissions generated by a non-permitted stationary source, such as gas-fired equipment not used for traditional space or water heating (e.g., a kiln other process equipment). Project-related emissions are not anticipated from this type of source or included in the inventory.
- **Operational Fugitive (Direct) Emissions.** These direct emissions are most commonly associated with a landfill project, whereby landfill gas is inadvertently emitted to the atmosphere due to leakage or inherent imperfections in the collection system. Direct fugitive GHG emissions that may be reasonably expected to be generated by a commercial building like the Project would consist of GHG refrigerants emitted from leaks or other imperfections in refrigeration or air cooling equipment.
- **Operational Fugitive (Indirect) Emissions.** These indirect emissions are most commonly associated with a landfill, whereby a project generates waste that is transported off-site to a landfill and landfill gas is inadvertently emitted to the atmosphere due to leakage or inherent imperfections in the collection. These types of emissions are not currently indicated as a source to be considered for GHG inventories in the latest BAAQMD Draft CEQA Air Quality Guidelines (December 2009). However, BAAQMD has indicated at Workshops it hosted in April of 2010 that it intends for indirect landfill emissions to be a consideration relative to its proposed project thresholds (Tholen, 2010a).
- **Operational Water Emissions (embedded energy).** These indirect emissions are associated with the electricity used to convey water, due to increased water demand from the Project.
- **Operational Wastewater (non-biogenic).** The draft Guidelines define indirect emissions from wastewater treatment as including the GHG emissions associated with the electricity use in wastewater treatment and not the biogenic CO₂ process emissions².

2.2 GHG Emission Sources Not Included in the Inventory

Emissions not included in the BAAQMD draft Guidelines, and therefore not included in the refined baseline GHG emissions inventory for the Project, are discussed below. These emissions may be considered in addition to those incorporated into the Project's baseline GHG emissions inventory discussed below in Section 3.0.

- **Permitted Stationary Source Equipment.** Per BAAQMD, GHG emissions from permitted stationary source equipment are not to be assessed as part of the operational emissions of a land development project, but are instead to be directly compared to the District's 10,000 metric ton per year threshold for such equipment for the purposes of impact assessment relative to CEQA. GHG emissions from permitted stationary source equipment are not to be included in the project inventory that is used for comparison to either the BAAQMD's proposed threshold of 1,100 metric tons (MT) of CO₂e per day or the efficiency-based threshold of 4.6 MT per year per service population (Tholen, 2010b).
- **Vegetation Sequestration Change.** This is the net change in CO₂ emissions resulting from vegetation change and its associated carbon sequestration. Given the urban location of the proposed Project, a significant change in sequestration of CO₂ from vegetative sources is not expected.

² Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, page 4-7. http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/Draft%20BAAQMD%20CEQA%20Guidelines_Dec%207%202009.ashx

- **Fugitive Refrigeration Emissions.** Refrigerant gases such as chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), and hydrochlorofluorocarbons (HCFCs) have a high global warming potential. Leaks of refrigeration gases were not quantified as the project proposes not to use any CFC-based refrigerants. In addition, since refrigeration systems would be new, they are likely to be efficient and designed for minimum leakage.
- **Life Cycle Emissions.** Although there is no regulatory definition for “lifecycle emissions,” the term is generally used to refer to all emissions associated with the creation and existence of a project, including emissions from the manufacture and transportation of component materials, and even emissions from the manufacture of the machines required to produce those materials. However, since it is impossible to accurately estimate the entire chain of emissions associated with any given project, lifecycle analyses are limited in effectiveness and meaning (relative to assessing or reducing Project-specific emissions for the CEQA analysis). The California Natural Resources Agency (CNRA) has stated that lifecycle analyses are not required under CEQA,³ and in December 2009 CNRA issued new energy conservation guidelines for EIR’s that make no reference to lifecycle emissions.⁴ The CNRA explained that: (1) There exists no standard regulatory definition for lifecycle emissions, and (2) Even if a standard definition for ‘lifecycle’ existed, the term might be interpreted to refer to emissions “beyond those that could be considered ‘indirect effects’” as defined by CEQA Guidelines, and therefore, beyond what project managers are required to estimate and mitigate.⁵

3.0 Project Design Features, City Standard Conditions of Approval, Regulatory Requirements, and General Plan Policies and Local Programs that Reduce GHG Emissions

There are many ways for a project to reduce its GHG emissions through its design, construction and operations. Local conditions of approval, policies, programs and regulatory requirements that apply to a project also combine to reduce Project GHG emissions. Each of these is considered in the estimate of the Project’s refined baseline GHG emissions inventory as follows:

3.1 Project Design Features

- **Green Guide for Health Care – Energy Performance Standard.** One of the Project objectives detailed in the DEIR Project Description is for the Project’s Patient Care Pavilion (PCP) to meet contemporary energy and design objectives adopted by Sutter Health Care in the Green Guide for Health Care (GGHC). The GGHC measures developed for the proposed Project include a variety of sustainability strategies that address GHG emissions and climate change as well as air quality, water quality and resource recovery improvement goals. The primary standards addressed in Sutter Health’s GGHC is to optimize energy performance to 14 percent greater than Title 24 requirements reduction and to provide enhanced commissioning to ensure implementation of GGHC measures.

The 14 percent reduction beyond Title 24 requirements is proposed to be attained through a variety of measures. These measures include the following:

³ California Natural Resources Agency, 2009. *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, pp. 71–72. http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf (accessed February 4, 2010).

⁴ State CEQA Guidelines, Appendix F. These new guidelines were part of amendments issued pursuant to SB97.

⁵ California Natural Resources Agency, 2009. *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, p. 71. http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf (accessed February 4, 2010).

- *Heat Island Effect Reduction Design Measures* – These elements reduce solar absorption and radiation resulting in lowered energy demands. The benefits of these measures will be realized by use of paving materials with a high solar reflectance index and by use of reflective white rooftops, which are accounted for in the energy demand estimates for the PCP.
- *Indoor Environmental Quality* – Day lighting of greater than 50 percent of spaces. This measure would reduce electricity demand for lighting systems.
- *Enhanced Refrigerant Management* – The PCP will comply with this measure by using low-global warming potential (GWP) alternative refrigerants.
- *Controllability of Systems: Lighting* – The PCP will comply with this element by installation of user controlled task lighting.
- *Controllability of Systems: Thermal and Ventilation* – The PCP will comply with this element by installation of user controlled, area-specific thermal controls.

These Project design features are incorporated into the emission inventory by using energy demand for the PCP as calculated by Ainsworth Consulting using the energyPRO model.

- CALGreen – Energy Performance Standard. Future Phase elements of the Project will be required to meet CALGreen standards proposed to take affect in January of 2011. CALGreen is a proposed building code requirement pursuant to Title 24 of the CCR. CALGreen will require that every new building constructed in California reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills and install low pollutant-emitting materials. It also requires separate water meters for nonresidential buildings’ indoor and outdoor water use with a requirement for moisture-sensing irrigation systems for larger landscape projects, and mandatory inspections of energy systems (e.g., heat furnace, air conditioner and mechanical equipment) for nonresidential buildings over 10,000 square feet to ensure that all are working at their maximum capacity and according to their design efficiencies. The effects of these energy and water saving features are incorporated into the revised emission inventory.

3.2 City Standard Conditions of Approval

City Standard Conditions of Approval (also referred to as “SCAs”) are incorporated and required as part of a proposed Project and are adopted as conditions of approval and required of the project to help ensure less than significant impacts.

- Standard Condition of Approval TRANS-1 – Parking and Transportation Demand Management Plan. SCA TRANS-1 (identified as SCA #25 in the City’s current *Conditions of Approval & Uniformly Applied Development Standards imposed as Standard Conditions of Approval* document). The Project Applicant has submitted for review and approval by the Planning and Zoning Division a Transportation Demand Management (TDM) Plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. GHG reductions from implementation of the TDM Plan are accounted for in the emission inventory by using trip reduction estimates generated by Fehr & Peers.
- Standard Condition of Approval UTIL-1 – Waste Reduction and Recycling. SCA UTIL-1 (identified as SCA #36 in the City’s current *Conditions of Approval & Uniformly Applied Development Standards imposed as Standard Conditions of Approval* document) requires the Project Applicant to submit a Construction & Demolition Waste Reduction and Recycling Plan (WRRP) and an Operational Diversion Plan (ODP) for review and approval by the Public Works Agency. Chapter 15.34 of the Oakland Municipal Code outlines requirements for reducing waste and optimizing construction and demolition (C&D) recycling. Affected projects include all new construction and all demolition. The city of Oakland’s waste stream characteristics and solid waste diversion rates were factors in the calculation of solid waste emissions included in the inventory.

3.3 General Plan Policies and City Programs

- Oakland General Plan Land Use and Transportation Element (LUTE). The LUTE identifies policies aimed at promoting use of public transit, bicycles and pedestrian travel, all of which would be reflected in the trip generation estimates for this urban project located near BART and AC Transit services. Therefore, no further reduction of transportation-related GHG emissions can be credited in the inventory until the Transportation consultant further defines and calculates trip reduction associated with the TDM Plan.
- Oakland General Plan Open Space, Conservation and Recreation (OSCAR) Element. The OSCAR contains policies that (a) encourage the provision of open space, which increases vegetation area (trees, grass, landscaping, etc.) to effect cooler climate, reduce excessive solar gain, and absorb CO₂; (b) encourage stormwater management, which relates to the maintenance of floodplains and infrastructure to accommodate potential increased storms and flooding; and (c) encourage energy efficiency and use of alternative energy sources. Policies that address vegetation area have no impact on the emissions inventory as vegetative sequestration is not a component of BAAQMD's draft Guidelines. Other policies regarding energy efficiency encourage and support energy efficiency but are not requirements under any implementation mechanism via the General Plan. They have resulted, however, in the implementation of the City of Oakland sustainability program discussed below.
- City of Oakland Sustainability Programs. The City of Oakland has proactively adopted a number of sustainability programs in an effort to reduce the City's impact on climate change. Oakland's sustainability efforts are managed by the Oakland Sustainability Community Development Initiative and are organized into six major categories described in the DEIR. The two main categories that would relate to reduced GHG emissions from a development project address renewable energy and green building.

With regard to renewable energy, the City's Sustainability Program has set a priority of promoting renewable energy with a particular emphasis on solar generation. The Program's aggressive renewable energy goals include the following: 50 percent of city facilities' entire electricity use from renewable sources by 2017; and 100 percent of the city's entire electricity use from renewable sources by 2030. The City has some control over renewable energy percentages for buildings it operates by contracting its energy needs directly with the local utility. However, private building operators generally receive a standard energy mix from PG&E and would not be required to contract for a higher percentage of renewables under this program, as it only targets City facilities. PG&E has a 20 percent renewable energy mix goal for 2020 (compared to a 12 percent mix in 2007).

With regard to green building strategies, the City of Oakland has implemented green building principles in City buildings through the following programs: Civic Green Building Ordinance (Ordinance No. 12658 C.M.S., 2005), requiring, for certain large civic projects, techniques that minimize the environmental and health impacts of the built environment through energy, water and material efficiencies and improved indoor air quality, while also reducing the waste associated with construction, maintenance and remodeling over the life of the building; Green Building Guidelines (Resolution No. 79871, 2006) which provides guidelines to Alameda County residents and developers regarding construction and remodeling; and Green Building Education Incentives for private developers. As yet, there are no green building requirements for private developers. However, the emissions inventory does assume implementation of GGHC and CALGreen standards as a project design feature.

3.4 Regulatory Requirements

- Pavley Greenhouse Gas Standards (AB 1493). AB 1493 required the California Air Resources Board (CARB) to develop and adopt, by January 1, 2005, regulations that achieve "the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State. The ARB has adopted amendments to the "Pavley" regulations that GHG emissions in new passenger vehicles from 2009 through 2016. The amendments, approved by the Board on September 24, 2009, are part of

California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. Adjustments have been made in the GHG inventory to account for the implementation of Pavley standards.

4.0 Refinements to Baseline GHG Emissions Inventory

4.1 Construction-Related GHGs

Assumptions

The Project inventory includes short-term or one-time emissions associated with construction-related activities. While construction-related activities also generate life-cycle GHG emissions associated with the manufacture and transport of building materials and infrastructure, as previously mentioned, these so-called life-cycle emissions are not included in the final inventory as they would be accounted for under California Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006, in other industry sectors and are specifically identified as "speculative" in the 2009 CEQA Amendments.

CO₂ emissions associated with different aspects of construction activities for urban development can be estimated using a combination of software programs. The OFFROAD2007 and the EMFAC2007 models are used to generate emissions factor data for construction equipment and motor vehicles, respectively. These values serve as inputs for the URBEMIS2007 model, which estimates emissions associated with several different phases of urban development and construction based on emission factors and information specific to the Project.

Assumptions regarding construction timing and the number, type, and operating hours of equipment associated with construction of the Project are used with emission factors embedded in the URBEMIS2007 model (drawn from OFFROAD 2007 and EMFAC2007 models) to estimate emissions. Available models do not analyze emissions from construction-related electricity or natural gas consumption, which are generally too speculative to quantify, and typically contribute a relatively small percentage of overall GHG emissions during construction.

Estimated Total Construction-generated GHG Emissions

The construction-generated GHG emissions of the Project are shown in **Table 1**, which summarizes the construction-related GHG emissions inventory (made up of the principal GHGs carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) for Phase 1 without MOB, Phase 1 with MOB, and Project buildout scenarios. Emissions estimates are presented in MT of CO₂e. The table indicates that an estimated total **3,219 MT CO₂e** emissions from Project construction equipment and vehicles would be emitted over the course of the minimum construction period of six years.

For purposes of analysis, construction emissions are annualized because the proposed operational GHG emissions thresholds are analyzed in terms of metric tons "per year". Also, because climate change is a cumulative impact, some districts, such as South Coast, suggest annualizing over a 30- or 40-year period. If the total one-time construction-generated GHG emissions are annualized for an assumed 40-year development life of the project structures after which they are demolished for another use (which is the common standard currently used in practice), the one-time construction-related contribution is approximately **80 MT CO₂e** emissions annually, over 40 years. If the total construction-generated GHG emissions are annualized over a six-year construction period of the Project, the one-time construction-related contribution is approximately **537 MT CO₂e**.

TABLE 1
CONSTRUCTION GENERATED GHG EMISSIONS OF THE PROPOSED PROJECT

Construction Year	Annual CO ₂ e Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Total Phase 1				
2010	507	0.61	4.03	512
2011	412	0.49	3.27	416
2012	414	0.50	3.28	418
2013	591	0.71	4.69	596
2014	245	0.29	1.95	<u>247</u>
				2,189
Total Phase 1 with MOB				
2010	606	0.73	4.81	612
2011	581	0.70	4.61	586
2012	583	0.70	4.63	588
2013	782	0.94	6.21	789
2014	324	0.39	2.57	<u>327</u>
				2,902
Total Future Phases				
2016	314	0.38	2.49	317
Total Construction Emissions - Project Buildout				
	3,190	3.84	25.3	3,219^a
Construction Emissions per Year (annualized over 40 years)				80
Construction Emissions per Year (annualized over 6 years to construct the Project)				537

^a Project Buildout Total assumes "Total Phase 1 with MOB" emissions plus "Total Future Phases" emissions.

SOURCE: ESA, 2010

As previously discussed, BAAQMD is the only agency with jurisdiction over the proposed Project that is considering the future adoption of quantitative CEQA thresholds of significance for GHG emission impacts. However, its draft Guidelines does not propose a specific threshold or methodology for assessing construction-related GHG emissions for CEQA analysis. Therefore, the City assumes BAAQMD's proposed threshold of 1,100 MT CO₂e emissions annually as a proxy for construction-related emissions. This analysis quantifies and discloses the construction GHG emissions and makes a significance determination based on 1,100 MT CO₂e emissions annualized, as well as the Project's ability to meet AB 32 GHG reduction goals. The annualized GHG emissions from construction of the Project (**80 or 537 MT CO₂e**) would not exceed the proxy threshold of 1,100 MT CO₂e annually.

The analysis of construction emissions in this document and the DEIR only consider improvements in construction equipment exhaust emissions through manufacturer requirements and turnover. In addition to considering the CO₂e emission from construction activities, the Project would incorporate dust control measures recommended by BAAQMD (Oakland Standard Condition AIR-1, Dust Control), and measures related to construction exhaust emissions (Oakland Standard Condition AIR-2, Construction Emissions). Further, the Standard Conditions that apply to the project align with existing BAAQMD regulations that relate to portable equipment (e.g., concrete batch plants, and gasoline- or diesel-powered engines used for power generation,

pumps, compressors, pile drivers, and cranes), architectural coatings, and paving materials. Equipment used during project construction would be subject to the requirements of BAAQMD Regulation 2 (Permits), Rule 1 (General Requirements) with respect to portable equipment unless exempt under Rule 2-1-105 (Exemption, Registered Statewide Portable Equipment); BAAQMD Regulation 8 (Organic Compounds), Rule 3 (Architectural Coatings); and BAAQMD Regulation 8 (Organic Compounds), Rule 15 (Emulsified and Liquid Asphalts).

Overall, given that the Project will adhere to all BAAQMD control measures and City of Oakland Standard Conditions addressing construction-period emissions, as presented in the DEIR, that annualized GHG emissions from construction of the project would not exceed the proxy threshold of 1,100 MT CO₂e annually (as shown in Table 1 and discussed above), and that the Project would not conflict with the goals of AB32, as discussed above, the impact would be less than significant.

4.2 Long-Term Operational GHGs

Assumptions and Estimated Operational GHG Emissions, by Source

Long-term operational GHG emissions associated with the Project include indirect emissions from mobile sources (motor vehicle trips), emissions from natural gas combustion used in non-residential buildings, emissions from electricity use in non-residential buildings (grid electricity), emissions from water conveyance and waste water treatment and conveyance, emissions from area sources, emergency generators, and direct fugitive emissions. Each of these sources was previously discussed in general in Section 2.1 of this memo. The following discussion and quantification of each of these operational emission sources is specific to the proposed Project.

- Mobile Source (Motor Vehicle) Emissions. The proposed Project consists of high-density commercial development located within walking distance of public transportation, designed to minimize the use and impacts of private automobiles.

The Project mobile source emissions would result from the typical daily operation of motor vehicles by employees, patients, visitors and vendors. Vehicle trip generation from the proposed Project is based on information from the Fehr & Peers Transportation Impact Study. Trip generation would vary, depending on the extent of development assumed and whether TDM measures are assumed. **Table 2** presents the vehicle trip generation for the Phase 1, Phase 1 with MOB, and Project buildout scenarios, both with and without TDM measures. The TDM Plan for the Project includes a goal of reducing single occupant vehicles (SOV) trips by 10 percent from the current baseline during Phase 1, and by 20 percent from the current baseline in the long term. The 10 percent reduction in trips for Phase 1 recognizes that the SOV reductions resulting from implementation of the TDM Plan will take time to be realized, and will need to be phased in as the Project develops. Trip reduction estimates for this long term analysis presents both a conservative 15 percent and a full 20 percent reduction for future phases.

Emissions from vehicle trips were calculated using the URBEMIS2007 computer model. Trip generation rates of the model were adjusted to reflect the project-specific vehicle trip generation presented in Table 2. The calculation used the model default vehicle trip lengths specific to urban areas of Alameda County in the San Francisco Bay Area Air Basin.

URBEMIS2007 calculates the CO₂ emissions from motor vehicle trips based on trip generation and trip lengths. CH₄ and N₂O emissions were calculated using emission factors from CCAR and multiplied by their respective GWP to convert them to CO₂e. Total CO₂e emissions were then adjusted to reflect the implementation of Pavley GHG standards using emissions reduction forecasts contained in CARB's Climate Change Scoping Plan. The resulting total Project mobile source emissions are estimated to be approximately **6,731 MT CO₂e per year** with trip reduction benefits that would be realized by

**TABLE 2
VEHICLE TRIP GENERATION AND GHG EMISSIONS OF THE PROPOSED PROJECT PHASES**

	Daily Trips without TDM	Mobile GHG CO ₂ e Emissions without TDM Measures (MT per year)	Daily Trips with TDM Measures (15% / 20%) ^a	Long Term Mobile GHG CO ₂ e Emissions with TDM Measures (MT per year) (15% / 20%) ^a	Reduction in GHG CO ₂ e Emissions from TDM Program (15% / 20%) ^a
Total Phase 1	2,059	2,487	1,579	2,024	- 463
Total Phase 1 with MOB	6,854	8,460	3,978 / 3,712 (interpolated)	4,938 / 4,607	- 3,522 / -3,853
Total Future Phases (with MOB)	5,201	5,171	4,320 / 4,026	4,707 / 4,395	- 464 / - 776
Project Buildout ^b	7,260	7,658	6,379 / 6,085	6,731 / 6,419	- 927 / -1,239

^a Estimates of TDM trip reductions were provided by Fehr & Peers both a conservative 15 % and 20 % reduction in the long term.

^b Project Buildout emissions (2030) assumes "Total Phase 1 with MOB" emissions plus "Total Future Phases" emissions, with adjustment for Pavley GHG Standards (AB 1493).

SOURCE: Fehr & Peers 2010, ESA 2010.

implementation of a TDM program (with a conservative 15 percent trip reduction), which is required as a Standard Condition of Approval for the Project (SCA TRANS-1, previously discussed in Section 3.0). If a 20 percent trip reduction for Future Phases is achieved by the TDM Plan, Project mobile source emissions are estimated to be approximately **6,419 MT CO₂e per year**.

- Project Natural Gas Combustion Emissions.** GHG emission estimates from natural gas were derived from CO₂ emission factors for natural gas combustion in the URBEMIS2007 program and CH₄ and N₂O emission factors from CCAR's General Reporting Protocol. Project natural gas combustion GHG emissions were calculated for the PCP based on natural gas demand estimates generated by Ainsworth Consulting. These demand estimates reflect the Project design features identified as Sutter Health adopted approaches to the GGHC. The parking garage was assumed not to result in increased natural gas demand as parking structures are typically not heated in California and usually do not have hot water facilities. Natural gas demand for the proposed MOB, university expansion, fitness center, as well as reduction in demand from existing medical office buildings to be demolished were calculated using the default demand values in the URBEMIS2007 program.

Per BAAQMD, GHG emissions from permitted stationary source equipment are not to be included in the project inventory that is used for comparison to either the BAAQMD's proposed threshold of 1,100 MT per day or the efficiency-based threshold of 4.6 MT per year per service population (Tholen, 2010b). Because natural gas consumption of the PCP would be the result of combustion through a permitted boiler, these estimated emissions of 1,364 MT per day are considered separately with respect to the Districts' 10,000 MT per day threshold for stationary sources and are not included in the inventory with respect to the other operational GHG thresholds. The net Project-related natural gas GHG emissions, including consideration of existing buildings to be demolished but exclusive of permitted sources, would be **263 MT CO₂e per year**.

Table 3 presents the natural gas demand estimates associated with the proposed project elements for each of the three development scenarios.

**TABLE 3
NATURAL GAS DEMAND ESTIMATES OF THE PROPOSED PROJECT ELEMENTS AND
EXISTING STRUCTURES TO BE DEMOLISHED**

Project Elements by Phase	Building Area (Square feet)	Natural Gas Demand (Therms/year)	GHG CO₂e Emissions from Natural Gas Demand (MT per year)
Total Phase 1			
Patient Care Pavilion (New Construction)	230,000	257,286	1,356
Parking Garage (New Construction)	392,800	(No Natural Gas Assumed)	0
370 Hawthorne Avenue (Existing to be Demolished)	- 69,674	- 17,493	- 93
422 Hawthorne Avenue (Existing to be Demolished)	- 11,136	- 2,916	- 16
435 Hawthorne Avenue (Existing to be Demolished)	- 17,280	- 4,459	- 24
3300 Elm Street (Existing to be Demolished)	- 2,600	- 686	- 4
3232 Elm Street (Existing to be Demolished)	- 7,330	- 1,887	- 10
461 34 th Street (Existing to be Demolished)	- 3,500	- 858	- 5
Total Net increase Phase 1 (without MOB)	511,280	228,987	- 152
Total Phase 1 with MOB			
Medical Office Building (New Construction)	175,000	43,904	233
Total Phase 1 with Medical Office Building	686,280	272,891	81
Total Future Phases			
Fitness Center (New Construction)	32,000	11,662	62
University Expansion (New Construction)	72,500	26,411	140
3023 Summit Street (Existing to be Demolished)	- 11,382	- 2,916	- 16
3043 Summit Street (Existing to be Demolished)	- 2,500	- 686	- 4
Project Buildout - Total Net Increase All Elements	776,898	307,362	263

^a PCP natural gas consumption would be from a permitted boiler. Per BAAQMD, GHG emissions from permitted stationary source equipment are not to be included in the project inventory that is used for comparison to either the BAAQMD's proposed "bright-line" threshold of 1,100 MT per day or the efficiency-based threshold of 4.6 MT per year per service population (Tholen, 2010b).

SOURCE: ESA, 2010, Ainsworth Consulting 2010, California Energy Commission, 2006

- **Indirect Project Electrical GHG Emissions.** Non-residential buildings require electricity for space and water heating, air conditioning, lighting, and plug-in outlets. The amount of energy used (and the amount of associated GHG emissions emitted) per dwelling unit would vary with the type of residential building.

GHGs are indirectly emitted as a result of electrical service required for a proposed project. GHGs are emitted during the generation of electricity from fossil fuels. When electricity is used in a building, a portion of the electricity is typically generated off site at a power plant, while the remaining percentages are generated by renewable resources such as hydroelectric dams. The relative percentages of renewable and non-renewable resources vary from year-to-year based on the magnitude of available water flows at hydroelectric dams and other source variables. Currently, electricity provided by the standard PG&E grid invariably represents indirect emissions of GHGs from the combustion of fossil fuels.

PG&E maintains records annually on the percentage of electricity from renewable and non-renewable resources and, using this data, calculates an annual CO₂e emission rate per kilowatt of electricity generated by its sources. The most recent year calculated was 636 pounds of CO₂e per megawatt hour (lb/MW-hr) for 2007. Because the percentage of renewable resources fluctuates from year to year depending on rainfall

which affects hydropower, PG&E uses a five-year rolling average emission factor of 526 lbs/MW-hr for the years 2002–2007 as a more stable emission factor. This factor is provided in terms of CO₂e.

Energy use in a building may be divided into (1) energy consumed by the built environment, and (2) energy consumed by uses that are independent of the construction of the building, such as plug-in appliances. In California, Title 24 governs energy consumed by the built environment, including HVAC systems, water heating, and some fixed lighting.

Project electrical GHG emissions were calculated for the PCP based on electrical demand estimates generated by Ainsworth Consulting. These demand estimates reflect the Project design features identified as Sutter Health adopted approaches to the GGHC. Project electrical demand for the parking garage was calculated by ESA based on energy demand estimates for parking structures published by U.S. Department of Energy.⁶ Project electrical demand for the MOB, and future phase elements of the fitness center and university expansion were calculated by ESA and are based on energy demand estimates for commercial buildings contained in the latest California Energy Commission's (CEC) *California Energy Demand Staff Report* adopted in December 2009. The proposed project elements other than the PCP were assumed to be constructed to 2010 CALGreen standards. To achieve CALGreen Tier I energy efficiency, buildings must achieve 15 percent beyond Title 24, part 6. These standards were assumed to be a part of the proposed project and a 15 percent reduction to energy demand was applied to the year 2008 commercial building demand rates in the calculation of GHG emissions from grid electricity.

Reduction in energy demand resulting from the demolition of existing buildings was also calculated by ESA using energy demand estimates for commercial buildings contained in CEC's *California Energy Demand Staff Report*. **Table 4** presents the electrical demand estimates associated with the proposed project elements for each of the three development scenarios. The resulting net energy demand increase quantities were then converted to GHG emissions by multiplying by the appropriate PG&E specific emission factors, incorporating information on local electricity production and renewable sources of energy. The net Project-related electrical GHG emissions would be **1,809 MT of CO₂e per year** for all project elements.

- **Stationary Source Emissions.** Per BAAQMD, GHG emissions from permitted stationary source equipment are to be directly compared to the District's 10,000 MT per year threshold for such equipment for the purposes of impact assessment relative to CEQA. GHG emissions from permitted stationary source equipment are not to be included in the project inventory that is used for comparison to either the BAAQMD's proposed "bright-line" threshold of 1,100 MT per day or the efficiency-based threshold of 4.6 MT per year per service population (Tholen, 2010b).

Phase 1 of the project would install backup diesel generators and a boiler to support the PCP. GHG emissions would result from regular testing and maintenance of these generators. Based on information provided by the Project Applicant, standby diesel generators would be tested once per month for approximately one hour. Two 1,250 kW generators were assumed to be tested at 60 percent load. Emission factor for CO₂ was calculated by the OFFROAD 2007 program of the CARB. Emission contributions of CH₄ and N₂O were calculated based on the ratio of diesel fuel emission factors for these components cited by the California Climate Action Registry in its 2009 Emissions Reporting Protocol. Generator GHG emissions are estimated at **14 MT CO₂e annually**.

Boiler emissions would result from natural gas combustion used to fire the boiler. GHG emission estimates from natural gas were derived from CO₂ emission factors for natural gas combustion in the URBEMIS2007 program and CH₄ and N₂O emission factors from CCAR's General Reporting Protocol. Project boiler GHG emissions were calculated for the PCP based on natural gas demand estimates generated by Ainsworth Consulting. Boiler GHG emissions are estimated at **1,356 MT CO₂e annually**.

⁶ U.S. Department of Energy, Energy Information Administration, *Commercial Buildings Energy Consumption and Expenditures*, Table 3.15, 1992 available at <ftp://ftp.eia.doe.gov/pub/consumption/commercial/cbcetb92.pdf>

**TABLE 4
ELECTRICAL DEMAND ESTIMATES OF THE PROPOSED PROJECT ELEMENTS AND
EXISTING STRUCTURES TO BE DEMOLISHED**

Project Elements by Phase	Building Area (Square feet)	Electrical Demand (KW- hr/year)	GHG CO₂e Emissions from Electrical Demand (MT per year)
Total Phase 1			
Patient Care Pavilion (New Construction)	230,000	5,262,146	1,255
Parking Garage (New Construction)	392,800	541,276	129
370 Hawthorne Avenue (Existing to be Demolished)	- 69,674	- 1,141,085	- 272
422 Hawthorne Avenue (Existing to be Demolished)	- 11,136	- 182,380	- 44
435 Hawthorne Avenue (Existing to be Demolished)	- 17,280	- 283,003	- 68
3300 Elm Street (Existing to be Demolished)	- 2,600	- 42,581	- 10
3232 Elm Street (Existing to be Demolished)	- 7,330	- 120,047	- 29
461 34th Street (Existing to be Demolished)	- 3,500	- 57,321	- 14
Total Net increase Phase 1 (without MOB)	511,280	3,977,005	949^a
Total Phase 1 with MOB			
Medical Office Building (New Construction)	175,000	2,436,152	581
Total Phase 1 with Medical Office Building	686,280	6,413,157	1,530^a
Total Future Phases			
Fitness Center (New Construction)	32,000	445,468	106
University Expansion (New Construction)	72,500	1,009,263	241
3023 Summit Street (Existing to be Demolished)	- 11,382	- 186,409	- 44
3043 Summit Street (Existing to be Demolished)	- 2,500	- 40,944	- 10
418 30th Street (Existing to be Demolished) ⁷	- 3,500	- 57,321	- 14
Project Buildout - Total Net Increase All Elements	773,398	7,583,214	1,809^a

^a Column totals do not add exactly due to rounding of intermediate values.

^b The Revised Development Plan no longer calls for demolition of the building at 418 30th Street. This change in the Project does not substantially affect the GHG CO₂e emissions from electrical demand, and therefore were not recalculated.

SOURCE: ESA, 2010, Ainsworth Consulting 2010, California Energy Commission, 2006

Therefore total stationary source GHG emissions would be **1,370 MT CO₂e per year**, which is less than the 10,000 MT CO₂e per year BAAQMD threshold for stationary sources. Project proposed stationary source GHG emissions would be less than significant. These stationary source emissions are not further considered in relation to other proposed BAAQMD thresholds.

- **Water and Wastewater Treatment and Conveyance.** The Project GHG inventory includes emissions associated with drinking water and wastewater supply and treatment. In general, the majority of these emissions are indirect emissions associated with the energy used to convey, treat, and distribute water and wastewater. Additional emissions from wastewater treatment include CH₄ and N₂O, which are emitted directly from wastewater treatment processes.

The amount of electricity required to treat and supply water is a function of water demand. A baseline net water demand increase of 66,621 gallons per day (gpd) for all Phases was determined in the DEIR. This net demand increase is attributable to future phase elements as well as the PCP and accounts for demolition of existing buildings. Because this estimated water demand estimate is back-calculated from existing

⁷ The Revised Development Plan no longer calls for demolition of the building at 418 30th Street. This change in the Project does not substantially affect the GHG CO₂e emissions from electrical demand, and therefore were not recalculated.

wastewater discharge flow from existing buildings that were not constructed to GGHC or CALGreen standards, a further reduction in water demand will be realized and is assumed in this GHG analysis.

Water demand is the result of flush and flow fixtures and irrigation. The PCP will be designed to GGHC standards using water efficient fixtures that are 28 percent more efficient than existing conventional fixtures. Based on a PCP operational demand of 8,806 gpd is attributable to flush and flow fixtures of the PCP and that an additional 28 percent to this demand or 11,272 gpd (standard construction similar to those buildings that currently exist) is what was assumed in the refined baseline calculation.

A rainfall analysis by AECOM indicates that the irrigation water demand would be 1,703 gpd attributable to the PCP and that an additional 50 percent to this or 2,555 gpd (standard construction similar to those buildings that currently exist) is what was assumed in the refined baseline calculation.

The contribution of the PCP (Flush and Flow and irrigation) totals 10,509 (8,806 + 1,703) gpd with measures not envisioned in the refined baseline calculation and 13,872 (11,272 + 2,555) gpd in the baseline. This later number represents about 21 percent of the total 66,621 net increase. The remaining portion (79 percent or 52,749 gpd) of the baseline demand would be attributable to other Future Phases elements to which GGHC measures would not be applicable. Consequently, only a CALGreen 20 percent reduction would be applicable to this portion of the demand. For the purposes of GHG calculations only ESA assumed an overall adjusted net water demand of 10,509 gpd from the PCP and 42,199 (52,749 × 0.8) gpd from other elements for an adjusted net demand increase of 52,708 gpd. Conservatively assuming this demand over an entire year, this demand is equivalent to 19.24 million gallons per year. This demand results in a water conveyance energy emission rate of **9 MT CO₂e annually**.

Indirect emissions resulting from electricity use were determined by multiplying electricity use by California statewide CO₂, CH₄ and N₂O emission factors from CCAR's General Reporting Protocol. Statewide emission factors are used rather than local PG&E factors to reflect the fact that drinking water from the local water utility (EBMUD) is pumped from a variety of sources including primarily the Mokelumne River watershed in the eastern Sierras and therefore, has the potential to be pumped through the jurisdictions of electricity providers other than PG&E.

Energy use for the various aspects of water treatment (e.g., source water pumping and conveyance, water treatment, distribution to users) was determined using the stated water demand and energy intensity values from the CEC that are also recommended for use by BAAQMD in its latest proposed Air Quality Guidelines.

Emissions associated with wastewater treatment include indirect emissions associated with powering the treatment process and direct emissions from degradation of organic material in the wastewater, which are biogenic in nature and not considered as part of the Project's GHG inventory. Wastewater discharge from the proposed Project is estimated in Section 4.13, Utilities and Service Systems, of the DEIR to be 66,448 million gpd. Implementation of the proposed GGHC measures to the PCP and CALGreen standards to remaining project elements would reduce water demand by an additional 28 and 20 percent, respectively. It was conservatively assumed that the wastewater discharge increase is equivalent to the net adjusted water demand increase of 19.24 million gallons per year. This demand results in a wastewater treatment and conveyance energy emission rate of **16 MT CO₂e annually**.

In total, all municipal water and wastewater treatment and conveyance for the proposed Project is expected to produce **25 MT CO₂e annually**: approximately **9 MT CO₂e per year** attributable to water conveyance and approximately **16 MT CO₂e per year** attributable to wastewater treatment and conveyance.

- Area Sources. Area source emissions stem from hearths (including gas fireplaces, wood-burning fireplaces, and wood-burning stoves) and small mobile fuel combustion sources such as lawnmowers and other landscape maintenance equipment. For commercial development, such as the proposed Project, there are no fireplace emissions and area emissions of GHG would be entirely from landscape maintenance equipment.

For the proposed Project, the URBEMIS model indicates practically no quantifiable change in GHG emissions from landscape equipment between the proposed Project and existing uses to be demolished. The net increase of area source emissions in the Project GHG inventory is approximately **0.74 MT CO₂e per year**.

- **Operational Direct Fugitive Emission Sources.** The only potential direct source of operational fugitive GHG emissions would be from leaking refrigeration equipment. GGHC measures adopted by the Project include a policy not to use any CFC-based refrigerants. Consequently, Project elements that would include refrigeration either as a building environment control or for operational storage purposes of the hospital were assumed not to contribute to a net increase in GHG emissions.
- **Operational Indirect Fugitive Emission Sources.** Potential indirect sources of operational fugitive GHG emissions would be from solid waste generation, whereby a project generates waste that is transported off-site to a landfill and landfill gas is inadvertently emitted to the atmosphere due to leakage or inherent imperfections in the collection system. The project would result in 109.5 tons of waste per year. Assuming a City of Oakland specific diversion rate of 59 percent, 45.9 tons of waste would be deposited to landfill annually. The City of Oakland recommends application of a 60 percent methane recovery rate (flaring rate) at the landfill for calculation of solid waste emissions for inventorying purposes, as well as county-wide waste characterization (20.4 percent paper, 12 percent food, 9.3 percent plant debris, 30 percent wood and textiles, and 28.3 percent all other waste). With these data, the Clean Air and Climate Protection Software tool provided by ICLEI – Local Governments for Sustainability calculated annual GHG contribution from solid waste generation to be of **14 MT CO₂e per year** (Fitzgerald, 2010).

Estimated Total Baseline Operational GHG Emissions Update

Phase 1

As shown in **Table 5**, factoring in all of the emission source categories discussed and quantified above, the total annual GHG emissions generated from Phase 1 of the Project, with the design features related to energy use and transit, is approximately **2,831 MT CO₂e per year**. Table 5 reveals that the majority of annual Project emissions is the result of vehicle use (approximately 72 percent), followed by electrical demand (approximately 34 percent).⁸

The resulting emissions for the proposed Project can be divided by a service population, calculated as the sum of additional net new residents (none) and net new employees. As discussed in Section 4.11, Population, Housing and Employment, of the DEIR, Phase 1 would result in no net increase of employees. Although the number of existing employees that would “transfer” to the Phase 1 development is not quantified, because there will be a net increase in GHG emissions with no change in service population, the ratio of emissions to service population would be greater than that which currently exists for uses that would be displaced for Phase 1 development.

Phase 1 with MOB

GHG Emissions for Phase 1 with the MOB were calculated similarly as those for Phase 1 of the Project. As shown in Table 5, using all the emission source categories quantified above, the total annual GHG emissions generated from Phase 1 with the MOB, with the design features related to energy use and transit, is approximately **6,585 MT CO₂e per year**. Table 5 reveals that the majority of annual Project emissions is the result of vehicle use (approximately 75 percent), followed by electrical demand (approximately 23 percent). Table 5 also reports the Project’s contribution to citywide emissions.

⁸ Total percentage may add to more than 100 percent since there are reductions in emissions from other emission sources, as shown in Table 5.

TABLE 5
REFINED BASELINE ESTIMATED OPERATIONAL GHG EMISSIONS INVENTORY FOR THE PROPOSED PROJECT

	Phase 1 CO ₂ e Emissions (MT per year)	Phase 1 with MOB CO ₂ e Emissions (MT per year)	Project Buildout CO ₂ e Emissions (MT per year)	Significant GHG Impact
Emission Sources				
Operational Vehicle Emissions ^a	2,024	4,938	6,731	
Natural gas	-152	81	263	
Indirect Electricity	949	1,530	1,809	-
Water Conveyance	-3	7	9	
Wastewater Treatment and Conveyance	-1	14	16	
Area Sources	0.24	0.49	0.74	
Solid Waste	14	14	14	
Refined Total Baseline Operational Project GHG Emissions ^b (Refined from Unadjusted Emissions below)	2,831	6,585	8,843 ^a	Yes
<i>Total Unadjusted Operational Project GHG Emissions Reported in DEIR</i>	3,927	9,635	10,157	Yes
<i>Total Unadjusted Operational Project GHG Emissions Using Same Assumptions applied to the Refined Total Baseline ^c</i>	3,793	10,736	11,532	Yes
Proposed BAAQMD Mass Operational GHG Emissions Threshold	1,100	1,100	1,100	-
Refined Total Baseline Operational Project Emissions per Service Population (429 new employees)	NA (No Change in Service Population)	15.3	20.6	Yes
<i>Total Unadjusted Operational Service Population Emissions (Based on Total Emissions Reported in DEIR)</i>	NA (No Change in Service Population)	15.3	23.7	Yes
Proposed BAAQMD Service Population Threshold	4.6	4.6	4.6	-
Permitted Stationary Emissions Sources				
PCP Backup Generators	14			
PCP Boiler	1,356			
Total Permitted Stationary Source Emissions	1,370			No
<i>Not Estimated in DEIR</i>	-			-
BAAQMD Threshold for Operational GHG Emissions	10,000			

- a Assumes TDM trip reductions at 15% for all phases. If a 20% reduction is assumed, total CO₂e emissions at would be reduced by an additional 312 MT CO₂e, or 8,936 at Project Buildout.
- b The City assumes BAAQMD's proposed threshold of 1,100 MT CO₂e emissions annually as a proxy for construction-related emissions since BAAQMD does not propose a specific threshold or methodology for assessing construction-related GHG emissions for CEQA analysis. For informational purposes, if the most conservative annualized construction emissions for each phase (i.e., annualized over the six-year construction period of the Project) are added to the annualized operational emissions, the Refined Total Baseline Project GHG Emissions (construction plus operational) would increase to 3,378 MT CO₂e during Phase 1; 7,311 MT CO₂e for Phase 1 with MOB; and 9,376 MT CO₂e for Project Buildout. Total emissions by service population would not increase for Phase 1 with MOB, but would increase to 20.6 for Project Buildout.
- c Excludes emissions reductions from Project design features, applicable City SCAs (including TDM), and regulatory requirements that are considered in the refined baseline, but assumes the same updated assumptions and inputs used in the refined baseline but not reflected in the emissions "reported in the DEIR". Implementation and application of Project design features, applicable City SCAs (including TDM), and regulatory requirements results in a reduction of approx. 2,689 MT CO₂e per year (23%) from the Project's unadjusted emissions estimates (see Table 6, below).

SOURCE: ESA 2010, CARB URBEMIS2007, OFFROAD2007.

When resulting emissions for Phase 1 with the MOB is divided by a service population of 429 net new employees, the result is service population emissions of approximately **15.3 MT CO₂e per year per capita of service population**, as shown in Table 5.⁹

Project Buildout – All Phases

GHG Emissions for Future Phases elements of the Project were calculated similarly as those for the Phase 1 phases. However, because construction of Future Phases would be completed after 2020, emission reductions related to the Pavley GHG standards would be realized and therefore, are applied to mobile emissions from the Future Phases. As shown in Table 5, using all the emission source categories quantified above, the total annual GHG emissions generated from Project Buildout (Phase 1 and Future Phases), with the design features related to energy use and transit, is approximately **8,843 MT CO₂e per year**. These emissions are less than those of Phase 1 with MOB scenario because of the mobile emissions reductions with the Pavley GHG standards by year 2020. The table reveals that the majority of annual Project emissions is the result of vehicle use (approximately 76 percent), followed by electrical demand (approximately 20 percent). When the resulting emissions for Project Buildout is divided by a total service population of 429 net new employees, this results in service population emissions of **20.6 MT CO₂e per year per capita of service population**.

(Calculations for GHG emissions shown in Table 5 are included in Appendix A to this GHG Reduction Plan.)

As shown in Table 5, the Project's total annual GHG emissions is approximately **8,843 MT CO₂e**, which exceeds the 1,100 MT CO₂e per year threshold. The Project's approximately **20.6 MT CO₂e per year per capita of service population** also exceeds the 4.6 MT CO₂e per year threshold. Consistent with BAAQMD, the City indicates that a project must exceed **both** thresholds for it to be considered a significant CEQA impact. Therefore, the proposed Project would result in a significant cumulative GHG impact since it exceeds both thresholds.

Comparison to Unadjusted Emissions for the Project: **Table 6** below is a comparison of the refined baseline of the Project's total annual GHG emissions, which incorporates emissions reductions from Project design features, applicable City SCAs (including TDM), and regulatory requirements, and what the Project's emissions are estimated to be without these measures applied, assuming the same updated assumptions and inputs that were applied to estimate the refined baseline. The updated assumptions result in increased emissions and primarily include more detailed data about electrical and natural gas use demands for the PCP, as noted in Table 5, above. However, natural gas emissions from the boiler associated with the PCP is approximately 3 percent more than the unadjusted estimated. This is because the energy models to be incorporated with the Project as part of its energy efficiency measures predict increased natural gas usage with reduced electrical demand for the efficiency cases (the refined baseline).¹⁰

As shown in the table, overall emissions reductions measures that are already assumed with the Project reduce total operational emissions by 24 percent in Phase 1, 39 percent in Phase 1 with MOB, and 23 percent at Project Buildout. These reductions occur prior to further reductions that could occur with additional emissions reduction measures, which are discussed in Section 2 of this memo. (Calculations for GHG emissions shown in Table 6 are included in Appendix B to this GHG Reduction Plan.)

⁹ Total Service Population is calculated as the sum of additional net new residents (zero) and 429 net new employees associated with the Project.

¹⁰ Electricity demand decreased from 2,309 MT CO₂e unadjusted, to 1,809 MT CO₂e refined baseline. Thus, natural gas from permitted stationary sources (specifically the PCP boiler) increased slightly from 1,327 MT CO₂e unadjusted, to 1,356 MT CO₂e refined baseline (see Tables 5 and 6).

TABLE 6
COMPARISON OF UNADJUSTED OPERATIONAL GHG EMISSIONS AND REFINED BASELINE OPERATIONAL EMISSIONS FOR THE PROPOSED PROJECT

	Phase 1 CO ₂ e Emissions (MT per year)	Phase 1 with MOB CO ₂ e Emissions (MT per year)	Project Buildout CO ₂ e Emissions (MT per year)
Unadjusted Emission Sources			
Operational Vehicle Emissions	2,640	8,460	8,905
Natural gas	-152	81	263
Indirect Electricity	1,284	1,968	2,308
Water Conveyance	-2	9	12
Wastewater Treatment and Conveyance	-0.4	15	20
Area Sources	0.24	0.49	0.74
Solid Waste (with existing national diversion rate of 32%)	23	23	23
Unadjusted Operational Project GHG Emissions^b	3,793	10,736	11,532
<i>Refined Total Baseline Operational Project GHG Emissions (From Table 5)^a</i>	<i>2,831</i>	<i>6,585</i>	<i>8,843</i>
Percent Change in Operational Emissions - Refined Baseline Compared to Unadjusted	-25%	-39%	-23%
Unadjusted Permitted Stationary Emissions Sources			
PCP Backup Generators	14		
PCP Boiler	1,327		
Total Unadjusted Permitted Stationary Source Emissions	1,341		
<i>Refined Baseline Permitted Stationary Emissions Sources (From Table 5)^a</i>			
<i>PCP Backup Generators</i>	<i>14</i>		
<i>PCP Boiler</i>	<i>1,356</i>		
<i>Total Refined Permitted Stationary Source Emissions</i>	<i>1,370</i>		
Percent Change in Permitted Stationary Source Emissions - Refined Baseline Compared to Unadjusted	+3%		

^a Implementation and application of Project design features, applicable City SCAs (including TDM), and regulatory requirements

SOURCE: ESA 2010, CARB URBEMIS2007, OFFROAD2007.

Section 2. Assessment of GHG Emissions Reduction Measures

This section of the GHG Emissions Reduction Plan presents and quantifies a comprehensive set of additional GHG reduction measures and identifies specific measures available for the Project to implement to reduce the Project's GHG emissions. These measures are considered "additional" because they are beyond those factored into the Project's refined baseline GHG emissions presented in Section 1, above, which already result in an approximately 2,689 MT CO₂e (23 percent) reduction from the Project's unadjusted emissions estimate. To prepare this assessment, ESA consulted multiple sources including the State of California's Climate Change Scoping Plan, the State Attorney General's web site, the California Air Pollution Control Officer Association's (CAPCOA) white paper on CEQA and Climate Change, the Green Guide for Health Care (version 2.2), Green Guide for Healthcare and Sustainability Practices, Reference Guides on Leadership in Energy and Environmental Design (LEED) published by the US Green Building Council, and BAAQMD's Draft CEQA Air Quality Guidelines. ESA identified and assessed the feasibility of additional emission reduction measures. ESA estimated the Project-related GHG emissions reductions associated with adoption and implementation of these additional measures.

Given the evolving nature of GHG emissions reduction measures, and technologies, there is some uncertainty involved with the identification and effectiveness of available GHG reduction measures. The information herein presents a best-professional effort exercise to identify available reduction measures and does not assume to be exhaustive in its scope.

The following Sections 1.0 through 4.0 examine individual GHG reduction measures from each of the above cited sources. Measures that are found to be potentially applicable to the proposed Project are identified. Sections 5.0 and 6.0 examine each of the potential reduction measures in more detail, discuss the feasibility of each, and indicate the degree to which each measure would reduce Project-generated GHG emissions.

1.0 GHG Reduction Measures Identified in the Climate Change Scoping Plan of the California Air Resources Board

Table 4.4-7 of the DEIR presented the 39 Recommended Actions (qualitative measures) identified to date by CARB's Scoping Plan. Of the 39 measures identified, those considered to have potential application to the proposed Project are primarily related to transportation, electricity and natural gas use and green building design. Each of these measures is evaluated below, by source-type, for its applicability to the proposed Project, its emissions reduction potential, and for its inclusion in the proposed Project as currently designed.

1.1 Transportation

CARB's Scoping Plan identifies nine transportation-related recommended actions. Action T-1 concerns improvements to light-duty vehicle technology for the purposes of reducing GHG emissions (Pavley Standards). This action focuses on legislating improved controls for vehicle manufacturers and would not generally be considered applicable to the proposed Project. However, it is reasonably anticipated that vehicles utilized by the proposed Project would be subject to the new Pavley regulation. As such, an adjustment was made in the refined baseline GHG emissions inventory for the Project, as presented in Section 1 (*Refinement of Baseline Emissions Inventory*), above. Therefore this action does not represent additional mitigation available to the City and Project applicant.

Action T-2 concerns implementation of a LCFS. To reduce the carbon intensity of transportation fuels, CARB is developing a LCFS, which would reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 as called for by Governor Schwarzenegger in Executive Order S-01-07. LCFS will incorporate compliance mechanisms that provide flexibility to fuel providers in how they meet the requirements to reduce GHG emissions. Implementation of such a standard is not within the purview of a development project and this action does not represent additional mitigation available to the City and Project applicant.

Action T-3 addresses regional transportation targets for reducing GHG emissions. SB 375 requires CARB to develop, in consultation with MPOs, passenger vehicle GHG emissions reduction targets for 2020 and 2035 by September 30, 2010. It sets forth a collaborative process to establish these targets, including the appointment by CARB of a Regional Targets Advisory Committee to recommend factors to be considered and methodologies for setting GHG emissions reduction targets. SB 375 also provides incentives – relief from certain CEQA requirements for development projects that are consistent with regional plans that achieve the targets. While no targets have been set pursuant to SB 375 and the Sustainable Community Strategy for the region will likely not be adopted prior to 2012, the proposed Project includes Transportation Demand Management (TDM) measures which reduce vehicle miles travelled (VMT). This action does not represent additional mitigation available to the City and Project Applicant.

Action T-4 is concerned with vehicle efficiency measures. The California Integrated Waste Management Board (CIWMB) with various partners continues to conduct a public awareness campaign to promote sustainable tire practices. CARB is pursuing a regulation to ensure that tires are properly inflated when vehicles are serviced. Because the proposed Project would not involve the operation of fleet vehicles, this action does not represent additional mitigation available to the City and Project Applicant.

Actions T-5 and T-6 addresses electrification of ships at ports and port operations and is not applicable to the proposed Project. Therefore, this action does not represent additional mitigation available to the City and Project Applicant.

Action T-7 requires addresses existing trucks/trailers to be retrofitted with the best available technology and/or CARB-approved technology. This action does not represent additional mitigation available to the City and Project Applicant.

Action T-8 focuses on hybridization of medium- and heavy-duty vehicles. The implementation approach to Action T-8 is to adopt a regulation and/or incentive program that reduces GHG emissions by encouraging hybrid technology as applied to vocational applications that have significant urban, stop-and-go driving, idling, and power take-off operations in their duty cycle. Such applications include parcel delivery trucks and vans. This action does not represent additional mitigation available to the City and Project applicant.

Action T-9 concerns implementation of a high speed rail (HSR) system. This action does not represent additional mitigation available to the City and Project Applicant.

1.2 Electricity and Natural Gas

Action E-1, together with Action GB-1 (Green Building), aims to reduce electricity demand by increased efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. Elements of this action include encouraging construction of zero net energy (ZNE) buildings and implementation of passive

solar design. In addition to employing on-site electricity generation, a ZNE building must either replace natural gas with renewable energy for space and water heating, or compensate for natural gas use by generating surplus electricity for sale on the state's electricity grid. While these building measures lend themselves to residential and some commercial applications, the goals are generally less applicable to hospital land uses that have substantial power demands. The proposed Project includes a number of green building design features, noted in Section 1 (*Refinement of Baseline Emissions Inventory*) of this document, that are consistent with the objectives of Action E-1 and GB-1. However, the proposed Project does not currently include any form of on-site electricity generation. Consequently, on-site power generation represents a potential additional mitigation measure that will be assessed in Sections 5.0 and 6.0, below.

Action E-2 encourages an increase in the use of combined heat and power (CHP) use, or co-generation, facilities. California has supported CHP for many years, but market and other barriers continue to keep CHP from reaching its full market potential. Increasing the deployment of efficient CHP will require a multi-pronged approach that includes addressing significant barriers and instituting incentives or mandates where appropriate. Co-generation would not be applicable to the Project site as it would require a constant need for steam that is absent. This action does not represent additional mitigation available to the City and Project applicant.

Action E-3 concerns Renewable Portfolio Standards for utilities and does not apply to development projects. Therefore, the proposed Project would not conflict with the recommended measure.

Action E-4 strives to promote solar generated electricity. As discussed with respect to Action E-1, the proposed Project does not currently include any form of on-site electricity generation. Consequently, on-site power generation represents a potential additional mitigation measure that will be assessed in Sections 5.0 and 6.0, below.

2.0 GHG Reduction Measures Identified in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change Guidance Document

Proposed Project design elements and mitigation measures may be compared to the list of 64 project-specific mitigation measures developed by the CAPCOA in their document *CEQA and Climate Change*.¹¹ **Table 7** presents an itemized list of each of the project-specific mitigation measures identified in the CAPCOA document and correlates them to any existing or proposed Project elements. Mitigation measures which are not proposed by the Project or identified as a Standard Condition of Approval or Mitigation Measure in the DEIR are then identified as potential GHG reduction measures if they are deemed applicable to the type of project proposed. The State Attorney General has also published a list of various "measures that may reduce the global warming related impacts of a project."¹² These measures are generally included in CAPCOA's more extensive listing of GHG mitigations and are not repeated.

¹¹ California Air Pollution Control Officers Association, *CAPCOA White Paper - CEQA and Climate Change*. CAPCOA, 2008, <http://www.capcoa.org/ceqa/CAPCOA%20White%20Paper%20-%20CEQA%20and%20Climate%20Change.pdf>, accessed on October 23, 2008.

¹² California Department of Justice, Attorney General Edmund G. Brown Jr., *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*, December 9, 2008, http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf, accessed on July 1, 2009.

TABLE 7
CAPCOA-IDENTIFIED GHG MITIGATION MEASURES

Mitigation Measure	Description	Generalized Emissions Reduction Estimate	Existing or proposed by the project?
MM T-1	Bike parking		Yes – Existing as indicated by TDM Recommendations
MM T-2	End of trip facilities (i.e., showers and lockers)	1-5 percent for MM T-1, MM T-2, and MM T-3	Yes – Showers to be included in new buildings per TDM recommendations and lockers are existing.
MM T-3	Bike parking (residential)		Not Applicable –No Residential component.
MM T-4	Proximity to bike path/bike lanes		Yes – per DEIR Transportation Section, Class II and III bike routes exist in the area.
MM T-5	Pedestrian network	1 percent – 10 percent	Yes – per DEIR Transportation Section, Pedestrian facilities include sidewalks, crosswalks, and pedestrian signals. Sidewalks are provided on all of the existing roadways in the study area.
MM T-6	Pedestrian barriers minimized		
MM T-7	Bus Shelter for Existing/Planned Transit Service	1 percent – 2 percent	Yes – per DEIR Transportation Section, the Project would install AC Transit stops on Webster Street with shelter or bench
MM T-8	Traffic Calming	1 percent – 10 percent	DEIR mitigation measures TRANS-1 and TRANS-2 would implement traffic calming measures.
MM T-9	Paid Parking	1 percent – 30 percent	Yes – As discussed in the TDM Recommendations, parking pricing will be adjusted and will affect employees as well as visitors to address trip reduction goals and parking demand deficits.
MM T-10	Minimum Parking	1 percent – 30 percent	Yes -The TDM encourages carpooling, biking, and flexible working hours which reduces commute times. The Municipal Code specifies a required amount of parking and the proposed Project would have a parking deficit of over 1,100 spaces per the TDM Recommendations.
MM T-11	Parking Reduction beyond Code/Shared Parking	1 percent – 3- percent	Yes -The Municipal Code specifies a required amount of parking and the proposed Project would have a parking deficit of over 1,100 spaces per the TDM Recommendations.
MM T-12	Pedestrian pathway through parking	1 percent – 4 percent	Yes – Per Transportation Section of the DEIR, a pedestrian connection would be provided that extends from the existing midblock crossing from the pedestrian entrance of the West Garage on 30th Street to Hawthorne Avenue at Summit Street. This pathway would be used by people parking in the West Garage and walking between the West Garage and either the new Patient Care Pavilion, new university building, or the new medical office building.
MM T-13	Off Street Parking	1 percent – 4 percent	Yes - Design of the proposed project provides for off street parking.
MM T-14	Parking Area Tree Cover (50 percent cover in ten years)	3.1 kg/m ³ of canopy	No –This measure represents a potential additional mitigation measure.
MM T-15	Valet Bicycle Parking	Low	Not Applicable – project is not an event center.
MM T-16	Garage Bicycle Storage	Low	Not Applicable – Project is not residential.
MM T-17	Preferential Parking for EVs/CNG Vehicles	Low	Yes – this measure is identified on a list of sustainable elements of the proposed parking structure.
MM T-18	Reduced/No Parking Fee for EVs/CNG Vehicles	Low	No –This measure represents a potential additional mitigation measure.
MM T-19	TMA Membership	1 percent – 28 percent	Yes - Project has TDM implementation as Condition of Approval.
MM T-20	Use or provide ULEV	Low	Not Applicable – No applicant vehicle fleet that can feasibly operate on hybrid or electric power.

TABLE 7 (Continued)
CAPCOA-IDENTIFIED GHG MITIGATION MEASURES

Mitigation Measure	Description	Generalized Emissions Reduction Estimate	Existing or proposed by the project?
MM T-21	Flex Fuel Vehicles	Low	Not Applicable – No applicant vehicle fleet.
MM D-1	Office/ Mixed Use Density	0.05 percent – 2 percent	Yes – Project provide office use proximate to transit with bicycle and pedestrian access.
MM D-2	Orientation to Existing/Planned Mass Transit	0.4 percent – 1 percent	Yes – DEIR Transportation Section states that the site is located approximately 0.7 mile south and east of the MacArthur BART station. AC Transit provides bus service to the project site.
MM D-3	Services Operational – for Employees	0.5 percent – 5 percent	Yes - Operational features include main lobby of the hospital would be on the first level and would house a gift shop, café, and kitchen.
MM D-4	Residential Density	1 percent – 40 percent	Not Applicable – Project is not residential.
MM D-5	Street Grid	1 percent	Not Applicable to non-residential projects.
MM D-6	Neighborhood Electric Vehicle Access	0.5 percent – 1.5 percent	Not Applicable to non-residential project.
MM D-7	Affordable Housing Component	0.4 percent – 6 percent	Not Applicable – Project is not residential.
MM D-8	Recharging Area	Low	Not Applicable – Project is not residential.
MM D-9	Urban Mixed Use Development	3 percent - 9 percent	Yes - Development predominantly characterized office and institutional uses that are combined in a single building or on a single site in an integrated development project with functional interrelationships.
MM D-10	Suburban Mixed Use Development	3 percent	Not Applicable – Project is urban not suburban (see MM D-9)
MM D-11	Other Mixed Use Development	1 percent	Not Applicable to non-residential project.
MM D-12	Infill Development	3 percent - 30 percent	Not Applicable – Project is not located on a vacant infill site, brownfield or greyfield.
MM D-13	Electric Lawnmower	1 percent	Not Applicable – Project is not Residential.
MM D-14	Enhanced Recycling		<p>Construction : Yes – DEIR Project Description states a detailed Construction and Demolition Waste Management Plan would be prepared and implemented to divert a minimum of 50 percent of construction and demolition debris from landfills, consistent with SCA & GGHC.</p> <p>Operation: -No. In terms of operational elements, while the City has adopted a zero-waste resolution there are no project recycling goals beyond allocating a space for recycling collection. Operational recycling goals represent a potential additional mitigation measure</p>
MM D-15	LEED Certification	Moderate	Partially – The proposed Project will be designed to standard of the GGHC. The GGHC is borrowed, by agreement, from the LEED rating system. While the GGHC can be used to pursue LEED accreditation, it is not being pursued for the project. Additionally, not all GGHC measures are proposed to be incorporated in the Project. Therefore, there are additional LEED/GGHC measures that represent potential additional mitigation measures.
MM D-16	Retro-Commissioning: Building systems perform interactively to optimize energy performance	8 percent – 10 percent	Yes – Project GGHC measures include implementation of “enhanced commissioning”. This oversight will ensure full and appropriate implementation of GHG reduction measures.

TABLE 7 (Continued)
CAPCOA-IDENTIFIED GHG MITIGATION MEASURES

Mitigation Measure	Description	Generalized Emissions Reduction Estimate	Existing or proposed by the project?
MM D-17	Drought tolerant Landscaping and shade trees	Low	Yes – GGHC will implement drought tolerant plants and efficient irrigation to reduce water demand for irrigation by 50 percent.
MM D-18	Local Farmers Market	Low	Not Applicable to institutional/office project.
MM D-19	Community Gardens	Low	Not Applicable to institutional/office project.
MM E-1	High-Efficiency Pumps	Low	Yes – Project buildings will use high-efficiency pumps for water transport and storage components (e.g, water tanks or electric air-source heat pumps for heating/cooling).
MM E-2	Wood Burning Fireplaces/Stoves	Low	Not Applicable to institutional/office project.
MM E-3	Natural Gas Stove	Low	Not Applicable to institutional/office project.
MM E-4	Energy Star Roof	0.5 percent – 1 percent	Yes – Per GGHC, the Project will utilize light-colored roofing materials with an SRI of at least 78 over 75 percent of surfaces.
MM E-5	On-Site Renewable Energy System	1 percent – 3 percent	No –This measure represents a potential additional mitigation measure.
MM E-6	Exceed Title 24	1 percent	Yes – GGHC goal is to exceed Title 24 requirements by 14 percent. Latest modeling exceeds this goal.
MM E-7	Solar Orientation	Low	Not feasible for PCP – This measure cannot be implemented for the PCP. Energy reduction features implemented based on existing design plans, which may, to a degree, accommodate solar orientation into the design. This measure may represent potential mitigation for the MOB or Future Phase buildings.
MM E-8	Non-roof Surfaces -Provide light-colored pavement for at least 30 percent of the site's non-roof impervious surfaces, including parking lots, walkways, plazas, OR place a minimum of 50 percent of parking spaces underground or covered by structured parking	Low	Yes – Per GGHC, Operational facility design features include light colored paving and shade trees. Covered parking to reduce heated surface is a design element of the proposed project.
MM E-9	Low-energy Cooling (Separate ventilation and Cooling systems)	1 percent – 10 percent	Yes – modeling of electrical demand for PCP indicates multiple ventilation and cooling systems.
MM E-10	Green Roof	1 percent	Yes – The Project meet the conditions of this measure by virtue of the SRI roofing material covering 75 percent of roof surfaces.
MM E-11	Charging Facilities	Low	Yes – this measure is identified on a list of sustainable elements of the proposed parking structure.
MM E-12	Light-colored Paving	Low	Yes. Per GGHC, parking structures are covered and roofs will consist of light-colored asphalt with an SRI of at least 29.
MM E-13	Cool Roof	Low	Yes – Per GGHC, the Project will utilize light-colored roofing materials with an SRI of at least 78 over 75 percent of surfaces.
MM E-14	Solar Water Heaters	20 percent – 70 percent	Not applicable for institutional complex with central boiler.
MM E-15	Electric Yard Equipment Compatibility	Low	No –This measure represents a potential additional mitigation measure.

TABLE 7 (Continued)
CAPCOA-IDENTIFIED GHG MITIGATION MEASURES

Mitigation Measure	Description	Generalized Emissions Reduction Estimate	Existing or proposed by the project?
MM E-16	Energy Efficient Appliance Standards	Low	Not Applicable to institutional/office project.
MM E-17	Green Building Materials	Low	Yes –Per GGHC, all steel purchased for the project will contain 25 percent recycled materials and concrete will be purchased from local extractors and producers to the extent feasible.
MM E-18	Shading Mechanisms for windows, patio and walkway overhangs	Low	Yes – Per GGHC, all windows will have shading mechanisms.
MM E-19	Ceiling/whole-house fans	Low	Not Applicable to institutional/office project.
MM E-20	Programmable Thermostats	Low	Yes – Per GGHC, individual and programmable thermostats will be in common areas and patient rooms.
MM E-21	Passive Heating and Cooling Systems	Low	Not applicable for institutional/office complex with central boilers.
MM E-22	Day Lighting Systems	Low	Yes – Per GGHC, the Project strives for daylighting in 75 percent of both common work space and patient rooms. While the latest energy calculations that the 75 percent mark is not quite achieved, the realized percentage is well over 50 percent.
MM E-23	Low- Water Use Appliances	Low	Yes –Low flow, water efficient fixtures of the PCP will reduce non-irrigation water demand by 28 percent.
MM E-24	Goods Transport by Rail	Moderate	Not Applicable to institutional/office project.
MM S-1	Emissions Reduction Education	Low	Yes – Per GGHC, options being considered for education include an educational display in the lobby, building signage and a web site.
MM S-2	School Curriculum	Low	Not Applicable to institutional/office project.
MM M-1	Site Mitigation Fee Program	Moderate	The BAAQMD does not have a fee mitigation program for GHG. CARB's cap and trade program is not scheduled for launch until 2012. Although CAPCOA identifies this measure as not logistically feasible at present, the Climate Action Reserve (CAR) is expected to serve as a source of regulatory offsets under the Future California cap-and-trade program, which could provide a framework for a project-specific site mitigating fee program.
MM M-2	Offset Purchase	High	As noted above, CARB is developing a cap and trade program but it is not scheduled for launch until 2012. Although CAPCOA identifies this measure as not logistically feasible at present, the Climate Action Reserve (CAR) is expected to serve as a source of regulatory offsets under the Future California cap-and-trade program. <i>(See further discussion in Section 5.0, below.)</i> Newly enacted CEQA Guidelines Section 15126.4(c) expressly provides for this as mitigation.

SOURCE: CAPCOA, 2009.

3.0 GHG Reduction Measures Identified in the Bay Area Air Quality Management District (BAAQMD) Proposed CEQA Air Quality Guidelines

The December 2009 version of the BAAQMD's Draft CEQA Air Quality Guidelines contains tables of mitigation measures to reduce operational-related emissions of GHG's from mobile, area and stationary sources in Section 4.3 of that document. These measures include reduction estimates applicable to each measure. **Table 8** presents an itemized list of each of the Project-specific mitigation measures identified in by BAAQMD and correlates them to any existing or proposed Project elements. Mitigation measures which are not proposed by the Project or identified as a Standard Condition of Approval or Mitigation Measure in the DEIR are then identified as potential GHG reduction measures if they are deemed applicable to the type of project proposed.

**TABLE 8
BAAQMD-IDENTIFIED GHG MITIGATION MEASURES**

Mitigation Measure	Description	Generalized Reduction Estimate	Existing or proposed by the project?
1	Mix of Uses	-3 percent – 9 percent	Yes, residential within ½ mile
2	Local Serving Retail within ½ mile of Project	2 percent	Yes
3	Transit Service	0 percent – 15 percent	Yes – DEIR Transportation Section states that the site is located approximately 0.7 mile south and east of the MacArthur BART station. AC Transit provides bus service to the project site.
4	Bike & Pedestrian	0 percent - 9 percent	Yes – per DEIR Transportation Section, Class II and III bike routes exist in the area.
5	Affordable Housing	0 percent – 4 percent	Not Applicable to institutional/office project.
6	Daily Parking Charge	0 percent – 25 percent	Yes – As discussed in the TDM Recommendations, parking pricing will be adjusted and will affect employees as well as visitors to address trip reduction goals and parking demand deficits.
7	Parking Cash-out. California law requires certain employers who provide subsidized parking for their employees to offer a cash subsidy to employees who do not drive, in lieu of a parking space	0 percent – 12.5 percent	Yes – Existing measure implemented by ABSMC Existing TDM Program (Discounted [50 percent] Transit Passes)
8	Free Transit Passes	25 percent of transit service reduction	No – This measure represents a potential additional mitigation measure.
9	Employee Telecommuting Program	1 percent – 100 percent	Not feasible for a hospital and MOB land uses.
10-12	Compressed Work Schedule	1 percent – 40 percent	Unknown – This measure represents a potential additional mitigation measure.
13	Secure Bike Parking		Yes – Existing as indicated by TDM Recommendations
14	Showers/Changing facilities provided	3 or more elements = 1 percent; 5 or more = 2 percent reduction	Yes – Showers to be included in new buildings and lockers are existing per TDM recommendations.
15	Guaranteed Ride Home Program provided		

TABLE 8 (Continued)
BAAQMD-IDENTIFIED GHG MITIGATION MEASURES

Mitigation Measure	Description	Generalized Reduction Estimate	Existing or proposed by the project?
16	Car sharing services provided		Identified in the TDM Plan as an Additional Measure. This measure represents a potential additional mitigation measure.
17	Information provided on transportation alternatives		Yes, per TDM Plan, a transit Information Center is included – An adequately sized, full-time, on-site transit information center shall be developed and staffed to serve employees, patients and visitors in a central and visible location.
18	Dedicated employee transportation coordinator		Yes, see above.
19	Carpool matching program		Yes, per TDM Plan ABSMC reserves preferentially located parking spaces for employees who are participants in registered carpools. Currently, there are 45 registered carpools at the Summit campus and registration is two times a year.
20	Preferential carpool/vanpool parking		Yes, see above
21	Parking supply	0-50 percent	Yes -The Municipal Code specifies a required amount of parking and the proposed Project would have a parking deficit of over 1,100 spaces per the TDM Recommendations.
22	On Road trucks	URBEMIS determination	Not Applicable to institutional/office project
23	Increase energy efficiency beyond Title 24	Equal to percentage increase beyond Title 24	Yes – GGHC goal is to exceed Title 24 requirements by 14 percent. Latest modeling exceeds this goal.
24	Electrically powered landscape equipment and electrical outlets	Equivalent to URBEMIS estimated emissions	No –This measure represents a potential additional mitigation measure.
26	Plant shade trees within 40 feet of the south side or within 60 feet of the west sides of properties	30 percent	No –This measure represents a potential additional mitigation measure
27	Require cool roof materials	34 percent	Yes – Per GGHC, the Project will utilize light-colored roofing materials with an SRI of at least 78 over 75 percent of surfaces.
28	Install green roofs	1 percent	No - Cool Roof to be installed (see above).
29	Require smart meters and programmable thermostats	10 percent	Per Ainsworth, not applicable to PCP. This measure may represent a potential additional mitigation measure for office uses.
30	Meet GBC standards in all new construction	3 percent – 17 percent	Yes. PCP will be built to GGHC standards. Remaining buildings will be built to CALGreen standards.
32	Install solar water heaters	70 percent	Not applicable for institutional complex with central boiler.
33	Install tankless water heaters	35 percent	Not applicable for institutional complex with central boiler.
34	Install solar panels on residential and commercial buildings	100 percent	No –This measure represents a potential additional mitigation measure.
35	100percent increase in diversity of land use mix	5 percent	Not Applicable to institutional/office project.
36	Jobs/housing balance	Trip reduction as determined by traffic consultant	Trip generation estimates considered households and employment for the Study area. Not a true mitigation measure, given the project location is not changeable.
37	100 increase in design (i.e., presence of design guidelines for transit oriented development, complete street standards	3 percent	Yes – per DEIR Transportation Section, the Project would install AC Transit stops on Webster Street with shelter or bench and the site is located approximately 0.7 mile south and east of the MacArthur BART station. AC Transit provides bus service to the project site.

TABLE 8 (Continued)
BAAQMD-IDENTIFIED GHG MITIGATION MEASURES

Mitigation Measure	Description	Generalized Reduction Estimate	Existing or proposed by the project?
38	100% increase in density	5 percent	Not Applicable to institutional/office project.
39	HVAC duct sealing	30 percent	Yes – all new buildings will be equipped with fully sealed HVAC duct systems.
40	Provide necessary infrastructure and treatment to allow use of 50% greywater;/recycled water in residential and commercial uses for outdoor irrigation	6 percent	Unknown –This measure represents a potential additional mitigation measure.
41	Complete streets	1percent – 5 percent	Not Applicable to institutional/office project.
42	Maximize interior daylight	None Given	Yes – Per GGHC, the Project strives for daylighting in 75 percent of both common work space and patient rooms. While the latest energy calculations that the 75 percent mark is not quite achieved, the realized percentage is well over 50 percent.
43	Increase roof/ceiling insulation	None Given	Yes. PCP will be built to GGHC standards. Remaining buildings will be built to CALGreen standards.
45	Install rainwater collection systems in commercial buildings	None Given	No –This measure represents a potential additional mitigation measure.
46	Install low-water use appliances and fixtures	None Given	Yes –Low flow, water efficient fixtures of the PCP will reduce non-irrigation water demand by 28 percent.
47	Restrict the use of water for cleaning outdoor surfaces/prohibit systems that apply water to non-vegetated surfaces	None Given	No –This measure represents a potential additional mitigation measure.
48	Implement water-sensitive urban design practices in new construction	None Given	Yes – GGHC will implement drought tolerant plants and efficient irrigation to reduce water demand for irrigation by 50 percent. Low flow, water efficient fixtures of the PCP will reduce non-irrigation water demand by 28 percent.
50	Create food waste and green waste curb-side collection service	None Given	Not Applicable to institutional/office project.
51	Require provision of storage areas for recyclables and green waste in new construction	None Given	Yes, allocation of space for materials recycling is an element of the adopted GGHC.

4.0 Green Guide for Health Care (GGHC) Reduction Measures not Adopted for the Proposed Project

The GGHC is a comprehensive document that identifies available building techniques and an accreditation system specific to health care facilities. The GGHC borrows, by agreement, from the LEED rating system. Sutter, the parent company for the applicant, has adopted specific elements of the GGHC to be implemented in the design of its health care facilities, summarized in the October 2009 Green Guide for Healthcare and Sustainability Practices (GGHCSP). There are however, additional measures not adopted by Sutter that represent potential GHG reduction measures for the proposed Project. Based on a review of the GGHCSP and the formal GGHC, Version 2.2,

Table 9 shows the additional measure that is not presently considered as a part of the Project, a mitigation measure of the DEIR, or a Standard Condition of Approval, and therefore, represents additional measures available to reduce Project GHG emissions:

**TABLE 9
ADDITIONAL GGHC MITIGATION MEASURES**

GGHC Measure	Description	Reduction Estimate	Potential Implementation
EA 2 – On-Site Renewable Energy	Provide renewably-based on-site electricity or thermal energy to fulfill a portion of the building's energy needs	0.05 to 0.15 watts per sf of building area (approximately 0.25 to 0.75% of the annual electricity demand)	On-site solar PV panels; solar thermal system; employ net metering arrangement with PG&E. Note: this measure is duplicative of CAPCOA Mitigation Measure MM E-5.

5.0 Assessment and Emissions Reduction of Identified Additional Available GHG Reduction Measures

Table 10 summarizes the available additional GHG reduction measures identified in Subsections 1.0 through 4.0, above. Following Table 10 is an assessment of the feasibility and applicability of each of these identified reduction measures. For each additional measure, Table 10 presents the overall effectiveness in general, as well as an estimate of potential GHG reduction potential specific to Buildout of the proposed Project. For some measures a quantifiable emission reduction cannot be reasonably estimated and is insubstantial, however, these measures are still identified for possible implementation by the Project, as CEQA requires adoption of a feasible mitigation measures for significant impacts.

5.1 CAPCOA Mitigation Measure T-14: Parking Area Tree Cover

This measure would provide parking lot areas with 50 percent tree cover within ten years of construction, in particular low emitting, low maintenance, native drought resistant trees. This measure would reduce urban heat island effect and requirement for air conditioning, effective when combined with other measures (e.g., electrical maintenance equipment and reflective paving material). Paving materials are currently proposed to have a high solar reflection index (SRI). The parking garage is proposed to be to have all natural ventilation with no mechanical ventilation or heating or cooling. As such energy savings of this measure would be minimal as it would only reduce heat island radiance to adjacent cooled structures. CAPCOA references a net annual CO₂ reduction of 3.1 kilograms per square meter of canopy from implementation of this measure. The Project Applicant has indicated that the only exposed parking area proposed by the Project is the roof of the proposed Phase 1 parking garage. This structure is not designed to accommodate the load of substantial full-sized trees, and further, with development of the Fitness Center on top of the upper level of the parking garage in Future Phases, approximately 20,000 square feet of exposed surface area would remain for parking. Therefore, the feasibility of implementing this measure is limited.

5.2 CAPCOA Mitigation Measure T-18: Reduced Parking Fee for EV/CNG Vehicles

This measure would reward and encourage the use of low GHG emission vehicles. CAPCOA indicates that this measure has a low reduction score and does not quantify any emissions reduction related to this measure. Consequently, this measure is suggested to be implemented but no quantifiable reduction in transportation-related emissions can reliably be estimated.

**TABLE 10
ADDITIONAL GHG REDUCTION MEASURES IDENTIFIED FOR
POTENTIAL IMPLEMENTATION BY THE PROPOSED PROJECT^a**

Mitigation Measure	Description	Generalized Emissions Reduction Estimate	Potential Emissions Reduction Estimate (MT/year) for Project Buildout^a
CAPCOA MM T-14	Parking Area Tree Cover (50 percent cover in ten years)	3.1 kg/m ³ of canopy	Insubstantial
CAPCOA MM T-18	Reduced/No Parking Fee for EVs/CNG Vehicles	Low	Insubstantial
CAPCOA MM D-14	Enhanced Recycling		Insubstantial
CAPCOA MM D-15	LEED Certification	Moderate	Insubstantial
CAPCOA MM E-5	On-Site Renewable Energy System	1 percent – 3 percent	181
CAPCOA MM E-7	Solar Orientation	Low	Not Feasible
CAPCOA MM E-15	Electric Yard Equipment Compatibility	Low	Insubstantial
CAPCOA MM M-2	Offset Purchase	Up to 100 percent	Up to 100 percent
BAAQMD MM 8	Free Transit Passes	25 percent of transit service reduction	130
BAAQMD MM 10-12	Compressed Work Schedule	1 percent – 40 percent	249
BAAQMD MM 16	Car sharing services provided		Insubstantial
BAAQMD MM 24	Electrically powered landscape equipment and electrical outlets	Equivalent to URBEMIS estimated emissions	0.74
BAAQMD MM 26	Plant shade trees within 40 feet of the south side or within 60 feet of the west sides of properties	30 percent	Not feasible for Commercial Use
BAAQMD MM 29	Require smart meters and programmable thermostats	10 percent	Not Feasible for commercial Use
BAAQMD MM 34	Install solar panels on residential and commercial buildings	Up to 100 percent	Repeat of CAPCOA Measure MM E-5, above
BAAQMD MM 39	HVAC duct sealing	30 percent	Already Implemented
BAAQMD MM 40	Provide necessary infrastructure and treatment to allow use of 50% greywater;/recycled water in residential and commercial uses for outdoor irrigation	6 percent	0.18
BAAQMD MM 45	Install rainwater collection systems in commercial buildings	None Given	Insubstantial
BAAQMD MM 47	Restrict the use of water for cleaning outdoor surfaces/prohibit systems that apply water to non-vegetated surfaces	None Given	Insubstantial
Total Assuming Operations at Project Buildout^b			561

^a Reduction estimates are based on Buildout of the proposed Project only and do not include measures for other parts of the ABSMC Campus not being redeveloped. If measures are implemented on other parts of the ABSMC Campus not included in the Project or elsewhere, emissions reduction estimates could possibly be greater than shown in the table.

^b Total does not include potential 100 percent reduction from Offset Purchase (CAPCOA MM M-2).

5.3 CAPCOA Mitigation Measure D-14: Enhanced Recycling

This measure would provide infrastructure/education that promotes the avoidance of products with excessive packaging, recycle, buying of refills, separating of food and yard waste for composting, and using rechargeable batteries. CAPCOA indicates that this measure has a low reduction score and does not quantify any emissions reduction related to this measure. Consequently, this measure is suggested to be implemented but no quantifiable reduction in GHG emissions can reliably be estimated.

5.4 CAPCOA Mitigation Measure D-15: LEED certification

The proposed Project will be designed to the standards of the Green Guide for Health Care (GGHC). The GGHC is borrowed, by agreement, from the LEED rating system. While the GGHC can be used to pursue LEED accreditation, it is not being pursued for the Project. Additionally, not all GGHC measures are proposed to be incorporated in the Project. The potential benefits of additional GGHC measures for the PCP are addressed later in this section.

While LEED certification is not being proposed for the MOB or other future phase buildings, they nonetheless are proposed to be built to CALGreen standards. For the purpose of meaningful GHG emissions reduction calculations, CALGreen standards for commercial buildings would result in 15 percent less energy demand and 20 percent reduced water demand than a standard building built to 2008 Title 24 standards. Therefore, for the purpose of estimating an emissions inventory, CALGreen is equivalent to LEED in terms of meaningful emissions reductions and LEED certification does not represent a mechanism by which to achieve further GHG reductions.

5.5 CAPCOA Mitigation Measure E-5: On-site Renewable Energy System

This measure would provide onsite renewable energy system(s). Nonpolluting and renewable energy potential includes solar, wind, geothermal, low-impact hydro, biomass and bio-gas strategies. When applying these strategies, projects may take advantage of net metering with the local utility.

With regard to feasibility of this measure, it should be noted that in a March 30, 2010 press release, Kaiser Permanente announced its intention to install 15 megawatts of solar power systems¹³ on its hospitals, medical offices and other buildings at 15 locations in California. While this degree of investment may be beyond the economic intentions/capabilities of the applicant it does demonstrate that this type of measure is technically feasible for the land use proposed. Kaiser estimates that installation of solar power systems will provide for 10 percent of electricity demand for its buildings at each location. Using this reduction goal as an estimate of the potential GHG reductions if such a measure was to be implemented for the proposed Project, a potential reduction of 181 MT/year of CO₂e would be possible. The Project Applicant has indicated limitations to implementing this measure due to restricted roof space on existing or proposed buildings, due to existing mechanical equipment or roof design.

5.6 CAPCOA Mitigation Measure E-7: Solar Orientation

This measure would require the project to orient 75 percent or more of buildings to face either north or south (within 30° of N/S). Building design includes roof overhangs that are sufficient to block the high summer sun, but not the lower winter sun, from penetrating south facing windows. Trees, other landscaping features and other

¹³ <http://xnet.kp.org/newscenter/pressreleases/nat/2010/033010solarpower.html>

buildings are sited in such a way as to maximize shade in the summer and maximize solar access to walls and windows in the winter onsite.

Implementation of this measure would require extensive redesign of the proposed Project. Additionally, CAPCOA indicates that this measure has a low reduction score and does not quantify any emissions reduction related to this measure. Consequently, this measure is not suggested to be implemented because there would be no quantifiable reduction in GHG emissions and its implementation at this stage of Project design would be economically burdensome.

5.7 CAPCOA Mitigation Measure E-15: Electric Yard Equipment Compatibility

This measure would require provision of electrical outlets at building exterior areas. CAPCOA indicates that this measure has a low reduction score and does not quantify any emissions reduction related to this measure. Consequently, this measure is suggested to be implemented but no quantifiable reduction in GHG emissions can reliably be estimated.

5.8 CAPCOA Mitigation Measure M-2: Offset Purchase

This analysis considers Offset Purchase (CAPCOA Mitigation Measures M-2) to be a potentially feasible measure, despite CAPCOA's indication that it is "logistically infeasible at present", given that Phase 1 of the Project would not be operational until approximately 2016, and Future Phases or Project Buildout could be up to an additional 15 years after that, and given the potential for implementation of this measure to have a "Moderate/High" reduction estimate.

There is recognized uncertain in the current state of carbon markets (including the availability and pricing of offsets) in the U.S. With a federal climate bill languishing in the Senate, and emerging political challenges to AB 32 it is difficult at best to characterize supply and demand in yet-to-be-created carbon market, and even more difficult to predict the price of emissions allocations or offsets. A national cap and trade system, where buyers and sellers determine a market price for allocations and offsets, is still a possibility at the national level, and has a strong likelihood of developing in California (through AB 32) and other Western states (through the Western Climate Initiative). Currently in California, buyers purchase offsets either to reduce their carbon footprint voluntarily, or as a "pre-compliance" strategy with the hope that they can use them in a future cap-and-trade system. Prices have remained relatively low over the past year or two due to the sluggish economy and the policy uncertainty. They are certain to rise significantly if and when federal, regional, and/or state cap-and-trade becomes a reality.

The AB 32 Scoping Plan identifies cap-and-trade as a key strategy for helping California reduce its GHG emissions, but ARB still has not yet indicated how the system will work. Consistent with AB 32, ARB must adopt the cap-and-trade regulation by January 1, 2011, and the program itself must begin in 2012. At the time of this writing it is not known how such a system would distribute allocations to those who fall under the cap, and how offsets could be used to reduce emissions against the cap. It is also unclear whether ARB will operate their own cap-and-trade program or contract the program to a third party, and if the program will link to external registries of approved carbon offset credits.

Despite the various uncertainties, several registries of carbon reduction projects (representing carbon credits) have emerged in the United States in recent years. These registries facilitate and give legitimacy to carbon credit

tracking and trading. One of the leading registries, the Climate Action Reserve (CAR), is expected to serve as a source of regulatory offsets under the future California program. CAR is a spin-off program of the California Climate Action Registry (CCAR) which was created by California state legislation in 2001 and has been closely involved with ARB throughout the AB 32 implementation process, including the development of its reporting rule, verification scheme, and many sector accounting protocols. CAR is also recognized in the Kerry-Boxer and Waxman-Markey climate bills as eligible for providing offset credits to the federal cap-and-trade system. CAR is respected as a national project registry that sets standards, accredits verifiers, and registers and tracks projects using sophisticated software to serialize and transfer emission reduction credits. In 2009, CAR transactions accounted for the majority of the US offset market value, and CAR Climate Reserve Tons (CRTs) usually command a premium over the general voluntary offset market.

Newly enacted CEQA Guidelines Section 15126.4 (c), adopted March 18, 2010 expressly provides for this as mitigation to reduce GHG emissions.

5.9 BAAQMD Mitigation Measure 8: Free Transit Passes

This measure would require employers to provide free transit passes to employees. BAAQMD estimates that this measure would result in a further 25 percent of the existing transit service reduction. Per the TDM Plan, Alta Bates already provides a 50 percent discount to its employees for transit passes. To account for this difference, in offering free transit passes, it was only assumed that this measure would further increase transit trip reduction by half of the BAAQMD estimate, or 12.5 percent.

Ten percent of employees take BART or buses to the Project site, according to the TDM Plan. A 12.5 percent increase in this rate would result in 11.25 percent of employees taking transit. Given an existing employment of 2,812 as stated in the DEIR and an additional 429 employees added by the proposed Project results in 3,241 total employees with the Project. The additional 1.25 percent increase in employee transit ridership resulting from this measure would remove approximately 81 employees from daily vehicle trips to work. Assuming each employee who drives to work generates 2.5 vehicle trips per day, this measure would remove approximately 103 vehicle trips per day. Based on URBEMIS2007, this trip reduction would reduce GHG emissions by 130 MT/year of CO₂e. This estimate only assumes increased emissions reductions resulting from reduced vehicle trips (more transit riders) as estimated above by BAAQMD.

5.10 BAAQMD Mitigation Measure 10-12: Compressed Work Schedule

The GHG reduction benefits of a compressed work week program would vary depending on the extent of participation and the degree of compression. BAAQMD estimates anywhere from 1 to 40 percent reduction in employee commuting with this measure. It is assumed that the operations of a standard health care facility typically involve a certain degree of compressed working schedules among doctors and nurses. Therefore, a conservative estimate of 3 percent reduction in employee trips was assumed as an attainable benefit from this measure. Again, using 3,241 total employees with the full Project. The TDM Plan indicates that 80 percent of employees drive alone, or about 2,593 employees. Assuming each employee who drives to work generates 2.5 vehicle trips per day, this measure would remove approximately 195 vehicle trips per day. Using URBEMIS2007, this trip reduction would reduce GHG emissions by 249 MT/year of CO₂e. The Project Applicant has indicated that implementation of this measure would not be feasible for patient care functions of the Project, thus this estimate applies a conservative estimate of reduced employee trips.

5.11 BAAQMD Mitigation Measure 16: Car Sharing Services Provided

BAAQMD identifies this measure along with a menu of seven other TDM measures as reducing GHG emissions synergistically as a group. The degree of benefit estimated, depends on the number of TDM measures included from the menu. As this is the only measure of the eight measures on the menu that is not already identified in the TDM plan, the potential GHG reduction benefits are marginal and certainly less than 1 percent for the commuting employees. In an effort to be prudent regarding allocation of GHG reductions, no additional GHG reduction benefit will be assumed by implementation of this measure. Consequently, this measure is suggested to be implemented but no quantifiable reduction in GHG emissions is estimated.

5.12 BAAQMD Mitigation Measure 24: Electrically Powered Landscape Equipment

BAAQMD identifies this measure as reducing GHG emissions associated with operation of landscape maintenance equipment. This measure is similar to CAPCOA measure E-15 above. If we assume that this measure results in no landscape equipment emissions as calculated in Technical Memo #1, then implementation of this measure would reduce emissions by 0.74 MT/year of CO₂e.

5.13 BAAQMD Mitigation Measure 26: Plant Shade Trees

BAAQMD cites an electrical cooling sector benefit of 30 percent from the planting of shade trees within 40 feet of the south side or within 60 feet of the west side of buildings. The Energy Pro model used to estimate project electrical demand uses ambient temperature estimates for the geographical area and does not consider beneficial shade trees. However, give the height of proposed structures to be cooled (11 stories for the PCP, 5 stories for the MOB, and 4 stories for the university expansion) the benefits of tree shading realized for the proposed Project would likely be substantially less than 30 percent. Further, the study cited by BAAQMD examined the benefits of tree shading solely on single family residences. Consequently, potential benefits of this measure are considered not applicable to the prominent structures proposed by the Project. Tree shading to the specifications of this measure is suggested to be implemented for the fitness center but no quantifiable reduction in GHG emissions is estimated.

5.14 BAAQMD Mitigation Measure 29: Require Smart Meters and Programmable Thermostats

BAAQMD cites an electrical sector benefit of 10 percent from this measure. However, the study cited by BAAQMD examined the benefits of these elements solely on single family residences. Therefore, potential benefits of this measure would not be directly applicable to commercial buildings proposed. Consequently, this measure is suggested to be implemented to the extent feasible but no quantifiable reduction in GHG emissions is estimated.

5.15 BAAQMD Mitigation Measure 34: Install Solar Panels on Residential and Commercial Buildings

This measure is addressed relative to CAPCOA Mitigation Measure E-5 above.

5.16 BAAQMD Mitigation Measure 39: HVAC Duct Sealing

BAAQMD cites an electrical sector benefit of 30 percent from this measure. However, the study cited by BAAQMD examined the benefits of these elements solely on single family residences (and at 20 percent). Further given the needs of health care facilities to maintain good indoor air quality, filters and duct sealing are almost certainly standard. Consequently, this measure is assumed to be proposed by the Project and accounted for in the Energy Pro modeling of electrical and natural gas demand. Therefore no additional reduction in GHG emissions is estimated.

5.17 BAAQMD Mitigation Measure 40: Recycled Water for Irrigation

This measure would provide necessary infrastructure and treatment to allow use of 50 percent greywater/recycled water in residential and commercial uses for outdoor irrigation. BAAQMD cites a water-related electrical sector benefit of 6 percent for commercial uses with this measure. Six percent of the Project irrigation demand of 1,703 gallons per day would result in GHG reduction of water conveyance of 0.18 MT/year of CO₂e.

5.18 BAAQMD Mitigation Measure 45: Rainwater Collection Systems in Commercial Buildings

BAAQMD does not cite a reduction efficiency associated with this measure. Consequently, this measure is suggested to be implemented but no quantifiable reduction in GHG emissions is estimated.

5.19 BAAQMD Mitigation Measure 47: Restrict Use of Water for Cleaning Outdoor Surfaces

BAAQMD does not cite a reduction efficiency associated with this measure. Consequently, this measure is suggested to be implemented but no quantifiable reduction in GHG emissions is estimated.

Implementation of any of the additional measures in Table 10 would further reduce the Project's GHG emissions, even those that are identified as "insubstantial" because the emissions would be minimal. While various combinations of the quantified and feasible additional GHG reduction measures from Table 10 would result in a range of emissions reduction, if *only* those shown as quantified and feasible were implemented (excluding Offset Purchase), the total mitigated GHG emissions for the Project would be reduced by approximately 561 MT CO₂e. As presented in Section 1 of this document, the Project's total annual GHG emissions *without* consideration of the GHG reduction measures in Table 10 (i.e., the Project's "refined baseline") is approximately 8,843 MT CO₂e, and the service population emissions would be 20.6 MT CO₂e per year per capita of service population. Thus, a reduction of 561 MT CO₂e per year would reduce the Project's emissions to approximately 8,282 MT CO₂e per year (a reduction of approximately 7 percent) and 19.3 MT CO₂e per year per capita of service population. As indicated in Table 10, implementation of Offset Purchase alone could potentially reduce the Project's total annual GHG emissions up to 100 percent, depending on the emissions tonnage (MT CO₂e) of carbon offset credits purchased and if that tonnage is equal or greater than what the Project would generate in excess of the proposed significance thresholds for CEQA purposes, *after implementation of other reduction measures*. This would be a reduction of at least 7,183 MT CO₂e, which would reduce the residual estimated 8,282 MT CO₂e to 1,099 MT CO₂e (below 1,100 MT CO₂e threshold) and 2.6 MT CO₂e per year per capita of service population (below the 4.6 MT CO₂e service population threshold).

Section 3. Recommended GHG Reduction Plan Mitigation Program

This GHG Reduction Plan is intended to ensure implementation of a set of emissions reduction measures by the Project Applicant during development and operation of the Project to increase energy efficiency and reduce GHG emissions from the Project to the greatest extent practical and feasible. This Plan incorporates specific and quantifiable performance measures that the Project shall meet at each phase of the Project, through implementation of any one or more of the following measures (which are consistent with those identified in Table 10, above, excluding those identified as “insubstantial” because any quantifiable emissions reduction is substantially less than zero¹⁴), or any other measures that may be identified and approved by the City over the life of the Project. The available measures are presented by Project phase based on reasonable operational assumptions of the Project.

At each Project phase, the Project Applicant shall implement GHG reduction measures, excluding Offset Purchase (CAPCOA Mitigation Measure M-2), to reduce the Project’s operational emissions to the greatest extent feasible, but to a reduction that is not less than 7 percent of the residual emissions that exceed the applicable CEQA significance threshold, and shall then implement other offset measures or Offset Purchases to reduce the residual operational GHG emissions from that Project phase to less than the applicable CEQA significance threshold.¹⁵ The City has determined the performance standard of 7 percent to be reasonable for the proposed Project given that implementation of the quantified and feasible measures shown in Table 10 would result in a 7 percent reduction in annual emissions from the Project, and that implementation of such GHG reduction measures is not necessarily limited to those new buildings being constructed as part of the Project, but can also be implemented throughout the campus or elsewhere. The Project’s refined baseline analyzed in Section 1 of this GHG Reduction Plan incorporates emissions reduction measures that are considered part of the Project and that already result in a 23 percent reduction in total operational emissions compared to the Project’s emissions if those measures were not employed by the Project (i.e., “unadjusted” or “business-as-usual”, as previously noted in Table 5 and discussed supporting Table 6).

Using Phase 1 Plus MOB Scenario as example, per Table 5, the total operational GHG emissions from that phase is approximately 6,585 MT CO₂e and an emission ratio of 15.3 MT per service population. This is approximately 5,486 MT CO₂e above the proposed 1,100 MT CO₂e significance threshold and approximately 4,607 MT CO₂e above the effective service population ratio. To meet the required performance standard of 7 percent reduction from emissions that exceed the significance threshold, the Project would have to reduce 322 MT CO₂e for this phase. This could theoretically be partially met with implementation of CAPCOA Mitigation Measure E-5, On-Site Renewable Energy System, which could reduce approximately 71 MT CO₂e annually if applied to electrical demand from only the Phase 1 parking garage (129 MT CO₂e, see Table 4) and the MOB (581 MT CO₂e), which is a reasonable assumption given the physical constraints the Project Applicant has identified to implementing this measure Project-wide, and specifically to the Phase 1 PCP. Additional reduction toward the 322 MT CO₂e or 7 percent (i.e., the remaining 251 MT CO₂e), could be gained by implementing BAAQMD Mitigation Measure 10-12, Compressed Work Schedule, for the non patient care functions in the MOB or other feasible measures the Project Applicant may employ that are not identified or not yet known, including measures that could be implemented on other areas of the ABSMC Campus that are not part of the Project, or elsewhere. The Project

¹⁴ Measure identified as “insubstantial” could still be done, even though the emissions reduction would be minimal and the measure are not specified in Modified Mitigation Measure AIR-8.

¹⁵ Based on a refined emissions inventory to account for actual building design and operations and any newly identified GHG emission reduction measures and technologies at that time. Periodic updates would coincide with monitoring of the TDM Program pursuant to Standard Condition of Approval TRANS-1 and detailed in the Mitigation Monitoring and Reporting Program (MMRP).

Applicant would be required to implement offset measures or Offset Purchases to reduce any residual emissions exceeding the CEQA significance threshold. The Project Applicant would be required to apply the same methodology at subsequent phases and/or Project Buildout.

This approach to implementation is intended to result in 100 percent emissions reduction of its total operational GHG emissions over the threshold of significance, but to preclude the Project Applicant from achieving 100 percent reduction solely through Offset Purchase and those reduction measures already incorporated into the Project (the measures factored into the Project's refined baseline emissions presented in Section 1 of this GHG Reduction Plan).

The goal of the GHG Reduction Plan is to increase energy efficiency and reduce GHG emissions from the proposed project to the greatest extent feasible, but in no event less than the amount required to be less than the applicable significance threshold as adopted by the BAAQMD (i.e., currently 1,100 MT CO₂e per year, or 4.6 MT CO₂e per year per service population, based on the 2009 draft BAAQMD Thresholds). The GHG Reduction Plan includes strategies/measures that exceed those already identified in the Project Description, or that are City policies/programs or Standard Conditions of Approval, or otherwise required, and particularly includes strategies that reduce emissions generated by motor vehicle emissions (which represent the most significant contribution to total project GHG emissions). Strategies/Measures in the GHG Reduction Plan include, but are not be limited to, measures recommended by the California Air Resources Board Scoping Plan (December 2008), the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change Guidance Document (January 2008), the BAAQMD (BAAQMD, 2009), additional potential measures in the Green Guide for Health Care.

The following measures have been reviewed and determined to be the most feasible for the Project, at the time this analysis is being conducted. The emissions reduction estimates are based on Project Buildout and are also estimated by Project phase, based on information about development of the Project over time. The reduction estimates are based on Buildout of the proposed Project only; if measures are implemented on other parts of the ABSMC Campus not included in the Project, emissions reduction estimates could possibly be greater than shown below.

Mitigation Measure	Description	Potential GHG Emissions Reduction Estimate at (MT/year) at Assumed Implementation Phase ^a		
		Phase 1	Phase 1 With MOB	Project Buildout ^b
CAPCOA MM E-5	On-Site Renewable Energy System	-	-	181 ^c
CAPCOA MM M-2	Offset Purchase	Up to 100 percent	Up to 100 percent	Up to 100 percent
BAAQMD MM-8	Free Transit Passes	130 ^d	-	130
BAAQMD MM 10-12	Compressed Work Schedule	-	25 ^e	249 ^f

^a Reduction estimates are based on the proposed Project only and do not include measures for other parts of the ABSMC Campus not being redeveloped. If measures are implemented elsewhere, emissions estimates would be more that what is shown below.

^b Project Buildout includes all phases.

^c Assumes implementation of measure after construction of the Fitness Center in Future Phases.

^d This estimate only assumes increased emissions reductions resulting from reduced vehicle trips (more transit riders) as estimated above by BAAQMD as a result of increasing existing 50 percent transit passes to "free transit passes" (see narrative for BAAQMD MM-8, in Section 5.0 of this GHG Reduction Plan). ^e Assumes implementation of measure after operation of MOB (300 new employees for the MOB; approximately 9 percent of total employees campus-wide (see DEIR Table 3-3, Summit Sub-area employment).

^f Assumes total employees campus-wide ((see DEIR Table 3-3, Summit Sub-area employment

To implement this GHG Reduction Plan, prior to operation of the first phase of the Project, and every two years, coinciding with annual monitoring of the ABSMC TDM monitoring and Program, the applicant shall:

1. Prepare and submit to the City for review and approval a refined GHG emissions inventory, and a draft GHG Reduction Plan mitigation program for the specific project phase. The draft mitigation program shall, in order of priority:
 - a. specify and quantify reduction measures identified in, but not limited to, the GHG Reduction Plan (Table 10), excluding Offset Purchase (CAPCOA Mitigation Measure M-2), to reduce the Project's operational emissions to the greatest extent feasible,
 - b. specify and quantify reduction measures from the State of California's Climate Change Scoping Plan, the State Attorney General's web site, the California Air Pollution Control Officer Association's (CAPCOA) white paper on CEQA and Climate Change, the Green Guide for Health Care (version 2.2), Sutter Health's Green Guide for Healthcare and Sustainability Practices, Reference Guides on Leadership in Energy and Environmental Design (LEED) published by the US Green Building Council, and BAAQMD's Draft CEQA Air Quality Guidelines that are to be implemented elsewhere within the ABSMC campus (i.e., not as part of the Project) and/or elsewhere (first preference for within the City of Oakland, then within the BAAQMD, then the State of California, and finally elsewhere) to off-set operational emission of the Project. To the extent reasonable and feasible, the reduction measures incorporated into the Project or implemented elsewhere, shall be capable of reducing the equivalent of 7 percent of the emissions from that phase that exceeds the significance threshold,
 - c. establish a one-time fee (e.g., an escrow account or endowment fund) to offset the costs associated with implementation of certain City-wide GHG reduction strategies as may be identified in the City of Oakland's Climate Action Plan, once such Plan has been adopted. The amount of offset "credits" achieved under this fund are to be determined once such a fund has been offered or proposed, and then
 - d. quantify the annual residual operational GHG emissions from that Project phase, if any, for which the applicant shall implement offset measures to reduce the residual to less than the applicable CEQA significance threshold. The preference for Offset Purchases shall first be for offsets that can be achieved within the City of Oakland, then for offsets that can be achieved within the jurisdiction of the BAAQMD, then for offsets achieved within the State of California, and finally for offsets achieved elsewhere. The cost of Offset Purchases shall be based on current market value at the time purchased and shall be based on the Project's operational emissions estimated in this DEIR (of which the GHG Reduction Plan is incorporated) or subsequent approved emissions inventory, which may result in emissions that are higher or lower for than those estimated in the GHG Reduction Plan for any particular phase of the Project. In any case, the applicant shall implement a mitigation program to reduce emissions to the levels specified above.
2. Upon City review and approval of the phased mitigation program, the applicant shall implement the measures and provide the City appropriate documentation of all measures implemented, estimated emissions reductions compared to the performance standard of 7 percent reduction, and proof of an offset program or purchase of registered offset credits to achieve 100 percent emissions reduction to the applicable CEQA threshold.
3. The applicant shall reimburse City for all staff time involved in review and approval of each phased mitigation program, and/or shall pay for an independent reviewer by an outside party of the City's choosing.

Significance after Implementation of GHG Reduction Plan: This cumulative impact would conservatively be considered significant and unavoidable, with adoption of the proposed BAAQMD thresholds, because, while the measures in this Plan could reduce the cumulative GHG emissions associated with the Project, the actual reduction would depend on the combination and extent of the measures employed and the effectiveness carbon offsets to actually reduce GHG emissions. Therefore, the extent of potential reduction can not be known at this time, and as a result, the residual impact of the proposed project's CO₂e cumulative contribution would continue to conservatively be significant and unavoidable based on adoption of the proposed BAAQMD thresholds, even though it is reasonable to consider that implementation of this Plan could reduce total operational GHG emissions of the Project, throughout the life of the Project, to a less-than-significant level.

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APPENDIX A

GHG Emissions Calculations – Refined Baseline

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Alta Bates 207376

Motor Vehicle GHG Emissions (2014)

1. Phase 1 Project Mobile GHG Emissions with 15% TDM Measures

Daily Vehicle Trip input into URBEMIS = 1,579 trips/day

Daily VMT from URBEMIS 12463 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		1	1	kg/day
		1.645116	2.193488	lb/day
URBEMIS Output =	2101.5	0.000823	0.001097	ton/day
	1906.061	0.300234	0.400312	ton/yr
		0.272312	0.363083	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 1906.061 5.718551 112.5556 Metric tons/yr

Total eCO2 = 2024 Metric tons/yr

DO NOT **APPLY 14% reduction for Paveley Standards**

Alta Bates 207376

Motor Vehicle GHG Emissions (2014)

2. Phase 1 + MOB Mobile GHG Emissions with TDM 15% Measures

Daily Vehicle Trip input into URBEMIS = 3,978 trips/day

Daily VMT from URBEMIS 30458.61 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		2	2	kg/day
		4.020537	5.360715	lb/day
		0.00201	0.00268	ton/day
URBEMIS Output =	5125.27	0.733748	0.978331	ton/yr
	4648.62	0.665509	0.887346	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 4648.62 13.9757 275.0772 Metric tons/yr

Total eCO2 = 4938 Metric tons/yr
No reduction for Paveley Standards in 2015 4938 Metric tons/yr

Alta Bates 207376

Motor Vehicle GHG Emissions (2030)

3. Total Buildout Mobile GHG Emissions with 15% TDM Measures

Daily Vehicle Trip input into URBEMIS = 6,379 trips/day

Daily VMT from URBEMIS 48519.38 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		3	4	kg/day
		6.404558	8.539411	lb/day
		0.003202	0.00427	ton/day
URBEMIS Output =	8121.17	1.168832	1.558442	ton/yr
	7365.901	1.060131	1.413507	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 7365.901 22.26274 438.1873 Metric tons/yr

Total eCO2 = 7826 Metric tons/yr

APPLY 14% reduction for Paveley Standards = 6731 Metric tons/yr

Alta Bates 207376

Motor Vehicle GHG Emissions (2014)

1. Phase 1 Project Mobile GHG Emissions with TDM 20% Measures

Daily Vehicle Trip input into URBEMIS = 1,579 trips/day

Daily VMT from URBEMIS 12463 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		1	1	kg/day
		1.645116	2.193488	lb/day
URBEMIS Output =	2101.5	0.000823	0.001097	ton/day
	1906.061	0.300234	0.400312	ton/yr
		0.272312	0.363083	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 1906.061 5.718551 112.5556 Metric tons/yr

Total eCO2 = 2024 Metric tons/yr

DO NOT APPLY 14% reduction for Paveley Standards

Alta Bates 207376

Motor Vehicle GHG Emissions (2014)

2. Phase 1 + MOB Mobile GHG Emissions with TDM 20 % Measures

Daily Vehicle Trip input into URBEMIS = 3,712 trips/day

Daily VMT from URBEMIS 28416.53 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		2	2	kg/day
		3.750982	5.001309	lb/day
		0.001875	0.002501	ton/day
URBEMIS Output =	4781.65	0.684554	0.912739	ton/yr
	4336.957	0.620891	0.827854	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 4336.957 13.0387 256.6348 Metric tons/yr

Total eCO2 = 4607 Metric tons/yr
No reduction for Paveley Standards in 2015 4607 Metric tons/yr

Alta Bates 207376

Motor Vehicle GHG Emissions (2030)

3. Total Buildout Mobile GHG Emissions with TDM 20% Measures

Daily Vehicle Trip input into URBEMIS = 6,085 trips/day

Daily VMT from URBEMIS 46270.69 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		3	4	kg/day
		6.107731	8.143641	lb/day
		0.003054	0.004072	ton/day
URBEMIS Output =	7744.77	1.114661	1.486215	ton/yr
	7024.506	1.010997	1.347997	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 7024.506 21.23095 417.8789 Metric tons/yr

Total eCO2 = 7464 Metric tons/yr

APPLY 14% reduction for Paveley Standards = 6419 Metric tons/yr

Alta Bates Development Plan 207376

Natural Gas Emissions - Existing Buildings

370 Hawthorne

	CO2	CH4	N2O	
	102 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	102	0.011342	0.000192 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	102	2.38E-01	5.96E-02 Tons/year	
	92.51	2.16E-01	5.41E-02 MT/Year	
	92.78			

Back Calculated Demand = 11.66181 lb/therm 17493 therm/yr

422 Hawthorne

	CO2	CH4	N2O	
	17 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	17	1.89E-03	3.20E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	17	3.97E-02	9.93E-03 Tons/year	
	15.419	3.60E-02	9.01E-03 MT/Year	
	15.46 MT/Year			

Back Calculated Demand = 11.66181 lb/therm 2915.50 therm/yr

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Natural Gas Emissions
Existing Buildings

435 Hawthorne

	CO2	CH4	N2O	
	26 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	26	0.002891	4.9E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	26	0.060712	0.01519 Tons/year	
	23.582	0.055066	0.013778 MT/Year	
	23.65 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	4459.00 therm/yr

3300 Elm

	CO2	CH4	N2O	
	4 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	4	0.000445	7.54E-06 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	4	0.00934	0.002337 Tons/year	
	3.628	0.008472	0.00212 MT/Year	
	3.64 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	686.00 therm/yr

3232 Elm

	CO2	CH4	N2O	
	11 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	11	0.001223	2.07E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	11	0.025686	0.006427 Tons/year	
	9.977	0.023297	0.005829 MT/Year	
	10.01 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	1886.50 therm/yr

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Alta Bates Development Plan 207376

Natural Gas Emissions - PCP

URBEMIS has separate Emission factors for Nox and CO for residential land uses.

Assume worst case (non residential) emission factors. Not parsing out relative to electrical demand because of uses like parking garage for which relative percentage of electrical and gas demands would vary.

Natural Gas Demand = 255725 therms/year Per 031809 Data Matrix.

25572.5 MMBTtu/yr

Conversion factor: 1 mcf = 10,290 Therms http://www.energystar.gov/ia/business/tools_resources/target_finder/help/Energy_Units_Conversion_Table.htm

Emission Factor from URBEMIS2007 =

ROG	Nox	PM10	PM2.5	CO	SO2
7.26	100	0.18	0.18	84	0.001
0.000706	0.009718	1.75E-05	1.75E-05	0.008163	9.718E-08
		0	0		
		0	0		
180.42	2485.18	4.47	4.47	2087.55	0
0.49	6.81	0.01	0.01	5.72	0.00
54	54	82	54	NA	NA

Lbs/ million CF
Lbs/therm

0 pounds/year
0 pounds/day

CO2	CH4	N2O
120000	0	
11.66181		
	0.005	0.0001
2982216	0	0
1491.11	0.00	0.00
	127.863	2.557
1352.43	0.128	0.003

Lbs/ million CF
Lbs/therm
kg/MMBtu

0 pounds/year
0 tons/year
kg/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)
eCO2 = 1352.43 2.69 0.79 Metric tons/yr

Total eCO2 =

**Metric
1356 tons/yr**

Annual kWh Calculations for Project Emissions of Electricity Used by the project

Project Name: Alta Bates
 ESA Proj. Number: 207376

5262146

Electricity Consumption

(based on average CEC California Energy Demand Staff Report 2000, P200-00-002)

CA Energy Commission year 2008 data for PG&E

Source: <http://www.energy.ca.gov/2009publications/CEC-200-2009-012/CEC-200-2009-012-CMF.PDF>

Commercial Energy Demand (2008) = 39437 GWhr
 Commercial Floor Space (2008) 2408 MMsf

Commercial Demand/sf = 16.38 kWh/sf

with CALGREEN 15% Reduction = 13.92 kWh/sf

Parking Garage Demand = 6.9 kWh/sf
 with CALGREEN 15% Reduction = 5.865 kWh/sf

Source for parking = <ftp://ftp.eia.doe.gov/pub/consumption/commercial/cbcteb92.pdf>
 Table 3.15 (1992, latest year)

GHG Emission Factor

PG&E 5-year rolling average 2002-2007 526 lbs eCO2/MW-hr
 Source: Khamotu, Karen, PG&E, e-mail communication to ESA, July 31, 2009

Total GHG Emissions From Commercial Electricity Use

Project

Average annual consumption (kWh)

Commercial

(kWh/sq ft/Year)	Building		kWhrs per year
	Ainsworth PCP		5,262,146
	Redwood City Elec. Parking Garage	392,800 sq ft	541,276
13.92	MOB	175,000 sq ft	2,436,152
13.92	Fitness Center	32000 sq ft	445,468
13.92	University	72500 sq ft	1,009,263

EMMISSIONS

2.77E+06 lbs/year		1,255.2 MT/yr
2.85E+05 lbs/year	=	129.1 MT/yr
1.28E+06 lbs/year		581.1 MT/yr
2.34E+05 lbs/year		106.3 MT/yr
5.31E+05 lbs/year		240.8 MT/yr

Existing Conditions

Average annual consumption (kWh)

Commercial

(kWh/sq ft/Year)	Building		kWhrs per year
16.38	370 Hawthorne	69,674 sq ft	1,141,085
16.38	422 Hawthorne	11,136	182,380
16.38	435 Hawthorne	17,280	283,003
16.38	3300 Elm	2,600	42,581
16.38	3232 Elm	7,330	120,047
16.38	461 34th	3,500	57,321
16.38	3023 Summit	11,382	186,409
16.38	3043 Summit	2,500	40,944
16.38	418 30th	3,500	57,321

6.00E+05 lbs/year		272.2 MT/yr
9.59E+04 lbs/year		43.5 MT/yr
1.49E+05 lbs/year		67.5 MT/yr
2.24E+04 lbs/year		10.2 MT/yr
6.31E+04 lbs/year		28.6 MT/yr
3.02E+04 lbs/year		13.7 MT/yr
9.81E+04 lbs/year		44.5 MT/yr
2.15E+04 lbs/year		9.8 MT/yr
3.02E+04 lbs/year		13.7 MT/yr

3977004
 6413156
 7583213

Phase 1 Emissions = 948.7 MT/yr
 Phase 1 + MOB Emissions = 1,529.8 MT/yr
 Future Phase Emissions = 1,808.9 MT/yr

Natural Gas Emissions
Existing Buildings

461 34th

	CO2	CH4	N2O	
	5 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	5	0.000556	9.42E-06 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	5	0.011675	0.002921 Tons/year	
	4.535	0.01059	0.00265 MT/Year	
	4.55 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	857.50 therm/yr

3023 Summit

	CO2	CH4	N2O	
	17 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	17	0.00189	3.2E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	17	0.039697	0.009932 Tons/year	
	15.419	0.036005	0.009008 MT/Year	
	15.46 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	2915.50 therm/yr

3043 Summit

	CO2	CH4	N2O	
	4 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	4	0.000445	7.54E-06 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	4	0.00934	0.002337 Tons/year	
	3.628	0.008472	0.00212 MT/Year	
	3.64 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	686.00 therm/yr

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Natural Gas Emissions - MOB

	CO2	CH4	N2O	
	256 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	256	0.028466	0.000482 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	256	0.597784	0.149567 Tons/year	
	232.192	0.54219	0.135657 MT/Year	
	232.8698	Back Calculated Demand =	11.66181 lb/therm	43903.99 therm/yr

Natural Gas Emissions - Fitness Center

	CO2	CH4	N2O	
	68 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	68	0.007561	0.000128 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	68	0.158786	0.039729 Tons/year	
	61.676	0.144019	0.036034 MT/Year	
	61.85605	Back Calculated Demand =	11.66181 lb/therm	11662.00 therm/yr

Natural Gas Emissions - University Expansion

	CO2	CH4	N2O	
	154 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	154	0.017124	0.00029 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	154	0.359604	0.089974 Tons/year	
	139.678	0.326161	0.081606 MT/Year	
	140.0858	Back Calculated Demand =	11.66181 lb/therm	26410.99 therm/yr

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**Phase 1 Only
Water Useage Emissions**

Water Demand = -17053 GPD per Utility Section water demand decreaes with Phase 1

Water useage = -0.017053 MGD
= -6.224345 MG/year

Energy use factor = 1450 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
-9.03E+03 kW-hr/yr
-9.03E+00 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	-6.54E+03 lb/yr	-2.73E-01 lb/yr	-7.31E-02 lb/yr

Total emissions as eCO2 =

-6.54E+03 lb/yr	-5.72E+00 lb/yr	-2.27E+01 lb/yr
-3.27E+00 ton/yr	-2.86E-03 ton/yr	-1.13E-02 ton/yr
-2.96E+00 MT/yr	-2.60E-03 MT/yr	-1.03E-02 MT/yr

TOTAL WATER USAGE EMISSIONS AS eCO2 =
-6.56E+03 lb/yr
-2.98E+03 kg/yr
-3 MT/yr

Alta Bates 207376

Water Useage Emissions

Water Demand = 0.052708 MGD

Water useage = 0.052708 MGD
 = 19.23842 MG/year

Energy use factor = 1450 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
 2.79E+04 kW-hr/yr
 2.79E+01 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O	
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr	
Total Emissions =	2.02E+04 lb/yr	8.42E-01 lb/yr	2.26E-01 lb/yr	
Total emissions as eCO2 =				
	2.02E+04 lb/yr	1.77E+01 lb/yr	7.00E+01 lb/yr	
	1.01E+01 ton/yr	8.85E-03 ton/yr	3.50E-02 ton/yr	
	9.16E+00 MT/yr	8.02E-03 MT/yr	3.18E-02 MT/yr	9.20E+00

TOTAL WATER USAGE EMISSIONS AS eCO2 =
 2.03E+04 lb/yr
 9.22E+03 kg/yr
 9 MT/yr

Alta Bates 207376

Phase 1 Only

Waste Water Usage Emissions

Water Outflow = -4675 GPD
-0.004675 MGD
Water Outflow = -0.004675 MGD
= -1.706375 MG/year

Energy use factor = 2500 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
-4.27E+03 kW-hr/yr
-4.27E+00 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	-3.09E+03 lb/yr	-1.29E-01 lb/yr	-3.46E-02 lb/yr

Total emissions as eCO2 =

-3.09E+03 lb/yr	-2.71E+00 lb/yr	-1.07E+01 lb/yr
-1.54E+00 ton/yr	-1.35E-03 ton/yr	-5.36E-03 ton/yr
-1.40E+00 MT/yr	-1.23E-03 MT/yr	-4.86E-03 MT/yr

TOTAL WATER USAGE EMISSIONS AS eCO2 =

-3.10E+03 lb/yr

-1.41E+03 kg/yr

-1 MT/yr

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**Phase 1 + MOB
Waste Water Usage Emissions**

Water Outflow = Phase 1 demand + MoB demand from BFK sheet of 10/26/09
44825 GPD

Water Outflow = 0.044825 MGD
= 16.36113 MG/year

Energy use factor = 2500 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
4.09E+04 kW-hr/yr
4.09E+01 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	2.96E+04 lb/yr	1.24E+00 lb/yr	3.31E-01 lb/yr

Total emissions as eCO2 =

	2.96E+04 lb/yr	2.59E+01 lb/yr	1.03E+02 lb/yr
	1.48E+01 ton/yr	1.30E-02 ton/yr	5.14E-02 ton/yr
	1.34E+01 MT/yr	1.18E-02 MT/yr	4.66E-02 MT/yr

TOTAL WATER USAGE EMISSIONS AS eCO2 =

2.97E+04 lb/yr

1.35E+04 kg/yr

1.35E+01 MT/yr

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WasteWater Useage Emissions

Water outpflow = 0.052708 MGD
= 19.23842 MG/year

Energy use factor = 2500 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
4.81E+04 kW-hr/yr
4.81E+01 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	3.48E+04 lb/yr	1.45E+00 lb/yr	3.90E-01 lb/yr

Total emissions as eCO2 =

3.48E+04 lb/yr	3.05E+01 lb/yr	1.21E+02 lb/yr
1.74E+01 ton/yr	1.53E-02 ton/yr	6.04E-02 ton/yr
1.58E+01 MT/yr	1.38E-02 MT/yr	5.48E-02 MT/yr

TOTAL WasteWATER USAGE EMISSIONS AS eCO2 =
3.50E+04 lb/yr
1.59E+04 kg/yr
16 MT/yr

Generator Emissions

Based on information provided by the project applicant, standby diesel generators would be tested once per month for approx. 1 hour

	Pollutant						
	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
Emission Rate (g/bhp-hr) ^a	0.1	4.51	0.92	0.1	0.11	0.1012	568.3
Emissions (g/hr) (assuming 1000 HP) ^b	100	4510	920	100	110	101.2	568300
Emissions (lbs/hour)	0.2	9.9	2.0	0.2	0.2	0.22	1252.9
Emissions (lbs/day) (Assuming 2 hrs)	0.4	19.9	4.1	0.4	0.5	0.4	NA
Annual CO2 emissions (metric tons/year) (assuming 24 hours and 2 generators)							13.6
^a Emission rates from OFFROAD2007							
^b Assumes 1250 kW generator tested at an average of 60 percent load							

From CCAR GPR 3.1 (2009)

Table C-6

Diesel emission of CO2

10.15 kg CO2/gal
 0.00058 kg CH4/gal
 0.00026 kg N2O/gal

So for Mobile sources...	CH4 emission =	5.71E-05 percent of CO2 Emissions	=	7.79E-02 MT/YR
	N2O emissions =	2.56E-05 percent of CO2 Emissions	=	0.354621 MT/Yr
	Total eCO2 =			14.07

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Motor Vehicle GHG Emissions reductions with transit passes

1. Phase 1 Project Mobile GHG Emissions with TDM Measures

Daily VMT from URBEMIS

12463 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		1	1	kg/day
		1.645116	2.193488	lb/day
URBEMIS Output =	2101.5	0.000823	0.001097	ton/day
	1906.061	0.300234	0.400312	ton/yr
		0.272312	0.363083	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 1906.061 5.718551 112.5556 Metric tons/yr

Metric

2024 tons/yr

Total eCO2 =

DO NOT APPLY 14% reduction for Paveley Standards

1. Phase 1 Project Mobile GHG Emissions with TDM Measures and 203 less vehicle trips

Daily VMT from URBEMIS

10866 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		1	1	kg/day
		1.434312	1.912416	lb/day
		0.000717	0.000956	ton/day

URBEMIS Output =

1832.32	0.261762	0.349016 ton/yr
1661.914	0.237418	0.316557 Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)
 eCO2 = 1661.914 4.98578 98.13281 Metric tons/yr

**Metric
1765 tons/yr**

Total eCO2 =
 DO NOT **APPLY 14% reduction for Paveley Standards**

Reduction from 203 less trips = **Metric
259 tons/yr**

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APPENDIX B

GHG Emissions Calculations – Unadjusted Scenario with Refined (Post-DEIR) Project Assumptions, but without Emissions Reduction Measures that are Part of the Project

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Motor Vehicle GHG Emissions (2014)

1. Phase 1 Project Mobile GHG Emissions without TDM Measures

Daily Vehicle Trips input into URBEMIS = 2059 Trips/day

Daily VMT from URBEMIS 16254.56 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		1	1	kg/day
		2.145602	2.860803	lb/day
		0.001073	0.00143	ton/day
URBEMIS Output =	2740.83	0.391572	0.522096	ton/yr
	2485.933	0.355156	0.473541	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 2485.933 7.458279 146.7979 Metric tons/yr

Total eCO2 = 2640 Metric tons/yr

DO NOT **APPLY 14% reduction for Paveley Standards**

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Motor Vehicle GHG Emissions (2014)

2. Phase 1 + MOB Mobile GHG Emissions without TDM Measures

Daily Vehicle Trips input into URBEMIS = 6854 Trips/day

Daily VMT from URBEMIS 52206.33 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		3	4	kg/day
		6.891236	9.188314	lb/day
		0.003446	0.004594	ton/day
URBEMIS Output =	8781.75	1.25765	1.676867	ton/yr
	7965.047	1.140689	1.520919	Metric tons/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)

eCO2 = 7965.047 23.95447 471.4848 Metric tons/yr

Total eCO2 = 8460 Metric tons/yr
No reduction for Paveley Standards in 2015 8460 Metric tons/yr

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Motor Vehicle GHG Emissions (2030)

3. Total Buildout Mobile GHG Emissions with TDM Measures

Daily Vehicle Trips input into URBEMIS = 7260 Trips/day

Daily VMT from URBEMIS 55208.18 miles/day

	CO2	CH4	NO2	
Emission Factor =	URBEMIS	0.06	0.08	Emission factors for CH4 & NO2 from CCAR Protocol Table C5
		3	4	kg/day
		7.28748	9.71664	lb/day
		0.003644	0.004858	ton/day
URBEMIS Output =	9240.64	1.329965	1.773287	ton/yr
	8381.26	1.206278	1.608371	Metric tons/yr
GWP =	1	21	310	(GWP from IPCC SAR per CCAR 2009)
eCO2 =	8381.26	25.33184	498.595	Metric tons/yr
Total eCO2 =				8905 Metric tons/yr

Natural Gas Emissions
Existing Buildings

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Natural Gas Emissions - Existing Buildings

370 Hawthorne

	CO2	CH4	N2O	
	102 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	102	0.011342	0.000192 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	102	2.38E-01	5.96E-02 Tons/year	
	92.51	2.16E-01	5.41E-02 MT/Year	
	92.78			

Back Calculated Demand = 11.66181 lb/therm 17493 therm/yr

422 Hawthorne

	CO2	CH4	N2O	
	17 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	17	1.89E-03	3.20E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	17	3.97E-02	9.93E-03 Tons/year	
	15.419	3.60E-02	9.01E-03 MT/Year	
	15.46 MT/Year			

Back Calculated Demand = 11.66181 lb/therm 2915.50 therm/yr

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Natural Gas Emissions
Existing Buildings

435 Hawthorne

	CO2	CH4	N2O	
	26 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	26	0.002891	4.9E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	26	0.060712	0.01519 Tons/year	
	23.582	0.055066	0.013778 MT/Year	
	23.65 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	4459.00 therm/yr

3300 Elm

	CO2	CH4	N2O	
	4 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	4	0.000445	7.54E-06 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	4	0.00934	0.002337 Tons/year	
	3.628	0.008472	0.00212 MT/Year	
	3.64 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	686.00 therm/yr

3232 Elm

	CO2	CH4	N2O	
	11 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	11	0.001223	2.07E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	11	0.025686	0.006427 Tons/year	
	9.977	0.023297	0.005829 MT/Year	
	10.01 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	1886.50 therm/yr

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Natural Gas Emissions
Existing Buildings

461 34th

	CO2	CH4	N2O	
	5 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	5	0.000556	9.42E-06 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	5	0.011675	0.002921 Tons/year	
	4.535	0.01059	0.00265 MT/Year	
	4.55 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	857.50 therm/yr

3023 Summit

	CO2	CH4	N2O	
	17 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	17	0.00189	3.2E-05 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	17	0.039697	0.009932 Tons/year	
	15.419	0.036005	0.009008 MT/Year	
	15.46 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	2915.50 therm/yr

3043 Summit

	CO2	CH4	N2O	
	4 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	4	0.000445	7.54E-06 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	4	0.00934	0.002337 Tons/year	
	3.628	0.008472	0.00212 MT/Year	
	3.64 MT/Year			
		Back Calculated Demand =	11.66181 lb/therm	686.00 therm/yr

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Natural Gas Emissions - MOB

	CO2	CH4	N2O	
	256 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	256	0.028466	0.000482 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	256	0.597784	0.149567 Tons/year	
	232.192	0.54219	0.135657 MT/Year	
	232.8698	Back Calculated Demand =	11.66181 lb/therm	43903.99 therm/yr

Natural Gas Emissions - Fitness Center

	CO2	CH4	N2O	
	68 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	68	0.007561	0.000128 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	68	0.158786	0.039729 Tons/year	
	61.676	0.144019	0.036034 MT/Year	
	61.85605	Back Calculated Demand =	11.66181 lb/therm	11662.00 therm/yr

Natural Gas Emissions - University Expansion

	CO2	CH4	N2O	
	154 Tons/year (from URBEMIS)			
Emission Factor (nat gas) =	53.06 kg/MMBtu	0.0059	0.0001 kg/MMBtu	(From CCAR Tables C6 and C7)
Emission =	154	0.017124	0.00029 Tons/Year	
GWP =	1	21	310	per CCAR, Use GWP's from IPCC's SAR
CO2E emissions =	154	0.359604	0.089974 Tons/year	
	139.678	0.326161	0.081606 MT/Year	
	140.0858	Back Calculated Demand =	11.66181 lb/therm	26410.99 therm/yr

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Natural Gas Emissions - PCP

URBEMIS has separate Emission factors for Nox and CO for residential land uses.

Assume worst case (non residential) emission factors. Not parsing out relative to electrical demand because of uses like parking garage for which relative percentage of electrical and gas demands would vary.

Natural Gas Demand = 250248 therms/year Per Energy Pro Standard scenarion (last page)
 25024.8 MMBTtu/yr

Conversion factor: 1 mcf = 10,290 Therms http://www.energystar.gov/ia/business/tools_resources/target_finder/help/Energy_Units_Conversion_Table.htm

Emission Factor from URBEMIS2007 =

ROG	Nox	PM10	PM2.5	CO	SO2
7.26	100	0.18	0.18	84	0.001
0.000706	0.009718	1.75E-05	1.75E-05	0.008163	9.718E-08
		0	0		
		0	0		
176.56	2431.95	4.38	4.38	2042.84	0
0.48	6.66	0.01	0.01	5.60	0.00
54	54	82	54	NA	NA

Lbs/ million CF
Lbs/therm

0 pounds/year
0 pounds/day

CO2	CH4	N2O
120000	0	
11.66181	0.005	0.0001
2918344	0	0
1459.17	0.00	0.00
	125.124	2.502
1323.47	0.125	0.003

Lbs/ million CF
Lbs/therm
kg/MMBtu

0 pounds/year
0 pounds/year
0.00 tons/year
2.502 kg/yr

0.003 MT/yr

GWP = 1 21 310 (GWP from IPCC SAR per CCAR 2009)
 eCO2 = 1323.47 2.63 0.78 Metric tons/yr

Total eCO2 =

**Metric
1327 tons/yr**

Annual kWh Calculations for Project Emissions of Electricity Used by the project

Project Name: Alta Bates
 ESA Proj. Number: 207376

Business as Usual Scenario

5262146

Electricity Consumption

(based on average CEC California Energy Demand Staff Report 2000, P200-00-002)

CA Energy Commission year 2008 data for PG&E

Source: <http://www.energy.ca.gov/2009publications/CEC-200-2009-012/CEC-200-2009-012-CMF.PDF>

Commercial Energy Demand (2008) = 39437 GWhr
 Commercial Floor Space (2008) 2408 MMsf

Commercial Demand/sf = 16.38 kWh/sf
 kWh/sf

Parking Garage Demand = 6.9 kWh/sf

Source for parking = <ftp://ftp.eia.doe.gov/pub/consumption/commercial/cbcetb92.pdf>
 Table 3.15 (1992, latest year)

GHG Emission Factor
 PG&E 5-year rolling average 2002-2007 526 lbs eCO2/MW-hr
 Source: Khamotu, Karen, PG&E, e-mail communication toESA, July 31, 2009

Total GHG Emissions From Commercial Electricity Use

Project

Average annual consumption (kWh)

Commercial

(kWh/sq ft/Year)	Building		kWhrs per year
Ainsworth	PCP		6,667,049 (Energy Pro output)
6.90	Parking Garage	392,800 sq ft	541,276
16.38	MOB	175,000 sq ft	2,866,061
16.38	Fitness Center	32000 sq ft	524,080
16.38	University	72500 sq ft	1,187,368

EMMISSIONS

3.51E+06 lbs/year	=	1,590.4 MT/yr
2.85E+05 lbs/year		129.1 MT/yr
1.51E+06 lbs/year		683.7 MT/yr
2.76E+05 lbs/year		125.0 MT/yr
6.25E+05 lbs/year		283.2 MT/yr

Existing Conditions

Average annual consumption (kWh)

Commercial

(kWh/sq ft/Year)	Building		kWhrs per year
16.38	370 Hawthorne	69,674 sq ft	1,141,085
16.38	422 Hawthorne	11,136	182,380
16.38	435 Hawthorne	17,280	283,003
16.38	3300 Elm	2,600	42,581
16.38	3232 Elm	7,330	120,047
16.38	461 34th	3,500	57,321
16.38	3023 Summit	11,382	186,409
16.38	3043 Summit	2,500	40,944
16.38	418 30th	3,500	57,321

6.00E+05 lbs/year		272.2 MT/yr
9.59E+04 lbs/year		43.5 MT/yr
1.49E+05 lbs/year		67.5 MT/yr
2.24E+04 lbs/year		10.2 MT/yr
6.31E+04 lbs/year		28.6 MT/yr
3.02E+04 lbs/year		13.7 MT/yr
9.81E+04 lbs/year		44.5 MT/yr
2.15E+04 lbs/year		9.8 MT/yr
3.02E+04 lbs/year		13.7 MT/yr

5381907
 8247968
 9674742

Phase 1 Emissions = 1,283.8 MT/yr
 Phase 1 + MOB Emissions = 1,967.5 MT/yr
 Future Phase Emissions = 2,307.8 MT/yr

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BAU CALCULATION

**Phase 1 Only
Water Useage Emissions**

Water Demand = -17053 GPD per Utility Section water demand decreaes with Phase 1
 -13690 GPD subtract PCP GGHC demand of 10509 amd add non GHC PCP demand of 13872

Water useage = -0.01369 MGD
 = -4.99685 MG/year

Energy use factor = 1450 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption = -7.25E+03 kW-hr/yr
 -7.25E+00 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	-5.25E+03 lb/yr	-2.19E-01 lb/yr	-5.87E-02 lb/yr

Total emissions as eCO2 =

-5.25E+03 lb/yr	-4.60E+00 lb/yr	-1.82E+01 lb/yr
-2.62E+00 ton/yr	-2.30E-03 ton/yr	-9.10E-03 ton/yr
-2.38E+00 MT/yr	-2.08E-03 MT/yr	-8.25E-03 MT/yr

TOTAL WATER USAGE EMISSIONS AS eCO2 =

-5.27E+03 lb/yr

-2.40E+03 kg/yr

-2 MT/yr

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BAU CALCULATION

Phase 1 + MOB

Water Useage Emissions

Water Demand = Phase 1 demand + MoB demand - existing demand from BFK shhet of 10/26/09
 52735 GPD water demand for existing uses to be demolished

Water useage = 0.052735 MGD
 = 19.24828 MG/year No CALGREEN Reduction

Energy use factor = 1450 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
 2.79E+04 kW-hr/yr
 2.79E+01 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	2.02E+04 lb/yr	8.43E-01 lb/yr	2.26E-01 lb/yr

Total emissions as eCO2 =

	2.02E+04 lb/yr	1.77E+01 lb/yr	7.01E+01 lb/yr
	1.01E+01 ton/yr	8.85E-03 ton/yr	3.50E-02 ton/yr
	9.17E+00 MT/yr	8.03E-03 MT/yr	3.18E-02 MT/yr

TOTAL WATER USAGE EMISSIONS AS eCO2 =

2.03E+04 lb/yr

9.23E+03 kg/yr

9.E+00 MT/yr

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BAU CALCULATION

**Water Useage Emissions
BUILDOUT**

Water Demand = 0.0666 MGD

Water useage = 0.0666 MGD
= 24.309 MG/year

Energy use factor = 1450 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
3.52E+04 kW-hr/yr
3.52E+01 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O	
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr	
Total Emissions =	2.55E+04 lb/yr	1.06E+00 lb/yr	2.86E-01 lb/yr	
Total emissions as eCO2 =				
	2.55E+04 lb/yr	2.24E+01 lb/yr	8.85E+01 lb/yr	
	1.28E+01 ton/yr	1.12E-02 ton/yr	4.43E-02 ton/yr	
	1.16E+01 MT/yr	1.01E-02 MT/yr	4.01E-02 MT/yr	1.16E+01

TOTAL WATER USAGE EMISSIONS AS eCO2 =
2.56E+04 lb/yr
1.17E+04 kg/yr
12 MT/yr

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BAU SCENARIO

Phase 1 + MOB

Waste Water Usage Emissions

Water Outflow = Phase 1 demand + MoB demand from BFK sheet of 10/26/09
48188 GPD

Water Outflow = 0.048188 MGD
= 17.58862 MG/year

Energy use factor = 2500 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
4.40E+04 kW-hr/yr
4.40E+01 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	3.18E+04 lb/yr	1.33E+00 lb/yr	3.56E-01 lb/yr

Total emissions as eCO2 =

	3.18E+04 lb/yr	2.79E+01 lb/yr	1.10E+02 lb/yr
	1.59E+01 ton/yr	1.39E-02 ton/yr	5.52E-02 ton/yr
	1.44E+01 MT/yr	1.26E-02 MT/yr	5.01E-02 MT/yr

TOTAL WATER USAGE EMISSIONS AS eCO2 =

3.20E+04 lb/yr

1.45E+04 kg/yr

1.45E+01 MT/yr

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**WasteWater Useage Emissions
BAU SCENARIO**

Water outpflow = 0.0666 MGD
= 24.309 MG/year

Energy use factor = 2500 kWh/MG from CEC 2006 & BAAQMD 2009

Electrical consumption =
6.08E+04 kW-hr/yr
6.08E+01 MW-hr/yr

Emission factors for electricity use from California Climate Action Registry General Reporting Protocol January 2009 Version 3.1

	CO2	CH4	N2O
CALI Subregion	724.12 lbs/MW-hr	0.0302 lbs/MW-hr	0.0081 lbs/MW-hr
Total Emissions =	4.40E+04 lb/yr	1.84E+00 lb/yr	4.92E-01 lb/yr

Total emissions as eCO2 =

4.40E+04 lb/yr	3.85E+01 lb/yr	1.53E+02 lb/yr
2.20E+01 ton/yr	1.93E-02 ton/yr	7.63E-02 ton/yr
2.00E+01 MT/yr	1.75E-02 MT/yr	6.92E-02 MT/yr

TOTAL WasteWATER USAGE EMISSIONS AS eCO2 =
4.42E+04 lb/yr
2.01E+04 kg/yr
20 MT/yr

Landscape Maintenance Emissions

PHASE 1

CO2	CH4	N2O
0.25 tons/year (from URBEMIS)		

From Table 6 California Greenhouse Gas Emissions and Sink Summary, CEC 2006

in 2004 transportation fossil fuel combustion was	188 MMT CO2
Mobile source combustion	0.6 MMT CH4
Mobile Source Combustion	11.8 MMT N2O

So for Mobile sources...	CH4 emission =	3.19E-03 percent of CO2 Emissions
	N2O emissions =	6.28E-02 percent of CO2 Emissions

Total emissions as eCO2 in tons/year=

	CO2	CH4	N2O	Total GHG
	0.25	0.001	0.02	0.27
Total mobile Emissions as eCO2 on Metric tons/yr =	0.23	0.001	0.01	0.24

B-84

ALta Bates Landscape Emissions

Phase 1 + MOB

CO2 0.51 tons/year (from URBEMIS) **CH4** **N2O**

From Table 6 California Greenhouse Gas Emissions and Sink Summary, CEC 2006

in 2004 transportation fossil fuel combustion was 188 MMT CO2
 Mobile source combustion 0.6 MMT CH4
 Mobile Source Combustion 11.8 MMT N2O

So for Mobile sources... CH4 emission = 3.19E-03 percent of CO2 Emissions
 N2O emissions = 6.28E-02 percent of CO2 Emissions

Total emissions as eCO2 in tons/year=

	CO2	CH4	N2O	Total GHG
Total mobile Emissions as eCO2 on Metric tons/yr =	0.51	0.002	0.03	0.54
	0.46	0.001	0.03	0.49

B-85

ALta Bates Landscape Emissions

Total Buildout

CO2 0.76 tons/year (from URBEMIS) **CH4** **N2O**

From Table 6 California Greenhouse Gas Emissions and Sink Summary, CEC 2006

in 2004 transportation fossil fuel combustion was 188 MMT CO2
 Mobile source combustion 0.6 MMT CH4
 Mobile Source Combustion 11.8 MMT N2O

So for Mobile sources... CH4 emission = 3.19E-03 percent of CO2 Emissions
 N2O emissions = 6.28E-02 percent of CO2 Emissions

Total emissions as eCO2 in tons/year=

	CO2	CH4	N2O	Total GHG
Total mobile Emissions as eCO2 on Metric tons/yr =	0.76	0.002	0.05	0.81
	0.69	0.002	0.04	0.74

B-86