2.7 TRANSPORTATION

2.7.1 SETTING

2.7.1.1 Traffic Setting – Bay Bridge Demand

Comments

2. In Table 8 on page 45 of the TIS, the maximum observed AM queues for the Interstate (I) 80 approach on Tuesday, May 6, 2008 and Wednesday, May 7, 2008, of 5.45 miles and 1.69 miles, respectively, do not look typical. These queues were possibly due to incidents on the SFOBB. Based on the Department’s observations, the maximum AM queue for the I-80 approach typically extends approximately 0.8 mile to 1.1 miles upstream of the Toll Plaza. If the queues on these days were indeed the result of incidents, the average maximum observed queues would overestimate bridge demand. In addition, if there were incidents on these days, the longer queue would be caused by reduced bridge output (i.e., less demand served) rather than higher demand, and using a “normal” bridge output for those days would not be appropriate to estimate demand.

3. As the queue from the Toll Plaza extends greater than 1.5 miles upstream from the Toll Plaza, it begins to combine other bottlenecks that are not associated with the Toll Plaza queuing. While some of the vehicles in queue at I-80 upstream of the Powell Street interchange are certainly headed to the Toll Plaza, it is not possible to use this part of the queue to estimate Toll Plaza demand because the destinations of this traffic cannot be determined. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.3]

4. The maximum observed queues are only shown for the local street approaches to the SFOBB in San Francisco. However, the eastbound I-80 mainline also experiences queuing during both weekday AM and PM peak periods. The analysis does not include the eastbound I-80 mainline approach to the SFOBB. This would underestimate the eastbound demand for the SFOBB. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.4]

Response

As described in the Treasure Island and Yerba Buena Island Redevelopment Plan Transportation Impact Study, included as EIR Appendix C, vehicle queues leading to the Bay Bridge Toll Plaza were observed over three days in May 2008, and, as shown in Table 8 on p. 45 of the TIS, queues can vary substantially from day to day depending on weather, special events, or incidents on the bridge. To account for this variation, the average queue length for each of the three freeways leading to the Bay Bridge (I-80, I-880, and I-580) was calculated to determine the extent of the demand on the Bay Bridge. In performing the transportation study, the City noted the difference between one of the three days (Tuesday, May 6) and the other two observation days (Wednesday and Thursday, May 7 and 8, respectively). Although the comment notes that two of the three days exceeded “typical” queues, only one of the three days exceeded “typical” lengths by a substantial amount. After careful consideration, the analysis ultimately concluded that collisions
on the bridge and other incidents are not infrequent, and regular commute-hour drivers are somewhat accustomed to the associated delays. Therefore, the three-day average queue length is considered a reasonable “snapshot” of typical traffic conditions on the Bay Bridge for the purpose of the transportation impact analysis, even if a collision or other event affected the results on at least one of the days.

Despite the reasonableness of including the effects of an incident in the assessment of existing conditions, as shown in the TIS in Figure 14, on p. 48, and in the EIR in Figure IV.E.4: Existing Freeway Travel Demand, on p. IV.E.10, the Bay Bridge operated at its full capacity of 9,000 vehicles per hour in the peak direction during the AM and PM peak hours, respectively, on each of the three observation days. Based on discussions with staff of the California Department of Transportation (“Caltrans”), it appears that an incident occurred prior to the peak period on one of the observation days, causing a lengthy queue to form. Traffic volume data provided by Caltrans show a substantial decrease in traffic flow across the bridge on Tuesday, May 6, likely corresponding to an incident, during which traffic flow decreased from capacity flow to as low as 6,000 vehicles per hour, between approximately 6:00 and 7:00 AM. Traffic flow returned to typical peak period capacity of approximately 9,000 vehicles per hour at approximately 7:30 AM. During the peak hour observations, traffic flow on the bridge was at capacity; however, the queues observed were exceptionally long. These exceptionally long queues were likely residual from the earlier incident. Therefore, including this observation in the calculation of average queue length, which, in turn, was used to estimate unserved demand, ultimately provides a more conservative analysis. However, if this data point were not included in the calculation, the Proposed Project impacts associated with westbound queuing in the AM peak hour would remain significant and the conclusions presented in the EIR would remain the same.

The comment correctly states that as queues on westbound I-80 extend beyond 1.5 miles upstream of the Bay Bridge Toll Plaza, vehicles destined for the Bay Bridge begin to mix with other vehicle traffic destined for I-580/I-880 South or Powell Street or Ashby Interchanges. The demand at the Bay Bridge Toll Plaza identified in Table 9 on p. 46 of the TIS and described on EIR p. IV.E.9 reflect vehicle queues observed in the right-most lanes approaching the I-80/I-580 split before the approach to the Bay Bridge Toll Plaza. Vehicles queuing in the three left-most lanes were excluded from the observations and queuing analysis and were assumed to be destined for I-580/I-880. As shown in Table 8 on p. 45 of the TIS, only one observation period (Tuesday, May 6, 2008) had recorded vehicle queues in the right-most lanes that extended beyond Powell Street that would have been affected by traffic merging onto the freeway from Powell Street or Ashby Avenue.

If adjustments to the analysis were made to reduce the amount of traffic in the right-most lanes assumed to be destined to the Bay Bridge for the Tuesday May 6, 2008, observation period, the TIS would show shorter queues and less unserved demand for the westbound Bay Bridge during
Although this may revise how the existing demand volumes for the bridge and the existing average queue length are described, it would not change the results of the analysis presented in the EIR. Since the bridge operates at capacity and would continue to do so in the future, the EIR presents a reasonable worst-case assessment of the conditions drivers would experience queuing at the Bay Bridge Toll Plaza.

The EIR does not quantify the extent to which eastbound queuing that occurs on the I-80/US 101 mainline within San Francisco constitutes unserved demand for the Bay Bridge because of the complexity of the network approaching the Bay Bridge from the south. Traffic congestion on the I-80/US 101 mainline approaching the Bay Bridge from the south often extends upstream of the Central Freeway merge, making it impossible to separate hourly traffic demand destined to the bridge deck from traffic that exits at Seventh Street, Fourth Street, Ninth Street, or the Central Freeway/Octavia Boulevard. Further, the eastbound approach to the Bay Bridge is unlike the westbound approach, where there is an uninterrupted queue storage area approximately 1.8 miles long approaching the Toll Plaza (between the Toll Plaza and Powell Street) on which queues can be identified and associated with the Bay Bridge with a reasonable degree of certainty. Rather, on the eastbound approach, there are five on-ramps and two off-ramps located along the 1.8-mile segment between the Central Freeway and the Bay Bridge itself, making a precise quantification of the amount of queuing that represents “unserved demand” impossible due to the complexity of the network. In fact, it is unclear whether the congestion in this area is due to actual capacity constraints on the Bay Bridge or to the weaving of vehicles between various entrances and exits throughout this complex system of freeway, and as a result, it is unclear how much or if any of the resultant queues should be considered unserved demand. Therefore, identifying and including unserved demand from the I-80/US 101 mainline in the analysis would be speculative. The EIR does quantify the amount of unserved demand for the eastbound Bay Bridge originating on the approaches to on-ramps from Downtown San Francisco and acknowledge that the amount of unserved demand may actually be greater due to queuing on the eastbound mainline. This is noted on Figure IV.E.4 on EIR p. IV.E.10.

2.7.1.2 Transit Setting – Downtown San Francisco

Comment

The District requests that Page IV.E.19 be modified to state that Golden Gate Transit (GGT) Routes 2, 38, 56, 58, 74, and 97 also operate on surface streets in the vicinity of the Transbay Terminal. Routes 92 and 93 serve San Francisco but do not operate within the study area. While the route listing is correct at the time of publication of the DEIR, please note that Routes 26 and 73 will be discontinued effective September 12. (Ron Downing, Director of Planning, Golden Gate Bridge, Highway and Transportation District) [9.1]
Response

The second full paragraph on EIR p. IV.E.19 is revised as follows (new text is underlined):

The Golden Gate Bridge, Highway, and Transportation District (“GGBHTD”) provides bus and ferry service between the North Bay (Marin and Sonoma Counties) and San Francisco. Within San Francisco, Golden Gate Transit bus lines 2, 4, 8, 18, 24, 26, 27, 38, 44, 54, 56, 58, 72, 73, 74, 76, 97, 10, 70, 80 and 101 operate on surface streets, with stops adjacent to the Transbay Terminal offering service to Marin and Sonoma Counties. Golden Gate Transit also operates ferry service between the Larkspur and Sausalito Ferry Terminals in Marin County and the San Francisco Ferry Building.

Since the EIR Setting section presents conditions at the time the impact analysis was prepared, the September 2010 termination of Golden Gate Transit Routes 26 and 73, which occurred after the Draft EIR was published, was not incorporated.

2.7.1.3 Temporary Transbay Terminal

Comment

Section IV, page IV.E.23 - Did the temporary Transbay Terminal just open recently? If so, please change the reference of a “spring 2010” opening to “summer 2010” (P. M. McMillin, Captain, U. S. Coast Guard) [10.13]

Response

The temporary terminal was opened in August 2010. The last sentence of the third full paragraph on EIR p. IV.E.23 is revised as follows (deletions are shown in strike through and new text is underlined):

A temporary terminal, located on the block bounded by Main, Folsom, Beale and Howard Streets, opened in August spring 2010, and serves commuters during demolition and construction of the new Transit Center.

2.7.2 TRANSPORTATION IMPROVEMENTS

2.7.2.1 Americans with Disabilities Act

Comment

All improvements both on and off island, including the on-island shuttle, should meet the Americans with Disabilities Act standards. This includes providing adequate connections to the east span pedestrian/bicycle path currently under construction and the proposed west span multi-use path on the SFOBB. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.19]
Response

As required by Federal, State, and City regulations, the Proposed Project’s transportation infrastructure improvements would be constructed to meet the requirements of the California Building Code in Title 24 of the California Code of Regulations ("Title 24"), which is designed to comply with the requirements of the Americans with Disabilities Act ("ADA") and State statutes for physical accessibility. The on-island shuttle buses would also meet State and Federal accessibility requirements. Shuttle service would be administered by the Treasure Island Transportation Management Agency ("TITMA"), which would be a public agency, and would therefore be subject to the provisions of ADA/Title 24 applicable to public entities.

The sidewalk and bicycle lane improvements included in the Proposed Project on the east and west sides of Yerba Buena Island would comply with Title 24 standards, and the project design would be coordinated with the Title 24-compliant Bay Bridge East Span pedestrian/bicycle path currently under construction by Caltrans. The proposed West Span bicycle and pedestrian mixed-use path ("BPM") would not be under the control of project sponsors, and that project, if constructed, would include connections to the roadway and sidewalk network at both the Yerba Buena Island and San Francisco touchdown locations. As indicated on EIR p. IV.E.4, the West Span BPM Project Study Report ("PSR") is a separate study underway by Bay Area Toll Authority and Caltrans to evaluate potential alternative configurations for the proposed mixed-use pedestrian and bicycle path on the western portion of the Bay Bridge, but funding for its construction has not been identified, and it was not assumed to be in place for the transportation impact analysis.

2.7.2.2 Alternative Fuel Vehicles

Comments

4. The transportation program does not include a fleet of small nonpolluting vehicles, such as very small electric cars, that residents might use individually for on-island travel on a shared basis, like car share (or I could not find this in the text). This would be very helpful for shopping and other local trips that they would otherwise use a car for. It will also be very helpful for households that own no cars, and for persons with disabilities. The on-island shuttle buses alone do not meet all foreseeable practical needs. There are various possible mechanisms to fund and implement such a program, and short term parking for them with battery charging access will be need at destination points. (John Elberling, Director, TIDA Board) [22.5]

Transit Oriented Development 1) Require the use of zero emission vehicles by government agencies and encourage their use by businesses and non profits on the island, preferred parking for visitors should be limited even more. (Jorge Garcia) [4.2a]
Response

The Proposed Project does not include a requirement or specific proposal for provision of a fleet of electric cars or any particular alternative fuel source or zero-emission vehicles, nor does it include requirements that government entities use alternative fuel vehicles. Plug-in stations would not be required either of the master developer or of the developers of individual buildings. Such uses would be permitted, however, under the proposed Design for Development, and TITMA could institute a program of small electric vehicles if and when demand for them materializes. While a fleet of small electric cars would be beneficial for Islands residents, given their limited range, they would not substantially reduce vehicle emissions associated with travel within the Islands or reduce significant air quality impacts. In addition, it would be speculative to assume that TITMA would have the ability to access funding sources suggested by the comment.

As indicated on EIR p. IV.E.46, a car-share program would be implemented on the Islands, providing members access to automobiles without having to purchase a car. The car-share program may include electric vehicles. However, because fleet selection is currently unknown and would be beyond the control of the project sponsors, it would be speculative to assume any particular fuel source for the car-share program. See also the second response in Subsection 2.1.3.1, Transportation Facilities, in Section 2.1, Project Description, and the response in Subsection 2.19.1, Alternative Energy Sources, in Section 2.19, Minerals and Energy, regarding alternative fuels. As indicated in EIR Section IV.E, Greenhouse Gases Emissions, on p. IV.H.42, San Francisco uses carbon-free electricity to power its electric buses and trolleys; however, these vehicles do not and would not serve the Island. Approximately 17 percent of the San Francisco Metropolitan Transportation Agency’s non-electric bus fleet consists of hybrid buses.

Parking information related to the Proposed Project is presented on EIR pp. IV.E.136-IV.E.140. Overall, the Proposed Project proposes 10,675 parking spaces, including 1,035 on-street spaces. Preferential parking for visitors is not anticipated to be provided. Also please refer to the responses in Subsection 2.7.10.2, Parking Ratios, below, regarding parking supply.

2.7.2.3 Funding Mechanisms

Comments

- Exactly where is the “full funding” necessary to implement the improvements and service levels recommended in the 2006 Transportation Plan supposed to come from?
- How will any additional MUNI or ferry service be paid for? To what extent will the taxpayers have to pay for the existing or any increase in MUNI service, AC Transit service, and ferry service to TI/YBI under the currently proposed plan? (Vedica Puri, President, Telegraph Hill Dwellers) [39.60]
• Will phasing of the development be limited until transportation infrastructure can be financed and built? Why isn’t this a required Mitigation Measure for the Significant Traffic Impacts identified in the DEIR? (Vedica Puri, President, Telegraph Hill Dwellers) [39.67]

Response

Funding for the AC Transit and ferry component of the base transportation program identified as part of the Proposed Project would be provided by the Proposed Project. This includes project sponsor contributions for purchase of additional AC Transit buses and leasing of a ferry vessel, as well as revenues collected by TITMA. As the agency that would be responsible for managing revenue from congestion pricing, parking, and transit vouchers, TITMA would dispense funds to AC Transit and the Water Emergency Transit Authority (“WETA”). It is anticipated that TITMA would have available sufficient funds to cover operating costs for the level of AC Transit and WETA service proposed in the Proposed Project. The Proposed Project includes funding for transit operating subsidies for TITMA, during the interim period when congestion pricing, parking revenues, and transit vouchers are insufficient to cover the shortfall. Funding for the level of Muni service included as part of the Proposed Project is more particularly described in the response in Subsection 2.7.6.2.1, Transit Funding, below.

Sources of funding for elements of Mitigation Measure M-TR-2, the Expanded Transit Service for Muni operations, are more fully discussed in the responses in Subsection 2.7.6.2.1 and Subsection 2.7.15.3, Funding. Sources of funding for the lease of one ferry, and required expansion of berthing facilities at the Ferry Building to accommodate ferry service under Mitigation Measure M-TR-2 are discussed in responses in Subsection 2.7.6.5.2, Ferry Size, while funding for elements of the Expanded Transit Service to be operated by WETA are also discussed in the response in Section 2.7.6.2.1 (see also EIR Chapter II, Project Description, p. II.38). Funds for the San Francisco Municipal Transportation Agency (“SFMTA”) to operate the Muni line 108-Treasure Island bus route would continue to come from property taxes paid into the San Francisco General Fund. The cost of Muni operations to/from Treasure Island is currently projected to be substantially less than the amount of revenue generated by the Proposed Project to the General Fund, through property taxes, sales taxes, hotel taxes, and other sources; a fiscal impact study including analysis of the SFMTA service is being prepared for the Proposed Project and will be included as part of the final record for EIR certification. All of the transit services would also collect fares, although typically public transit fares do not generate sufficient revenue to fully support transit service.

A Disposition and Development Agreement (“DDA”) between TIDA and TICD would include a Transportation Implementation Plan and Schedule of Performance that would obligate TICD to provide adequate roadway and transit infrastructure improvements as the development progresses. The Transportation Implementation Plan and Schedule of Performance would also obligate TICD to provide a transit operating subsidy on a fixed schedule of payments, in order to...
subsidize transit operations until the point at which on-going project-generated revenues from congestion pricing, commercial and on-street parking, and transit vouchers are projected to be sufficient to cover the project’s share of operating costs for each transit service. Together, the infrastructure construction and operating subsidy payments are expected to enable each phase of development to have sufficient transportation infrastructure in place. A mitigation measure requiring phasing of transportation improvements is not included because, as noted above, a Transportation Implementation Plan and Schedule of Performance would be part of the Proposed Project.

2.7.2.4 On-Island Transit

Comment

5. Transportation and Parking: Staff supports the City’s Transit First Policy for Treasure Island and Yerba Buena Island. The proposal for a fleet of alternative fuel shuttle-buses that circulate throughout the Islands, with timed transfers at the Transit Hub offering fare-free rides to residents and visitors of the Islands is consistent with TIDA’s statutory trust grant and the public trust. Visitor serving parking and signage regarding the availability of the free shuttle-bus are encouraged throughout both islands. (Grace Kato, Public Land Management Specialist, California State Lands Commission) [24.6]

Response

The commenter’s support for the Transit First Policy and the shuttle bus proposal is noted. The transportation improvements to support the City’s Transit First Policy are presented on EIR pp. IV.E.30-IV.E.47. As indicated on EIR p. IV.E.46, the travel coordinator(s) in TITMA would be responsible for developing and distributing outreach and marketing materials, such as the signage regarding the availability of the fare-free shuttles.

2.7.2.5 Shuttles to Mainland

Comment

5. The transportation program does not include (or I can could not find it in the text) a required mitigation that large scale residential property managers provide shuttle van/bus services for their residents to mainland locations, such as shopping trips to major supermarkets etc. There are various possible mechanisms to fund and implement such services, which are routine in many master planned developments. This would be very helpful for shopping and other trips that they would otherwise use a car for. It will also be very helpful for households that own no cars, and for persons with disabilities. (John Elberling, Director, TIDA Board) [22.6]

Response

The transit and shuttle service for the Proposed Project was developed for the entire development program, rather than requiring individual developers to provide individual transit proposals. Additional shuttle van/bus service provided by individual developers would compete with, and
could affect the viability of the proposed service and required other transit mitigation measures by diverting riders from the proposed Muni and AC Transit routes. The existing Muni line 108-Treasure Island, the proposed AC Transit route between the Islands and Oakland, and the new ferry service between the Treasure Island Transit Hub and the San Francisco Ferry Building (described on EIR pp. IV.E.33-IV.E.35) would serve in a similar capacity as when dedicated shuttle van/bus service is provided for large scale developments located outside of San Francisco, in that they would provide point-to-point, non-stop service from Treasure Island to San Francisco and Oakland, where riders can make connections to other transit lines. Most of the large-scale master-planned developments referred to in the comment that provide private shuttle services consist of a single use, such as residential with no supporting retail, and are located in areas with substantially less transit service than is available in San Francisco and proposed for the Islands. In addition, the proposed fleet of fare-free shuttle buses that would circulate throughout the Islands would further benefit residents and visitors, including persons with disabilities, for trips within the Islands. The Proposed Project includes a set of transit improvements (see description of transit improvements on EIR pp. IV.E.33-IV.E.36). The EIR also identifies a mitigation measure to enhance transit (i.e., Mitigation Measure M-TR-2: Expanded Transit Service on EIR p. IV.E.74). Additional mitigation measures would not be required. Furthermore, the Project proposes about 75,000 square feet of neighborhood serving retail, which is expected to include a full service grocery store as well as other service establishments necessary for day-to-day activities.

2.7.2.6 Streets and Grades

Comment

The “Transportation Improvements” (page IV.E.31) need to be shown in comparison with existing transportation infrastructure, superimposed on topographic maps, as recommended in the CEQA Guidelines. The existing and proposed roads should be given names so that it is possible for the public and decision makers to discuss them, and the names should be consistent on all maps. The map on page IV.F.5, for example, calls Northgate Macalla Ct., among other confusions.

The proposed road segment that would connect Macalla Road with the Yerba Buena loop road appears to go straight uphill. What is the grade of this segment? Also, the new segment that would link Nimitz Drive with the real Macalla Court looks impossibly steep. What is the grade of the proposed new section? (Ruth Gravanis) [31.15]

Response

The purpose of Figure IV.E.8: Proposed Treasure Island and Yerba Buena Island Street System, on EIR p. IV.E.31, is to identify the hierarchy of the street system described on EIR p. IV.E.30. Selected roadways on Treasure Island have been named for identification purposes only and are subject to change, and have been identified consistently on the EIR figures. The Proposed Project would largely remove the existing streets on Treasure Island and replace them with new streets in
a new alignment. If the proposed street system was overlaid on top of the existing system, it would be difficult to differentiate street systems as additional information related to the Proposed Project is also presented, and the graphic would not provide useful information for the purposes of the requirements of the California Environmental Quality Act (“CEQA”), as the street grid is proposed to be entirely redesigned and replaced. Unlike Treasure Island, the Proposed Project would not remove and replace the existing streets on Yerba Buena Island; rather, existing streets would be improved substantially in conformance with their existing alignments and grades. The names of existing streets on Yerba Buena Island would remain the same as they were as of the date of the Draft EIR. New streets on Yerba Buena Island, primarily contained within the new development areas, would have new names. Street labels on Yerba Buena Island on revised Figure IV.F.1: Noise Measurement Locations, in EIR Section IV.F, Noise, on p. IV.F.5, are corrected, as shown on the next page.

New and/or improved, public rights-of-way on Yerba Buena Island would be constructed consistent with San Francisco Department of Public Works Standards, and would meet access requirements for the San Francisco Fire Department. The slope of Macalla Road would range from approximately 4 percent to 20 percent, with an average slope of 10 percent. The new road segment that connects Macalla Road to the loop road would have a grade of 15 to 20 percent. The street would start off at a slope of approximately 15 percent at its intersection with Macalla, steepen up to approximately 20 percent through the main portion of the street, and then level off at the top. The San Francisco Fire Department allows for a maximum street grade of 26 percent and maximum approach grades of 15 percent, and therefore, the new roadways would meet the San Francisco standards.

With respect to linking Nimitz Drive and Macalla Court, the project sponsors are proposing to construct new roads in these locations, rather than just connecting the existing ones. The two main legs of the “U” shape are expected to have an average slope of approximately 10 percent with increases in grade to up to 20 percent around the bend.

Figure II.10: Proposed Street System, on EIR p. II.41, and Figure IV.E.8 are revised to reflect minor corrections to the roadway classification of proposed streets on Treasure Island, and to correct the location of private streets on Yerba Buena Island. The shared public way on Development Blocks C12 and C13 on Treasure Island has been removed, because there would be no through access on these blocks. This change is consistent with the information presented in Section T2: Streets, on pp. 95-144, of the proposed Design for Development. The shared public way adjacent to Development Blocks 3Y and 4Y on Yerba Buena Island has been removed, because this land is on U.S. Coast Guard property, and it is not accessible to the public. These revised figures are presented on the following pages.

1 Macalla Road is not proposed to be regraded, so existing and future slopes are the same.
The street names shown on this figure are for identification purposes only and subject to change.

**LEGEND:**
- **= Major Arterial**
- **= Secondary Arterial**
- **= Collector Street**
- **= Shared Public Way/Private Street**

**SOURCE:** Fehr & Peers, 2009

**TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR**

(REVISED) FIGURE II.10: PROPOSED STREET SYSTEM

2.7.12
The street names shown on this figure are for identification purposes only and subject to change.

**LEGEND:**
- **Red** = Major Arterial
- **Dotted** = Secondary Arterial
- **Purple** = Collector Street
- **Green** = Shared Public Way/Private Street

Source: Fehr & Peers, 2009
2.7.2.7 Walking and Bicycling

**Comment**

In addition, the DTP does not adequately evaluate the needs of families with children (e.g. creating either a walkable and/or bikeable transit-oriented community), and lacks focus on those individuals that cannot afford cars (e.g. encouraging electronic transportation such as golf carts). It is notable that at the August 12, 2010 Planning Commission hearing, one commissioner took issue with the Project’s demolition of the existing place of worship, and failure to replace such; he asked the question (but did not receive an answer) as to what effect/burden such demolition/lack of replacement would have on the residents and increased trip generation. The DEIR completely fails to take this fact into consideration when analyzing the traffic impacts. *(Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters)* [19.18]

**Response**

EIR pp. IV.E.30-IV.E.45 and revised Figure IV.E.8 shown above present the street network improvements on Treasure Island and Yerba Buena Island that would be provided to support higher density development within a walkable and bikeable transit-oriented community, consistent with the project sponsors’ objectives as described on EIR pp. II.4-II.5. The Proposed Project would completely redesign and reconstruct existing streets on Treasure Island and provide a comprehensive network of new streets and shared streets that would facilitate travel to and from transit facilities, shopping, a school and recreational uses. Generally, sidewalks on Treasure Island would be about 6 feet wide, plus 4 to 5 feet of landscaping separating the sidewalk from adjacent roadways. An 80-foot-wide pedestrian-only linear park (Eastside Commons) would be provided as a primary source of connection between the Eastside Neighborhood and the Transit Hub. Shared public ways – a new City street type proposed for Treasure Island – would be narrow, low-speed facilities without separate pedestrian and auto accommodations, and instead pedestrians would be permitted to use and share the entire space. In addition to these internal rights-of-way focused on pedestrians, a continuous Class I mixed-use pedestrian and bicycle path would be provided around the perimeter of Treasure Island (as shown on Figure IV.E.11: Proposed Bicycle Circulation Plan, on EIR p. IV.E.38).

Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations sidewalks are not proposed.

However, several pedestrian paths would be provided through the open spaces and development areas on Yerba Buena Island. The Proposed Project would include new bicycle facilities on both Treasure Island and Yerba Buena Island, as illustrated on Figure IV.E.11. Please refer to responses in Subsection 2.7.7.1, Bicycle Access – Macalla Road and Subsection 2.7.7.2, Bicycle Access – View Area, and see Figure IV.E.11 for descriptions of revisions to the proposed bicycle network that were made in response to comments on the Draft EIR.
The Proposed Project would also include a new, fare-free on-island shuttle system with three proposed lines: two serving the neighborhoods on Treasure Island (including the Job Corps), and a third serving Yerba Buena Island. Each of the three shuttle lines would provide continuous service from early morning to late evening. The fare-free shuttles would stop at the Transit Hub on Treasure Island, facilitating transfers to ferry and outbound Transbay bus service. In addition to the Transit Hub stop, the shuttles would stop at the two other stops where express bus lines from downtown San Francisco and Oakland drop off in the City Center district, allowing for convenient connections. All residents, commuters and visitors would be able to use the on-island shuttle.

Please refer to responses to Subsection 2.7.2.2, Alternative Fuel Vehicles, for a discussion of small electric vehicles for on-island use.

At noted in the response in Subsection 2.6.2, Navy Chapel, in Section 2.6, Historic Resources, the project sponsors have decided to modify the Proposed Project to retain the existing Treasure Island Chapel. However, the use of the existing chapel on Treasure Island would not affect the transportation analysis presented in EIR Section IV.E, Transportation, which was conducted for weekday AM and PM, and Saturday midday peak hours. The existing Treasure Island Chapel is non denominational and can be used for all types of ceremonies and services, and has a capacity of 250 people. Events at the chapel typically occur during the non-peak travel periods, and would therefore, not affect the peak hour analyses. Transportation impacts during the non-peak periods would be less than those identified for the Proposed Project for the peak hour analyses.

2.7.3 METHODOLOGY

2.7.3.1 2005 EIR

Comment

- What mitigation measures were required in the 2003 EIS and subsequent ROD to alleviate traffic impacts for a much smaller Reuse Plan?
- What were the peak AM and PM conditions assumed in the 1996 Reuse Plan and in the 2003 EIS?
- What are the are peak AM and PM conditions assumed in the DEIR? *(Vedica Puri, President, Telegraph Hill Dwellers)* [39.68]

Response

The *Record of Decision for the Disposal and Reuse of Naval Station Treasure Island California* was adopted on October 25, 2005 by the US Navy following completion of an Environmental Impact Statement conducted to comply with the National Environmental Policy Act (NEPA). In addition, the *Transfer and Reuse of Naval Station Treasure Island Final Environmental Impact Report* (State Clearinghouse #1996092073) was prepared by the City and County of San
Francisco and the Treasure Island Development Authority and was certified in May 2005 to comply with CEQA. Those documents evaluated the potential environmental impacts of a substantially different project than analyzed in the EIR for the Proposed Project (see EIR p. I.4 for a summary of the previous proposed project). However, transportation mitigation measures in the 2005 EIR consisted of the following:

- Implementation of a robust Transportation Demand Management program to reduce automobile trip generation and encourage carpooling, transit use, walking, and bicycling;
- Installation of traffic controls, such as ramp metering, on on-ramps to the Bay Bridge from Yerba Buena Island;
- Regular monitoring of ramp volumes, and a flexible and responsive TDM program that allows for adjustments based on monitoring results to improve the program’s effectiveness;
- Coordination with other transit agencies to provide new transit service on the Islands;
- Encouraging traffic destined for the westbound Bay Bridge to use the on-ramp on the east side of Yerba Buena Island through signage or other physical means;
- Encouraging traffic on the eastbound Bay Bridge destined for Yerba Buena Island to use the east side off-ramp through signage or other physical means;
- Improvement of the eastbound ramps on the east side of the Bay Bridge;
- Limiting project traffic to no more than five percent of total traffic volume on the Bay Bridge during peak hours;
- Establishing transit service to the East Bay;
- Establishing ferry service to San Francisco;
- Providing priority transit access to the Bay Bridge; and
- Restriping Treasure Island Road to accommodate three travel lanes, instead of two present under existing conditions.

With the exception of the provision of signage or other physical improvements to encourage traffic to use the east side off-ramp from the eastbound Bay Bridge, each of these measures has been incorporated into the Proposed Project, included as mitigation measures to mitigate the Proposed Project’s impacts, or, in the case of the improvements to the eastbound ramps on the east side of Yerba Buena Island, have been proposed as separate projects that are now under review. The transportation engineers working on the EIR for the Proposed Project concluded that travelers to the project site would likely be familiar with the area and that traffic would eventually reach an equilibrium between use of the west side and east side off-ramps from the eastbound Bay Bridge, making a requirement for extra signage alerting drivers to the existence of a second off-ramp on the east side unnecessary.

The development proposal in the 2005 EIR is included in the section of the EIR that discusses alternatives that were considered but rejected (see EIR pp. VII.74-VII.75). The Maximum
Development Alternative in the 2005 EIR included 2,800 housing units, a themed attraction, and three hotels with a total of 1,450 rooms. The 2005 EIR also included renovation and expansion of the existing marina at Clipper Cove from 100 to 400 slips. The Maximum Development Program was estimated to generate 7,020 person-trips and 1,410 vehicle trips during the AM peak hour (as compared to 7,950 person-trips and 1,613 vehicle trips for the Proposed Project); 13,280 person-trips and 2,530 vehicle trips during the PM peak hour (as compared to 11,689 person trips and 2,462 vehicle trips for the Proposed Project); and 12,390 person-trips and 2,220 vehicle trips during the Saturday midday peak hour (as compared with 12,274 person-trips and 2,861 vehicle trips for the Proposed Project). The impact assessment for the 2005 EIR identified the following impacts for the Maximum Development Alternative:

- Significant and unavoidable impacts associated with increased traffic volumes on freeway ramps and the Bay Bridge, specifically the eastbound on-ramp (east side) and the Bay Bridge approach – at the toll plaza and metering lights in the westbound direction, and on the ramps in downtown San Francisco in the eastbound direction.
- Significant and mitigable impacts on bus service between NSTI and the East Bay. (The plan did not include direct transit service between NSTI and the East Bay.)
- Significant and mitigable impacts on ferry service.
- Less than significant pedestrian, bicycle, goods movement, parking and construction impacts.

As with the 2005 EIR, the EIR analysis for the Proposed Project also identified significant and unavoidable impacts associated with increased traffic volumes, on the Yerba Buena Island ramps, at the toll plaza approach in the East Bay, and at intersections in downtown San Francisco. The Proposed Project EIR identifies a significant impact on AC Transit bus service between the Island and the East Bay related to operational delays associated with queuing extending from the on-ramps, and finds that this impact remains significant and unavoidable. The EIR also identifies a significant impact on Muni operations between the Island and the Transbay Terminal associated with queuing extending from the Bay Bridge on-ramps; however, this impact was reduced to a less-than-significant level with implementation of Mitigation Measure M-TR-24. Impacts on capacity of Muni bus service between the Islands and San Francisco were determined to be significant and unavoidable, because full funding for Mitigation Measure M-TR-2, the Expanded Transit Service, has not yet been identified, and its implementation remains uncertain. (Please refer to responses in Subsection 2.7.2.3, Funding Mechanisms, regarding funding of Mitigation Measure M-TR-2.) The Proposed Project would have less-than-significant impacts on other transit providers, including ferry service, BART, Golden Gate Transit, Caltrain, as well as pedestrians, bicycles, goods movement. The Proposed Project would have significant and unavoidable secondary parking impacts related to effects on transit capacity. Proposed Project construction impacts were determined to be significant and unavoidable.
Thus, the impacts identified in the EIR for the Proposed Project are similar to most of those identified in the 2005 EIR. However, the Proposed Project would not result in significant impacts on ferry service, unlike the project analyzed in the earlier EIR.

The EIR’s traffic analysis focuses on weekday AM and PM peak conditions, and on Saturday midday peak conditions. The weekday AM peak is from 7:00 AM to 9:00 AM. The weekday PM peak is from 4:00 PM to 6:00 PM. The Saturday midday peak is from 1:00 PM to 3:00 PM. These times correspond to the periods when traffic congestion is at its highest levels and, as a result, the period during which Proposed Project impacts are likely to be highest.

2.7.3.2 2006 Transportation Plan

Comment

Vol. 1, IV.E.33, Transportation: Footnote 11: What are the Planned Improvements referred to in the footnote? What population assumptions are they based on? What car ratios are they based on? The fact that full funding for improvements is currently not available doesn’t justify a complete change in project intent. (Kathrin Moore, San Francisco Planning Commission) [20.30]

Response

The transit improvements identified in the 2006 Treasure Island Transportation Plan are similar to those included as part of Mitigation Measure M-TR-2: Expanded Transit Service, discussed on EIR pp. IV.E.74-IV.E.75. As noted in the footnote referenced in the comment, the EIR does not assume full implementation of these services as part of the Proposed Project due to funding uncertainty. Rather, the EIR assumes only those transit services that can be reasonably guaranteed by existing agreements and funding arrangements with relevant transit agencies so that all potential impacts are identified. With implementation of Mitigation Measure M-TR-2, the level and quality of transit service provided to the Proposed Project would be similar to that identified in the 2006 Treasure Island Transportation Plan.

The population assumptions associated with the Proposed Project are generally discussed in Chapter IV.C, Population and Housing. Tables IV.C.3 and IV.C.4, on EIR pp. IV.C.11-IV.C.12, present the population forecasts for the Proposed Project, in terms of new residents and new employment. At full buildout, the Proposed Project would increase the on-site residential population from about 1,820 people to about 18,640 people, and employment is expected to increase from 320 employees to about 2,920 employees. The transportation analysis and ridership projections as presented by the project sponsors in their 2006 Transportation Plan were based on 6,000 units; the analysis in the EIR is based on the current Development Plan uses, presented on EIR p. II.16, including up to 8,000 dwelling units.

It is not clear what the comment is referring to when inquiring about “car ratios”; however, the question is interpreted to mean automobile occupancy rates, or the number of people assumed to

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be in each automobile trip. The EIR includes a discussion of the methodology by which vehicular trip generation was forecasted on pp. IV.E.55-IV.E.61. Footnote 2 in Table 19 of the project’s Transportation Impact Study, included as EIR Appendix C, notes that for most uses, an average vehicle occupancy of 2.0 was assumed; however, trips to the cultural use were assumed to have an average occupancy of 2.3 persons per vehicle. These rates were generally based on the vehicle occupancy rates in the SF Guidelines for auto trips crossing the Bay Bridge for most uses. Exceptions include vehicle occupancy rates for travel to/from the museum/cultural uses, which were based on a study of travel characteristics for patrons of the New York Museum of Modern Art, and for the recreation/sports fields, which were based on previous analyses of sports fields in the Bay Area. Additional detail on the derivation of vehicle occupancy rates is included in the Technical Appendix D to the Transportation Impact Study, available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.

If the comment is referring to parking supply ratios, Table IV.E.22: Permitted Parking Ratios and Maximum Off-Street Car Parking Spaces, on EIR p. IV.E.138, presents the proposed parking supply ratios for the various land uses. The parking supply ratios in EIR Table IV.E.22 are the same as in the 2006 Transportation Plan for residential, retail, hotel, and marina uses. The only difference in parking supply ratios is in office/commercial uses, identified as flex space in the 2006 Transportation Plan. While EIR Table IV.E.22 permits up to 2 spaces for every 1,000 square feet (with a maximum supply of 604 spaces), the 2006 Transportation Plan includes less than 1 space per 1,000 square feet.

It is also possible the comment regarding “car ratios” is referring to the percentage of trips made by automobile or the number of auto trips generated per residential unit, since the comment was made in the context of population assumptions. Table IV.E.5: Person-Trip Generation by Mode on p. IV.E.60 of the EIR shows the net increase in person-trip generation due to the Proposed Project and the percentage of those trips expected to use each mode, including private automobile. The number of auto trips generated per residential unit is also summarized in the Technical Appendix D to the Transportation Impact Study. Specifically, the average auto trip generation rate for trips onto and off of the Islands due to the Proposed Project’s residential uses is 0.14 trips per dwelling unit in the AM peak hour, 0.16 trips per dwelling unit in the PM peak hour, and 0.17 trips per dwelling unit in the Saturday peak hour.

The comment refers to a change in project intent. Traffic improvements identified as part of the Proposed Project in EIR Chapter II, Project Description, including all Transportation Demand Management program features, the base level of transit, congestion pricing, and ramp metering, or adopted as mitigation measures, will have to be implemented if the Proposed Project is approved. The project sponsors have also indicated their intent to work with outside transit agencies to secure the funding and facilities to implement Mitigation Measure M-TR-2.
2.7.3.3 Analysis Approach

Comment

- Please explain the disturbing statement in the Transportation Section of the DEIR which states as follows: “Because the actual phasing of development would be market-driven and is unknown, it was determined that comparing the Proposed Project at full build out against two comparison points would best capture the full range of transportation impacts of the Proposed Project.” (Vedica Puri, President, Telegraph Hill Dwellers) [39.70]

Response

The statement quoted in the comment is intended to explain that the analysis compares full project build-out against existing conditions and against year 2030 cumulative conditions without the Proposed Project. Impacts due to the Proposed Project, individually, can be identified by comparing full buildout of the project to Existing Conditions. The Proposed Project’s contribution to cumulative impacts can be identified by comparing full buildout of the Proposed Project to year 2030 cumulative conditions without the Proposed Project. This is consistent with most other environmental analyses conducted in San Francisco.

Analysis of full buildout of the Development Plan under Existing plus Project conditions provides a conservative assessment of project impacts, since trip generation would be less during the interim years prior to full buildout. Since the analysis included in the EIR presents a reasonable worst-case scenario, additional analysis of the Proposed Project on a phased basis was determined not to be necessary. See also the response in Subsection 2.1.8, Phasing, in Section 2.1 Project Description.

2.7.3.4 Cumulative Impacts

Comment

Vol. 1, IV.E.1f, Transportation: Why does the DEIR fail to provide a cumulative impact analysis that looks at this and other large projects in the pipeline, i.e. Eastern Neighborhoods, Market Octavia, TransBay, Rincon Hill, Bay View Hunters Point? (Kathrin Moore, San Francisco Planning Commission) [20.33]

Response

A cumulative transportation impact analysis was conducted for future year 2030 conditions. Cumulative impacts are identified in Impacts TR-39 through TR-62 in the section titled “Cumulative Impacts” on EIR pp. IV.E.117-IV.E.141. The year 2030 traffic projections used to assess the Proposed Project’s contribution to cumulative impacts account for the projects cited in the comment, as well as other reasonably-foreseeable development, consistent with the Association of Bay Area Governments (“ABAG”) land use growth projections, including growth outside of San Francisco that could affect the transportation facilities analyzed. Appendix M in
the Transportation Impact Study Technical Appendices provides additional detail regarding the future year 2030 cumulative conditions traffic forecasts.

### 2.7.3.5 Future Regional Improvements

**Comment**

And while this isn’t a subject for discussion today, it’s a future subject for -- by other bodies, that being, BART and regional transportation agencies. But we know there will be a time when they look for redundancy to their present tube, and if there is ever a possibility to that linking up to Yerba Buena and Treasure Island, it makes a lot of sense to me. As an additional alternative, to allow people to travel into San Francisco, particularly, easily and quickly, even though the analysis of the Ferry Terminal and those things are quite well analyzed to address the transportation needs. *(Michael Antonini, San Francisco Planning Commission)* [TR.26.2]

**Response**

The suggestion that, as part of a future project, BART consider providing service to Treasure Island and Yerba Buena Island, is noted. With implementation of Mitigation Measure M-TR-2: Expanded Transit Service, transit service would provide adequate capacity, and additional transit service such as that suggested in the comment would not be required. Further, the high-frequency, direct bus and ferry service between the Proposed Project and Downtown employment centers in Oakland and San Francisco would offer a similar quality of service to BART, and would both provide direct connections to BART stations. Therefore, it is unlikely that introducing BART service to the Islands would result in a substantial decrease in automobile traffic compared to implementation of M-TR-2. As a result, while the Proposed Project does not preclude BART service in the future, it is neither planned nor required as a mitigation measure or alternative to reduce significant transportation-related impacts associated with the Proposed Project.

#### 2.7.3.6 Accounting for Density

**Comments**

...we have a totally different area, not connected to the mainland, other than by very attenuous transportation roads. What I’m concerned about is the density of the project as it’s proposed. Density transportation services are intimately linked. *(Ron Miguel, San Francisco Planning Commission)* [TR.25.1]

But I do believe that the density and transportation issues need further examination. In my mind, they have not been linked successfully. *(Ron Miguel, San Francisco Planning Commission)* [TR.25.3]
Response

The comments correctly note a link between density and transportation – a link that is often not adequately accounted for in traditional methods of forecasting travel behavior. In this EIR, the effect of the Proposed Project’s density with respect to influencing vehicle trip generation and its ability to support high-quality and high-frequency transit service is incorporated into the transportation impact analysis. Specifically, EIR pp. IV.E.55-IV.E.61 describe the methodology by which the Proposed Project’s vehicle trip generation was forecasted. As noted in the EIR, traditional methods of calculating trip generation apply static rates to the size of development. However, these methods are insensitive to three of the four factors that have been shown to have a direct influence on travel behavior, known as the 4D’s:

- **Development Scale** – The amount of trips generated increases as the amount of development increases. This is the only one of the 4D’s that is most commonly used to forecast travel demand for new development.

- **Density of the Project** – As development density increases, fewer vehicle trips are generated per unit of development, although the total number of vehicle trips generated may increase. For example, constructing 50 dwelling units on one acre of land may generate 50 peak hour vehicle trips. Constructing 100 dwelling units on that same acre of land may generate 75 vehicle trips – a higher total, but a lower rate per unit of development and fewer trips than if that same 100 units had been constructed over two acres. This phenomenon occurs primarily because as land uses are provided closer together, the distances one must travel between destinations become shorter. Shorter trips are more likely to be made by walking or bicycling, and therefore trips are less likely to be made by automobile in higher density environments. In addition, higher density development, particularly adjacent to transit stops, can encourage transit use, which can then support a higher quality of transit service. As a result, as density increases, vehicle trip generation rates decline.

- **Diversity of Uses** – Proximity of a variety of land uses to each other can also serve to reduce automobile traffic. This occurs because as uses are mixed together, uses become closer together which shortens distances between destinations and trips can be more easily linked together (e.g., a trip from home to a doctor’s office to the grocery store and back home). As a result, as the diversity of proximate uses moves toward an ideal balance, vehicle trip generation rates generally decline.

- **Design** – A walkable, pedestrian- and bicycle-oriented circulation system can help to reduce automobile dependence within a project site. A traditional grid pattern, for example, can substantially reduce distances between destinations compared to a more modern suburban development pattern with curvilinear streets and cul-du-sacs. Similar to density and the diversity of uses within a development, reducing trip distances can encourage walking and cycling and therefore, a development with a more pedestrian- and bicycle-friendly design, including a grid street pattern with good sidewalk coverage can reduce automobile traffic generation.

Unlike traditional transportation analyses, which only account for Development Scale, the analysis conducted for this Proposed Project includes the combined effects of each of the 4D’s.
listed above. As a result, the analysis is based on the latest research regarding travel behavior, including the effects that density has on reducing travel demand. Thus, the analysis does link the Proposed Project’s density to the assessment of transportation impacts and does so in a much more robust manner than typical transportation analyses.

As summarized in Table IV.E.4: Person-Trip Generation by Land Use, on EIR p. IV.E.58, the Proposed Project has been designed and planned in a way such that its relatively high density, mix of uses, and pedestrian- and bicycle-oriented street design would effectively reduce the Proposed Project’s vehicle trip generation by approximately 40 percent, compared to a traditional development pattern and design.

2.7.3.7 Marina – Trip Generation

Comments

- Why was the Clipper Cove Marina project not analyzed in this DEIR? It represents a 400% increase in the size of the Marina, which could have substantial impacts on traffic. It does not matter that it was analyzed in a 2005 FEIR. In 2005, the Development Plan for TI was an entirely different and much smaller project. The impacts of the Clipper Cove Marina project must be analyzed cumulatively in this EIR. (Vedica Puri, President, Telegraph Hill Dwellers) [39.12]

- Why is the Clipper Cove Marina project not analyzed in the DEIR for its cumulative impacts on traffic? This project represents a 400% increase in the size of the Marina and includes the addition of 246 parking spaces (plus 94 temporary parking spaces), which could have a substantial additional impact on traffic that was not considered in this DIER. See the attached Site Plan for the Clipper Cove Marina from the 2005 FEIR, which is attached as Exhibit B. It is irrelevant that the Marina project was analyzed in a 2005 FEIR. Not only was the Treasure Island development plan in 2005 a different and smaller project, but also traffic impacts of the Marina Cove project should have been cumulatively analyzed in this DEIR as a part of Proposed Project in this EIR. (Vedica Puri, President, Telegraph Hill Dwellers) [39.66]

Response

The effects of the Clipper Cove Marina expansion have been incorporated into the cumulative conditions analysis as part of reasonably foreseeable background growth and not as part of the Proposed Project. Although the Marina is not part of the Proposed Project, Table IV.E.4: Person-Trip Generation by Land Use, on p. IV.E.58, includes the trip generation of the Marina use as expanded, for information purposes only. Footnote 2 in the table notes that the trip generation of the Marina is shown for informational purposes, as the Marina is not part of the Proposed Project, but is included as part of the background growth in the cumulative conditions analysis. (See also EIR p. II.10, which states that “The Marina Project waterside improvements are not part of the Proposed Project and are therefore analyzed only as part of the cumulative scenario in this EIR.”)

The 400-slip Marina analyzed in the cumulative conditions analysis in the EIR is consistent with the Marina analyzed under the Maximum Development Alternative in the 2005 Transfer and
Reusing Naval Station Treasure Island Final Environmental Impact Report (State Clearinghouse #199602073). As explained in Chapter II, Project Description, on EIR pp. II.9-II.10, the Marina Project analyzed in the 2005 EIR included both landside and waterside improvements. The landside improvements are no longer being pursued as part of the Marina Project; however, the Proposed Project includes landside improvements along Clipper Cove that would serve either the existing Marina or the expanded Marina Project in the event that the Marina Project is implemented. Construction and operational impacts of these landside improvements are analyzed as part of the Proposed Project in the current EIR.

2.7.3.8 Multimodal Assessment

Comment

But taking a step back, I think many people need to understand that this is an environmental document, and the role of the “CEQA” document here is looking at alternatives in impacts in mitigation. If you just look at the transportation area, which I think is the No. 1 issue with Treasure Island, there’s 141 pages of Section 4E.

If you review this section and compare this to other “CEQA” documents that we have produced as a City, this is the most comprehensive look for getting on and off the island, whether it’s through water taxis or hydrofoil or mass transit for the future. And I think if we take a step back and look at this document, that it’s been very well-prepared when it comes to the transportation era, which actually surprised me. (William Lee, San Francisco Planning Commission) [TR.24.1]

Response

This comment provides general support for the analysis and conclusions described in EIR Section IV.E, Transportation. No additional response is necessary.

2.7.3.9 Traffic Analysis Assumptions

Comments

1. The Traffic Impact Study (TIS) assumes that the ramp meter would be operated at a fixed rate of 550 vehicles per hour (vph). This is not a realistic assumption. The ramp meter would operate in a traffic responsive mode such that the sum of the upstream mainline flow rate and the ramp metering rate would not exceed the downstream mainline capacity. In the westbound direction, the existing mainline meter at the San Francisco Oakland Bay Bridge (SFOBB) Toll Plaza operates to maintain capacity flow on the bridge. We understand that the analysis assumed that the mainline meter would be operated such that the flow on the bridge would be less than capacity to the extent that a 550 vph metering rate at the Yerba Buena Island (YBI) on-ramp could be absorbed by the mainline traffic stream on the SFOBB. Due to current levels of congestion, the Department cannot commit to operate the mainline meter in this manner. It is also questionable whether this level of coordination between the mainline meter and the ramp meter would even be possible. Accordingly, it would be prudent to assume that the current mainline meter operating strategy would be maintained. The analysis should also assume that maximum metering rate at the westbound YBI on-ramp would be set such that the downstream mainline...
capacity would not be exceeded. Practically speaking, this would mean that the metering rate would be approximately equal to the flow rate for the westbound YBI off-ramp. That being the case, the ramp metering rate would be significantly lower than the 550 vph used in the analysis. Therefore, to fully and accurately evaluate the impacts from the proposed redevelopment project, please revise your traffic analysis to use a metering rate that does not exceed the off-ramp flow rate (projected to be 219 vph in the AM peak). (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.1]

10. In Appendix D3 of the TIS, “Congestion Pricing and Ramp Metering Analysis”, the information does not include an analysis of the effect of ramp metering on eastbound vehicle trips from Treasure Island during the PM peak hour. The meter on the on-ramp to eastbound I-80 would likely operate during the PM peak period. Was this analysis performed? (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.10]

5. In Section 4.2 of the TIS, freeway mainline and ramp metering impacts analysis appears to only evaluate peak hours. The report should note that the peak hour impacts would be greater if the demand for the preceding time periods is higher than the capacity, which is likely to occur in the westbound direction for the AM period and the eastbound direction for the PM period. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.5]

6. The analysis of ramp metering impacts appears to assume that HOVs originating on Treasure Island would reach the HOV ramp meter bypass when in the mixed-flow queue. This is not a realistic assumption due to the physical constraints on the roads approaching the on-ramp. If the HOVs remain in the mixed-flow ramp meter queue before reaching the HOV bypass, the ramp meter delays, queue lengths, and number of unserved ramp vehicles should be included in the HOV volumes. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.6]

7. In Section 4.2.1.1 of the TIS, it indicates that VISSIM was used to evaluate the impacts of ramp metering. There is no discussion of model calibration in the report or appendices. Was the model properly calibrated before the analysis? What were the procedures and criteria used for the calibration? (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.7]

8. In Table 38 on page 108 of the TIS, the ramp meter queue lengths are shown for the westbound on-ramp during the AM and PM peak hours. What average vehicle length was used to estimate the queue length? The average vehicle length in ramp meter queues is typically 29 to 30 feet per vehicle. This is slightly greater than the vehicle length used at controlled intersections because vehicles in ramp meter queues are moving rather than stopped. In addition, as noted in a previous comment, the number of unserved ramp vehicles in the peak hour would be higher if ramp demands for the preceding time periods are higher than the metering rates. (Lisa Carboni,
Response

The assumptions used to forecast traffic for and to analyze impacts of the Proposed Project to the regional freeway system, including the on- and off-ramps at Yerba Buena Island, as well as approaches to the Bay Bridge in both San Francisco and the East Bay are as follows:

**Yerba Buena Island Ramps**

A number of the California Department of Transportation’s comments raised questions regarding queuing on the Islands and the effect of ramp metering, specifically the assumed rate at which the meters would operate. The EIR assumes that ramp metering would be installed and would operate at a rate of 550 vehicles per hour. Some comments have suggested an alternative metering rate would be more appropriate. Under a scenario suggested in one comment, the total mainline bridge volume would be held constant; net traffic off and on the Bay Bridge would be zero (westbound trips from Yerba Buena Island onto the West Span of the bridge would be metered such that they would equal westbound trips from the east span of the bridge onto Yerba Buena Island); and thus, there would be no change to the Bay Bridge Toll Plaza metering rate and associated queues and delays as a result of the Proposed Project.

The purpose of the EIR is to describe a reasonable worst-case operating scenario at the time the Proposed Project is built out. In this context, “worst case” means the scenario that would have the largest impact on queues at the Bay Bridge Toll Plaza.

Mainline bridge capacity is finite and fixed in that the bridge can accommodate a specific number of vehicles travelling westbound during the AM peak hour. Because the Toll Plaza is metered, and meters will also be installed at the westbound on-ramps on Yerba Buena Island, Caltrans can allocate this capacity either entirely to the Toll Plaza (as the comment proposes), or a portion of this capacity can be allocated to the Yerba Buena Island on-ramps. The EIR’s traffic analysis assumed that some capacity (550 trips/hour) would be allocated to the Yerba Buena Island on ramps. (The net impact on bridge capacity would be at most 350 trips/hour, due to the fact that approximately 200 westbound vehicles are expected to exit at Yerba Buena Island.) As noted in Impact TR-6 on EIR pp. IV.E.83-IV.E.84, this approach would also result in incrementally longer queues at the Bay Bridge Toll Plaza. This rate was chosen because it is approximately halfway between the rate that does not exceed the westbound off-ramp flow rate (approximately 200 vehicles per hour) and the maximum rate that Caltrans operates ramp meters throughout the State of California (900 vehicles per hour). The traffic analysis took this approach because it was regarded as a reasonable estimate of how Caltrans would allocate main-line capacity on the bridge. This approach was also taken in order to ensure the EIR disclosed the potential for incrementally longer queues during the a.m. peak hour at the Bay Bridge Toll Plaza.
The EIR acknowledges on p. IV.E.84 that metering rates at the Bay Bridge Toll Plaza and at the Yerba Buena Island on-ramps will ultimately be determined not by the City, but by Caltrans. As noted above, metering rates serve as a means of allocating the fixed vehicle capacity of the Bay Bridge. Caltrans may decide to implement metering rates that differ from the metering rates assumed in the EIR’s analysis. In particular, Caltrans may adopt the approach set forth in the comment, or it may allocate a portion of main-line capacity that is lower than 550 trips/hour, or (as the comment states) the allocation may be dynamic and may vary depending on traffic conditions. The purpose of the EIR’s analysis was not to anticipate every conceivable operation of the metering rates, or to determine what metering rates ought to be used by Caltrans. Rather, the purpose was to disclose the plausible “worst-case” impact on Bay Bridge Toll Plaza queues.

If the metering rate at the westbound Yerba Buena Island on-ramp were lower than assumed in the EIR, drivers on the Islands would be subject to longer delays and queues than described in the EIR. While this scenario would present a “worst-case” scenario for traffic on the Islands, it could underestimate potential queuing at the Bay Bridge Toll Plaza. The EIR concludes in Impact TR-3, on pp. IV.E.75-IV.E.80, that queues on the westbound on-ramps from the Islands onto the west span of the Bay Bridge represent a significant and unavoidable impact. This impact would occur regardless of the metering rates implemented by Caltrans at the Yerba Buena Island on-ramps. If the rate on the on-ramps were lower than assumed in the EIR, queues would likely increase by a corresponding amount. For example, if the metering rate were reduced by 100 vehicles per hour, the maximum queue would be increased by approximately 100 vehicles, so long as demand volumes in the hour following the peak hour were lower than the metering rate and queues were able to dissipate after the peak hour. In this case, Mitigation Measures M-TR-2, Enhanced Transit Service, and M-TR-25, Transit Only Lane, would be triggered sooner.

A comment also suggests that the analysis described in the EIR assumed some level of coordination between the meters at the Yerba Buena Island and those at the Bay Bridge Toll Plaza, such that rates could be dynamically coordinated, and notes that this level of coordination may not be feasible. However, the analysis does not assume a high degree of communication between the westbound Yerba Buena Island on-ramp metering hardware and the Bay Bridge Toll Plaza metering hardware as suggested in the comment. Rather, the changes in metering rates at the Bay Bridge Toll Plaza were assumed to operate independently, with lower metering rates and a reduction in capacity as a by-product of higher traffic demand on the bridge.

Ramp metering was also assumed on the eastbound on-ramp to the Bay Bridge. Based on the forecasted traffic volumes (presented in Figure IV.E.18: Existing plus Project Bay Bridge Travel Demand (No New Westbound On-Ramps), on EIR p. IV.E.77), the eastbound on-ramp to the Bay Bridge would have a total demand of fewer than 550 vehicles (i.e., 322 vehicles during the weekday AM peak hour, 429 vehicles during the weekday PM peak hour, and 489 vehicles during the Saturday peak hour). If operated similar to the westbound on-ramp (i.e., metered at
550 vehicles per hour), ramp metering lights on the eastbound on-ramp may cause minor queuing on the on-ramp due to short-term fluctuations in demand approaching the ramp; however, the queue and delay experienced by eastbound vehicles is expected to be negligible since the ramp demand volume would be lower than the ramp meter capacity. Alternatively, if operated as suggested by Caltrans, the metering rate for traffic entering the eastbound Bay Bridge would be set at a rate equivalent to the amount of eastbound traffic exiting the Bay Bridge to the Islands. Because the amount of eastbound traffic expected to exit the Bridge to the Islands exceeds the amount of traffic forecasted to enter the eastbound Bay Bridge from the Islands in each of the three peak hours, the ramp metering rate for eastbound traffic would always exceed the demand, similar to the scenario described in the EIR. Therefore, whether operated as assumed in the EIR or as proposed by Caltrans, the metering rate would always exceed the demand. For this reason, detailed analysis of the effects of the ramp meter on the eastbound on-ramp is not required.

Some comments also correctly note that peak hour impacts at the ramp meters on the Islands could be exacerbated by heavier demand preceding the peak hour if that demand exceeded capacity and queues began to form prior to the peak hour. In this case, the Yerba Buena Island on-ramp queues presented in Section 4.2 of the Transportation Impact Study and shown in Figure IV.E.19: Existing plus Project Maximum On-Island Queue, on EIR p. IV.E.79, may not reflect the full extent of queuing. To evaluate this potential, the analysis examined data from other on-ramps along the I-80 corridor, to provide a comparison set of ramp volumes that could be applied to the Yerba Buena Island ramps. Specifically, count data was obtained from the Caltrans’ PeMS count database for the on-ramps to I-80 at Powell Street, Ashby Avenue, and University Avenue. The counts on these ramps showed that ramp volumes between 6:00 and 7:00 AM hour were approximately 52 percent lower than the 7:00 to 8:00 AM hour. The highest observed percentage difference was 61 percent, which was observed at Powell Street.

Assuming that the westbound on-ramp on Yerba Buena Island has a pre-peak hour demand volume that is 61 percent of the peak hour volume, the ramp would have a demand volume of approximately 600 vehicles between 6:00 and 7:00 AM under Existing plus Project conditions. If the ramp meter processes 550 vehicles per hour (“vph”), excluding high occupancy vehicles (“HOV”), and approximately 7.5 percent of vehicles use the HOV bypass lane (approximately half of what was assumed to occur during the peak hour), the westbound on-ramp would have a vehicle queue of five vehicles remaining at the beginning of the peak hour. This queue would be negligible and would not substantially affect the results of the ramp analysis in the TIS or EIR. Conclusions presented in Impacts TR-2 through TR-7 and TR-40 through TR-45 would not change. If the metering rate ultimately implemented was lower than assumed in the EIR, it is possible that residual queues would exceed five vehicles and on-island queues would consist of unserved demand from the peak hour as well as residual queuing from unserved demand preceding the peak hour. As a result, as noted on EIR p. IV.E.84, if the ramp meters were
operated with a lower metering rate than assumed in the EIR, queues on the Islands may be longer than reported.

Other comments noted that although HOV’s are anticipated to receive a ramp metering bypass lane, they may still be caught in queues in the lanes leading up to the on-ramps, such that simply removing them from the analysis may underestimate the total length of approach queues. However, the ramp queuing and average delays presented in Table IV.E.13: Maximum On-Ramp Queues and Average Delays – Existing plus Project Conditions, on EIR p. IV.E.78, include HOVs unable to reach the HOV bypass ramp. The analysis was conducted using the VISSIM microsimulation software, which simulates the entire network, including the effects of HOVs as a percentage of the total volume approaching the westbound on-ramp. Therefore, the physical constraints of HOVs stuck in queues approaching their bypass lane are accounted for in the analysis of queuing impacts on the Islands. Conversely, the ramp junction analysis presented in Table IV.E.12: Ramp Junction Analysis – Proposed Project, and Project with Mitigation Measure M-TR-2 (Expanded Transit Service), on EIR p. IV.E.76, assumes that all HOVs would reach the Bay Bridge mainline during the peak hour, without being constrained by on-island queues. This presents a conservative analysis of the ramp junction because it may over-estimate the number of vehicles reaching the junction.

The VISSIM microsimulation analysis accounts for typical vehicle spacing and sizes and for the fact that queues at ramp meters may be slowly moving, as suggested in the comment. The vehicle mix used in the analysis included standard passenger vehicles, smaller vehicles, and heavy vehicles, including vans, buses, delivery vehicles, and large trucks.

The VISSIM software was used to estimate maximum queue lengths and ramp meter delays for the westbound on-ramp on Yerba Buena Island so that the physical constraints of the approach roadway network and the somewhat complex and interactive traffic streams referenced in the response to another comment (Subsection 2.7.3.11, Traffic Impact Analysis) could be accurately analyzed. Ramp geometrics, traffic control devices, speeds, and storage lengths for the existing and proposed ramp configurations were based on aerial photography and data from the Project Study Report (PDS) to Request Programming for Capital Support (December 2007) for the Yerba Buena Island Ramps Improvement Project that was prepared by Caltrans. Existing traffic volumes were obtained from the ramp and mainline volume counts conducted in May 2008 for the analysis of the Treasure Island / Yerba Buena Island Redevelopment Project. For scenarios that assumed reconstruction of the westbound ramps, the operations of the existing ramps were not useful in calibrating the VISSIM model because the reconstruction of the westbound on-ramp proposed by the Yerba Buena Island Ramps Improvement Project would fundamentally change how the ramps would function, and because there is very little activity on the existing ramps with which to calibrate a model. Instead, the model’s default driver behavior calibration statistics, which are based on detailed research described in the model’s user manual, were used given the
lack of sufficient similarities between the existing conditions and the scenario analyzed using the model.

For scenarios that did not involve the westbound ramp reconstruction, in which case both westbound on-ramps would remain open to mixed traffic and would remain stop sign controlled, observations were conducted of existing traffic to determine the typical minimum “gap” in traffic that drivers on the on-ramp were willing to use to merge onto the Bay Bridge. This information was coded into the VISSIM model to determine the capacity of the on-ramps, given typical traffic patterns on the Bay Bridge mainline. These observations were conducted prior to the opening of the so-called “S-Curve” temporary bridge structure on the east side of Yerba Buena Island.

The model was run 10 times and the runs were compared to ensure that traffic volumes on the ramp met the expected ramp volumes shown in the EIR. Using the model results, demand volume served, queuing, and time spent in delay were reported in Figure IV.E.17: Existing plus Project Bay Bridge Travel Demand (With New Westbound On-Ramps), and Figure IV.E.18 and in Table IV.E.13: Maximum On-Ramp Queues and Average Delays – Existing plus Project Conditions, on EIR pp. IV.E.73, IV.E.77, and IV.E.78, respectively.

A comment suggested that if substantial queues begin to form on the Islands, it may be advisable to restrict vehicular access from the Islands to the Bay Bridge to HOVs only during peak periods. The roads that would access the property would be public roads that are subject to the Tidelands Trust. Restricting access to these roads to only certain members of the travelling public (i.e. those in high occupancy vehicles) would be a violation of the state vehicle code and the Trust doctrine. Moreover, on a practical level this arrangement was not considered to be a feasible mitigation measure, as it might prohibit emergency travel by some residents. For example, a parent working at home whose child had an emergency somewhere off the Islands that was not accessible by transit during peak periods might not be able to leave the Islands to reach his or her child.

The project sponsor has indicated that as part of the sales brochure for residential units, information related to the transportation program for the Islands would be provided. This would include information on the TITMA, its TDM programs, transit services to San Francisco and the East Bay, on-island shuttles, the congestion pricing program, and use of ramp metering. The transportation program insert would describe the mechanics of the congestion pricing program

2 AB981, the legislation that authorizes the TITMA and the congestion pricing states, “Program elements shall not interfere with the provision of public access to public trust lands consistent with the beneficial use of those lands, including, but not limited to, roadway access to serve the public along the western shoreline of Treasure Island.” Program elements, such as limiting road access to only HOVs, and/or alternative fuel vehicles, would interfere with the provision of public access to public trust lands and therefore, would be in violation of the law.
and how the TITMA may change the terms over time, disclose that the ramp metering rates will be selected by Caltrans and may vary, and describe the roles and responsibilities of the various parties involved in providing transit services, TDM programs and congestion control measures on the Islands.

**Bay Bridge Approaches**

In addition to comments related to ramp metering and queues on the Islands approaching on-ramps, there were several comments related to the analysis of queuing on approaches to the Bay Bridge. Queues on the westbound approach to the Bay Bridge at the Toll Plaza are identified, and the amount of traffic remaining in these queues approaching the Bay Bridge is quantified, and assumed to be unserved demand, or demand exceeding the capacity of the Bay Bridge.

Similar to the comment regarding residual queues at on-ramps due to over-capacity traffic volumes during the hour preceding the peak hour, a comment suggested that some residual queues exist at the Toll Plaza preceding the peak hour, and therefore, the entire queue should not be considered unserved hourly demand. Existing peak hour demand and associated queuing at the Bay Bridge Toll Plaza was based on the average of maximum queues observed during aerial and floating car surveys conducted over three days in May 2008. These surveys captured conditions at the Bay Bridge Toll Plaza during a typical mid-week period, which, as described in Subsection 2.7.1.1, Traffic Setting – Bay Bridge Demand, did vary from day to day. On at least one of the observation days, residual queues from an incident that occurred prior to the peak period were present and inclusion of the entire queue (rather than the increase) on this day likely results in a conservatively high estimate of unserved demand. This observation was averaged with observations made under more typical conditions in which residual queues were not present. Ultimately, a conservatively high estimate of existing demand for travel on the Bay Bridge does not affect the conclusions described in the EIR – namely that the Proposed Project could increase queues at the Toll Plaza both due to trips traveling to the site from the East Bay and due to a reduction in metering rate at the Toll Plaza to allow trips from the Project Site to enter the westbound Bay Bridge.

### 2.7.3.10 Traffic Baseline

**Comment**

The Draft Transportation Plan for Treasure and Yerba Buena Islands (“DTP”), which plan is part of the DEIR states, “[T]otal peak period vehicle trips should be similar to the number of trips generated when Treasure Island was operating as a Naval Base.” There has been no analysis by the DEIR (or elsewhere) that the previous naval traffic was an acceptable burden then or would now be an acceptable burden; such is especially true in light of the fact that no one would seriously argue that traffic on the Bay Bridge has decreased since the closure of the Naval Base. The DEIR’s baseline traffic data should be compared to current conditions and not outdated and
inaccurate data. Historical traffic data should not be considered part of the current environmental setting. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.16]

Response

The language quoted in the comment is not from the EIR but from the Draft Transportation Plan, which was prepared by the project sponsors in 2006. The EIR does not rely on the analysis performed for the 2006 Draft Transportation Plan. As noted on EIR p. IV.E.47, the traffic impact analysis in the EIR compares existing conditions with the Proposed Project to existing conditions without the Proposed Project, and not to conditions when the Naval Station was in operation on the Islands. Existing conditions without the Proposed Project were established via field research as described in the TIS pp. 42 - 44, included as EIR Appendix C. Therefore, the conditions when the Naval Station was in operation are not part of the environmental setting or environmental baseline for the EIR analyses.

The “baseline” or environmental setting against which the impacts of the project are measured normally consists of physical conditions as they exist at the time the lead agency publishes the Notice of Preparation (“NOP”) for a project (CEQA Guidelines, Section 15125(a)). CEQA authorizes agencies to use an alternative baseline where the project at issue consists of a reuse plan for a military base; under this section, the “baseline” may instead consist of conditions as they existed at the time the Federal government made the base closure decision (CEQA Section 21083.8.1). In this case, however, this “alternative baseline” was not used. Rather, baseline conditions were defined as those that existed at the time of the NOP, which was in January 2008. This approach is more conservative than the approach authorized by CEQA Section 21083.8.1.

2.7.3.11 Traffic Impact Analysis

Comment

9. Using the 550 vph ramp metering rate assumed in the analysis, the ramp meter delays shown in Table 38 do not correspond with our calculation of delays for unserved ramp demands shown in Figures 21, 25, and 30. Please discuss how the unserved ramp demands are calculated. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.9]

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3 Since publication of the Draft EIR, the California Appellate Court (6th District) issued a decision, Sunnyvale West Neighborhood Association v. City of Sunnyvale Council (2010), that, among other things, found that a Proposed Project’s environmental impacts should be evaluated by comparing full buildout of the Proposed Project with existing conditions. The analysis conducted in this EIR is consistent with the findings of that case in that only those changes associated with the Proposed Project have been added to existing conditions to evaluate project impacts. An analysis of the Proposed Project’s contribution to significant future cumulative impacts is presented separately in the EIR.
Response

Figure 21 (EIR Figure IV.E.17: Existing plus Project Bay Bridge Travel Demand (With New Westbound On-Ramps), on EIR p. IV.E.73) and Figure 30 of the TIS present unserved demand for the Existing Plus Project and Existing Plus Reduced Development Project, respectively, and assume the reconstruction of the westbound on-ramp on Yerba Buena Island. Since the reconstructed ramps were assumed to be metered at a rate of 550 vph, unserved demand was assumed to be equal to total ramp demand minus demand served at the ramp meter (550 vph) minus HOVs\(^4\) (which would enter the mainline via a bypass lane). In other words, the total number of vehicles that would be permitted to enter the Bay Bridge mainline from the reconstructed westbound on-ramp during the peak hours would be 550 single-occupant vehicles plus all HOVs. This is consistent with the operation of other ramp meters operated by Caltrans, in which a metering rate is set for vehicles with one or two occupants and HOVs with three or more occupants are metered based on demand.

Figure 25 of the TIS presents unserved demand for the Existing plus Project with Mitigation Measure M-TR-2 (described on EIR p. IV.E.74) without the reconstructed westbound on-ramps. Without the reconstructed westbound on-ramp, the existing ramps were assumed to have a capacity to serve 375 vph, based on field observations of the existing on-ramp. Under the scenario where the westbound on-ramps are not reconstructed, both existing westbound on-ramps to the Bay Bridge would be open to mixed-flow traffic. Therefore, the unserved demand in this scenario would be equal to the total westbound on-ramp demand minus 750 vph (or the combined capacity of both westbound on-ramps).

The figures the comment references are illustrative to indicate where demand would be concentrated and where capacity constraints would be located; however, the actual analysis of delays and queues at the westbound on-ramps is based on the VISSIM microsimulation analysis, which accounts for the ability (or lack thereof) of HOVs to bypass the queue. Table C&R.1, below, summarizes the demand volumes, the ramp capacity, and the unserved demand for each scenario evaluated in the EIR.

\(^4\) For purposes of this analysis, HOV facilities leading from the Islands to the Bay Bridge were assumed to be for HOVs with three or more occupants, consistent with other HOV facilities leading toward the Bay Bridge. Vehicles with two occupants were assumed to not be allowed to use the HOV lane.
# Table C&R.1: Yerba Buena Island Westbound On-Ramp Demand and Capacity

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Westbound On-Ramp Demand Volume [AM (PM) Peak Hour]</th>
<th>Reconstructed Westbound On-Ramps</th>
<th>Existing On-Ramps</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Capacity</td>
<td>Unserved Demand</td>
<td>Capacity</td>
</tr>
<tr>
<td>Existing Plus Project</td>
<td>983 (984)</td>
<td>293 (301)</td>
<td>233 (234)</td>
</tr>
<tr>
<td>Existing Plus Reduced Development Project</td>
<td>782 (899)</td>
<td>118 (227)</td>
<td>32 (149)</td>
</tr>
<tr>
<td>Existing Plus Project w/ MM-TR2</td>
<td>768 (819)</td>
<td>106 (159)</td>
<td>18 (69)</td>
</tr>
<tr>
<td>Existing Plus Reduced Development Project w/ MM-TR2</td>
<td>638 (750)</td>
<td>0 (101)</td>
<td>0 (0)</td>
</tr>
</tbody>
</table>

**Notes:**

1. Based on a ramp metering rate of 550 vehicles per hour. As noted in the table and the discussion above, the 550 vehicle-per-hour metering rate applies only to vehicles with one or two occupants. HOVs with three or more occupants would be metered based on demand. Thus, the total number of vehicles that could enter the Bay Bridge mainline from the reconstructed westbound on-ramp is 550 vehicles with one or two occupants per hour plus all HOVs with three or more occupants. The existing westbound on-ramp on the west side of Yerba Buena Island would be converted to a transit and emergency vehicle only on-ramp.

2. Based on observations of the existing westbound on-ramp on Yerba Buena Island. Existing on-ramps would be unmetered; however, due to the current configuration of the ramps, capacity would be approximately 375 vehicles per hour per ramp. Total capacity represents both existing westbound on-ramps on Yerba Buena Island open to mixed-flow traffic.

**Source:** Treasure Island and Yerba Buena Island Redevelopment Plan TIS, Fehr & Peers, 2010.

Finally, as a point of clarification, the figures referenced in the comment present total hourly unserved demand. Table 38 of the TIS presents the average travel time and the maximum queue. Vehicles traveling through the maximum queue will have a longer travel time than the average travel time presented in Table 38.

## 2.7.3.12 Trip Distribution

### Comments

I also could not find, although it probably exists in some appendix, where they would work. I was really curious how many would be working in the East Bay, for example. *(John Elberling, Director, TIDA Board)* [TR.23.2]

And I’m curious to what extent many of the TI residents may, in fact, be working in the East Bay, which is very consequential for the EIR. There is probably an estimate. I just couldn’t find it. *(John Elberling, Director, TIDA Board)* [TR.23.3]

I do want to echo Commissioner Elberling’s comments about the East Bay, the link to the East Bay and those jobs. I think that had not been adequately addressed in this document *(Jean-Paul Samaha, Director, TIDA Board)* [TR.27.1]
Response

The geographic distribution of project-related trips is summarized in Table IV.E.6: Proposed Project Trip Distribution Patterns, on EIR p. IV.E.61. Overall, approximately 20 percent of project-related trips are expected to travel between the Proposed Project and the East Bay, 12 percent would travel between the Proposed Project and the South Bay (including all of San Mateo County), 3 percent would travel between the Proposed Project and the North Bay, and 64 percent would travel between the Proposed Project and the City of San Francisco. However, those percentages are inclusive of all trips to and from the Islands. Some comments specifically requested information regarding the geographic distribution of trips associated with those made by residents of the Proposed Project to and from work. Table C&R-2, below, summarizes the distribution of person-trips (including trips made by auto, bus, and ferry) for work trips generated by the Proposed Project during the weekday AM and PM peak hours. Since substantially fewer trips during the Saturday peak hour are work trips, those trips are not summarized in Table C&R.2.

Table C&R.2: Geographic Distribution of Project-Generated Residential Work Person-Trips

<table>
<thead>
<tr>
<th>Peak Hour</th>
<th>San Francisco</th>
<th>East Bay</th>
<th>North Bay</th>
<th>South Bay(^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AM Peak Hour</td>
<td>838 (54%)</td>
<td>279 (18%)</td>
<td>47 (3%)</td>
<td>388 (25%)</td>
</tr>
<tr>
<td>PM Peak Hour</td>
<td>946 (54%)</td>
<td>315 (18%)</td>
<td>53 (3%)</td>
<td>438 (25%)</td>
</tr>
</tbody>
</table>

Notes:
\(^1\) Includes all of San Mateo County, as well as points south.


2.7.3.13 Trip Generation

Comment

We find the following statement in the DEIR disturbing. “18 Family-sized units are those with two or more bedrooms. While 20 percent of the units is the minimum proposed number of family-sized units, a larger number was used for the purpose of analyzing transportation impacts, since the Proposed Project is likely to include more than the minimum number of family-sized units. As described in more detail in Section IV.E, Transportation, trip generation rates for units of two bedrooms or more are higher than those for one bedroom or less. This EIR assumes that the proposed 8,000 residences would include about 2,005 studio and one-bedroom units, and about 5,995 units with two or more bedrooms, resulting in a larger travel demand than would result with the minimum number of family-sized units.”

We understand the rationale provided later in the document however there is still the fact that a certain dwelling unit may not be occupied by people of the same demographic throughout its lifetime. A young couple could buy a 1-bedroom condo and live there even after having a baby (at least for a little while). They might sell it to some empty nesters, but later it might get sold to another young couple who wind up starting a family there. The assumption that family oriented housing would generate more or less trips just seems too precise given the variables involved.
Given that it is equally likely that with the amenities proposed and in place work force housing, Treasure Island and Yerba Buena Islands could do much more with regard to addressing the City’s need for dramatically increasing its stock of family oriented housing. Please provide further evidence that family housing will negatively impact the transit/traffic issues. (Saul Bloom, Arc Ecology) [28.5]

Response
This comment refers to Footnote 18, on EIR p. II.24 in Chapter II, Project Description. Text on that page of the EIR notes that 20 percent of dwelling units proposed by the Project would be “family-sized.” The footnote defines “family-sized units” as those with two or more bedrooms. The footnote goes on to say that the transportation analysis differentiated the travel behavior characteristics between “family-sized” units and for smaller units. Further, the footnote adds that, to be conservative, the transportation analysis assumed a larger number of “family-sized” units than 20 percent.

The footnote is incorrect. The transportation analysis does not distinguish travel behavior characteristics by the number of bedrooms in a particular unit. Instead, the transportation analysis applies an average trip generation rate for all dwelling units that accounts for the diverse range of occupants (both in terms of number of occupants and their travel characteristics) that may be present in all units, as suggested by the comment. Footnote 18 on EIR p. II.24 is revised as follows:

18 Family-sized units are those with two or more bedrooms. While 20 percent of the units is the minimum proposed number of family-sized units, a larger number was used for the purpose of analyzing transportation impacts, since the Proposed Project is likely to include more than the minimum number of family-sized units. As described in more detail in Section IV.E, Transportation, trip generation rates for units of two bedrooms or more are higher than those for one bedroom or less. This EIR assumes that the proposed 8,000 residences would include about 2,005 studio and one-bedroom units, and about 5,995 units with two or more bedrooms, resulting in a larger travel demand than would result with the minimum number of family-sized units.

2.7.3.14 Trip Generation - Parking

Comment
One problem is that this DEIR, like many others, uses a traditional method of determining transportation mode based on residential origin and attractions to a destination. This method doesn’t work for automobile trips, which require a parking place near the residential origin and another parking place near the destination. If either end of the trip does not have parking the auto trip cannot take place. Congestion happens on roadways between areas of more than ample parking. City policy in San Francisco recognized this statement as true, when, over forty years ago, we limited the supply of parking in the central business district to low maximums when every other community was requiring high minimums. We also improved transit as the way to reduce increases in congestion. This truth of how well this worked is demonstrated by an observation: Throughout the Bay Area over 90% of people drive to work in their own car.
However, in downtown San Francisco, where parking is limited and expensive over 50% get to work without their own car. The drivers and non-drivers are neighbors and similar people. The difference is the availability of parking. A deficiency in this EIR, and this project, is that the traditional method of analysis provides no incentive for the developer to consider an alternative with less parking and therefore fewer transportation impacts. The DEIR analysis should be corrected to reflect the availability of parking. (Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group) [35.2]

Response

As noted on EIR p. IV.E.57, the percentage of total trips forecasted to use travel modes other than the private automobile was based on surveys of travel behavior conducted within San Francisco, where parking conditions, at both the origin and destination ends of trips, are constrained in a manner similar to conditions expected on Treasure Island. Therefore, the effect of a constrained parking supply is reflected in the analysis. EIR p. IV.E.138 presents the maximum permitted parking ratios, while EIR p. IV.E.129 presents the proposed residential and non-residential parking supply.

In response to this and other comments, a new project alternative has been included. See Subsection 2.21.2, Reduced Parking Alternative, in Section 2.21, Alternatives, of this Comments and Responses document, for an analysis of a Reduced Parking Alternative added to the EIR.

2.7.3.15 Trip Generation – Retail and Sports Facility

Comments

- How much traffic would be generated by these regional-serving retail uses? (Vedica Puri, President, Telegraph Hill Dwellers) [39.63]

- As to the proposed 25-40 acre regional sports complex with baseball diamonds, soccer fields and other sports facilities, how many people/private automobiles will the sports events attract? (Vedica Puri, President, Telegraph Hill Dwellers) [39.64]

Response

Table IV.E.4: Person-Trip Generation by Land Use, on EIR p. IV.E.58, identifies the total number of person-trips expected to be generated by each land use included in the Proposed Project, with both regional and neighborhood serving uses included under the “Retail” land use. The regional retail uses would generate approximately 103 external vehicle trips in the AM peak hour, 297 external vehicle trips in the PM peak hour, and 311 external vehicle trips during the Saturday midday peak hour. The vehicle trips generated by the regional retail uses represent 6 percent of the net-new project-generated AM peak hour vehicle trips, 12 percent of the PM peak hour vehicle trips, and 11 percent of the Saturday midday peak hour vehicle trips.
Scheduled games at the athletic fields would not begin prior to 6:30 PM on weekday evenings (30 minutes after the evening peak hour). Although there would be little activity at the fields during the evening peak hour, the analysis conservatively assumes that each field would be in use each night, each player would arrive with one spectator, and that up to 50 percent of players and spectators would arrive during the peak hour (at least 30 minutes early).

Table IV.E.4 identifies the total number of person-trips expected to be generated by each land use included in the Proposed Project. As shown in the table, the athletic fields would not generate any trips in the AM peak hour, approximately 700 person-trips in the PM peak hour, and 1,400 person-trips during the Saturday peak hour. Some of these trips would be internal to the Islands, and some of the external trips would use transit. The analysis assumes an average vehicle occupancy of 2.0. The athletic fields would generate about 167 external vehicle trips in the PM peak hour and 325 external vehicle trips in the Saturday midday peak hour. The vehicle trips generated by the athletic fields represent 7 percent of the net-new project-generated PM peak hour vehicle trips, and 11 percent of the Saturday midday peak hour vehicle trips.

2.7.3.16 Cumulative Transit Improvement Assumptions

Comment

Another problem with usual method of environmental analysis is considering generally predicted population and land use cumulative impacts but only considering transportation improvements with completed designs, authorization and funding. Bus speeds and ridership should be reanalyzed based on predicted system improvements including: proof-of-payment; low floor buses; congestion pricing and other system changes which will reduce running time. This problem was demonstrated by the Central Subway FEIR which predicted surface transit running times through downtown that will be 50% greater in 2030 than today because of increased congestion, but did not consider transit improvements. This means that automobile drivers will experience about a doubling of their driving time in the downtown because they don’t spend time while passengers get on or off the bus or while the bus struggles to get back into a moving traffic lane. San Francisco knows that drivers will find this delay unacceptable and while congestion pricing is only a study, at this time, something will happen to reduce future driving, even if it is not expected. Further, in San Francisco when an EIR predicts increasing transit demand this is not an adverse impact but rather a public service prediction to warn Muni of future needs to allow them to plan for the additional transit capacity required. *(Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group)* [35.3]

Response

The purpose of the EIR is to disclose to decision-makers potential impacts associated with the Proposed Project, based on reasonably-foreseeable future conditions. It would be speculative for the analysis presented in the EIR to assume future unfunded and unapproved improvements that would benefit any individual mode, and the resulting analysis may underestimate potential project-related impacts.
The comment states that “in San Francisco when an EIR predicts increasing transit demand this is not an adverse impact but rather a public service prediction to warn Muni of future needs to allow them to plan for the additional transit capacity required.” This statement is incorrect. CEQA allows the lead agency the discretion to determine locally-appropriate thresholds for identifying significant environmental impacts. As noted on EIR p. IV.E.28, the Planning Department’s Initial Study Checklist provides the framework for evaluating a project’s impact under CEQA. This checklist notes that implementation of a project could have a significant impact on transportation if the project were to “conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel……” The City has established a capacity utilization threshold of 85 percent for transit service. As a result, if the Proposed Project were to result in demand exceeding available capacity, it would be considered a significant impact on transit capacity.

2.7.4 TRAVEL DEMAND MANAGEMENT

2.7.4.1 Congestion Pricing

Comments

Section IV, page IV.E.45 - Would USCG personnel be subject to any “congestion fees” to be imposed by TITMA? Please clarify. Based on previous discussions the USCG believes it will not be subject to these fees and would like the exclusion to be mentioned in the DEIR text. (P. M. McMillin, Captain, U. S. Coast Guard) [10.15]

Furthermore, as part of implementing the Project, the Treasure Island Transportation Management Act (“TITMA”) would administer a variable congestion fee to those accessing the Bay Bridge (at IV. Environmental Setting and Impacts E. Transportation, Page IV.E.45.) In other words, fees would be charged for auto access between the Bay Bridge and TI/YBI during periods of peak congestion. This “congestion pricing” program is designed to discourage residents from making auto trips during peak travel periods and encourage other modes of travel to and from TI/YBI. The amounts and hours that fees would be charged would be controlled by the TITMA. However, individuals can simply circumvent the higher price for this fee by leaving or entering the islands at different time periods. Therefore, the revenue is uncertain as well as its effect on car ownership/traffic. Consequently, the primary purpose of TITMA will be significantly underfunded and/or frustrated to the point of being ineffectual – all of which is a significant impact that should be addressed in the DEIR. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.15]

A. The EIR reveals plans to implement congestion pricing. During both the a.m. and p.m. peak hours, in both the eastbound and westbound directions, residents entering or exiting the islands would be subject to a $5.00 toll. However, the EIR reveals that visitors are not subject to this fee, nor carpools of at least three people. What is the rationale for not charging visitors a fee as properly priced parking fees for visitors could dramatically reduce congestion? (Saul Bloom, Arc Ecology) [28.1]
14) Saturday traffic congestion indicates a need for inclusion of Saturday congestion pricing. and the EIR should analyze and compare Saturday congestion with and without Saturday congestion pricing (Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group) [35.6]

Response

As currently proposed, only residents of the Islands would be subject to congestion pricing fees. However, the congestion pricing program is intended to be flexible, and over time the TITMA could vary who will be subject to congestion fees and the amount of those fees. TIDA is expected to execute a Memorandum of Understanding (“MOU”) with the Coast Guard prior to implementation of the Proposed Project that would prohibit TITMA from charging Coast Guard employees the congestion fee. Coast Guard traffic was not assumed to be subject to congestion pricing fees in the analysis presented in the EIR. To clarify this point, the following new sentence is added to the paragraph regarding “Congestion Pricing” on EIR p. IV.E.45 (new text is underlined):

Visitors to the Islands, high-occupancy vehicles, and Coast Guard-related vehicles would not be charged a congestion pricing fee.

The steps by which vehicle trip generation forecasts were prepared are summarized on EIR p. IV.E.57. In summary, the first several steps in the process result in forecasts of vehicle trips entering and leaving the Islands during peak periods assuming no congestion pricing. The last step identifies the effects of implementing congestion pricing. If the congestion pricing program is effective, it would reduce the number of vehicle trips that travel onto or off of the Islands during peak periods, incrementally reducing the revenue generated by the pricing program, as suggested in one of the comments. However, the revenue projections included in the Transportation Implementation Plan attached to the DDA are based on the EIR’s trip generation forecasts, and therefore, account for the effects of congestion pricing at reducing peak period automobile travel. As such, the forecast of funding is accurate. TITMA would have the authority to modify the amount charged and the times during which congestion pricing fees apply. It is unlikely that TITMA would administer a pricing program that would result in severe revenue shortfalls for transit and other transportation services, because TITMA would be ultimately responsible for dispersing funds to those services as well.

As currently proposed, visitors to the Islands would not be subject to the same congestion pricing fee for entering or exiting the Bay Bridge that would apply to residents. Instead, visitors that travel to and from the Islands by auto would be subject to other fees, namely parking fees, which could vary by time of day. The effect of varied parking pricing would be similar to the effects of congestion pricing, in that both increase the out-of-pocket costs associated with driving and therefore, influence travel choices. Charging visitor trips both congestion pricing and variable parking fees would not yield extra revenue, as the amount that could be charged for each would
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have to be reduced. Similarly, as currently proposed, Saturday travel would not be subject to congestion pricing fees, although TITMA could decide to implement pricing for Saturday conditions in the future.

As indicated in the comment, HOVs would not be subject to the congestion pricing fee. AB 981, the legislation that authorizes TITMA and the congestion pricing states that “HOVs [shall] be permitted to enter and exit Treasure Island without paying the fee.” This legislative requirement cannot be altered by TITMA.

TITMA has been designed to be a flexible and responsive agency, authorized with the discretion and authority to dynamically adjust a variety of transportation programs on the Islands, including administering the congestion fee program, parking pricing, the on-island shuttle, and various other Transportation Demand Management elements. This flexibility would allow TITMA to direct resources into the most effective programs. Specific and binding requirements, either as mitigation measures or as project elements, for a specific amount, time period, or group to charge congestion fees would not allow TITMA to be responsive to changing travel patterns and characteristics, and were therefore, not considered feasible or practical.

2.7.4.2 Parking Demand

Comment

B. The EIR estimated parking demand based on the San Francisco Planning Department’s 2002 Transportation Impact Analysis Guidelines for Environmental Review. The parking analysis also considered that different land uses reach their peak parking demand at different times of day. As a result of utilizing these guidelines, a peak demand of 10,162 residential spaces (including residential visitors) and 2,138 nonresidential spaces was identified. This equates to a shortfall of 2,162 residential parking spaces and a surplus of 1,015 nonresidential spaces. Residential visitors could seek parking in on- or off-street nonresidential parking spaces, but an ultimate shortfall of 1,147 parking spaces is anticipated. In other words, the proposed project allows a maximum parking supply of 91 percent of anticipated demand based on parking utilization rates in the City of San Francisco. Because no minimum parking requirements are being established, the shortfall when construction is completed could be greater.

Mandating further reductions of nonresidential parking may not be productive. Residents who are provided with transit alternatives and required to pay each time they exit and enter the islands would be incentivized to use public transit instead of driving. However, visitors to the islands have chosen their mode of travel without knowing whether a space is available to them. If insufficient parking is available when a vehicle arrives on the island, vehicles would have to continue circling the islands’ streets searching for a space, which would increase local traffic congestion. Appropriately priced parking could limit a visitor’s desire to drive on subsequent visits. Please elaborate on the strategy? (Saul Bloom, Arc Ecology) [28.2]

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As noted on EIR p. IV.E.136, the City of San Francisco does not consider parking shortfalls to be a significant environmental effect. Further, secondary effects to traffic congestion, noise, air quality, and other environmental resource areas associated with drivers who opt to drive and find themselves circulating around the Islands searching for parking are likely to be offset by other visitors who do not wish to take this risk, and opt to take transit or shift their trip to off-peak times. The EIR considered the secondary impacts of the parking shortfalls in Section IV.F, Noise, and Section IV.G, Air Quality. In addition, the transportation analysis in the EIR took into account the secondary impacts of parking shortfalls. Impact TR-63 on EIR pp. IV.E.140- IV.E.141 states that the parking shortfall on the Islands could result in a shift from auto to transit modes, resulting in an increase in transit travel demand during the peak hours. Impact TR-19 on EIR p. IV.E.95 identified a significant and unavoidable impact for capacity utilization of the Muni line 108-Treasure Island bus line. During the three peak hours of analysis, the total transit demand for the 108-Treasure Island would not be accommodated within the 85 percent capacity utilization standard, and an increase in transit demand due to a mode shift from auto to transit would exacerbate the exceedance of the capacity utilization standard. Therefore, a shift in mode from auto to transit would result in a worsening of the identified significant impact on Muni line 108-Treasure Island. The parking shortfall is not expected to result in additional significant environmental impacts beyond those identified in the EIR in Impact TR-63. Further, if parking deficits do cause substantial frustration to visitors and residents on the Islands, TITMA would have the authority to increase parking fees to better match the high demand, as suggested by the comment. Please also see the response in Subsection 2.7.4.2, Parking Demand, above, for additional information on the project sponsors’ proposed approach for pricing of nonresidential parking.

2.7.4.3 TDM

Comments

In item (3), please advise us of your thought on IV.E.46 Sect #4, the Pre-Paid Transit Passes. You have written in the report “where-by residence and hotel guests would be REQUIRED to purchase transit passes. The pre-paid transit voucher will provide a subsidy to transit operator’s …”. Please cite specific legal statute that allows you to force resident and guest to purchase an item that will subsidize a private or public agency. This is not a valid section and the conclusions based on an illegal requirement cannot be allowed to be included in the EIR as is. (Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation) [12.7]

Vol. 1, IV.E.46, Transportation: The Transportation Demand Management Plan among other measures describes a Travel Coordinator and a Guaranteed Ride Home Program, both unrealistic mitigation suggestions. Can the DEIR identify other projects of comparable size which have successfully implemented a similar TDM Plan? (Kathrin Moore, San Francisco Planning Commission) [20.31]
Response

The pre-paid transit vouchers discussed in the EIR are expressly authorized by state legislation, which authorizes the Treasure Island Transportation Management Agency to impose transit voucher fees on residents and users of Treasure Island. Assembly Bill 981, the Treasure Island Transportation Management Act, which was passed by the Legislature and signed by the Governor in 2008, authorizes the formation of a Transportation Management Agency for Treasure Island, and authorizes the Transportation Management Agency to impose and collect transit voucher fees from the residents and other users of Treasure Island (see Section 1967.3(g)). It is anticipated that the pre-paid transit vouchers will be implemented through Covenants, Conditions and Restrictions (“CC&Rs”) that are recorded against residential properties on Treasure Island and Yerba Buena Island. Residents of affordable housing projects would not be required to purchase the pre-paid transit voucher. A likely structure would be for residential property owners to have the cost of the transit voucher included in their homeowner’s association dues, and the cost of the transit voucher for renters to be subsidized by the rental property owner. The pre-paid transit voucher requirement is not unlike other conditions of approval commonly imposed on residential projects in California to reduce congestion, requiring property owners to participate and fund a transportation management agency that is charged with area-wide efforts to reduce traffic congestion.

Homeowners Association (“HOA”) dues are often used as a means of financing ongoing maintenance or other activities that address the impacts of a project. State law (Civil Code § 1350 et seq.) authorizes such assessments if consistent with the HOA’s governing documents. The City has authority to require that the bylaws of an HOA provide financing for specific purposes, provided there is a nexus between the impacts of the project and the uses for which the HOA fees will be used (see CEQA Guidelines, Section 15041).

The elements in the TDM Plan, including a transportation coordinator and a guaranteed ride home program, are based on best practices for travel demand management for mixed-use development sites. The Presidio is an example of a site with an agency responsible for implementing a comprehensive TDM program with many similar elements to the Proposed Project’s TDM program. The Presidio Trust successfully operates a fare-less shuttle system, including direct point-to-point service to downtown San Francisco, as well as a Guaranteed Ride Home Program, carpool/vanpool matching services, a bicycle rack program, an on-site transit voucher sales office, and also requires individual employers in the Presidio to participate in the park’s TDM Program.

With respect to specific elements of the program cited in the comment, the funding of a transportation coordinator is also a relatively common requirement. There are many developments throughout the Bay Area and the United States that have full-time or part-time transportation coordinators, responsible for promoting bicycling, transit use, and carpooling and
administering various programs, such as parking cash-out or commuter checks. Major employment campuses, such as Yahoo!, Google, and Genentech; large institutions, such as Stanford University; and a number of transit-oriented residential developments, such as the Contra Costa Centre, near Walnut Creek, administer robust transportation demand management services and have at least one full-time staff dedicated to administering a TDM Program.

Guaranteed Ride Home programs are equally common throughout the Bay Area and beyond. For example, as noted above, the Presidio administers a pool for employers and employees located in the Presidio through which employees who use transit, walk, or bicycle to work can get reimbursed for a taxi or rental car in the case of an emergency. There is no cost to the employee and the Presidio Trust bears the entire cost of providing this service. The City of San Francisco, Alameda County, and many other jurisdictions in the Bay Area also administer similar programs free of charge to employees and employers.

The overall TDM Program, including the proposals for a TDM Coordinator and a Guaranteed Ride Home program, are based on successful examples of similar services throughout the Bay Area and are considered reasonable and relatively common elements of a successful TDM Program. The comment queries whether these features are appropriate mitigation for traffic impacts. Both the TDM Coordinator and the Guaranteed Ride Home program are features of the Proposed Project that were included in the 2006 Transportation Plan. Neither feature is proposed as a mitigation measure by the EIR. While the EIR preparers consider these features to be reasonable and common elements of a successful TDM Program that ultimately increase transit use, the methodology used to estimate trips for the EIR conservatively did not assume any additional mode shifting because of these features, with two exceptions. First, the on-site shuttle was assumed in the calculation of travel times. Second, the pre-paid transit vouchers for residents were factored into the cost comparisons used to assess the effectiveness of congestion pricing.

2.7.4.4 Treasure Island Marina

Comments

These additional facilities for sailors should be considered as recreational transit and initial funding should be available from congestion pricing. (Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group) [35.10]

This project includes the use of Trust Lands to provide access to Bay waters. This access should be available for those of modest means as well as yacht owners who will rent berths in the TI marina. The EIR should analyze the reduction in driving that will be induced by providing storage facilities, made available at modest fees, for: wind surfing equipment and kayaks; small dinghies on racks and larger dinghies on trailers as well as rentable kayaks. (Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group) [35.8]
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Response

Specific amenities, such as kayak storage or other facilities supporting recreational watersports, may be provided as part of the land-side amenities associated with the Marina, or other components of the parks and open space adjacent to the shoreline. However, the provision of such facilities is not expected to substantially affect travel patterns for the Proposed Project, because the proposed usage would be small in relation to the total travel demand associated with the Proposed Project.

2.7.4.5 Travel Mode

Comments

We are greatly concerned with the proposed regional-serving retail uses (a Regional Shopping Mall) which would only increase the number of discretionary trips to the Islands. This document should break down the transportation of this use, and identify the potential transit use of this visitor sector. Evidence should be given if this expectation or assumption (that they will use transit) is made. *(Jennifer Clary, President, San Francisco Tomorrow)* [38.17]

A project with a thirty percent affordability demographic may mean that (as to at least those residents) they probably cannot afford an expensive ferry service; as such, there will be many more vehicular trips than estimated by the DEIR - a mitigation by way of a transportation subsidy paid for by the Project should be studied. *(Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters)* [19.20]

Additionally, since public transportation is voluntary, it is difficult to quantify the amount of reduced traffic; therefore, the aforesaid traffic mitigation analysis is inadequate and fatally flawed. *(Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters)* [19.22]

In addition, it should be noted that TI/YBI is passed [sic] the toll plaza heading towards San Francisco. Therefore, it is likely commuters would drive instead of taking alternative transportation. Even if alternative transportation is provided, such does guarantee it will be utilized. *(Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters)* [19.24]

A project with thirty percent affordability may mean that (as to at least those residents) they probably cannot afford an expensive ferry service; as such, there will be many more trips than estimated - mitigation by way of a transportation subsidy paid for by the Project should be studied. *(Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters)* [19.33]

In addition, the project sponsors should take additional steps to ensure maximum ridership, for example by subsidizing ferry tickets, or further adjusting pricing mechanisms to discourage vehicle trips to and the Project to San Francisco. *(Jean Roggenkamp, Deputy Air Pollution Control Officer, Bay Area Air Quality Management District)* [26.3]

Golden Gate Audubon has focused its comments on impacts to wildlife and natural habitats. However, we are also greatly concerned about the transportation plan as presented in the DEIR and join in the comments provided by the Bay Chapter of the Sierra Club. Increased population on TI-YBI will undoubtedly contribute to additional traffic on the Bay Bridge and to increased air

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pollution in the region. The TI-YBI plan does not include adequate measures to reduce
dependence on cars (and in fact seems to encourage the use of automobiles as a primary form of
transportation) and does little or nothing to offset the impacts that will inevitably arise. (Mike
Lynes Conservation Director, Golden Gate Audubon Society) [32.30]

Response

The Proposed Project includes a substantial number of physical improvements designed to
facilitate high-quality transit and encourage walking and bicycling on the Islands (see EIR
pp. IV.E.33-IV.E.45), as well as a robust Transportation Demand Management Plan, which
would include pre-paid transit vouchers for each residential unit and hotel room, requirements for
an unbundled parking supply, congestion fees for peak hour automobile travel, car-share and
bicycle-sharing programs, and other effective strategies to reduce travel by automobiles (see EIR
pp. IV.E.45-IV.E.47).

The effect that all of these strategies have at reducing peak hour automobile travel is substantial.
Specifically, as discussed on EIR pp. IV.E.55-IV.E.61, the Proposed Project has been designed,
both in terms of its physical form and its mix of uses, to maximize the extent to which trips can
be made internal to the Islands, with bicycling, transit, and walking as the primary modes. As
summarized in Table IV.E.4: Person-Trip Generation by Land Use, on p. IV.E.58, these factors,
known as the “4D’s” result in an approximately 40 percent reduction in auto travel compared to
traditional development forms (see the response in Subsection 2.7.3.6, Accounting for Density,
for additional discussion of the 4Ds).

Further, the Proposed Project would also include a basic amount of new transit service to
encourage the use of transit, based on what can be fully funded at this time. As noted on EIR pp.
IV.E.33-IV.E.36, the Proposed Project’s transit service would include:

- New ferry service between Treasure Island and the San Francisco Ferry Terminal,
  operating at 50-minute frequencies
- New AC Transit bus service between Treasure Island and Downtown Oakland, operating
  at approximately 10-minute frequencies during the peak commute periods, and
- New shuttle-buses circulating throughout the Islands.

Existing bus service between Treasure Island and downtown San Francisco, via the Muni line
108-Treasure Island bus, operating at 15-minute frequencies, would remain. As noted in several
locations in the EIR, this basic level of transit service would not be adequate, either in terms of
reducing significant automobile impacts or providing adequate transit capacity. Therefore
Mitigation Measure M-TR-2 calls for increasing frequencies on the 108-Treasure Island bus line,
providing a new bus line between Treasure Island and another location in San Francisco (likely
the Civic Center), and increasing frequencies on the ferry from every 50 minutes to every
15 minutes. Dialogue with SFMTA and with WETA has thus far indicated that Mitigation
Measure M-TR-2 is reasonable and likely to be funded and implemented. Nevertheless, implementation of Mitigation Measure M-TR-2 cannot be guaranteed, because the expansion of Muni service must rely on future annual appropriations by future Boards of Supervisors, and because providing the more frequent ferry service would require expansion of the San Francisco berthing facilities, which relies on future environmental review and discretionary actions by the Port of San Francisco, the Board of Supervisors, and WETA. However, with implementation of Mitigation Measure M-TR-2, approximately 40 percent of PM peak hour travel to and from the Proposed Project would be made by transit. The combined effect of the project’s physical design, its mix of land uses, and the robust transit service plan called for in Mitigation Measure M-TR-2 would be a reduction in peak hour automobile travel of approximately 60 percent, compared to traditional development patterns. Therefore, the combination of project components and mitigation measures identified in the EIR would result in a substantial decrease in the severity of impacts associated with automobile travel, although, as noted in several locations in the EIR, some impacts would remain significant and unavoidable.

Several comments suggest that, since it is difficult to predict transit ridership, the forecasts in the EIR are invalid, and that the EIR therefore, underestimates vehicle trip generation. It is unclear from these comments why any error in transit ridership forecasting would necessarily mean that ridership was overestimated and not underestimated. The transit ridership forecasts were developed by examining behavior of San Francisco residents who live in similar neighborhoods with similar access to similar levels of transit service as expected to be offered by the Proposed Project. These forecasts are discussed in more detail in pp. 73-74 of the Transportation Impact Study, included in EIR Appendix C. CEQA does not require that forecasts be exact, but rather, that they be based on the best available information. Although there is some uncertainty inherent in travel demand forecasting, it is equally likely that transit ridership could be either higher or lower than predicted, and, as a result, vehicle trip generation could be either higher or lower than forecasted in the EIR. The City continues to regard the travel demand forecasting approach used in the EIR as reasonable.

Both ferry and the East Bay bus service would be subsidized by TITMA, with revenues collected from parking pricing, congestion pricing, and the pre-paid transit vouchers for residential units. Some comments suggest that since the Proposed Project includes a substantial affordable housing component, a higher portion of residents would likely not be able to afford to ride ferry transit, and would instead choose to drive, compared to the forecasts in the EIR. However, a resident who chooses not to travel by ferry due to its cost would not likely choose driving as a preferable option, as the cost of owning and operating a car is typically substantially higher than taking transit, particularly when, in the case of the Proposed Project, the cost of driving would also include a congestion fee.
Although the ferry service would be subsidized such that its price would be more competitive with bus service than most ferry service in the Bay Area, it is expected to remain slightly more expensive than the bus. With implementation of Mitigation Measure M-TR-2 (on average for the three peak hours analyzed in the EIR), for transit riders traveling between San Francisco and Treasure Island, approximately 55 percent would choose bus as a travel mode and 45 percent would choose ferry service. As shown in Table IV.E.17: Transit Ridership and Capacity Utilization – Existing plus Project and Existing plus Project with Mitigation Measure M-TR-2, on EIR p. IV.E.96, even if more transit riders opted to ride the bus (and fewer rode the ferry) than predicted, bus capacity would still be expected to be adequate to handle increased ridership and no new significant impacts would occur.

One comment noted that since the Proposed Project is west of the Bay Bridge Toll Plaza, more people would opt to drive than predicted in the EIR. It is unclear from the comment how the project’s location with respect to the Toll Plaza would affect travel demand, particularly since the mode split forecasts were derived from travel behavior surveys conducted in San Francisco, which is also west of the Toll Plaza. In addition, while trips between Treasure Island and San Francisco would not have to pay the toll at the toll plaza, the Proposed Project would implement congestion pricing during peak hours, which would act as a price signal to reduce vehicular trips. The extent to which some trips would be affected by congestion pricing, tolls or queues at the toll plaza was incorporated into the forecasts as part of the analysis of the effects of congestion pricing at the Islands. In the Transportation Impact Study included in EIR Appendix C, p. 77 provides more discussion of this topic.

The retail uses proposed as part of the project would include both local-serving and regional retail. For more discussion on why regional retail uses are included in the Proposed Project, please see the response to comments in Subsection 2.1.4, Project Land Use, in Section 2.1, Project Description. Although some regional retail uses would be included, the characterization of the project as including a “regional shopping mall” is inaccurate. The Proposed Project would include 85,000 square feet of regional-serving retail uses. Regional shopping malls typically contain between 400,000 and 800,000 square feet situated on 40 or more acres.5

Trip generation rates in the EIR include trips associated with the Proposed Project’s retail component. The regional retail would generate trips by both auto and transit, as shown in Table C&R.3, below. The transit mode share forecasts are based on surveys conducted of both work-trips and non-work trips for trips from similar sites in San Francisco with similar access to similar levels of transit as the Proposed Project, as discussed on pp. 73-74 of the project’s Transportation Impact Study.

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5 Appraisal Institute, CoStar and the International Council of Shopping Centers, April 2009.
Table C&R.3: Regional Retail Trip Generation

<table>
<thead>
<tr>
<th>Mode</th>
<th>Proposed Project</th>
<th>Proposed Project with Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AM</td>
<td>PM</td>
</tr>
<tr>
<td>Auto Person-Trips</td>
<td>206</td>
<td>594</td>
</tr>
<tr>
<td>Transit Person-Trips</td>
<td>105</td>
<td>330</td>
</tr>
<tr>
<td>Vehicle Trips</td>
<td>103</td>
<td>297</td>
</tr>
</tbody>
</table>

Note: An average vehicle occupancy of 2 persons per vehicle for retail trips was used in the analysis. Therefore, the number of vehicle trips generated is one-half the number of person-trips by auto.

Source: Fehr & Peers, 2010

2.7.5 TRAFFIC

2.7.5.1 Traffic Circulation

Comments

Historically that having all “your eggs in one basket” has never been a good idea and making the current west-side westbound ramp into a transit & emergency vehicle lane will create severe overcrowding on Treasure Island Road and Hillcrest as there would be only one single westbound entrance for general traffic on the east side of the island where the bridge connects to the island tunnel fixture. That area has always been significantly crowded with slower traffic as vehicles prepare to enter the tunnel. Study of the traffic flow prior to the current bridge configuration showed this speed decrease and resulting congestion as mostly a psychological event as there were no significant increases in accidents in the tunnel, people just are generally claustrophobic and hesitate when entering enclosed spaces. With that in mind, you are proposing that all the general traffic be made to proceed around the island on a small two way it will share with traffic coming from the eastbound off ramp from San Francisco & the west-bound off ramp from Oakland. The traffic flow study needs to be done [as] part of a realistic view of how vehicles move and how this “one ramp fits all” can be even proposed. (Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation) [12.1]

Now let’s look at Figure IV.E.13 and the questionable decision to use the bridge underpass as the sole route to the westbound onramp for the entire island. Requiring all traffic to go through such a bottle-neck is inherently dangerous. The underpass can be subject to closure from many things that are readily foreseeable. The lanes are close together and there is no room for emergency vehicles on the side. Trucks coming off the eastbound top-deck may be too tall for the underpass and damage or in a worst case instance destroy the outer segment weakening the decking. An accident in the tunnel east or west bound would not allow traffic to exit and re-enter the freeway in a thoughtful and timely manner as they would have to come back around the island and the use the west-side Emergency/Transit only lane. Most motorists would not know if they would be allowed to use it and emergency responders would have other more pressing issue to take care of…the gridlocked traffic would lead to critical delays that have negatively impact emergency operations. (Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation) [12.5]
Response

As described on EIR p. IV.E.7, the Yerba Buena Island Ramps Improvement Project (the “Ramps Project”) is a separate study underway by the San Francisco County Transportation Authority (“SFCTA”) to evaluate the potential reconfiguration of the ramps, and is not part of the Proposed Project. Under the Ramps Project, the westbound on-ramp on the east side of Yerba Buena Island would be completely reconstructed to provide greater acceleration distance. The ramp would also be outfitted with ramp metering traffic signals to meter the flow of traffic onto the westbound Bay Bridge from the Islands. The reconfigured ramp would alleviate the constraints imposed by the existing on-ramp configuration described in the comment.

As indicated on Figure IV.E.3: Proposed Access Ramps with Existing Roadways, on EIR p. IV.E.6, access to the westbound on-ramp would be reconfigured and would be provided from Macalla Road, and would not require the use of the bridge underpass as the sole route to the on-ramp. The construction associated with the ongoing Bay Bridge East Span Project and the Ramps Project would meet Caltrans standards for design, and would accommodate trucks accessing the Islands. Caltrans and the California Highway Patrol deploy appropriate emergency response personnel to facilitate traffic flow in the event of incidents on State highway facilities, and implementation of the Ramps Project would facilitate access to and from westbound Bay Bridge. Implementation of the Proposed Project would not affect the ability of CHP and Caltrans, or other emergency service providers, to respond to incidents.

Implementation or replacement of the westbound on- and off-ramps as part of the Ramps Project, if undertaken, would be a separate project from both the Bay Bridge East Span project currently under construction and the Proposed Project. If the Ramps Project were not to go forward, both of the two existing westbound on-ramps would remain in use for the general public. Because the implementation of the Ramps Project is not certain, the traffic impact analysis was conducted for future conditions without and with the Ramps Project. Traffic impact analysis results are presented on EIR pp. IV.E.71-IV.E.83 and IV.E.118-IV.E.121.

2.7.5.2 Unavoidable Impacts

Comment

Notwithstanding these alternatives and obvious analysis failures, the DEIR improperly concludes that the majority of the Traffic Impacts are “unavoidable,” which obviously is a false conclusion. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.23]

Response

Under CEQA, the term “unavoidable” means an impact that would remain significant even after application of all feasible mitigation. The methodology used to analyze the potential traffic impacts associated with the Proposed Project and alternatives is presented on EIR pp. IV.E.47-
IV.E.52. Each impact determination was based on the significance criteria presented on pp. IV.E.28 and IV.E.29. Significant traffic impacts were determined to be “unavoidable,” as defined by CEQA, if the mitigation measure(s) included in the EIR would not reduce the identified impact of the Proposed Project to a less than significant level or if no feasible mitigation measure was available to reduce the impacts. Implementation of Mitigation Measure M-TR-2, Expanded Transit Service, would reduce vehicle trip generation and improve operating conditions at locations where the Proposed Project would result in significant impacts, but in some of these locations the improvements gained from M-TR-2 were not sufficient to reduce impacts to a less-than-significant level, as defined in the significance criteria. At these locations, therefore, the EIR correctly concludes that the Proposed Project impacts would remain significant and unavoidable.

2.7.6 TRANSIT

2.7.6.1 General

2.7.6.1.1 Transit Capacity

Comment

The fully funded base transit scenario includes one ferry making round trips to the Ferry Building requiring 50 minutes for a roundtrip, 15-minute headways on Muni-108 during both peak hours (40-foot [ft] buses), and a new bus route to downtown Oakland with 10-minute headways during both peak hours (40 ft buses). In this scenario, total transit capacity is 1,415 passengers per hour. The expanded transit scenario includes three ferries making roundtrips to the Ferry Building with 15 minute headways, 7-minute headways on Muni-108 in the a.m. peak hour, 5-minute headways on Muni-108 in the p.m. peak hour (with larger, 60 ft buses), a new bus route to downtown Oakland with 10-minute headways during both peak hours (40 ft buses), and a new bus line with 12-minute headways to Civic Center San Francisco during both peak hours (40 ft buses). In this scenario, total transit capacity is 4,241 passengers in the a.m. peak hour and 4,563 passengers in the p.m. peak hour. Travel demand off the island is estimated at 5,376 in the a.m. peak hour and 7,559 in the p.m. peak hour. In the absence of private automobiles, travel demand could be accommodated in the a.m. peak hour with the expanded transit scenario with the addition of two ferries for a total of five ferries and 10-minute headways. Travel demand in the p.m. peak hour would require five ferries with 10-minute headways, 5-minute headways on Muni-108 with 60 ft buses, 5-minute headways to downtown Oakland with 60 ft buses, and 5-minute headways to Civic Center San Francisco with 60 ft buses. Please identify how the project will address and mitigate this discrepancy. (Saul Bloom, Arc Ecology) [28.4]

Response

The comment summarizes both the fully-funded base transit scenario included as part of the Proposed Project and the expanded transit scenario proposed as part of Mitigation Measure M-TR-2. The comment correctly summarizes the transit capacity for both scenarios; however, it should be clarified that the capacities cited are total capacity onto and off of the Islands (regardless of destination) and the capacities are one-way hourly capacities. The comment also
cites project-generated travel demand, in terms of total person-trips, onto and off of the Islands during the AM and PM peak hours. However, the numbers cited are for project-related trips only, and do not account for existing uses expected to remain on the Islands, such as the Job Corps and Coast Guard facilities. Consequently, at buildout of the Proposed Project, the total number of person-trips traveling onto and off of the Islands would be greater than the numbers cited in the comment. Further, the demand numbers cited in the comment are total person-trip generation, not one-way or peak direction demand, which does not present an accurate comparison of travel demand to the transit capacity numbers cited. Despite these clarifications, the thesis presented in the comment, that peak hour transit capacity could physically be provided at levels adequate to accommodate all person-trips generated onto and off of the Islands, likely remains true.

By making this point, the comment appears to be suggesting that the Proposed Project should provide sufficient transit service to accommodate all desired travel in the peak hours via transit, and to require use of that transit. The comment does not propose a mechanism for restricting residents and visitors from using private automobiles. The response to comments in Subsection 2.1.3.1, Transportation Facilities, in Section 2.1, Project Description, discusses why it would be infeasible for the Proposed Project to ban gasoline powered vehicles and only permit transit and nonpolluting vehicles to be used on the Island. For similar reasons, prohibiting the use of all automobiles on the Island is not considered feasible.

Restricting access to and from the Islands to transit-only would make multiple land uses infeasible, and therefore, the land use program and associated travel demand would be substantially different from that presented in the EIR on Table IV.E.5: Person-Trip Generation by Mode, on p. IV.E.60. Since revenues from congestion pricing and visitor parking are proposed to be used to fund transit operations, by not allowing the use of private automobiles, neither the development program nor the transit service would be supportable, and therefore, the service proposals identified in the comment would not be appropriate or fundable. Other funding mechanisms would need to be identified to provide the transit service, which may affect the services provided.

The Proposed Project is not required, nor is it proposing, to accommodate all travel demand generated by the proposed uses by transit. The Proposed Project is instead proposing to provide a package of transit and transportation improvements. These improvements alone were analyzed by the EIR and found to be insufficient to accommodate all transit trips. The EIR finds that, with implementation of the expanded transit service under Mitigation Measure M-TR-2, the amount of transit is sufficient to accommodate the estimated number of transit trips. That level of transit service was considered to be uncertain, however, because of the inability to commit future funding for the expanded Muni bus service and because it requires expansion of the ferry docking facilities in San Francisco that are currently under review but have not been approved.
2.7.6.1.2 Transit Travel Time

Comment

Eliminating ferry service eliminates the one mode of transit that is not dependent on the bridge. The proposal to increase bus service is great in concept, but is not studied for its feasibility in light of the increased congestion. How long will it take to travel to and from the island by bus at peak, near peak and off peak times? What impact will that have on the reliability and use of the service? (Jennifer Clary, President, San Francisco Tomorrow) [38.9]

Response

As indicated on EIR p. VII.48, the No Ferry Service Alternative was considered in response to comments on the NOP and to evaluate if and to what extent development of fewer residential units on Treasure Island would avoid or substantially lessen traffic and traffic-related air quality and noise impacts, as well as air quality impacts related to ferry operations. This alternative was also considered to evaluate to what extent it would avoid or lessen impacts on scenic views, noise, and historic resources.

Eliminating ferry service would reduce transit capacity between the Islands and San Francisco, but the capacity would be made up by the expanded bus service described in Mitigation Measure M-TR-2. With the expanded bus service, the No Ferry Service Alternative would result in a slightly higher overall transit mode share compared to the Proposed Project with the base transit service.

As indicated on EIR p. VII.57, the No Ferry Service Alternative was analyzed with and without the Ramps Project. Under conditions without and with the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island would impact Muni line 108-Treasure Island and AC Transit bus operations. With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) (p. IV.E.100), the impact on Muni line 108-Treasure Island operations under conditions without and with the Ramps Project would be reduced to a less-than-significant level. Implementation of Mitigation Measure M-TR-24 under either circumstance would improve operations for AC Transit buses destined to the eastbound on-ramp. However, since this improvement would extend only to the westbound on-ramp on the west side of Yerba Buena Island, and since sufficient right-of-way is not available to extend a transit-only lane beyond the westbound on-ramp, AC Transit vehicles would continue to experience congestion between the diverge point for the westbound on-ramp and the eastbound on-ramp. Therefore, similar to the Proposed Project, either with or without the Ramps Project, the impact to AC Transit operations would remain significant and unavoidable.
The second paragraph on EIR p. VII.57 is revised as follows (deletions are shown in strikethrough and new text is underlined):

Similar to the Proposed Project, under conditions without and with the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island would impact Muni line 108-Treasure Island and AC Transit bus operations. Under conditions with the Ramps Project, queues would impact AC Transit bus operations; however, queues would not significantly impact Muni line 108-Treasure Island bus operations. With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) identified in Section IV.E, Transportation, for the Proposed Project (p. IV.E.100), the impact on Muni line 108-Treasure Island operations under conditions without the Ramps Project would be reduced to a less-than-significant level.

The comment queries what the travel time would be by bus on and off of Treasure Island. The comment does not provide a specific bus route or locations on or off of Treasure Island for which travel times should be identified; however, given the nature of the overall comment regarding the competitiveness of bus versus ferries, the comment is assumed to refer to bus service between the Treasure Island Transit Hub and the Transbay Terminal in downtown San Francisco on Muni line 108-Treasure Island. The amount of traffic on the section of the Bay Bridge between the Islands and downtown San Francisco is, and will continue to be, constrained by the eastbound approach and the Toll Plaza in the East Bay. Further, with implementation of Mitigation Measure M-TR-24, congestion on the approaches to the Bay Bridge from the Islands would not affect travel times for the 108-Treasure Island. Therefore, travel times are not expected to change substantially in the future, even in the context of increased demand for travel on the bridge. According to SFMTA service planners, travel times between Treasure Island and downtown San Francisco on Muni line 108-Treasure Island are expected to be 8 minutes in the AM peak hour and 9 minutes in the PM peak period.

Under the No Ferry Service Alternative, it is not anticipated that bus travel times would be greater than with the Proposed Project for any of the bus routes proposed. Under both Proposed Project and No Ferry Service Alternative conditions, with implementation of M-TR-24, buses would have exclusive travel lanes approaching the Bay Bridge between Treasure Island and the westernmost westbound on-ramp. Operations on the Bay Bridge would be similar to existing conditions, as the bridge generally operates at capacity in the peak direction of traffic flow during the peak periods. The expanded bus service included in Mitigation Measure M-TR-2, and assumed for the No Ferry Service Alternative, took into account the travel times that would be experienced by AC Transit and Muni buses in order to maintain the proposed headways. In some instances, additional buses would need to be provided in order to maintain the proposed headways; allowances for increased congestion are typically included in overall transit planning by the various transit operators.
2.7.6.2 San Francisco Muni

2.7.6.2.1 Transit Funding

Comments

1. As stated on page 23 of the TIS, the Treasure Island Transportation Management Agency (TITMA) will oversee the collection of revenue from parking, transit passes and congestion pricing, and the disbursement of funds to transit operators. Would these funds go toward improving and maintaining the Muni Route 108 service? Due to annual fluctuation of the San Francisco Municipal Transportation Agency (SFMTA) budget and numerous competing priorities for General Fund revenues, the TITMA should contribute directly to SFMTA to ensure that the headways for Route 108 are maintained or improved. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.11]

13) The Sierra Club’s major comment is that a DEIR on a project of this magnitude should include an alternative with minimum transportation impacts. We are concerned that the project will be allowed to proceed and create profits on the island while causing delays to Muni and AC transit while both services are suffering with operating costs exceeding their available funding. (Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group) [35.1]

Response

TITMA, as the agency that would be responsible for managing revenue from congestion pricing and parking, would disburse funds to AC Transit and WETA to cover operating costs not paid for via farebox receipts. The Proposed Project also includes funding for transit operating subsidies for the TITMA, for the interim period when congestion pricing, parking revenues and transit vouchers are insufficient to cover the shortfall.

Funds for SFMTA to operate the Muni line 108-Treasure Island bus route, and expansion of Muni bus service proposed as part of Mitigation Measure M-TR-2, would come from the San Francisco General Fund. The City prepared a Fiscal Impact Analysis for the Proposed Project that indicates that General Fund revenues generated from the Proposed Project through property taxes, sales taxes, hotel taxes, and other sources would provide sufficient General Fund revenues for the Muni line 108-Treasure Island bus route both under the Proposed Project and the Enhanced Transit
Service under Mitigation M-TR-2.6 Ongoing economic feasibility studies related to revenue projections and discussions between TIDA and SFMTA regarding funding and service levels will be documented as part of the final record supporting the decision-maker’s actions on the Proposed Project. See also the responses in Subsection 2.7.2.3, Funding Mechanisms, and Subsection 2.7.15.3, Funding, for additional discussion of funding for proposed transit facilities.

Under the base transit scenario, Muni line 108-Treasure Island is assumed to operate on its existing headways. Planning Department staff has reviewed the Muni line 108-Treasure Island headways for the last several years (2007 to present). Despite the annual SFMTA budget fluctuations and declarations of fiscal emergency, the Muni line 108-Treasure Island has maintained headways of 15 minutes or less during the AM and PM peak periods over the course of the last three years. As such, it was reasonable to assume existing service levels for the purposes of the EIR analysis.

The comments also suggest some concern that funds for Muni line 108-Treasure Island service would be uncertain in the future due to budgeting priorities. Based on the trip generation forecasts for the Treasure Island project with the baseline transit service (e.g., with existing headways on the Muni line 108-Treasure Island maintained), ridership on the Muni line 108-Treasure Island would increase between 100 percent and 400 percent, depending on peak hour and direction.

Although SFMTA would maintain control over Muni line 108-Treasure Island operations, so long as General Fund revenues generated by the Proposed Project, and annually appropriated by the Board of Supervisors to Muni, are sufficient to cover the increased cost of service, it is unlikely that SFMTA would reduce service or eliminate a high ridership line such as the one that the Muni line 108-Treasure Island is projected to be. However, as indicated in Impact TR-19 on EIR p. IV.E.95 in the EIR, because full funding for the expanded transit service has not yet been identified and the sustenance of such service cannot be guaranteed, its implementation remains uncertain and was therefore, not assumed in the transit analysis. Accordingly, Proposed Project impacts to transit capacity on the 108-Treasure Island have been determined to be significant and unavoidable.

The Proposed Project’s development program, transportation network, and TDM Plan were designed to accommodate all travel modes, while advancing the City’s Transit First policy. The

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unique location of the Proposed Project and the use of congestion pricing and parking fees, along with other funding mechanisms, for funding transit improvements, required careful consideration of the mix and density of land uses in order to develop a viable and thriving community on the Islands. Due to the scale of the proposal and nature of congested urban areas, the travel demand generated by the proposed development would be expected to result in some transportation impacts. The EIR includes transportation mitigation measures to enhance and further encourage the use of transit by residents and visitors to the Islands, and physical improvements to minimize impacts of on-island congestion.

2.7.6.2.2 Transit Impacts – Effects on Headways

Comment

In addition, in the DEIR, numerous downtown intersections in San Francisco experience ‘significant and unavoidable’ impacts. Please discuss how SFMTA plans to maintain the proposed seven minute bus headways between the Transbay Terminal and Treasure Island if there are significant delays within San Francisco and on-ramps onto I-80 and the SFOBB. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.15]

Response

The Muni line 108-Treasure Island would operate as a point-to-point bus line between the Treasure Island Transit Hub and the Transbay Terminal in Downtown San Francisco. Within Downtown San Francisco, Muni line 108-Treasure Island currently operates on transit-only ramps and transit-only lanes as it approaches and departs from the Transbay Terminal, and is not subject to congestion on Downtown streets. Since Muni line 108-Treasure Island would continue to operate within transit-only ramps and transit-only lanes as it approaches and departs the Transbay Terminal, it would not experience delays associated with increased traffic congestion on Downtown streets in the future.

2.7.6.2.3 Transit Mitigation – Headways

Comment

3. The DEIR states that Mitigation Measure M-TR-2 will reduce the headways for Muni Route 108 from 15 minutes to as low as seven minutes in the AM peak and as low as five minutes in the PM peak. By implementing M-TR-2, an additional four to eight buses would be added to the westbound on-ramp. Due to the projected congestion on the Treasure Island westbound on-ramp to the SFOBB and the SFOBB itself, will an additional four to eight buses be sufficient to maintain lower headways? Since transit schedule reliability is critical to attracting transit riders, please discuss how to mitigate the potential affects on transit headways. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.14]
Response

Congestion on the approaches to the Bay Bridge from the Islands would increase travel times for transit, which would increase the number of vehicles required to maintain the anticipated headways. However, implementation of Mitigation Measure M-TR-24, described on EIR p. IV.E.100, would construct a transit-only lane between First Street on Treasure Island and the existing west-side westbound Bay Bridge on-ramp such that Muni vehicles would have a continuous transit-only route from the ferry terminal/transit hub on Treasure Island to the existing west-side westbound Bay Bridge on-ramp. Under the scenario where the YBI Ramps Improvement Project is implemented, the west-side westbound Bay Bridge on-ramp would be restricted to transit and emergency vehicle use only, further extending the transit-only route to the Bay Bridge mainline. As discussed in the EIR, implementation of Mitigation Measure M-TR-24 would reduce the impact on Muni operations caused by vehicle queues on Treasure Island Road to a less-than-significant level. Under these mitigated conditions, travel times for buses destined to San Francisco would be relatively similar to today. Based on this, SFMTA and the project sponsor have agreed that Muni would require a total of six buses on Muni line 108-Treasure Island to maintain proposed headways (an increase of two vehicles over existing conditions) and four new buses on the new route. TIDA and TICD have consulted with SFMTA on the design of the intermodal transit facilities for Treasure Island; a proposed bus layover location is identified on Figure IV.E.9: Proposed Transit Circulation, on EIR p. IV.E.34.

Since the proposed transit-only lane would extend only as far as the west side westbound on-ramp to the Bay Bridge, AC Transit vehicles destined for the East Bay would experience some congestion during peak periods between that on-ramp and the eastbound on-ramp (see Impacts TR-25 and TR-26 on EIR pp IV.E.101-IV.E.102). The analysis conducted by AC Transit to determine the number of vehicles required to operate proposed service (which informed the costs accounted for by the project sponsor in their estimates of the operating costs for TITMA-funded services) did include additional travel time due to this congestion and no additional vehicles beyond those already assumed and accounted for would be required for proposed AC Transit service.

As a result, additional transit vehicles beyond those identified in the analysis would not be required to maintain headways since the effects of congestion on transit travel times would be reduced.

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7 See, for example, Jack Sylvan, Mayor’s Office of Economic & Workforce Development, letter to Nathaniel P. Ford, Sr., Executive Director, San Francisco Municipal Transportation Agency, June 9, 2009. A copy of this letter is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.
2.7.6.3 AC Transit

2.7.6.3.1 Transit Circulation – Bay Bridge

Comment

Bay Bridge Congestion Study
As the process goes forward, it is important that all relevant agencies coordinate their efforts. In order to make the best use of their new facility the Transbay Joint Powers Authority (along with the San Francisco County Transportation Authority) is currently conducting a study of projected Bay Bridge congestion. This study, now in draft, makes a preliminary recommendation for a “contraflow” westbound transit lane on the lower deck of the Bay Bridge. The Treasure Island EIR should review and incorporate (as needed) the findings of the Bay Bridge Congestion Study, particularly the proposal for the contra-flow lane. (Cory LaVigne, Director of Service Development and Planning, AC Transit) [23.1]

Response

The Bay Bridge Corridor Congestion Study (draft study dated October 2010) assessed the future operating conditions for vehicular travel across the Bay Bridge from Oakland into San Francisco during the morning commute hours, with particular focus on impacts on transit travel times. The effort included development of a traffic micro-simulation model for a 24-mile study area, including the Bay Bridge and its approaches, and development and analysis of future year 2035 conditions. In response to projections of increased congestion levels and increased transit travel times, a preliminary set of potential improvements were identified that would warrant additional study. These include increased toll plaza metering rates, physical improvements such as an I-580 High Occupancy Vehicle (“HOV”) lane, additional westbound HOV facilities, and a westbound contraflow lane on the lower level of the Bay Bridge. The results of the study indicated that additional investigation of improvements to the Bay Bridge Corridor is warranted. Since significant additional study is needed to determine the feasibility and design of a potential contraflow lane and other options to improve transit are also under study, consideration of a facility contraflow lane would be speculative at this time and is not appropriate for the CEQA analysis of the Proposed Project.

The Bay Bridge Corridor Congestion Study was intended to be the first step in a more detailed study of potential Bay Bridge corridor improvements. It should be noted that the Bay Area Toll Authority (“BATA”) has recently selected a consultant to conduct the San Francisco Bay Crossing Study Update, to look at long-term options for traffic relief in the Bay Area. Both of these studies involve longer term improvements, and would include the Proposed Project as part of the planning and analysis effort.

The Proposed Project includes the formation of a transportation management agency, TITMA, that would be responsible for coordinating the Proposed Project’s transit and transportation activities both on-Island and within the regional context. Should large changes in the regional
transportation network materialize, such as a contraflow lane on the Bay Bridge, the TITMA would be responsible for coordinating the use of such a lane by Island transportation providers.

2.7.6.3.2 Transit Funding

Comments

Transit Funding
The EIR assumes that AC Transit will operate the robust transit service from Downtown Oakland to Treasure Island that is contemplated in the 2006 Treasure Island Transportation Plan (a document which should be specifically incorporated by reference into the EIR). AC Transit's ability to provide this service is completely based on the ability of the development project to provide an adequate and sustainable source of funds for transit operations. This should be noted in the EIR. The specific cost estimates in the 2006 Plan are now obsolete, and will need to be updated to costs at the time service is initiated (with ongoing inflation adjustments). If it is not possible to fully fund this transit, then levels of service would have to be reduced, either in frequency and/or in hours of operation (span of service). We would be happy to work with the newly formed Treasure Island Transportation Management Agency (TITMA) to analyze various potential funding sources. (Cory LaVigne, Director of Service Development and Planning, AC Transit) [23.2]

Roadway Assumptions
AC Transit’s ability to provide service rests on certain roadway assumptions as well as funding assumptions. It is assumed that Hillcrest Road will not suffer Impact TR-25 (p. IV.E.101), backups due to the Ramps Project not being implemented. It is also assumed that the development project will not cause congestion on the Bridge mainline. We are particularly concerned because the Bay Bridge Congestion Study has made a preliminary finding that without mitigation congestion in the area of the Toll Plaza will block bus access to HOV lanes by 2035.

If either Hillcrest Rd. or the Bay Bridge mainline experience delays, then bus service quality will degrade, and operating time and costs would increase. That would in turn require additional funding to maintain the every ten minutes level of service planned in the Treasure Island Transportation Plan. Alternatively, appreciably increased travel times with no additional resources would result in levels of service to be reduced. (Cory LaVigne, Director of Service Development and Planning, AC Transit) [23.3]

Response

The Proposed Project would provide operating funding for the proposed AC Transit service between the Islands and Downtown Oakland. It is anticipated that TIDA and AC Transit would enter into a Memorandum of Understanding, followed by a service contract or other arrangement, which would document that the sources of project-generated funding would be sufficient to cover AC Transit’s cost of providing the level of service proposed as part of the Project. The MOU would include provisions to maintain headways to account for the effects of congestion on Hillcrest Road and the extent to which congestion blocks access to HOV/bus-only lanes at the Toll Plaza on AC Transit travel times under conditions without the Ramps Project, and funding requirements to maintain headways in the future.
The 2006 Treasure Island Transportation Plan is referenced in the EIR, but not specifically incorporated by reference because the Plan has been refined since it was published in 2006, and would be replaced by the Transportation Implementation Plan to be adopted by TIDA as part of the final project approvals.

2.7.6.3.3 Transit Impacts

Comment

6. In the DEIR, Impact TR-27 states that AC Transit will experience significant and unavoidable impacts after implementing Mitigation Measures M-TR-2 and M-TR-24. Although AC Transit buses can use the Transit/Emergency Vehicle-only lane proposed for westbound transit, AC Transit buses would need to merge back into the mixed-flow lane towards the eastbound on-ramp. Due to the size and significant queuing on Treasure Island Road, buses merging could potentially block both travel lanes and delay Muni buses accessing the westbound on-ramp. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.18]

Response

The comment correctly notes that if Mitigation Measure M-TR-24 were implemented, AC Transit buses would use the Transit/Emergency Vehicle-only lane between Treasure Island and the west-side westbound Bay Bridge on-ramp before merging back into mixed-flow traffic to reach the eastbound on-ramp on the east side of Yerba Buena Island. Based on proposed transit headways for these service operators, the potential that Muni and AC Transit vehicles arrive at the location where AC Transit buses need to merge back into the mixed-flow lane, resulting in a conflict between buses, would occur at most four times during the peak hour under the Proposed Project and at most six times under conditions with implementation of Mitigation Measure M-TR-2. Delay incurred by Muni because of this conflict is expected to be minor and would not impact transit operations such that additional vehicles would be needed to meet described transit levels of service. As described in Mitigation Measure M-TR-24, the construction of the transit-only lane would reduce the impact to Muni to less-than-significant and would improve conditions for AC Transit, but impacts to AC Transit due to congestion on Hillcrest Road would remain significant and unavoidable.

2.7.6.4 Golden Gate Transit

2.7.6.4.1 Congestion on Bay Bridge

Comment

- Impacts TR-6, TR-7, TR-44, and TR-45 indicate that significant and unavoidable queuing will occur on freeway approaches to the Bay Bridge, at the Bay Bridge Toll Plaza (TR-6 and TR-44) and on San Francisco city streets (TR-7 and TR-45). It is unclear if the queuing impacts will affect bus operations to the Bay Bridge. Although GGT does not operate in
revenue service across this bridge, it is used by GGT buses operating in non-revenue service between the District's main bus garage in San Rafael and San Francisco. Excess congestion on the approaches to the Bay Bridge, especially in the vicinity of the entrance to the bus lane at the Toll Plaza, can adversely impact GGT operations and ultimately increase operating costs. (Ron Downing, Director of Planning, Golden Gate Bridge, Highway and Transportation District) [9.2]

Response

The Proposed Project would not substantially affect the PM peak period Golden Gate Transit non-revenue service on the westbound Bay Bridge. Under Existing plus Project conditions, the Proposed Project would result in a significant impact on queues at the Bay Bridge toll plaza during the weekday AM peak hour (Impact TR-6), and not during the PM peak hour when Golden Gate Transit buses are traveling from San Rafael to downtown San Francisco. Under 2030 Cumulative conditions, toll plaza operations would experience increased congestion during both the weekday AM and PM peak hours, and the Proposed Project would contribute to significant cumulative queuing impacts at the Bay Bridge toll plaza. However, during the PM peak period, the increased queues would not extend upstream into the I-80/I-580/I-880 distribution structure, which is the location where queues spilling back from the toll plaza block the bus lane, and therefore, the entrance to the bus lane at the toll plaza would not be affected during the future PM peak hour conditions.

As indicated in Impact TR-32 on EIR pp. IV.E.107-IV.E.108, and Impact TR-62 on EIR p. IV.E.136, the Proposed Project’s impact on Golden Gate Transit due to increased traffic congestion in downtown San Francisco would be less than significant. At intersections where project-generated vehicle trips would result in significant impacts, Golden Gate Transit buses operate within transit-only lanes or in lanes that are not subject to the queued conditions associated with traffic destined to the Bay Bridge.

2.7.6.4.2 Impacts on Golden Gate Transit

Comment

- Impacts TR-32 (existing conditions plus project) and TR-62 (cumulative conditions plus project) indicate that the proposed project will have a less-than-significant impact on GGT operations even though buses travel through intersections that will see degradation in traffic operations. The District agrees with this assessment because GGT buses operate in lanes that appear to be mostly unaffected by project-generated traffic.

8 Golden Gate Transit primarily runs non-revenue service across the Bay Bridge in the westbound direction only on weekdays between 12:15 and 7:15 PM, although based on needs could run non-revenue service across the bridge outside of these hours and on weekends. (Telephone conversation between David Davenport, GGBHTD and Luba Wyznyckyj, LCW Consulting on 1/4/11)
• Impact TR-36 indicates that the proposed project will have a less-than-significant impact to pedestrian access to the Ferry Building. Golden Gate Ferry operates two ferry lines originating at this location, and it is the District appreciates that the impact remains less than significant if ferry service to Treasure Island is operated at 15- or 50-minute headways. (Ron Downing, Director of Planning, Golden Gate Bridge, Highway and Transportation District) [9.3]

Response

The District’s concurrence with the EIR impact determination for Impact TR-32 and TR-62 is acknowledged. As indicated, Proposed Project impacts on Golden Gate Transit due to increased traffic congestion in downtown San Francisco would be less than significant.

As indicated in Impact TR-36, the pedestrian travel demand in the vicinity of the Ferry Building that would be associated with the new ferry service to and from Treasure Island would not result in overcrowding of public crosswalks, and would not impede existing Golden Gate Ferry operations at the Ferry Building.

2.7.6.5 Ferry

2.7.6.5.1 Ferry Service – East Bay

Comment

Moreover, as noted above, it is difficult to conceive as to why ferry service is not extended to the East Bay cities. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.14]

Response

As described on EIR p. IV.E.35, the Proposed Project would include new bus transit operating between the Island and downtown Oakland, which would be operated by AC Transit. The service is assumed to stop in two Oakland locations, at 20th and Broadway and 14th and Broadway. Both locations are near major Easy Bay employment centers and have direct connections to BART and other AC Transit bus lines. Service would be provided at approximately 10-minute headways during the peak hours, and less frequent service during off-peak hours. The proposed bus service would accommodate the projected number of transit trips destined to the East Bay, would deliver the transit riders to a more centrally located destination than would new ferry service, and would have fewer environmental impacts with respect to air quality and noise than ferry service (refer to EIR Section IV.F, Noise, Impact NO-4 on pp. IV.F.23-IV.F.26, and EIR Section IV.G, Air Quality, Impact AQ-6 on pp. IV.G.42-IV.G.47, where noise and diesel particulate emissions from ferry operations are discussed). Mitigation requiring additional ferry service to the East Bay was therefore, not considered necessary. Please see Subsection 2.7.6.3.2, Transit Funding, regarding funding for East Bay bus service.
Should WETA decide at some point in the future to implement ferry service between Treasure Island and the East Bay, the Proposed Project would not preclude the provision of such new ferry service.

2.7.6.5.2 Ferry Size

**Comment**

A 699 passenger vessel will be one of the largest ferries operating on the Bay. Has the City already verified the availability of this size boat and an operator to provide the service? Is there available capacity at the Port of San Francisco to accommodate the larger ferry? *(Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation)* [16.13]

**Response**

The Proposed Project would initially provide funding for the lease of one ferry to operate between Treasure Island and the Ferry Building in downtown San Francisco. The leased ferry could range in size from 299 to 699 passengers, depending on actual ferry ridership. By full buildout, the Proposed Project anticipates having one 699 passenger ferry operating at 50-minute headways under the base transit scenario.9

The existing facilities at the San Francisco Ferry Building would be able to accommodate the service anticipated to be provided under the base transit scenario. Ferry service included as part of Mitigation Measure M-TR-2, Expanded Transit Service, would be accommodated within the existing and proposed berthing facilities at the Ferry Building. WETA and its consultants have recently initiated conceptual design and will undertake the necessary environmental review for the expansion of berthing facilities at the Ferry Building. Note that because implementation of the expanded berthing facilities will require future discretionary approvals by WETA, the Port and the Board of Supervisors, as well as an identified funding source, the base analysis in the EIR assumes that the Expanded Transit Service would not be in place, as further described in the response in Subsection 2.7.15.3, Funding, below.

2.7.6.5.3 Ferry Vessel

**Comment**

The ferries should provide areas for bikes where they will be protected from salt spray, How many more people will bring their bikes on the ferries if they know that their bikes and accessories will not be sprayed with salt water. *(Ruth Gravanis)* [31.14]

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9 The EIR analysis conservatively assumes that this vessel can accommodate 699 passengers; however, the capacity of the vessel is highly dependent on the seat and amenity configuration, and as a result, the vessels could be reconfigured to increase capacity up to 899 passengers, if needed.
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Response

The ferry would include a protected area for bicycle storage. While the design of the ferry is not currently known, TITMA would work with WETA to ensure that appropriate provisions would be made for bicyclists. Existing ferry vessels that provide outdoor bicycle storage for bicycles are generally well-used by bicycle riders. Statistics are not available regarding the additional number of persons that may bring a bicycle on the ferry if the bicycles were protected from salt water spray.

2.7.6.5.4 Travel Mode – Ferry Demand

Comment

2. On page 73 of the TIS, it indicates that the ferry will have a capacity of 699 passengers. In Table 26 (page 89), the DEIR projects 817 PM peak hour ferry trips under the Base Transit Scenario. With ferries operating at 50 minute headways, will there be enough capacity to accommodate all these trips? (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.12]

Response

The comment correctly notes that the Proposed Project would generate approximately 817 PM peak hour ferry trips, irrespective of direction. Table 43 on p. 163 of the TIS and Table IV.E.16: Existing and Existing plus Project Transit Ridership and Capacity Utilization, on p. IV.E.94 of the EIR present ferry ridership by peak hour and direction. As shown, the ferry would have a maximum one-way load of 479 passengers in the eastbound direction during the PM peak hour. This would result in a PM peak hour utilization of 57 percent, and there would be capacity to accommodate the demand.

In the case of either scheduled or unscheduled ferry maintenance, the project sponsors expect to execute a Memorandum of Understanding ("MOU") with the Water Emergency Transit Authority ("WETA") to ensure that service is uninterrupted. Specifically, and among other things, the MOU is expected to include a statement of intent to allow the use of spare vessels that WETA currently uses for purposes of continuing fleet operations during vessel maintenance to also be used for the proposed Treasure Island ferry route, as needed.

2.7.6.5.5 Ferry Terminal

Comment

And our campaign to correct the location of the Ferry Building -- the Ferry Terminal at the site, help lead to its current location. So we’ve been involved in this for some time. (Saul Bloom, Arc Ecology) [TR.16.1]
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Response

The input provided by Arc Ecology as part of the planning process on the location of the Ferry Terminal on Treasure Island is noted.

2.7.6.6 Shuttle Service

2.7.6.6.1 On-Island Shuttle

Comments

An enhanced shuttle system [II.39] should provide for all visitor/tourist and recreational uses – including teams arriving from off-island by transit; tourist and museum visitors, as well as island residents. (Ron Miguel, President, San Francisco Planning Commission) [7.5]

For instance, the Project’s proposed public transportation system does not adequately serve and/or account for intra-island transportation, including where visitors would like to travel (e.g. the northern shoreline, to the wetlands or historical admiral mansions); more study needs to be done concerning on-island transportation. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.13]

Response

As indicated on EIR p. IV.E.36, Job Corps commuters and visitors would also be able to use the proposed on-island shuttle system. The shuttle system would be provided without fares and would be available for all visitors and residents of the Islands, including tourists, visitors, museum visitors, teams using sports fields and Islands residents.

As described on EIR p. IV.E.36 and illustrated on Figure IV.E.9: Proposed Transportation Circulation Plan, on p. IV.E.34, the fare-free on-island shuttle system would consist of three separate lines: two serving the neighborhoods on Treasure Island (including the Job Corps), and a third serving Yerba Buena Island. (Note: Figure IV.E.9 has been corrected in response to comments noting inconsistencies between Figure II.9: Proposed Shuttle Routes, on EIR p. II.40, and Figure IV.E.9; please see Subsection 2.1.3.1, Transportation Facilities, in Section 2.1, Project Description, of this Comments and Responses document, for description of revisions and clarification to shuttle routes.) Each of the three shuttle lines would provide continuous service from early morning to late evening. The fare-free shuttles would stop at the Transit Hub on Treasure Island, facilitating transfers to ferry and outbound Transbay bus service. On weekends, the on-island shuttles could extend their routes to provide access to parks and open spaces on both Treasure Island and Yerba Buena Island, including the northern shoreline park and wetlands that would be part of the Great Park, and the Senior Officer’s Quarters Historic District on Yerba Buena Island. Please refer to Figure IV.J.1: Proposed Open Space, on p. IV.J.15, for location of existing and proposed parks and open spaces.
In addition to the above, the TDM Program for the Project would require that operators of special events coordinate with TITMA regarding transportation to and from the special event. Arrangements for special events would vary depending on the size, type, and time of day of the event, but could include adding more shuttles or providing shuttle service to a special location for the event.

Since publication of the Draft EIR, the City of San Francisco was selected to host the 34th America’s Cup yacht race. Current plans call for races to be held in the summers of 2012 and 2013 in San Francisco Bay. Race-related facilities are currently proposed at several waterfront sites on mainland San Francisco; however, there are no plans to construct race-related facilities or uses on Treasure Island or Yerba Buena Island. Facilities proposed to be constructed for America’s Cup-related uses will undergo separate environmental review, which will consider the individual effects of those facilities as well as their cumulative effects combined with other anticipated development in the area, including the Proposed Project.

2.7.6.6.2 Funding

**Comment**

The developer-provided shuttle will be useful for residents and visitors who cannot or desire not to walk long distances. However the history of developer-provided transit is that it doesn’t last very long. The EIR should show future new guaranteed funding sources from the project and a method to determine funding needs for Muni when the shuttle service is discontinued; or show how the shuttle will go on in perpetuity. *(Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group)* [35.5]

**Response**

CEQA does not require a project sponsor to demonstrate how the shuttle service would be funded in perpetuity. The on-island shuttle service would be included as part of the Proposed Project, and is anticipated to be a permanent service to support the ferry and off-island bus services. While the project sponsors would purchase shuttles for use on the Islands, the on-Island shuttle service is not expected to be provided by the project sponsors; rather, the Board of Supervisors would create or designate a new transportation agency, the TITMA, which would collect revenues and arrange for transit service, including the shuttle service that would serve the Proposed Project. Provision of the on-island shuttle system would be included as part of the Transportation Implementation Plan a part of the Disposition and Development Agreement between TIDA and TICD.

In San Francisco, a number of institutions and larger developments that provide shuttle service to connect with transit and other destinations have maintained their shuttle service for many years (e.g., Mission Bay shuttle, University of California San Francisco shuttle, California Pacific Medical Center shuttle, Presidio shuttle).
2.7.7 BICYCLES

2.7.7.1 Bicycle Access – Macalla Road

Comments:

In item (2), I want to address the EIR consideration of turning Macalla road into a one-way leading from the Hillcrest Road/I-80 underpass to Treasure Island Road. This was being done to facilitate bicyclist coming off the east bridge span. This idea again put all the traffic flow “eggs in one basket” as the only way to the bridge (east or west bound onramps) is on Treasure Island road to Hillcrest Road. Having only one way off an island with upwards of 6500 units and hotels is just nuts. Add to that the incline on Macalla road coming down to Treasure Island road is too dangerous. The EIR study does not have a single authority on bicycle safety cited on this study. The danger in allowing bicyclist to come down Macalla at full speed is evident in figure IV.E.14, there is simply no way bicyclist can stop or turn at speeds of over 30 mph. Which is the minimum speed a bicyclist will reach if they fail to realize there is a sudden stop or their brakes fail, which is a very real issue as bicycle brakes lose stopping power as they heat since the rubber composite becomes soft. There also needs to be a rethink of the design of figure IV.E.15 - No one who has seen that design feels it is in anyway safe or even rational. Please look at making the bicycle lane follow the hill. This design will get people injured or killed. (Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation) [12.6]

5. As stated in the DEIR, Mitigation Measure M-TR-24 would create a Transit Only Lane between First Street on Treasure Island and the Transit/Emergency vehicle-only westbound SFOBB on-ramp by eliminating the proposed southbound bicycle lane on Treasure Island Road and a segment of Hillcrest Road. Although bicyclists will still have access to the bicycle path on the new east span of the SFOBB by the bicycle lanes proposed on Macalla Road, eliminating the southbound bicycle lane will result in a significant disconnect to the proposed multi-use path on the west span of the SFOBB between Treasure Island and the rest of San Francisco. On page 17 of the TIS, the report states the Department and the Bay Area Toll Authority are currently considering alternatives for the proposed path. The proposed redevelopment project should proactively plan for connectivity between Treasure Island and San Francisco. Eliminating the southbound bicycle lane would severely limit future options to provide bicycle access to the proposed multi-use path. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.17]

Regarding bicycle and pedestrian access on Yerba Buena Island (YBI) Figures II.12 and IV.E.10 show the proposed conceptual bicycle and pedestrian plans. While we are aware of existing site constraints, as mentioned in the Transportation section of this letter, we are concerned about the safety, usability, and lack of a separated, Class One trail on YBI. Visiting bicyclists and pedestrians coming from the east span of the Bay Bridge will likely be a mix of advanced and novice riders both youth and adult. Without a Class I trail, the novice riders would likely interfere with the advanced riders going down hill and up hill on Macalla Road. The FEIR should address providing a Class I trail, in both directions on Macalla Road, including curb separation and guardrails along the outside edge of Macalla Road, which could allow for bicycles to safely use the four-foot-wide shoulder. (Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission) [17.17]
In addition, we are concerned over Mitigation Measure M-TR-24, which could allow for the removal of the proposed bicycle lane on Treasure Island Road if bicycle access interferes with bus access off the island. Without this proposed bicycle access, a bicycle would be forced to use the steep incline up Macalla Road. (Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission) [17.18]

Thank you for the opportunity to comment on the above referenced DEIR. As described in detail below, the Bay Trail project has serious concerns regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the San Francisco-Oakland Bay Bridge to the Islands. As stated on several previous occasions, a fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island with connections to Treasure Island and to the future path on the West span of the Bay Bridge must be included in the project description.

The underlying mission of the Bay Trail is a Class I, multi-use pathway along the shoreline. While there are times it is not feasible to accommodate a Class I facility due to existing conflicting land uses (San Francisco International Airport, Port of Oakland, etc.), the development of Treasure and Yerba Buena Islands represents an unprecedented opportunity to build not only ‘gold-standard’ Bay Trail, but a green transportation infrastructure that can become a model for cities worldwide.

The new eastern span of the San Francisco-Oakland Bay Bridge will feature a multi-use path connecting Oakland to Yerba Buena Island. Treasure Island will feature a stunning multi-use shoreline path around its perimeter. Both of these facilities are proposed to become part of the region-wide Bay Trail system, and will be a welcome addition. While many progressive statements are made encouraging environmentally sound transportation choices and a true “transit first” approach on the Islands, unfortunately, the current plans as depicted in the DEIR fail to deliver for bicycles and pedestrians on several important fronts. (Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail) [25.1a]

...while we understand that the exact alignment of the offramps from the new eastern span of the Bay Bridge are not finalized at this time—a factor that may impact the final alignment of a trail in this area—we believe that denoting even a draft alignment for the trail on YBI will encourage the myriad planners, engineers, landscape architects, and regulatory agencies who are involved to think of the trail as an important part of this exciting redevelopment opportunity (Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail) [25.1b]

A 6’ wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. It is a well known phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve—this is human nature.

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 18,640 residents and 2,930 employees of the proposed new hotels, restaurants, entertainment and other uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco's "Better Streets" Plan, the Bay Trail Plan, BCDC’s Public Access Design Guidelines, or the Transportation Objectives Shared by TIDA and TICD.
The Macalla Road cross section shown in Figure IV.E.13 shows a 32’ ROW with an 11’ vehicle lane. In order to construct a world class bicycle/pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect—the San Francisco-Oakland Bay Bridge and Treasure Island—a Class I facility or its functional equivalent is needed on both sides of the road. Given the steepness of this route, design within bike/pedestrian facilities must be carefully planned as many cyclists—young and old—will surely be walking the steepest pitches.

During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the above referenced Class I facilities will be incorporated on Macalla Road. The Bay Trail Project is confident that the TI/YBI design team can find an innovative solution to the challenging terrain presented by YBI, and we are open to any solution that provides a safe and enjoyable connection between the Bay Bridge and Treasure Island. However, it is important to note that from our perspective, a singular Class I path in the uphill direction and a bike lane in the downhill direction are baseline starting points from which to begin designing this facility.  

(Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail)  
[25.6]

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a “bicycle circulation improvement”. The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge. Please provide detailed design information and drawings of a proposed solution in the FEIR.  

(Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail)  
[25.7]

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road “would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists.” The impact is deemed “Less than Significant”. Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project’s lack of commitment to non-motorized transportation. Please remove Mitigation Measure M-TR-24 from the proposed project as it will have a significant impact on bicycle circulation on the Islands.  

(Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail)  
[25.8]

It is of the utmost importance that the planners, developers, engineers and landscape architects of TI/YBI plan for future bicycle and pedestrian connections to the west span of the Bay Bridge. Once this facility is in place, the TI and YBI developments will be able to fully realize their promise of green transportation on and off the islands. To this end, the Class I path on Treasure Island should be continued to the 80 westbound onramp, and alongside the remainder of Treasure Island Road to complete a full loop of both Islands.  

(Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail)  
[25.9]

There are serious problems with the proposed ped/bike connection (p. IV.E.38) to the planned new path on the East Span of the bridge. Please provide an analysis of realistic ways to get people between TI and the bridge. Consider the needs and abilities of families with children. Consider
shuttles with racks for multiple bicycles. Consider a significant widening of Macalla Road to accommodate a Class I bike path. Please also do a comparative analysis of the impacts on the bike/ped connection of retaining or removing eucalyptus trees in the area, both with regard to safety and maintenance needs.  

(Ruth Gravanis)  [31.16]

A 6’ wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. It is a well known phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve—this is human nature.

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 16,000 new inhabitants, hotels, restaurants, entertainment and other new uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco’s “Better Streets” Plan, the Bay Trail Plan, or the Transportation Objectives Shared by TIDA and TICD.  

(Tom Radulovich, Livable City)  [36.6]

The Macalla Road cross section shown in Figure IV.E.13 shows a 32’ R.O.W. with an 11’ vehicle lane. Retaining a 5’ bike lane in the downhill direction leaves 21’ in which to construct a world class bicycle/pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect—the San Francisco-Oakland Bay Bridge and Treasure Island. Given the steepness of this route, design within the 21’ ROW for the bike/pedestrian facility must be carefully planned as many cyclists—young and old—will surely be walking the steepest pitches. During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the Class I facility that ABAG has been requesting for the past 8 years will be incorporated on Macalla Road.  

(Tom Radulovich, Livable City)  [36.7]

Treasure Island Road

Page IV.E.39 describes the proposed bicycle facilities on Treasure Island Road as a “…one way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the new Bay Bridge east span. One exception to the continuous Class II facility loop would be on a short section of Treasure Island Road, where the westbound on-ramp to the Bay Bridge diverges from Treasure Island Road, which is on an elevated structure. On this section, the Proposed Project calls for a Class III facility, with special colored pavement and frequent in-street stencils and signage to alert bicycles, autos, and buses that they must share the roadway at this location (see Figure IV.E.15).”

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a “bicycle circulation improvement”. The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge.  

(Tom Radulovich, Livable City)  [36.8b]
Mitigation Measure M-TR-24
“The adoption of Mitigation Measure M-TR-24 could require the removal of the proposed bicycle lane on Treasure Island Road to accommodate a transit-only lane if congestion on Treasure Island Road adversely affects transit operations. If the proposed bicycle lane is removed, cyclists would continue to have a Class II contra-flow facility connecting Treasure Island and the Bay Bridge, via Macalla Road”.

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road “would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists.” The impact is deemed “Less than Significant”. Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project’s lack of commitment to non-motorized transportation. Please remove Mitigation Measure M-TR-24 from the proposed project as it will have a significant impact on bicycle circulation on the Islands. (Tom Radulovich, Livable City) [36.10]

It is a commonsense and reasonably-anticipated phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve, a very significant impact to bicycle circulation.

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 16,000 new inhabitants, hotels, restaurants, entertainment and other new uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco’s “Better Streets” Plan, the Bay Trail Plan, or the Transportation Objectives Shared by TIDA and TICD.

The Macalla Road cross-section shown in DEIR Figure IV.E.13 shows a 32’ right-of-way with an 11’ vehicle lane. Retaining a 5’1 bike lane in the downhill direction leaves 21’ in which to construct a world class bicycle/ pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect – the San Francisco-Oakland Bay Bridge and Treasure Island. Given the steepness of this route, design within the 21’ ROW for the bike/pedestrian facility must be carefully planned, as many cyclists – young and old – will surely be walking the steepest pitches. During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the Class I facility that ABAG has been requesting for the past 8 years will be incorporated on Macalla Road. (Andy Thornley, Program Director, San Francisco Bicycle Coalition) [41.4]

EIR p. IV.E.39 describes the proposed bicycle facilities on Treasure Island Road as a “...one way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the new Bay Bridge east span. One exception to the continuous Class II facility loop would be on a short section of Treasure Island Road, where the westbound on-ramp to the Bay Bridge diverges from Treasure Island Road, which is on an elevated structure. On this section, the Proposed Project calls for a Class III facility, with special colored pavement and frequent in-street stencils and signage to alert bicycles, autos, and buses that they mush share the roadway at this location (see Figure IV.E.15).”
Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a “bicycle circulation improvement”. The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge. (Andy Thornley, Program Director, San Francisco Bicycle Coalition) [41.6]

See comments above in “2. Analyzed alternatives conflict with Bay Trail Plan and policies”. (Andy Thornley, Program Director, San Francisco Bicycle Coalition) [41.7]

5. Mitigation Measure M-TR-24 introduces new significant impacts: The DEIR states:

The adoption of Mitigation Measure M-TR-24 could require the removal of the proposed bicycle lane on Treasure Island Road to accommodate a transit-only lane if congestion on Treasure Island Road adversely affects transit operations. If the proposed bicycle lane is removed, cyclists would continue to have a Class II contra-flow facility connecting Treasure Island and the Bay Bridge, via Macalla Road.

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road “would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists.” The impact is deemed “Less than Significant”. Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project’s lack of commitment to non-motorized transportation. Mitigation Measure M-TR-24 should be struck from the DEIR as it will have a significant impact on bicycle circulation on the Islands. (Andy Thornley, Program Director, San Francisco Bicycle Coalition) [41.9]

As others have commented and we agree, there are serious concerns regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the East Span to both Yerba Buena Island and to Treasure Island. We completely support the proposal for a fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island with connections to Treasure Island and to the future path on the West span of the Bay Bridge. (Dave Campbell, Program Director, East Bay Bicycle Coalition) [43.1]

It is estimated that more bicyclists will use a new bikeway on the Bay Bridge than currently use the bikeway on the Golden Gate Bridge, which sees 250 pedestrians/hour and 250 bicyclists/hour during weekday commutes. This estimate is not unexpected since both the City of San Francisco and the City of Oakland rank in the top 15 nationally as the cities with the highest numbers of bicyclists. The Bay Bridge is the only road between these two bike-centric cities.

Please re-evaluate your plans and the environmental documents for the Yerba Buena Island Redevelopment Project to include safe and inviting bikeways on the Bay Bridge, its connections to the Islands and on the Islands, themselves. (Dave Campbell, Program Director, East Bay Bicycle Coalition) [43.2]
Response

EIR pp. IV.E.36-IV.E.45 describe the bicycle circulation improvements proposed for Treasure Island and Yerba Buena Island. The bicycle facilities proposed on Macalla Road met basic design standards and, as a result, the EIR concluded in Impact TR-33 on pp. IV.E.108 and IV.E.109 that impacts would be less than significant. However, in response to comments that raised concerns regarding the bicycle and pedestrian facilities on Macalla Road, the project sponsors have revised the proposed design of Macalla Road to widen the roadway to expand the bicycle facilities.

Figure II.12: Proposed Bicycle Routes, in EIR Chapter II, Project Description, p. II.46, and Figure IV.E.11: Proposed Bicycle Circulation Plan, p. IV.E.38, are revised to reflect changes to the bicycle route network on Macalla Road and Treasure Island Road to provide additional Class I facilities and a scenic overlook on Treasure Island Road. The revised figures are presented on the following two pages, and the changes to pedestrian and bicycle facilities are described in detail here.

The Proposed Project would reconfigure Macalla Road into a one-way road, allowing vehicular traffic in the northbound, or downhill, direction only (i.e., from the Bay Bridge toward Treasure Island) because two-way travel could not be accommodated with the addition of bicycle and pedestrian facilities. As a result, the only vehicular access for non-emergency vehicles from Treasure Island to the Bay Bridge would be from Treasure Island Road. The primary vehicular capacity constraint for traffic leaving the Islands is the on-ramps to the Bay Bridge, either with or without the separate Ramps Project to reconfigure the westbound ramps on the east side of Yerba Buena Island. This is discussed in Impacts TR-3 through TR-5 on EIR pp. IV.E.75-IV.E.83, which identify the extent to which queuing occurs on roadways approaching the Bay Bridge due to the limited capacity at the on-ramps. The capacity of the on-ramps would not be affected by the proposed reconfiguration of Macalla Road; therefore, traffic congestion would not be exacerbated by converting Macalla Road to one-way. Similarly, providing two-way travel on Macalla Road, as suggested by a comment, would not increase the capacity of the on-ramps.

In response to concerns regarding the safety of the proposed bicycle treatments on Macalla Road, including design treatments at intersections and the roadway’s grade, the EIR concluded that the proposed facilities met standard design guidelines and constituted an adequate provision of bicycle facilities, such that the Proposed Project’s impacts on bicycle circulation would be less than significant (see EIR Impact TR-33). However, in light of this and several other comments regarding bicycle circulation on Yerba Buena Island, and in particular, connections between the Class I mixed-use pedestrian and bicycle path on the new East Span of the Bay Bridge and Yerba Buena Island and Treasure Island, the project sponsors reviewed the available right-of-way and revised the planned improvements to Macalla Road. The revised proposal includes (from south
(REVISED) FIGURE II.12: PROPOSED BICYCLE ROUTES
to north) a 16-foot, two-way Class I mixed-use pedestrian and bicycle path, an 11-foot vehicular travel lane, a 2- to 3-foot buffer, and a 6- to 7-foot Class II bicycle lane in the downhill direction. Cyclists traveling downhill could use either the Class I facility or the Class II facility. Cyclists traveling in the uphill direction would use the Class I facility, which would follow the existing, relatively steep contours of Macalla Road, but would provide a greater separation from vehicular traffic than the Class II facility previously proposed, as it would be elevated from the roadway and separated by a curb and gutter. The 16-foot facility would stretch from the intersection of Treasure Island Road/Macalla Road to North Gate Road/Macalla Road. At the Treasure Island Road/Macalla Road intersection, users would be able to connect to proposed 10-foot Class I mixed-use bicycle and pedestrian paths on either side of Treasure Island Road between Macalla Road and Treasure Island, where users could connect to the proposed bicycle and pedestrian network on Treasure Island. Beyond the North Gate Road/Macalla Road intersection, users would be able to continue toward the Class I mixed-use pedestrian and bicycle path on the new East Span of the Bay Bridge using either a 12-foot Class I bicycle path or a 6.5-foot pedestrian path. Ultimately, these facilities provide continuous Class I facilities between the Class I mixed-use pedestrian and bicycle path on the new East Span of the Bay Bridge and Treasure Island.

Figure IV.E.13: Proposed Macalla Road at Bay Bridge Westbound On-Ramp Intersection Configuration, on EIR p. IV.E.41, is revised to illustrate these changes on Macalla Road. Figure IV.E.14: Proposed Treasure Island Road at Macalla Road Intersection Configuration, on EIR p. IV.E.42, is revised to present the changes to the intersection to accommodate the 16-foot wide, two-way shared pedestrian/bicycle path, as well as a new 10-foot wide shared pedestrian/bicycle path on the west side of Treasure Island Road (discussed further below in the response in Subsection 2.7.7.2, Bicycle Access – View Area). A scenic overlook would be provided at the terminus of this Class I path on Treasure Island Road; beyond that point, there would be no pedestrian facilities and the bicycle facilities on Treasure Island Road would be limited to the one-way Class II path originally proposed and discussed on EIR pp. IV.E.32 and IV.E.38-IV.E.39. Figure IV.E.15: Proposed Treasure Island Road at Bay Bridge Westbound On-Ramp (West Side) Intersection Configuration, on EIR p. IV.E.44, is revised to correct the width of the bicycle lane from 4 feet to 6 feet. Revised Figures IV.E.13, IV.E.14, and IV.E.15 are shown on the next three pages.

Text in EIR Chapter II, Project Description, and EIR Section IV.E, Transportation, is revised to account for these revisions to the Proposed Project.

The second sentence in the first full paragraph on p. II.48 is revised as follows (deleted text is shown in strike through, new text is underlined):

Class I mixed bicycle and pedestrian paths are proposed around the perimeter of Treasure Island, connecting to Class I bicycle-only bicycle paths in the open space areas. A Class I mixed-use, two-way bicycle/pedestrian path along the south side of Macalla Road
(REvised) Figure IV.E.13: Proposed Macalla Road at Bay Bridge Westbound
On-Ramp Intersection Configuration
TREASURE ISLAND AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISED) FIGURE IV.E.14: PROPOSED TREASURE ISLAND ROAD AT MACALLA ROAD INTERSECTION CONFIGURATION

SOURCE: AECOM, 2009

NOT TO SCALE

16' Two-Way Shared Bike/Pedestrian Path

16' Bike Lane

5' Bike Lane

10' Shared Bike/Pedestrian Path

5' Bike Path

10' Bike Left Turn Lane

5' Median

11' Median

10' Median

11' Median

12' Median

11' Median

11' Median

10' Median

5' Median

5' Median

10' Bike Lane

Area outside of existing Right of Way

Stop

Stop

11' Median

11' Median

11' Median

11' Median

16'

Macalla Rd

10' Shared Bike/Pedestrian Path

4' Striping

Shared Bike/Pedestrian Path

Bike Lane

Bike Lane

Area of Detail

Area of Detail

SOURCE: AECOM, 2009
(REVISED) FIGURE IV.E.15: PROPOSED TREASURE ISLAND ROAD AT BAY BRIDGE WESTBOUND ON-RAMP (WEST SIDE) INTERSECTION CONFIGURATION
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would also connect to the east span of the Bay Bridge on Yerba Buena Island. A Class II bicycle lane also would be provided on the north side of Macalla Road for cyclists heading downhill (with traffic) from the Bay Bridge.

A new sentence is added at the end of the first full paragraph on p. II.48:

A Class I mixed-use, two-way bicycle/pedestrian path would be provided west of and parallel to Treasure Island Road south of the causeway, leading to a scenic overlook to be provided about 500 feet south of the intersection with Macalla Road.

The first paragraph under the bulleted paragraph “Major Arterials” on p. IV.E.32 is revised as follows (deleted text is shown in strike through, new text is underlined):

- On Treasure Island Road, a bicycle lane would be provided in the south and east-bound directions only (i.e., from Treasure Island towards the Bay Bridge only), with the exception that a Class II bicycle lane would be provided for a short segment in the northbound direction from Macalla Road to Treasure Island, connecting the proposed bicycle lane in the downhill direction on Macalla Road with Treasure Island. A short section on Treasure Island Road near the existing Bay Bridge westbound on-ramp would have a 14-foot wide travel lane and a Class III bicycle route instead of a Class II bicycle lane. There would be sidewalks 10-foot Class I shared bicycle/pedestrian facilities provided on both sides of Treasure Island Road between Treasure Island and Macalla Road. In addition, the 10-foot Class I shared bicycle/pedestrian facility proposed on the west side of Treasure Island Road would extend from the Transit Hub on Treasure Island to the proposed lookout point south of the Macalla Road intersection. Otherwise, no sidewalks would be provided on the section of Treasure Island Road between Macalla Road and the Bay Bridge.

There is no change to footnote 10, cited in this text change.

The last dashed paragraph on p. IV.E.32, which continues at the top of p. IV.E.33, is revised as follows (deleted text is shown in strike through, new text is underlined):

- Macalla Road would be reconfigured to provide (from south to north) a 16-foot two-way Class I shared bicycle/pedestrian path, an 11-foot travel lane allowing one-way vehicular traffic only, from the Bay Bridge northwesterly towards Treasure Island Road, a 2- to 3-foot buffer, and a 5- to 9-foot Class II bicycle lane in the downhill direction. Cyclists traveling downhill could use either the Class I facility or the Class II facility. Cyclists traveling in the uphill direction could use the Class I facility. Pedestrians traveling in either direction could use the Class I facility on the south side of Macalla Road. This street would provide one 11-foot wide travel lane, a five-foot Class II bicycle lane on the right-hand side, and a 6-foot wide contra-flow bicycle lane on the left-hand side. A 5-foot wide sidewalk would also be provided on the left-hand side.

The second full paragraph on EIR p. IV.E.39 is revised as follows (deleted text is shown in strike through, new text is underlined):

In addition, a contra-flow, 16-foot two-way, shared Class II bicycle/pedestrian path lane would be provided on Macalla Road. The Macalla Road bicycle path would provide
a shorter, yet steeper, alternative route from Treasure Island to the Bay Bridge. A 10-foot two-way shared Class I bicycle/pedestrian path would also be constructed on the west side of Treasure Island Road between Treasure Island and the new lookout point just south of the Macalla Road intersection, as well as on the east side of Treasure Island Road between Treasure Island and Macalla Road. Other streets on Yerba Buena Island would allow shared bicycle/auto use, but no exclusive bicycle right-of-way would be provided.

The last two sentences in the second bulleted paragraph on EIR p. IV.E.39 are revised as follows (deleted text is shown in strike through, new text is underlined):

On the north side of this intersection, the shared path would continue on the south side of Macalla Road to its terminus at Treasure Island Road, and bicyclists destined for Treasure Island would need to cross Macalla Road at a new crosswalk. North of this crossing, Macalla Road would provide one travel lane northbound (toward Treasure Island) and would have a Class II bicycle lane in each direction, one being a contra-flow lane.

The text in the first bulleted paragraph at the top of EIR p. IV.E.43 is revised as follows (deleted text is shown in strike through, new text is underlined):

Treasure Island Road at Macalla Road – The proposed bicycle treatments at this intersection are shown on Figure IV.E.14: Proposed Treasure Island Road at Macalla Road Intersection Configuration. Bicyclists using Treasure Island Road to access the Class I two-way shared bike/pedestrian path contra-flow bicycle lane on Macalla Road from Treasure Island would need to turn left across the opposing direction of traffic on Treasure Island Road to access Macalla Road. The Proposed Project would provide a new five-foot wide bicycle-only left-turn lane from Treasure Island Road to Macalla Road adjacent to an 11-foot wide travel lane on Treasure Island Road and separated from oncoming traffic by an 11.5-foot median. The bicycle-only turn lane and wide median would facilitate the left turn maneuver, and provide a clear and safe route to access Macalla Road from Treasure Island Road

The second and third bulleted items on the bottom of EIR p. IV.E.43 are revised as follows (deleted text is shown in strike through, new text is underlined):

- Macalla Road contra-flow Class II downhill bicycle lane at intersecting cross-streets; and
- Treasure Island Road/Macalla Road intersection.
  - Bicycle-only left-turn lane from Treasure Island Road to the contra-flow Class I bicycle lane path on Macalla Road; and
  - Bicycle-only section of median on Treasure Island Road at Macalla Road.

The second bulleted item on the bottom of EIR p. IV.E.100 is revised as follows (deleted text is shown in strike through, new text is underlined):

- Elimination of the proposed southbound Class II bicycle lane on Treasure Island Road and a small portion of Hillcrest Road south of the intersection with Macalla
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On Yerba Buena Island, a one-way Class II bicycle lane would be provided on Treasure Island Road and Hillcrest Road, which would continue as a loop around South Gate Road and Macalla Road, back to Treasure Island Road. Although Macalla Road is one-way northbound for vehicles; a contra-flow Class II bicycle lane would also be provided from Treasure Island Road to South Gate Road, continuing on South Gate Road to its intersection with Hillcrest Road, and the Class I path connecting to the new Bay Bridge eastern span path, although portions of this facility near the bridge and ramps connections are proposed to be constructed separately by the Ramps Project and the Bay Bridge eastern span replacement project, separated from traffic by a two-foot buffer with painted chevrons. As a result, Macalla Road would provide a Class II bicycle lanes path in each direction connecting Treasure Island Road and the Bay Bridge for bicycle traffic in each direction, as well as a Class II bicycle lane specifically for bicycle traffic traveling in the downhill direction from the Bay Bridge toward Treasure Island.

The last paragraph on p. IV.E.108, and continuing on to p. IV.E.109, is revised as follows (deleted text is shown in strike through, new text is underlined):

There would be one primary bicycle route from the Bay Bridge to Treasure Island, on Macalla Road, either via the Class I or Class II facilities provided on that roadway. There would be two primary routes from Treasure Island to the Bay Bridge. The Class I facility on Macalla Road would be the most direct (although steeper) route to the Bay Bridge from Treasure Island. Bicyclists who opt for a longer, but less steep route from Treasure Island to the Bay Bridge would use the one-way Class II bicycle lane on Treasure Island Road and Hillcrest Road. At the intersection of Hillcrest Road and South Gate Road, bicyclists would be able to enter the Bay Bridge bicycle/pedestrian path providing access to the East Bay. Bicyclists traveling on Macalla Road to access the Bay Bridge bicycle path would use the Class I bicycle lanes path on Macalla Road; and South Gate Road between Treasure Island and the Bay Bridge westbound/ eastbound ramps intersection at Hillcrest Road and South Gate Road, where the Class I facility would intersect the Bay Bridge eastern span facility. Between that intersection and the Bay Bridge bicycle path, which begins at the intersection of Hillcrest Road and South Gate Road, bicyclists and pedestrians would use a 10-foot shared pathway on the west side of the street, which would continue along South Gate Road and loop around onto the bridge.
The third sentence in the first full paragraph on EIR p. IV.E.109 is revised as follows (deleted text is shown in strike through, new text is underlined):

At Macalla Road and the Bay Bridge westbound ramps, treatments would include a Class II bicycle-only lanes in each the downhill direction between the Bay Bridge westbound ramps and Treasure Island Road.

The first full sentence of the first partial paragraph on p. IV.E.110 is revised as follows (deleted text is shown in strike through, new text is underlined):

Cyclists would continue to have a Class II contra flow facility connecting Treasure Island and the Bay Bridge, via Treasure Island Road (eastern side) and Macalla Road.

A new sentence is added at the end of the first paragraph on p. IV.E.112 (deleted text is shown in strike through, new text is underlined):

On Yerba Buena Island, sidewalks would be built on public streets, except on Treasure Island Road, south of Macalla Road, where grading constrains the width of the right-of-way along roadways. In addition to sidewalks, several trails through the open spaces and development areas would be constructed on Yerba Buena Island. A new Class I shared bicycle/pedestrian facility would also be constructed on Macalla Road and South Gate Road providing pedestrian connections between Treasure Island and the Bay Bridge eastern span bicycle/pedestrian facility.

The proposed Class I bicycle/pedestrian path on Macalla Road would involve some widening of Macalla Road, requiring the removal of eucalyptus and other non-native plants. The draft Habitats Management Plan for Yerba Buena Island (“HMP”) includes provisions for removing and thinning stands of non-native trees, specifically eucalyptus trees, in Section V, Best Management Practices, Subsection G, Non-native Tree Removal. There is also a section in the draft HMP on surveying for hazardous trees (see Section V, Best Management Practices, Subsection F, Hazard Tree Assessment), particularly large eucalyptus trees, because they are prone to structural deficiencies. High human use areas such as pedestrian and bicycle facilities on Yerba Buena Island would be one of the areas focused on in performing surveys for hazardous trees. Therefore, bicycle and pedestrian facilities would be taken into account as part of the overall management plan. Removal strategies and hazards issues would be balanced with habitat issues, such as surveys for active bird nests. The notable California buckeye tree on the south side of Macalla Road near its intersection with Treasure Island Road would be retained.

The revised configuration for Macalla Road would allow a two-way Class I path between Treasure Island and the East Span of the Bay Bridge. Comments also ask how the Proposed Project would connect to the proposed West Span Bicycle / Pedestrian Mixed Use (“BPM”) Path currently under study by BATA and Caltrans. The scope for the West Span BPM Path Project

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10 Draft Habitat Management Plan, pp. 50-53
11 Draft Habitat Management Plan, p. 49.
Study Report ("PSR") includes looking at how to design the path on the west span of the Bay Bridge, and exploring how that path would connect both to the East Span path currently under construction and to the facilities on Treasure Island. While the details of how the two projects would connect cannot be determined until a design for the West Span BPM Path is selected, the Proposed Project would not preclude Class I connections to that path. Bicyclists and pedestrians could connect indirectly, by using the Class I facilities that connect to the Class I path on the new eastern span and from there connect to a new path on the west span; alternatively, the Class I path and scenic overlook provided along Treasure Island Road as part of the Proposed Project in response to comments would terminate at the point that the West Span BPM Path project is considering adding separate bridge structures to connect to the West Span of the Bay Bridge. Under either circumstance, there would be continuous Class I facilities from Treasure Island to the West Span BPM Path. None of the alternatives currently under study as part of the West Span BPM Path PSR relies on the southern portion of Treasure Island Road to make connections to the West Span BPM Path.

In response to comments that suggested that the grade of Macalla Road is unsafe for cyclists traveling downhill, and that cyclists may travel too fast, the grade and connections provided on Macalla Road were considered in developing the Proposed Project improvements. Because Macalla Road provides the most direct route between the Bay Bridge and Treasure Island, it is likely to be more heavily used than alternate routes, such as Hillcrest Road and Treasure Island Road for downhill travel. Therefore, the Proposed Project has focused safety improvements on Macalla Road to improve conditions for cyclists that would likely use this road whether improvements are made or not. As part of Proposed Project improvements on Macalla Road, warning signs would be posted for hills and steep grades, including California Manual on Uniform Traffic Control Devices sign 2C.48 “Watch Downhill Speed.” These signs would warn drivers and bicyclists of steep grades.

The EIR concludes that implementing Mitigation Measure M-TR-24 (a transit-only lane on Treasure Island Road, which would remove the proposed Class II bicycle lane on Treasure Island Road) would not cause significant secondary impacts to bicycle circulation. The mitigation measure was deemed necessary by the EIR preparers because, under certain conditions vehicle queues on the Bay Bridge on-ramp approaches would extend along Treasure Island Road, potentially blocking bus circulation from Treasure Island toward the Bay Bridge, resulting in delays to bus service. As indicated on EIR p. IV.E.100, Mitigation Measure M-TR-24 would be implemented if and only if the extent of actual vehicle queues were to impact buses accessing the Bay Bridge. The implementation of a transit-only lane would be triggered if impacts in the form of delay to bus service equal to or greater than the prevailing headway are observed over the course of six months at least 50 percent of the time during the AM, PM, or Saturday peak periods. If queues do not cause these delays to bus service, Mitigation Measure M-TR-24 would not be implemented. The SFMTA will determine whether and at what point to require implementation
of Mitigation Measure M-TR-24. Conditions on Treasure Island Road will be monitored as established in the Mitigation Monitoring and Reporting Program and as summarized above. Installation of the associated improvements could be done in a relatively short period following action, perhaps within a month or two, as the improvements would involve only changes to the roadway striping and no construction other than minor reconfiguration of the median on Treasure Island Road north of Macalla Road would be required.

The second paragraph on EIR p. IV.E.100 is revised as follows to clarify that SFMTA is the implementing agency of Mitigation Measure M-TR-24 (new text is underlined):

Implementation of Mitigation Measure M-TR-24 would only be triggered if the extent of actual vehicle queuing impacts the proposed Muni line 108 Treasure Island on Treasure Island Road and creates delays for Muni buses accessing the westbound transit-only on-ramp. As such, throughout the life of the project, the TITMA, in consultation with SFMTA and using SFMTA’s methodology, shall monitor the length and duration of potential queues on Treasure Island Road and the associated delays to Muni service. If the queues between First Street and the westbound on-ramp on the west side of Yerba Buena Island result in an operational delay to Muni service equal to or greater than the prevailing headway during the AM, PM or Saturday peak periods, SFMTA, in consultation with TITMA, shall implement a southbound transit-only lane between First Street on Treasure Island and the transit and emergency vehicle-only westbound Bay Bridge on-ramp. The implementation of a transit-only lane would be triggered if impacts are observed over the course of six months at least 50 percent of the time during the AM, PM, or Saturday peak periods.

Although under these certain circumstances the proposed Mitigation Measure M-TR-24 would eliminate the Class II facility on Treasure Island Road and use the right-of-way to accommodate a transit-only lane, as noted above bicyclists destined for San Francisco could potentially access the proposed West Span BPM path through a variety of means, depending on the final design selected for that project. None of the Proposed Project transportation network improvements preclude future construction of the proposed West Span BPM as a separate project, nor would the facilities being provided by the Proposed Project preclude connections being made to those facilities under consideration in the West Span BPM PSR.

As noted in the discussion of Impact TR-33 on EIR pp. IV.E.109-IV.E.110, the implementation of Mitigation Measure M-TR-24 would create a less desirable option for cyclists traveling uphill, as they would have to use a steeper roadway. However, the Planning Department, in consultation with SFMTA, determined that this would not be considered a significant impact because bicycle facilities on Macalla Road would be substantially upgraded compared to existing baseline conditions, with a two-way Class I facility and a separate northbound Class II facility. In addition, for cyclists who do not wish to cycle up either Macalla Road or Treasure Island Road, the on-island shuttle fleet would be outfitted with bicycle racks, such that users could secure their bicycle onto the shuttle, and then remove it at the top of the hill to join the Bay Bridge East Span bicycle path, and, if completed, the west span bicycle path.
Even without implementation of Mitigation Measure M-TR-24, a number of comments suggested that the bicycle treatment on Treasure Island Road, particularly where it crosses the westbound on-ramp to the Bay Bridge on the west side of Yerba Buena Island, would present a challenge for cyclists. Generally, good design practices call for designing on-ramp terminals to intersect roadways at right angles, similar to a standard intersection. As a result, vehicles entering the on-ramp do so at slower speeds, and drivers and cyclists, alike, are presented with a more familiar roadway configuration to navigate. However, in the case of the westbound Bay Bridge on-ramp on the west side of Yerba Buena Island, the existing roadway configuration is constructed as a “free-right” diverge, whereby autos can enter the on-ramp at full speed. This interchange is constructed as part of a bridge structure and substantial physical design improvements, such as re-aligning the on-ramp to be more perpendicular to Treasure Island Road would involve completely reconstructing the viaduct structure and the on-ramp connection to the Bay Bridge, which would be prohibitively expensive.

Some of the bicycle/automobile conflicts may be reduced if a Class I facility were to be provided along Treasure Island Road, past its currently-proposed terminus at the new lookout point. However, the roadway width is not sufficient in several locations to provide a Class I facility on Treasure Island Road without substantial widening. Providing a Class I bicycle facility on the east (uphill) side of Treasure Island Road would also not satisfy many of the concerns raised by the commenters. First, it would be difficult to connect a Class I facility on the east side of the road to the proposed West Span Bike Path; the connection would require a structure to go either over or under the roadway to get to the bridge, and it would be difficult to have the space to do that at a reasonable grade given that the Class I path would be immediately adjacent to the hill. In addition, a Class I facility would also need to cross over Hillcrest Road at some point to avoid conflicts with traffic exiting from the eastbound off-ramp, and to get to the correct side of the road for the new East Span bicycle-pedestrian path. Finally, even if the physical challenges to constructing a Class I facility on this portion of Treasure Island Road were overcome, Mitigation Measure M-TR-24 would still require the removal of this facility.

Although there is not physically room for a Class I or II facility for a short section of Treasure Island road near the on-ramp to the Bay Bridge, the Proposed Project includes a substantial amount of visual cues for both drivers and cyclists, alerting them to the junction. Cues and warning devices would include colored pavement treatments, warning signs, and frequent in-pavement stencils. This configuration was developed in consultation with SFMTA, the San Francisco Bicycle Coalition, and others, and was identified as the best available treatment given the constraints at that location. Although the treatments do not provide continuous Class I or Class II facilities through the segment, they do substantially increase the visibility of cyclists and represent a substantial improvement over the existing condition of Treasure Island Road. Finally, with implementation of the Ramps Project, the westbound on-ramp to the Bay Bridge from
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Treasure Island Road would be limited to transit vehicles only, meaning that conflicts with cyclists would be less frequent than if the ramp were open to mixed traffic.

2.7.7.2 Bicycle Access – View Area

Comments

A vista point near the westbound onramp to I-80 off of Treasure Island Road would not only be a desirable amenity, but could potentially serve to secure right-of-way until an alignment onto and across the bridge is secured. R.O.W in the area between the vista point and the bridge structure should be secured so that interim plans or construction do not preclude this important connection in the future. *(Maureen Gaffney, Bay Trail Planner, San Francisco Bay Trail)* [25.10]

The Bay Trail Project’s comment letter for the *Design for Development Document* recommended a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the Highway 80 west onramp from Treasure Island Road, suggesting that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. Please include discussion of such an overlook in the FEIR, and include complete Class I multiuse paths to this location from both sides of the Island. *(Andy Thornley, Program Director, San Francisco Bicycle Coalition)* [41.2]

The Bay Trail Project’s comment letter regarding the Design for Development Document suggested a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the 80 west onramp from Treasure Island Road. We suggested that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. Please include discussion of such an overlook in the FEIR, and include complete Class I multi-use paths to this location from both sides of the Island. *(Tom Radulovich, Livable City)* [36.4]

Response

In response to comments requesting to include a scenic overlook from Treasure Island Road, near the on-ramp to westbound I-80, both as an amenity and as a means to secure right of way for potential future connection to the separate proposal for a new bicycle and pedestrian path on the western span of the Bay Bridge, the project sponsors conducted additional engineering analyses. An overlook cannot be constructed at the requested location because Treasure Island Road is on a structure, and there is no land on which to locate an overlook. Also, even if an overlook were possible in this location, access would be limited to Class II bicycle lanes, as there is not room to include a Class I facility, as requested in some comments.

However, the project sponsors have identified an alternative location for a scenic overlook, on Treasure Island Road, approximately 500 feet south of the Macalla Road intersection, as shown in revised Figure IV.E.11: Proposed Bicycle Circulation Plan, presented in the response in Subsection 2.7.7.1, Bicycle Access – Macalla Road, above. The Project is also proposing to include a two-way Class I bicycle facility between the new overlook and Treasure Island. Although the scenic overlook and Class I bicycle connections to Treasure Island are anticipated to
provide a substantial amenity to visitors and residents of Treasure Island, these amenities are not required as mitigation measures to mitigate significant project-related impacts.

The newly-proposed Class I facilities on the northern portion of Treasure Island Road on Yerba Buena Island, and along Macalla Road would preserve right-of-way for a Class I facility between Treasure Island and the Bay Bridge. See the responses in Subsection 2.7.7.1, Bicycle Access – Macalla Road, for additional discussion of bicycle access to the Bay Bridge.

2.7.7.3 Bicycle Access – West Span

Comment

Connections to Future Path on the West Span

It is of the utmost importance that the planners, developers, engineers and landscape architects of TI/YBI plan for future bicycle and pedestrian connections to the west span of the Bay Bridge. Once this facility is in place, the TI and YBI developments will be able to fully realize their promise of green transportation on and off the islands. To this end, the Class I path on Treasure Island should be continued to the 80 westbound onramp, and alongside the remainder of Treasure Island Road to complete a full loop of both Islands. A vista point near the westbound onramp to I-80 off of Treasure Island Road would not only be a desirable amenity, but could potentially serve to secure right-of-way until an alignment onto and across the bridge is secured. R.O.W in the area between the vista point and the bridge structure should be secured so that interim plans or construction do not preclude this important connection in the future. (Tom Radulovich, Livable City) [36.11]

Response

The Proposed Project does not preclude future construction of a bicycle path on the West Span and a connection to Treasure Island and Yerba Buena Island. Also see the response in Subsection 2.7.7.1, Bicycle Access – Macalla Road, regarding Proposed Project improvements on Yerba Buena Island. A connection to a bicycle path on the West Span could be provided in various ways.

2.7.7.4 Bicycle Safety

Comments

Section IV, page IV.E.104 - “At the intersection of Hillcrest Road at South Gate Road, bicycle treatments would allow for an uncontrolled crossing of South Gate Road for bicyclists destined to the Bay Bridge bicycle path.” – The USCG has concerns with this proposal in light of USCG personnel turning right from Southgate onto the eastbound on-ramp. Signage should be provided to both drivers on Southgate and to cyclists on Hillcrest to proceed with caution through this intersection. (P. M. McMillin, Captain, U. S. Coast Guard) [10.18]

In addition, the FEIR should address incorporating signals along Treasure Island Road at the Bay Bridge Westbound On-Ramp Intersection, as shown on Figure IV.E.15, which could create a
safer bicycle access lane across the on-ramp. (Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission) [17.19]

Response

Figure IV.E.12: Proposed Hillcrest Road at South Gate Road Intersection Configuration, on EIR p. IV.E.40 presents the Proposed Project treatments at the intersection of Hillcrest Road and South Gate Road. The approach to Hillcrest Road from Southgate Road would be controlled with “STOP” signs, and bicycles on Hillcrest Road would be traveling in marked bicycle lanes. Coast Guard motorists turning right from Southgate Road to the eastbound on-ramp to the Bay Bridge would be required to stop before proceeding onto the Bay Bridge. This situation would be similar to other side-street stop-controlled intersections with striped Class II bicycle lanes, and therefore, the EIR’s conclusion that this intersection would not constitute a significant impact to bicycle circulation and safety remains valid. Figure IV.E.12 is revised to include the Coast Guard Quarters 9 Driveway, as well as to illustrate the changes to the South Gate Road paths that are currently under construction by Caltrans as part of the Bay Bridge East Span Project to provide a separated 6.5-foot-wide pedestrian path and a 12-foot-wide bicycle path. The revised figure is shown on the following page. See the response in Subsection 2.7.11.1, Circulation Impacts, regarding additional improvements at this intersection to accommodate Coast Guard vehicles.

Regarding the suggestion to install a traffic signal at the intersection of Treasure Island Road and the westbound on-ramp to the Bay Bridge on the west side of Yerba Buena Island to improve bicycle safety, it would be unusual to provide a signal at a location where a single traffic stream diverges into two streams. The California Manual on Uniform Traffic Control Devices, California Department of Transportation, 2010, contains several criteria for determining whether new signals are warranted. Specifically, pp. 4C-7 and 4C-8 describe the warrants for installing a signal to facilitate bicycle travel. The criteria include three warrants: volume, collision, and geometric. To meet the criteria for installing a signal, either the volume and collision warrants must be met or the volume and geometric warrants must be met. Since there is very little bicycle activity at the site under existing conditions, and since it is impossible to predict future collisions, it is speculative to predict whether warrant would be met. The geometric criteria state that a signal is appropriate only when a separate bicycle/multi use path intersects a roadway or to facilitate a bicycle movement that is not permitted for a motor vehicle. In this case, although there would be a Class II/Class III facility along Treasure Island Road, it would not be a separated facility intersecting a roadway. Further, since vehicles are also allowed on Treasure Island Road, it would not facilitate a movement that is not permitted for a motor vehicle. Thus, the geometric warrant would not be met, and the overall bicycle signal warrant would not justify installation of a new bicycle signal at this location.

Also see the response in Subsection 2.7.7.1, Bicycle Access – Macalla Road, above, for additional discussion of bicycle safety and Proposed Project improvements.
Hillcrest Southgate proposed intersection.ai

December 30, 2010

From EB Off Ramp
To EB On Ramp

Hillcrest Rd

Shared 16' wide Ped / Bike Path

Separated 6.5' Ped Path; 12' Bike Path

Quarters 9 Driveway

Area of Detail

SOURCE: AECOM, 2009

TREASURE ISLAND AND TERESA BUENA ISLAND REDEVELOPMENT PROJECT EIR

(REVISI) FIGURE IV.E.12: PROPOSED HILLCREST ROAD AT SOUTH GATE ROAD INTERSECTION CONFIGURATION
2.7.8 PEDESTRIANS

2.7.8.1 Pedestrian Circulation

**Comment**

3. **Transportation analysis fails to recognize significant impacts to pedestrian and bicycle circulation:** The DEIR’s discussion of Pedestrian Circulation Improvements within Section IV E: Transportation, states that the pedestrian circulation network “would encourage walking as the primary mode within the Development Plan Area.” However, this is followed with “Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed.”(Andy Thornley, Program Director, San Francisco Bicycle Coalition) [41.5]

Under “Pedestrian Circulation Improvements” (p. IV.E.36) the document states that the pedestrian circulation network “would encourage walking as the primary mode within the Development Plan Area.” However, this is followed with “Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed.” It is difficult to evaluate this approach when the diagram on E.37 fails to show the streets and erases the contour lines in the housing areas.

Please rethink the “Secondary Pedestrian Route” that appears to traverse the rip-rap along the causeway to bring people down onto Clipper Cove Beach and along a sensitive habitat area. Please analyze the impacts on native plants and animals that would result from the construction and use of such a route. (Ruth Gravanis) [31.17]

Under “Pedestrian Circulation Improvements”, the document states that the pedestrian circulation network “would encourage walking as the primary mode within the Development Plan Area.” However, this is followed with “Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed.” (Tom Radulovich, Livable City) [36.8a]

**Response**

The pedestrian impact assessment is presented in Impact TR-35 on EIR pp. IV.E.111-IV.E.113. On Treasure Island, where the majority of new development would occur, sidewalks would be constructed on all streets, except on the pedestrian priority shared public ways, where pedestrians would have use of the full right-of-way. Intersections would include crosswalks and a number of corner bulbouts to shorten pedestrian crossing distances and improve pedestrian visibility. On Yerba Buena Island, sidewalks would be built on public streets, except on Treasure Island Road, south of Macalla Road, where grading constrains the width of the right-of-way. In addition to sidewalks, several paths through the open spaces and development areas would be constructed on Yerba Buena Island. In addition, as indicted on EIR p. II.39, Yerba Buena Island would also have privately owned streets that would provide access to the main residential areas.

While the proposed sidewalk and pedestrian path system on Yerba Buena Island would be less direct than on Treasure Island due to the topography of the Island, it would nonetheless provide
adequate pedestrian connections to all uses on the island. Since the new pedestrian trips generated by the Proposed Project would not result in substantial overcrowding on the proposed pedestrian facilities, or result in hazardous conditions, the Proposed Project’s impacts on pedestrians was determined to be less than significant.

Figure IV.E.10: Conceptual Yerba Buena Island Pedestrian Circulation Plan, on EIR p. IV.E.37, is revised, and is presented on the following page. The revisions include removing a pedestrian path along Clipper Cove Beach, provision of a pedestrian connection to a new lookout point on Treasure Island Road, just south of Macalla Road, and refinements to interior paths. Changes to interior trails were made to more accurately reflect the alignment of existing trails that would be available after redevelopment. These include, for example, the trail from near the top of Macalla Road (just north of the Bay Bridge) that leads down toward the “Great Whites,” and removal from the figure of a fire road that previously extended through the Coast Guard property, which is outside the control of the project sponsors. Changes were also made in the development areas (including both residential areas and on the hilltop park) to show a greater level of detail on conceptual circulation. In addition, the Bay Trail designation was removed from the west span of the Bay Bridge, as this trail does not currently exist and is not currently planned (feasibility is still under study). The removal of the pedestrian path along Clipper Cove Beach responds to concerns raised in a comment regarding potential impacts on native plants and animals if a pedestrian path were to be constructed along the Cove.

The first paragraph on EIR p. IV.E.112 is revised as follows to add mention of the new pedestrian connection to the new overlook viewing area (deleted text is shown in strike through, new text is underlined):

On Yerba Buena Island, sidewalks would be built on most public streets, except on Treasure Island Road, south of Macalla Road, where grading constrains the width of the right-of-way along roadways and a pedestrian path would be constructed as part of a two-way, mixed-use bike/pedestrian facility along Treasure Island Road to a scenic overlook about 500 feet south of the intersection with Macalla Road. In addition to sidewalks, several trails through the open spaces and development areas would be constructed on Yerba Buena Island.

2.7.8.2 Walking Times

Comment

The Walking Times map (page II.47) is inaccurate for YBI. People take longer to walk uphill (and up stairs), and since most of us can’t walk on water it will take longer to get from the transit hub to the east housing area on YBI than to a site that is the same distance away (as the crow flies) on TI. Please revise the walking times diagram to make it realistic. It is necessary to have this information to be sure that YBI residents and visitors are equitably served. *(Ruth Gravanis)* [31.13]
Response

Figure II.13: Walking Times to Transit Hub, in EIR Chapter II, Project Description, on p. II.47, is revised to more clearly show walking time radii on Treasure Island and Yerba Buena Island, and is presented on the next page. Although some residents and visitors to Yerba Buena Island would walk to/from the transit hub, the majority would most likely take the Islands shuttle instead. As indicated on EIR p. II.45, residents of Yerba Buena Island would be within a 5-minute walk of a shuttle stop. The modifications to Figure II.13 do not affect the pedestrian impact analysis discussion presented in Impact TR-35 on EIR pp. IV.E.111-IV.E.113; the Proposed Project’s impacts on pedestrians would remain less than significant.

2.7.9 GOODS MOVEMENT

2.7.9.1 Trucks – Bay Bridge

Comment

In Table 49, page 207 of the TIS, the proposed project would generate 583 daily truck trips (approximately 24 per hour). The I-80 eastbound and westbound off-ramps for Treasure Island and YBI are designed with small radius curves. As a result, there is a potential for serious operational and safety issues on the mainline as a result of the queuing caused by vehicles waiting to exit behind larger vehicles negotiating these small radius curves at slow speeds. As the owner and operator of State highway facilities, the Department is obligated to ensure public safety on all highways under its jurisdiction, and monitors factors such as accident rates, traffic and truck volumes, speed and level of service. Please include proposed improvements and mitigation measures to address these potential safety issues. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.20]

Response

As indicated by the comment, the I-80 eastbound and westbound off-ramps for Treasure Island and Yerba Buena Island have small radius curves, which require slower travel speeds for vehicles, and especially trucks, exiting the bridge (see discussion on EIR p. IV.E.74). The small radius curves are an existing condition, and these ramps have been continuously used by trucks accessing the Islands since their construction. Due to the tight radius, warning signs indicating a tight turn and 15 mph speeds are posted at the approach to the eastbound off-ramp on the west side of Yerba Buena Island. According to Caltrans, California legal size trucks are no longer than 65-feet, and the existing westbound off-ramp on the west side of Yerba Buena Island can accommodate a 65-foot truck. However, the Surface Transportation Assistance Act of 1982 (STAA) allows larger trucks to operate on routes that are part of the National Network, which includes I-80 and the Bay Bridge. Due to the tight radius, STAA trucks longer than 65 feet cannot be accommodated on the existing westbound off-ramp on the west side of Yerba Buena Island. In response, the following item has been added as an item required as part of M-TR-1: Construction Traffic Management Plan (new text is underlined):
0 - 5 MIN. WALK
5 - 10 MIN. WALK
5 - 10 MIN. WALK
10 - 15 MIN. WALK
10 - 15 MIN. WALK
10 - 15 MIN. WALK
15 - 20 MIN. WALK
15 - 20 MIN. WALK

WATERFRONT PLAZA
* ALL DISTANCES TAKEN FROM THE TRANSIT HUB

SOURCE: Perkins + Will
2.7.10 PARKING

2.7.10.1 Parking – Open Space Users

Comment

The DEIR states that the residential and non-residential parking demand associated with the Project would be for 21,233 vehicles and that 18,917 spaces would be provided as a part of the Project resulting in about 2,300 fewer spaces than what is actually needed. The DEIR does not identify parking areas or spaces dedicated to users of the public access areas at the project site. Because the demand for off-street parking would likely be high, the FEIR should clarify whether parking for shoreline public access areas would be provided, how parking restrictions would be enforced to assure parking availability for shoreline users and, if no designated parking is proposed, where users of these areas would be expected to park. (Karen Weiss, Coastal Program Analyst, San Francisco Bay Conservation and Development Commission) [17.15]
Response

The comment is correct to note that the EIR analysis finds that the Proposed Project would supply less parking than would be demanded. The numbers cited in the comment, however, are incorrect. As stated on EIR p. IV.E.139, the Proposed Project would supply 10,675 parking spaces, but there would be demand for 12,300, generating a shortfall of 1,725 spaces. The Project Description, on EIR pp. II.50-II.51 describes the amount of parking proposed for individual uses. However, most parking on the Islands is expected to be publicly available and shared among uses. Users of public recreational and open space who choose to drive to the Islands would use on-street parking and public parking garages or lots, similar to other visitors to the Islands. On-street parking located adjacent to major open space areas would likely be further away from other uses such as retail and residential units, and therefore would likely be more available to visitors of the shoreline public access areas. Further, since all on-street parking would be subject to parking fees, it is unlikely that residents would use on-street parking for long term use.

2.7.10.2 Parking Ratios

Comments

I strongly support the basic concept of the Treasure Island Redevelopment Plan: creating a relatively high-density mixed-use community that has the critical mass necessary to support neighborhood services and high-quality transit. The Plan’s provision for 1:1 residential parking, however, weakens the Plan’s strategy for minimizing automobile use and is inconsistent with the approach the City has taken in other recently adopted neighborhood plans. (See, e.g., the Market & Octavia Better Neighborhoods Plan, the Eastern Neighborhoods plans, and downtown residential parking limits.) (Christopher Pederson) [5.2]

At page IV.E.139, the DEIR states that providing less than 1:1 parking would affect the project’s livability, financeability, and marketability and would make the project economically infeasible. It goes on to point out that parking fees would pay a substantial portion of the funding for transit facilities and other aspects of the TDM Plan. It concludes by asserting that with “no” off-street parking, the transit service, the TDM Plan, and the project as a whole would be infeasible.

There are multiple problems with these statements. First, they suggest that residential parking fees would help pay for transit service and other TDM programs. Page VII.76, however, states that only commercial parking fees would fund transit service and the TDM Plan. If the statement on page VII.76 is accurate, then the statement on page IV.E.139 should be corrected. In addition, if residential parking fees will not fund transit services, then a reduction in residential parking supply would not have a direct effect on transit funding.

Second, according to the DEIR, 30 percent of the housing units will be below market rate. The DEIR fails to explain how reducing residential parking for affordable units would harm their marketability or the financial viability of the project. To the contrary, by reducing construction expenses, reducing parking supply for affordable units would make those units less of a financial drag on the overall project. (Christopher Pederson) [5.4]

Fourth, given that the City has in recent years approved residential parking maximums of less than 1:1, it is surprising to see the statement in the DEIR that the City concluded than anything
less than 1:1 residential parking would render the project entirely infeasible. Given the recent plans where the City reached very different conclusions, the EIR should at a minimum explain this seeming inconsistency. (Christopher Pederson) [5.6]

The provision of 1:1 residential parking is completely in opposition to San Francisco’s currently approved areas plans (Market-Octavia, etc.), and no reasoning is supplied. Nor is there logical explanation for 1,035 spaces of on-street parking being projected [II.50]. These provisions are totally unsupported in view of the stated Walking and Biking Objectives [II.45]. No explanation for the stated amount of hotel parking – 400 spaces for 500 hotel rooms is given – the amount is ludicrous and totally unsupported. (Ron Miguel, President, San Francisco Planning Commission) [7.4]

The TDM measures noted under Encouraging Use of Transit & Other Modes, and Discouraging Automobile Use [II.51] are useful, however they must be applied to a much lower parking allowance following the principles articulated by the Transportation Demand Management Plan [IV.E.45-47], i.e. “...designed to reduce use of single-occupant vehicles and to increase the use of rideshare, transit, bicycle, and walk modes for trips to and from, as well as within the Proposed Project.” A maximum ratio of .5:1 residential parking; wide sidewalks in all areas; bike lanes with the possibility of bike-share; car-share; and enhanced shuttle service would be far more in keeping with the stated objectives. Analysis must proceed directly from Objectives! (Ron Miguel, President, San Francisco Planning Commission) [7.6]

The way to reduce the vehicle miles traveled that are generated by the development is to reduce the availability of parking on the islands. Merely increasing the cost of parking is not sufficient. As SPUR wisely points out in its October 2004 report, Parking and Livability in Downtown San Francisco; Policies to reduce congestion: The more parking you build, the more cars you attract and the worse congestion gets. (Ruth Gravanis) [31.2]

Response

The proposed maximum parking supply rates are summarized in Table IV.E.22: Permitted Parking Ratios and Maximum Off-Street Car Parking Spaces, on EIR p. IV.E.138, and in Table 2 on p. 21 of the Transportation Impact Study, included as EIR Appendix C. The parking supply ratios used for major land uses in the Proposed Project, such as residential, office/commercial, and hotel are consistent with the San Francisco Planning Code requirements for projects in many neighborhoods in San Francisco,12 with the exception that the rates proposed for Treasure Island are island-wide maximum rates, and the rates required in the Planning Code are minimum rates for individual uses and do not account for surpluses that may exist from adjacent on-street and off-street public or private parking facilities. Additionally, the maximum rate proposed for retail uses on Treasure Island is approximately one-half the default minimum rate required by the

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12 A number of more recent area plans in San Francisco have adopted parking maximums for individual buildings at ratios lower than one space per dwelling unit for residential uses.
Planning Code for miscellaneous retail uses,\textsuperscript{13} although some specific types of retail uses within specific districts of the City have different parking requirements. Therefore, the parking rates proposed would be more restrictive than those required by the City’s Planning Code.

The first paragraph on EIR p. IV.E.139 has been revised as follows to clarify that only parking fees for non-residential uses would be used to fund transit improvements and the TDM Plan (new text is underlined):

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“….Some centralized off-street parking is proposed as part of the Project and is likely to be built even if individual buildings do not provide parking.[footnote omitted] Market analysis conducted for TICD indicated that providing less than one parking space per residential unit could affect the financeability of the development program, the marketability of the homes, and livability of the Islands, and make the project economically infeasible. In addition, parking fees for non-residential uses would be a substantial portion of the funding supporting transit facilities and other features of the Proposed Project’s TDM Plan. With no off-street commercial parking, there would not be sufficient funds to support the entire TDM Plan and transit services, and the Proposed Project would be infeasible.”
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There have been several studies on the relationship between parking supply and weekday peak hour automobile trip generation. Many of those studies have found only weak statistical relationships between parking supply and peak hour automobile trip generation. However, in response to a number of comments that suggested that the Proposed Project’s parking supply would be too high, a new project alternative has been included in the EIR. See the response in Subsection 2.21.2, Reduced Parking Alternative, for more information.

\textbf{2.7.11 \hspace{5pt} COAST GUARD OPERATIONS}

\textbf{2.7.11.1 \hspace{5pt} Circulation Impacts}

\textbf{Comments}

Section IV, page IV.E.31 - Figure IV.E.8 does not classify nor improve Northgate Rd in the Proposed Street System, yet its function needs to be reflected and studied as a “major artery” in the TIR definition as it provides sole USCG access to TI and the SFOBB for majority of our operations. Because our access is not improved, this DEIR should document how the project will impact USCG existing access.

Section IV, page IV.E.39 - Southgate Rd at Hillcrest Rd bicycle enhancement detail states flow through uncontrolled Hillcrest Southgate intersection and direct entry onto the SFOBB bike landing area. An opening into the bike landing area at north side of this intersection was requested but eliminated due to safety concerns. The project as designed has significant impact to USCG QTRS 9 driveway access as it will remove the existing Hillside Rd stop sign controlling vehicle and bike right turn movement onto Southgate Rd. Thus safe use of the driveway can no

\textsuperscript{13} Planning Code requirement for miscellaneous retail uses is 2 spaces per 1,000 square feet of use up to 20,000 square feet, plus 4 spaces for each 1,000 square feet of area in excess of 20,000 square feet.
longer be assured as cyclists make in essence a blind turn into traffic movements in/out of the driveway. USCG personnel may collide with cyclists.

Section IV, page IV.E.40 - This relates to the comment above. On Figure IV.E.12 please address the impacts of the Southgate & Hillcrest Rd configuration to CG QTRS 9 driveway access without mitigation. As shown, either this or the ramp project will remove existing Hillside Rd stop sign controlling vehicle and bike right turn movement onto Southgate Rd. We have noted through previous discussions that possible acceptable mitigation measures include:

- A traffic control trigger activated by exiting driveway vehicles.
- A relocation of the driveway.
- New stop signs and signage to alert drivers on Southgate to the presence of the bike path in the intersection and cyclists to the driveway when making the right turn.

We hope to minimize cyclist and traffic conflicts at the intersection and at the driveway. (P. M. McMillin, Captain, U. S. Coast Guard) [10.14]

Section IV, page IV.E.81 - Thank you for this thorough discussion of ramp traffic impacts at the Hillcrest/Southgate intersection. While the USCG will experience a shorter ramp queueing distance as personnel will not be required to circle the Island to access the eastbound on-ramps, there are still impacts. These should be elevated to an actual “TR” impact section in the document – such as Impact TR-5 while the remaining impacts are renumbered. Access to the eastbound on-ramps and westbound off-ramps are of vital importance as USCG requires access to its units in the East Bay.

While most have impacts been addressed, there are residual concerns about those in the Hillcrest queue allowing USCG vehicles to make a right hand turn from Southgate onto the ramps. Also we have concerns about truck access to Macalla Road down to the CG facilities as at least twice a week deliveries are made to Sector San Francisco Buildings on the east side of VBI. Many USCG vehicles do not have sirens or signals. The USCG would recommend that ongoing monitoring of the intersection by USCG and SFMTA be included as a recommendation to ensure that dialogue commences early and often regarding traffic impacts to USCG operations. (P. M. McMillin, Captain, U. S. Coast Guard) [10.16]

Response

North Gate Road, which primarily provides access to the Coast Guard and to the Senior Officer’s Quarters Historic District uses, would be classified within the hierarchy of streets as a “local street.” It would not be considered a “major arterial,” as it is not a through road, and does not connect with collector streets.14 With implementation of the Proposed Project, the function of North Gate Road would not change, and it is not anticipated that there would be a substantial increase in the number of vehicles on North Gate Road. As such, Figure IV.E.8: Proposed Treasure Island and Yerba Buena Island Street System, on EIR p. IV.E.31, does not warrant

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14 The San Francisco General Plan defines Major Arterials as crosstown routes whose primary purpose is to link districts within the city and to distribute traffic from and to the freeways; these are routes generally of citywide significance; of varying capacity depending on the travel demand for the specific direction and adjacent land uses. Local Streets are defined as streets intended for access to abutting residential and other land uses, rather than for through traffic; generally of lowest capacity.
changes. Access to the Coast Guard operations would not change from existing conditions, although as indicated on EIR p. IV.E.81, queues on the Islands and associated delay may affect the U.S. Coast Guard operations around Yerba Buena Island and their access to the Bay Bridge.

Additional engineering assessments were conducted by the project sponsors to determine options to better accommodate access to and from the Coast Guard Quarters 9 driveway, which is located off of South Gate Road about 20 feet east of the intersection of Hillcrest Road/South Gate Road/I-80 Eastbound Ramp, as well as the right turns from South Gate Road onto the I-80 eastbound ramps. Three options to improve access from the driveway were assessed: closure of the driveway and construction of a new access road that would connect with the existing driveway on Hillcrest Road; signalization of the intersection of Hillcrest Road/South Gate Road/I-80 Eastbound Ramps as the Quarters 9 driveway as an additional leg of the signalized intersection; left turn restrictions out of the Quarters 9 driveway. The most appropriate option to accommodate the Coast Guard access driveway and the need for monitoring of intersection operations would need to be determined as part of the Bay Bridge East Span Project; the project sponsors would coordinate their activities in this area with Caltrans, the Ramps Project, and the Coast Guard. Signage to alert drivers on South Gate Road of the presence of the bicycle lane on Hillcrest Road and/or to alert cyclists to the presence of the driveway on South Gate Road would be provided as part of the bicycle lane improvements.

Option 1: New Access Road

A new access road and driveway on Hillcrest Road to the Coast Guard Quarters 9 facility would increase travel time for vehicles destined for, or travelling from, the Bay Bridge. Vehicles that would previously exit the Quarters 9 driveway onto South Gate Road would now travel along a newly constructed north-south access road connecting to Hillcrest Road. The access road would be approximately 0.15 mile long and would likely be located on the eastern edge of the Coast Guard property. Given the length of the Coast Guard property, the entire route would be approximately 0.30 mile. The additional travel time would be approximately one minute.

Option 2: Intersection Signalization

Signalization of the intersection of Hillcrest Road/South Gate Road/I-80 Eastbound Ramps would require Caltrans traffic operations approval for a traffic signal at this intersection. Issues related to signalization of this intersection include the non-standard geometry, and the potential for queuing on the freeway mainline (eastbound off-ramp). Detailed design and assessment of potential

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15 AECOM, October 8, 2009, Yerba Buena Island – United States Coast Guard Quarters 9 Driveway Access Memorandum. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.
signalization should be conducted by Caltrans in coordination with the project sponsors, the Ramps Project, and the Coast Guard.

Inclusion of the Quarters 9 driveway as an additional leg of the intersection would result in a non-standard, 4-legged intersection configuration. A separate signal phase would need to be provided for vehicles exiting the driveway. A phase would also be provided for vehicles approaching the intersection from South Gate Road. Due to low volumes on the Quarters 9 driveway and southbound South Gate Road approaching the intersection, the installation of an actuated signal is recommended to ensure that these phases are only called when required. In addition, queue detection is recommended to prevent queues developing at the off-ramp.

The majority of green time would be given to traffic movements from the Hillcrest Road approach and Bay Bridge eastbound off-ramp, which would maximize the efficiency of the high volume Hillcrest Road approach and prevent queues at the off-ramp approach to the intersection from spilling upstream onto the Bay Bridge mainline. Installation of a loop detector would ensure that a green light would be called should a queue affecting the mainline operation begin to develop.

Option 3: Left Turns Prohibited

Prohibiting left turns out of the Quarters 9 driveway would result in an increase in travel time and distance for Coast Guard vehicles destined for the Bay Bridge eastbound on-ramp. The return route to the Coast Guard facility along South Gate Road would increase travel distance by approximately 0.18 mile, less than one minute of additional travel time. The increase in travel distance under this alternative would be considered minimal, and less than the forecast 0.30-mile additional travel distance that would be required under Option 1, a new access road.

Vehicles that wish to travel westbound on the Bay Bridge or to proceed to the Coast Guard’s main facility on Yerba Buena Island would have no increase in travel time or distance. These vehicles would turn right out of the driveway, as they do under existing conditions. Vehicles that would previously exit the Quarters 9 driveway by turning left onto South Gate Road and immediately right onto the eastbound on-ramp would be required to turn right onto South Gate Road, continue under the new span of the Bay Bridge, and complete a U-turn maneuver at the intersection of Macalla Road / South Gate Road. Analysis indicates that the all-way stop controlled intersection as currently configured would be large enough for passenger vehicles to safely complete this turning maneuver. However, single unit trucks and heavy vehicle traffic would be required to travel around the island along Macalla Road and Hillcrest Road to access the eastbound onramp.
2.7.11.2 Coast Guard Access

Comment

Section IV, page IV.E.81 - The sentence: “Coast Guard vehicles are equipped with lights and sirens, and during emergency conditions, would be able to bypass queued vehicles.” is factually incorrect. The assumption that all USCG vehicles are equipped with lights and sirens is incorrect and reliance on this strategy to mitigate traffic impacts is invalid and not acceptable to the USCG.

The longest potential queue the Coast Guard vehicles would have to face would be about one-tenth of a mile, based on the distance between access points on the main YBI circulation route and the Bay Bridge. The TIS did not quantify any CG facility trip generators in its data, nor study all potential CG delays and queues. The primary USCG access concerns are the Macalla/Southgate/Northgate road intersection which was not studied. USCG trip generators MUST be included in the assessment of transportation impacts. (P. M. McMillin, Captain, U. S. Coast Guard) [10.17]

Response

The discussion on EIR p. IV.E.81 does not assume that all Coast Guard vehicles are equipped with lights and sirens. The discussion discloses that Coast Guard vehicles would be subject to additional delay due to queues on Hillcrest Road. The duration of travel within queued conditions and added delays would depend on the day of week, time of day, and conditions on the Bay Bridge. Based on existing driveway locations, Coast Guard vehicles would be within queued conditions for a distance of between 50 and 550 feet from the eastbound on-ramp (likely less than two minutes of delay), compared with a maximum queue of about 1.2 miles (6,340 feet) on Hillcrest Road. While some Coast Guard vehicles may wait in a short queue, emergency vehicles are equipped with lights and sirens, and would be able to bypass the queues during an emergency.

Since the Coast Guard facility is an existing use that is anticipated to remain, its trip generation is included as part of existing conditions, and is therefore, included as part of the assessment of transportation impacts.

The intersection of North Gate Road/South Gate Road/Macalla Road is anticipated to be all-way stop controlled. This means that Coast Guard traffic exiting from North Gate Road onto either South Gate Road or Macalla Road during times when queues are present would be able to enter the stream of traffic relatively easily, since cross-traffic would be required to stop and yield right-of-way to traffic from North Gate Road. The forecasted cumulative conditions peak hour traffic volumes at this intersection are not expected to be large enough to meet peak hour signal installation warrants, as defined in the Manual on Uniform Traffic Control Devices (MUTCD), primarily due to the low projected volumes on North Gate Road.
2.7.11.3  Coast Guard Operations

Comment

Once the project is completed, the USCG believes the increase in traffic volumes and the proposed congestion pricing described in the DEIR may continue to impinge on USCG access to our facilities. Traffic may restrict the ability of our personnel to enter facilities and congestion pricing will place a cost on access to USCG facilities. It seems the traffic study did not explicitly consider USCG operations in its evaluation, or study USCG operations in depth. The full impacts to the USCG from the project cannot be clearly discerned or mitigated. The project liaison proposed for project construction should therefore be maintained after project completion to ensure that no access to USCG facilities is compromised.  

(P. M. McMillin, Captain, U. S. Coast Guard) [10.3]

Response

While the transportation analysis presented in EIR Section IV.E, Transportation, did not discuss the Coast Guard operations in depth, the travel demand associated with Coast Guard operations is included as part of the impact assessment. As indicated in the Transportation section, implementation of the Proposed Project would increase traffic volumes on roadways on Yerba Buena Island destined to and from the Bay Bridge, and result in increased congestion, that would affect Coast Guard vehicles. The Coast Guard would not be subject to congestion pricing fees.

During and after completion of construction, TIDA would maintain a project liaison with the Coast Guard. See the response in Subsection 2.7.12.1, Coast Guard Operations, immediately below, regarding liaison between Coast Guard and TIDA during construction activities.

Footnote 4 in Table IV.E.5: Person Trip Generation by Mode, on EIR p. IV.E.60, is revised as follows (new text is underlined):

4  Based on counts of peak hour vehicle traffic on the Islands and assumes that the existing trip generation of the Job Corps center on Treasure Island and at the Coast Guard Station and Sector Facility on Yerba Buena Island would remain the same.

2.7.12  CONSTRUCTION

2.7.12.1  Coast Guard Operations

Comment

Personnel and equipment assigned to support USCG operations based at YBI also require unfettered, uninterrupted (24/7/365) access to and egress from USCG facilities on YBI. The increase in traffic volumes, construction equipment, and changes of traffic patterns during construction could negatively impact the USCG’s mission response posture. Based on the USCG’s experience in accommodating the construction of the San Francisco Oakland Bay Bridge Eastern Span Replacement Project, the USCG strongly advocates that the City designate a liaison
with whom the USCG can work to ensure that access to USCG facilities is not compromised during construction. *(P. M. McMillin, Captain, U. S. Coast Guard)* [10.2]

**Response**

Mitigation Measure M-TR-1: Construction Traffic Management Plan, described on EIR pp. IV.E.69-IV.E.71, requires consultation with Island users, including the Job Corps and the Coast Guard. TIDA staff would serve as liaison with the Coast Guard during construction. TIDA anticipates entering into a Memorandum of Understanding with the Coast Guard to, among other things, establish construction rules and to formalize the communication channels between the two parties.

### 2.7.12.2 Truck Routing

**Comment**

2. Where will the construction truck routes be located on the island? *(Johannes Hoffman, AIA Contracting Officer’s Technical Representative, U.S. Department of Labor, Employment and Training Administration)* [15.2]

**Response**

The Proposed Project would largely reconfigure existing streets on Treasure Island, as illustrated on Figure IV.E.8: Proposed Treasure Island and Yerba Buena Island Street System, on EIR p. IV.E.31. While specific truck routes on the new street system have not been identified, it is anticipated that trucks would use the major and secondary arterials to access construction sites. Mitigation Measure M-TR-1, Construction Traffic Management Plan, includes provisions for developing traffic management strategies and route strategies for minimizing impacts of construction activities. It is anticipated that the construction routes would be developed in consultation with the Job Corps.

### 2.7.12.3 Pedestrian Hazards

**Comment**

3. Will the proposed/anticipated locations of the truck routes result in potential pedestrian hazards? If so, how is the developer proposing to deal with the hazards? *(Johannes Hoffman, AIA Contracting Officer’s Technical Representative, U.S. Department of Labor, Employment and Training Administration)* [15.3]

**Response**

Construction-related transportation impacts are discussed in Impact TR-1 on EIR pp. IV.E.67-IV.E.71. As indicated on EIR p. IV.E.69, the Proposed Project would involve construction of a new street system, which would require temporary closure of traffic and parking lanes and
sidewalks on the Islands. These closures could last the entire duration of construction of particular phases, and it is possible that more than one area could be closed simultaneously. As disclosed in the EIR on p. IV.E.69, these closures may involve temporary disruptions to the routes and stops for the Muni line 108-Treasure Island, the new AC Transit bus line, and the new Islands shuttle service, resulting in the need for rerouting. Changes to transit lines would be coordinated and approved, as appropriate, by SFMTA, AC Transit, and TITMA.

Closure of one or more travel lanes is not expected to cause severe congestion on the Islands because existing traffic volumes on the Islands are relatively low and would continue to be low during early development phases. However, the closures may necessitate temporary changes in bicycle and pedestrian circulation during construction. The construction contractors would be required to meet San Francisco’s Regulations for Working in San Francisco Streets (the “Blue Book”), including those regarding sidewalk and lane closures. Mitigation Measure M-TR-1, Construction Traffic Management Plan, would ensure that temporary accommodations for pedestrians and bicyclists would be maintained to minimize these potential disruptions, and therefore, the impact on pedestrians and bicyclists from construction of the Proposed Project would be less than significant.

2.7.12.4 Traffic Management

Comment

4. As an affected agency, Job Corps would like an opportunity to review and comment on the Construction Traffic Management Plan. (Johannes Hoffman, AIA Contracting Officer’s Technical Representative, U.S. Department of Labor, Employment and Training Administration) [15.4a]

Response

Mitigation Measure M-TR-1: Construction Traffic Management Plan, described on EIR pp. IV.E.69-IV.E.71, requires consultation with Island users, including the Job Corps and the Coast Guard. TIDA anticipates entering into a Memorandum of Understanding with the Job Corps to establish construction rules and to formalize the communication channels between the two parties. The Job Corps would have an opportunity to review and comment on the Construction Traffic Management Plan.

2.7.12.5 Construction Vehicle Trips

Comment

1. Truck traffic, with noise and pollution, to fill in the island is not discussed. Does truck traffic projections include trucks needed to add fill as well as those for building construction? (Johannes Hoffman, AIA Contracting Officer’s Technical Representative, U.S. Department of Labor, Employment and Training Administration) [15.1]
Response

Construction-related transportation impacts are discussed in Impact TR-1 on EIR pp. IV.E.67-IV.E.71. Table IV.E.10: Proposed Project Construction Traffic, on EIR p. IV.E.68, provides the number of truck trips and barge trips associated with equipment and materials deliveries and disposal trips. The estimates of materials needed include delivery of fill, as well as for materials for infrastructure and building construction.

2.7.13 REGULATORY FRAMEWORK

Comment

Regulatory Framework
This section (page IV.E.25) appears to be incomplete. Consider adding AB 32, AB 981, the Bay Trail legislation, etc. (Ruth Gravanis) [31.21]

Response

AB 32, the Global Warming Solutions Act, is discussed in EIR Section IV.H, Greenhouse Gas Emissions, on p. IV.H.12. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020 by enforcing a statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs the California Air Resource Board to develop and implement regulations to reduce statewide GHG from stationary sources. While the Air Resources Board is developing new emissions controls for automobiles and encouraging use of zero-emissions vehicles to help reduce statewide GHG, these regulations would affect the manufacture of new vehicles and would not directly affect vehicular travel or travel modes. Therefore, AB 32 does not need to be included in EIR Section IV.E, Transportation.

AB 981, enacted in 2008, authorized the San Francisco Board of Supervisors to designate a board or agency to act as the transportation management agency for Treasure Island and Yerba Buena Island. The Treasure Island Transportation Management Agency (“TITMA”) is the name of the agency designated in AB 981. AB 981 also establishes the authority for the Board of Supervisors and the San Francisco County Transportation Authority to adopt a congestion pricing program for Treasure Island and Yerba Buena Island. The statute authorizes TITMA to recommend a fee structure for congestion pricing to City decision makers, and to establish parking fees, fines and other parking-related revenues, among other actions. The authority and duties of TITMA are described on EIR pp. IV.E.45-IV.E.46 and throughout relevant discussions and analyses in Section IV.E, Transportation, as well as on pp. II.51 and II.84 in Chapter 3, Project Description. Please also see the response in Subsection 2.7.4.3, TDM, above, for information on the project sponsors’ proposed TDM Plan for the Islands. The congestion pricing program is included in the analysis of trip generation and travel mode in the transportation analysis, and is discussed on EIR pp. IV.E.45 and IV.E.58-IV.E.60 and in EIR Chapter II, Project Description, on p. II.51. The legislation authorizing the City to establish the congestion pricing program and TITMA is not a
typical “regulation” that provides some of the foundation for analysis of impacts, and therefore, was not discussed in the Regulatory Framework subsection of the Transportation section. However, since AB 981 authorizes the creation of TITMA, information regarding this legislation is added to the EIR.

The Bay Trail Plan is included in EIR Chapter III, Plans and Policies, on p. III.12, and in EIR Section IV.J, Recreation, on p. IV.J.16. The text under the heading “Federal, State, and Regional” in the Regulatory Framework subsection on EIR p. IV.E.25 is revised and new text is added, as follows (deleted text is shown in strike through, new text is underlined):

**Federal, State, Regional**

There are no Federal, State, or regional transportation regulations applicable to the Proposed Project.

**State**

**Treasure Island Transportation Management Act**

AB 981, enacted in 2008, authorized the San Francisco Board of Supervisors to designate a board or agency to act as the transportation management agency for Treasure Island and Yerba Buena Island. The Treasure Island Transportation Management Agency (“TITMA”) is the name of the agency designated in AB 981. AB 981 also authorizes the Board of Supervisors and the San Francisco County Transportation Authority, by a two-thirds majority of each body, to adopt a congestion pricing program for Treasure Island and Yerba Buena Island and to set an initial congestion pricing fee structure based on recommendation by TITMA. AB 981 also authorizes TITMA, among other things, to establish parking fees, fines, and other parking-related revenues, to establish a transit pass fee structure and program, and to adopt amendments to the congestion pricing fee structure.

**Regional**

**San Francisco Bay Trail Plan**

Refer to Chapter III, Plans and Policies, for a description of the San Francisco Bay Plan and its application to the Proposed Project. The following information about the San Francisco Bay Plan is related to the Transportation analysis.

The 2005 Gap Analysis Study, prepared by ABAG for the entire Bay Trail area, attempted to identify the remaining gaps in the Bay Trail system; classify the gaps by phase, county, and benefit ranking; develop cost estimates for individual gap completion; identify strategies and actions to overcome gaps; and present an overall cost and timeframe for completion of the Bay Trail system. In the vicinity of the Project site, the 2005 Gap Analysis Study proposes to connect existing Bay Trail segments in downtown San Francisco with the trail on the eastern span of the Bay Bridge. The proposed trail would then connect to the existing trails in Oakland.

As indicated on EIR p. IV.J.16, an approximately 3.0-mile-long multi-use path would be developed around the perimeter of Treasure Island, consisting of a 30-foot-wide, 4,522-foot-long
segment within the proposed Cityside Waterfront Park and a 40-foot-wide, 2,210-foot-long segment within the Clipper Cove Promenade. This perimeter path is planned to be an extension of the San Francisco Bay Trail; however, it has not been designated as such at the time this EIR was published. See also the discussion of the Class I and II bicycle facilities proposed on Macalla Road in the response to Subsection 2.7.7.1, Bicycle Access – Macalla Road, above.

2.7.14 EMERGENCY ACCESS

Comment

There is no reason to change the current configuration on the west-side top-deck onramp. Including a timed transit lane would meet all the requirements as emergency vehicles will have plenty of opportunity to enter the westbound traffic. Currently few emergency vehicles enter the bridge from Ti/YBI to affect emergency services or transports as CHP and Caltrans operate constantly on the bridge and dispatch vehicles for either the Oakland meter-station or the San Francisco CHP station on 8th/Howard. SFPD do not operate in significant numbers to impact this need a reconfiguration on the west-side, westbound top-deck on-ramp. (Todd Brennen, Secretary, YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation) [12.4]

Response

As indicated on EIR p. IV.E.7, the proposed Yerba Buena Ramps Improvement Project (“Ramps Project”) currently underway by SFCTA is evaluating potential reconfiguration of two of the westbound (upper deck) on- and off-ramps on the east side of the Bay Bridge tunnel. If the Ramps Project is implemented, the westbound on-ramp on the west side of Yerba Buena Island would not be modified geometrically; however, it would be restricted to transit and emergency vehicle use only, providing exclusive access for transit and emergency vehicles departing the Islands destined for the San Francisco mainland. Thus, the comment is correct in stating that the westbound on-ramp on the west side would provide opportunities for emergency vehicles to access the Bay Bridge. The Ramps Project is not part of the Proposed Project.

The proposed reconfiguration of the east side ramps by SFCTA is not simply to accommodate emergency vehicles, but to upgrade the substandard ramp design and acceleration and deceleration distance for vehicles accessing and exiting the Bay Bridge. The SFCTA considered closing the west side westbound on-ramp completely as part of the Ramps Project, but, after consultations with SFMTA, determined it would be preferable to keep it open for limited use for services such as transit and emergency services that would benefit from the travel time savings associated with the ramp, and whose professional drivers would be comfortable despite the existing ramp’s substandard design. With the reconfiguration of the westbound on-ramp on the east side of Yerba Buena Island, the westbound on-ramp on the west side of Yerba Buena Island would be used for Muni and emergency vehicles. As appropriate, emergency vehicles would also use the reconfigured westbound on-ramp on the east side of Yerba Buena Island, and would benefit from the improved geometrics.
2.7.15 MITIGATION MEASURES

2.7.15.1 Mitigation Measures

Comments

Of equal or more significance is the Project’s traffic impact(s) and the DEIR’s flawed conclusion that such is “unavoidable.” In fact, the various Mitigation Impacts TR1 through TR63 as addressed by Mitigation Measures M-TR-2 and M-TR-24, are fatally flawed because of their vague and speculative/incomplete nature, including but not limited to a failure to consider/examine direct access to BART, an overdependence on an expensive, limited, bi-directional (only between TI/YBI and SF) ferry service, and an illogical reliance on a fundamentally inadequate congestion management “fee.” Indeed, it is incredible that there can be sixty three identified Traffic Impacts, but only some basic, oversimplified Mitigation Measures proposed in M-TR-2 and M-TR-24. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.12]

The first one is on transportation. It appears that out of all the topics and all the impact being analyzed, I think the area of transportation really suffers the most impact. Out of the 60-some impacts stated in the report, over 35 or up to 38 are considered significant and unavoidable. (Claudine Cheng, Director, TIDA Board) [TR.22.1]

And the mitigation measure suggested -- the one mitigation measure that was suggested for this significant and unavoidable impact, or 38 of them, happens to be to expand transit service, MTR-2.

And the report also stated that funding for extended transit service are not identified and secured, and therefore, its implementation must be considered uncertain at this time. I think we all understand that, given the budget of the City and the budget of Muni. It’s understandable.

But I wish, because of the totality of the impact, and so many of them, I just wish that planning staff would consider adding more information, as far as alternatives as to how we can or possibilities of how we can -- the transit service can be extended. Will it be a function of the soon to be newly created Treasure Island Transportation Management Agency, which is supposed to be appointed by the board of supervisors? Will it be one of the responsibilities of the transportation management agency to oversee and guide us in the future in developing policies, mitigation measures, and how we can afford it.

Maybe we can also consider giving some options, so that we, as well as members of the public, can look into, can understand what other possibilities, because the impacts are quite immense. And I would really like to see some alternatives being suggested or options into how these mitigation measures can be funded. (Claudine Cheng, Director, TIDA Board) [TR.22.2]

Response

As indicated by the comments, EIR Section IV.E, Transportation, includes only three mitigation measures for 63 project impacts, although 19 of the 63 transportation impacts were identified as less-than-significant impacts, and two were identified as less than significant with implementation of mitigation measures. Further, for CEQA purposes, several impacts were identified separately as impacts of the Proposed Project with the current ramp configuration and impacts with the
reconfigured westbound ramps on the east side of Yerba Buena Island, and impacts identified under Existing plus Project conditions are also identified as impacts under 2030 Cumulative conditions. Identifying the same or similar impacts separately, depending on the condition of the ramp configuration, serves to exaggerate the number of impacts due to the Proposed Project, particularly when the same mitigation measure would reduce impacts under both circumstances. As such, the Proposed Project would result in 20 significant and unavoidable transportation impacts, which is not surprising given the magnitude of the Proposed Project.

One reason that there are relatively few mitigation measures to reduce the Project’s significant impacts due to automobile traffic generation is that several potential measures, such as congestion pricing, paid parking, and pre-paid transit vouchers, have been incorporated into the Proposed Project, as described in the EIR on pp. IV.E.45-IV.E.47. Further, Mitigation Measure M-TR-2, Expanded Transit Service, serves as an effective measure at reducing a number of significant impacts identified in the EIR. Implementation of Mitigation Measure M-TR-2 cannot be guaranteed, because the expansion of Muni service must rely on future annual appropriations by future Boards of Supervisors, and because providing the more frequent ferry service would require expansion of the San Francisco berthing facilities, which relies on future environmental review and discretionary actions by the Port, the Board of Supervisors and WETA. Please refer to the response in Subsection 2.7.2.3, Funding Mechanisms, above, regarding funding of the Proposed Project improvements and improvements included in Mitigation Measure M-TR-2.

Finally, additional measures that involve physical modifications to existing roadways to improve capacity for specific modes are generally not feasible given the physical constraints of the roadways on Yerba Buena Island and the Bay Bridge.

The Proposed Project would not preclude future connections between a new BART tunnel and Treasure Island or Yerba Buena Island, should BART determine that a new tunnel in the vicinity of the Islands is feasible. See also the response in Subsection 2.7.3.5, Future Regional Improvements, above.

Chapter VII, Alternatives, identifies alternatives to the Proposed Project and discusses the environmental effects associated with them. The alternatives analyzed in the EIR have been developed to focus on those that are capable of avoiding or substantially lessening one or more of the significant impacts identified for the Proposed Project. Under the Reduced Development Alternative and No Ferry Service Alternative presented in Chapter VII, the transportation impacts would be similar to those identified for the Proposed Project, although overall trip generation would be less, as would the overall degree of significant transportation impacts. Under the Reduced Parking Alternative presented in Chapter VII, there is weak evidence suggesting that if parking supplies were reduced, trip generation might be reduced to a level similar to the Reduced Development Alternative. If the reduction in vehicular trips were to materialize, the Reduced
Parking Alternative would have similar transportation impacts to those identified for the Reduced Development Alternative, and therefore, similar to those of the Proposed Project, although, as noted above, the overall degree of significant transportation impacts would be less than the Proposed Project.

2.7.15.2 Fees

Comment

The proposed project would generate numerous significant and unavoidable transportation impacts but only three mitigation measures were proposed to reduce the number of vehicle trips on the SFOBB. Since only the ‘base transit’ is fully funded, the Department cannot assume the ‘expanded transit’ will be in place after project completion. In the DEIR, under the “Proposed project – base transit” scenario, the project would generate 1,613 AM, 2,462 PM, and 2,861 Saturday vehicle trips. As a result, the proposed project will have significant impacts to the already congested State highway system.

Per California Environmental Quality Act (CEQA) law precedence, the City has a legal duty to require mitigation of all the significant impacts identified. In the case of City of Marina et. al. v. Board of Trustees of the California State University (2006) 39 Cal 4th 341. The California Supreme Court determined that,

“CEQA requires a public agency to mitigate or avoid its projects’ significant effects not just on the agency’s own property but “on the environment” (Pub. Resources Code, Section 21002.1, subd. (b)), with “environment” defined for these purposes as “the physical conditions which exist within the area which will be affected by a proposed project” (id., Section 21060.5). Thus, if the [Board of Trustees of the California State University] cannot adequately mitigate or avoid [California State University Monterey Bay]’s off-campus environmental effects by performing acts on campus (as by reducing sufficiently the use of automobiles or the volume of sewage), then to pay a third party such as [Fort Ord Reuse Authority] to perform the necessary acts off campus may well represent a feasible alternative. A payment made under these circumstances can properly be described neither as compulsory nor, for that reason, as an assessment.” (City of Marina at p.704)

In April 2010, the Department identified three projects which have the potential to reduce trips on the SFOBB and its approaches. Since then, the Department has refined these cost estimates as referenced below.

i. Traffic Operation System (TOS) projects in San Francisco and Alameda Counties for ramp meters and fiber optics installation – Estimated cost $25.9 million

ii. Projects near Toll Plaza approach in Alameda County for TOS and fiber optics installation – Estimated cost $13.1 million

iii. Proposed Multi-use bicycle and pedestrian path on the west span of the SFOBB – Estimated cost – $500 million

These TOS projects will improve operations on the State highway system by improving response time to incidents and providing more reliable travel times for all users of the system. Any operational improvements to the approaches to the SFOBB have the potential to add capacity that would mitigate the impacts of the proposed redevelopment project. The proposed multi-use path
on the west span of the SFOBB has the potential to reduce vehicle trips by providing an attractive alternative to driving. The Department strongly urges the City and County of San Francisco to contribute fair-share fees to these projects that would improve the efficiency of the transportation system and reduce delays while maintaining reliability on the major approaches to the SFOBB. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.21]

Response

Impacts TR-2 through TR-7 and TR-40 through TR-45 in the EIR identified the significant and unavoidable impacts associated with project-generated vehicle trips on the Bay Bridge approaches in the East Bay, San Francisco and on the Bay Bridge ramps. As indicated on EIR p. IV.E.74, as a means to reduce vehicular travel to and from the Islands, additional transit capacity shall be provided as part of Mitigation Measure M-TR-2, Expanded Transit Service. While the specific improvements within the baseline conditions and as part of Mitigation Measure M-TR-2 have been discussed between the City, project sponsors, SFMTA, AC Transit and WETA, certain elements of the transit improvements are uncertain. Accordingly, Impacts TR-2 through TR-7 and TR-40 through TR-45 remain significant and unavoidable.

As noted on EIR p. IV.E.45, the majority of the trips on and off the Islands would be subject to a congestion pricing fee and ramp metering. These two measures would more directly affect the travel mode choice and use of vehicles for access to and from the Islands than traffic operations systems (“TOS”) projects in San Francisco and Alameda Counties.

As discussed elsewhere (see Subsection 2.7.3.9 – Traffic Analysis Assumptions), the selection of the metering rate is within the control of Caltrans. The metering rate assumed in this analysis was a conservative one, in that it was relatively high, and assumed relatively more traffic could exit Yerba Buena Island onto the Bay Bridge. The selection of the congestion pricing rate would be within the control of the TITMA, the SFCTA and the San Francisco Board of Supervisors.

The comment correctly notes that the result of the EIR’s analysis is that, even after application of Mitigation Measure M-TR-2, there remain significant and unavoidable impacts associated with project-generated vehicle trips on the Bay Bridge approaches in the East Bay, San Francisco and on the Bay Bridge ramps. The comment, therefore, proposes that the Project make a “fair share” contribution to three transportation improvement projects currently under study. The three projects identified in the comment may be beneficial to the overall transportation system in the region. It is possible that these regional benefits would improve congestion on the Bay Bridge. However, the magnitude of such a regional benefit has not been determined and it is not known whether these projects are feasible, or whether these projects represent a cost-effective means of helping alleviate regional congestion.
If the Proposed Project were to make a fair-share contribution towards these projects, it is not known whether these projects would ultimately prove to be feasible, or whether Caltrans would be able to secure the balance of funding necessary to move forward with these projects. The current status of the three proposed regional improvements is summarized as follows:

i: TOS projects in San Francisco and Alameda Counties for ramp meters and fiber optics installation: These include various projects that are proposed to be included as State Highway Operations and Protection Program projects. A Project Study Report has been prepared for these projects; however funding sources have not been identified.

ii: Projects near Toll Plaza approach in Alameda County for TOS and fiber optics installation: These include various projects that are proposed to be included as State Highway Operations and Protection Program projects. A Project Study Report has been prepared for these projects; however, funding sources have not been identified.

iii: Proposed Multi-use bicycle and pedestrian path on the west span of the Bay Bridge: In 2009 the Bay Area Toll Authority initiated preparation of the ongoing Project Study Report (Project Development Support) [PSR(PDS)] for the Bay Bridge West Span Bike Path. Upon completion of the PSR(PDS), sponsor agencies will seek approval to move into the Project Approval/Environmental Documentation phase. Funding for this project has not been identified.

As this summary indicates, Caltrans has not approved these three projects, nor has it adopted a program to secure funds for their construction. Until a program is adopted that identifies the funding sources necessary to construct these improvements, it would be speculative to assume they would be constructed. In particular, under CEQA, it is inappropriate to rely upon fair-share funding to mitigate the cumulative traffic impacts of a project, where no mechanism has been established to actually obtain funding for or implement the identified improvement. For this reason, the proposal to require the project to provide fair-share funding for these regional improvements is considered speculative and infeasible.

Based on available information, the three projects identified in the comment would not be as effective in reducing the number of vehicle-trips generated by the Proposed Project as Mitigation Measure M-TR-2, and would not be considered to represent feasible alternative mitigation. As suggested in the comment, provision of Traffic Operations Systems projects in San Francisco and Alameda counties would improve operations on Bay Bridge and on its approaches by improving response times to incidents and providing more reliable travel time information. However, neither of these proposals would add capacity, and therefore, neither of them would mitigate the cumulative impacts of the Proposed Project. Therefore, Mitigation Measure M-TR-2 is deemed by the EIR preparers to be more appropriate.

As noted in the comment, the proposed multi-use path on the west span would accommodate pedestrians and bicyclists traveling to and from the Islands. A multi-use bicycle and pedestrian path on the west span of the Bay Bridge could potentially divert some travelers who would
otherwise use their vehicles to travel across the bridge. It is not known, however, how many
travelers would use their bikes instead of cars. As a result, it is not anticipated that the proposed
multi-use path would have a substantial effect on peak hour mode choice or reduce traffic impacts
to less-than-significant levels.

In sum, the three projects identified in the comment would be less effective than the provision of
additional transit service in reducing travel demand by vehicles. The Proposed Project would
include substantial investment in transportation infrastructure with regional benefit, including
roadways, bicycle and pedestrian facilities, and transit services. In addition, the Proposed Project
would contribute financially to the Ramps Project planning and engineering studies in the amount
of over $10 million. While the Ramps Project would not add capacity to either the ramps
themselves or the mainline, the Ramps Project would improve the safety and operations of the
mainline, and therefore, have a direct benefit to the regional system.

In conclusion, the contribution of fair share fees to the three projects identified in the comment
would not represent a feasible alternate mitigation measure to Mitigation Measure TR-2, as
suggested in the comment.

2.7.15.3 Funding

Comment

4. The expanded transit scenario for Mitigation Measure M-TR-2 has not yet been funded but is
considered as a mitigation measure for transportation impacts. Please discuss how these
transit improvements will be funded and explain development phasing in relation to expanded
transit services. (Lisa Carboni, District Branch Chief, Local Development,
Intergovernmental Review, California Department of Transportation) [16.16]

Response

As described on EIR p. IV.E.74, Mitigation Measure M-TR-2, Enhanced Transit Service, would
increase the frequency of Muni line 108-Treasure Island, create an additional Muni bus route
between Treasure Island and another employment center in San Francisco (e.g., Civic Center),
and increase frequency of ferry service between the Island and Downtown San Francisco.

The specific transit improvements contemplated under Mitigation Measure M-TR-2 are uncertain.
The City prepared a Fiscal Impact Analysis for the Proposed Project that indicates that General
Fund revenues generated from the Proposed Project through property taxes, sales taxes, hotel
taxes, and other sources would greatly exceed the incremental cost of providing the increase in
Muni service under Mitigation Measure M-TR-216. Please refer to responses in Subsection
2.7.2.3, Funding Mechanisms, above, for information related to funding of project improvements.

16 The Fiscal Impact Analysis is Exhibit 14 in the 2010 Term Sheet Update, cited above in footnote 3.
However, because the expansion of Muni service must rely on future annual appropriations by future Boards of Supervisors, the service was not assumed to be in place.

The provision of ferry service under Mitigation Measure M-TR-2 is uncertain because providing the decreased headways would require expansion of the San Francisco berthing facilities, which relies on future environmental review and discretionary actions by the Port, the Board of Supervisors and WETA.

Given the uncertainty of these transit improvements, the Expanded Transit Service was not assumed to be in place. As a result, the transit impacts associated with not implementing this level of transit would be significant and unavoidable. Although the EIR makes the assumption that the Expanded Transit Service is not in place, the specific improvements included in Mitigation Measure M-TR-2 have been discussed between the City, project sponsors, and SFMTA (for San Francisco bus service), AC Transit (for Oakland bus service), and WETA (for ferry service). An Interagency Cooperation Agreement would be entered into between TIDA and the City. SFMTA would be a party to the Interagency Cooperation Agreement, which would be subject to approval by the SFMTA Board. By entering into the Interagency Cooperation Agreement, SFMTA would confirm its concurrence with the Transportation Implementation Plan and the SFMTA’s service. A Memorandum of Understanding describing the expectations of the project sponsors, AC Transit and WETA is anticipated to be attached to the Transportation Implementation Plan that is part of the Project's Disposition and Development Agreement. The Transportation Implementation Plan would define how TITMA, the agency responsible for managing funding for transportation improvements for the Islands, would operate. TITMA would be responsible for developing, in conjunction with TIDA, SFMTA, WETA, and AC Transit, a phasing plan to determine when specific transit improvements would occur. TITMA would also be responsible for administering the proposed congestion pricing program, and for coordinating their transit and other TDM efforts with Caltrans’ metering of the Yerba Buena Island Bay Bridge on-ramps. As indicated in the EIR, because full funding for the expanded transit service has not yet been identified, and because expansion of the San Francisco berthing facilities relies on future environmental review and discretionary actions by the Port, the Board of Supervisors and WETA implementation of M-TR-2 remains uncertain and was therefore, not assumed in the transit analysis. Accordingly, Proposed Project impacts to transit capacity would be considered significant and unavoidable.

2.7.15.4 Additional Mitigation Measures

Comment

- Why isn’t the following Mitigation Measure recommended in the DEIR: “If it is determined that traffic from the Redevelopment Area is constraining the capacity of the SFOBB, either more aggressive transit improvements must be implemented or additional development should be
delayed until such improvements are implemented.” Please explain why this is not a Mitigation Measure. (Vedica Puri, President, Telegraph Hill Dwellers) [39.69]

Response

The extent to which the Proposed Project constrains capacity on the Bay Bridge is largely a function of the metering rate selected for on-ramps. As discussed in the response in Subsection 2.7.3.9, Traffic Analysis Assumptions, the analysis is based on a metering rate that the City believes presents a reasonable worst-case scenario for purposes of identifying impacts on the Bay Bridge. Thus, even if the Proposed Project generated more vehicle traffic than projected in the EIR, the effect on the Bay Bridge would be the same because additional vehicles could not get through the ramp meters. Thus, such a mitigation measure is not necessary as a means to lessen the project’s impact on the Bay Bridge or its approaches. Aggressive transit improvements, such as increased frequencies on Muni line 108-Treasure Island, additional ferry service, and a new bus route to San Francisco, are included as part of Mitigation Measure M-TR-2.

2.7.15.5 Mitigation Monitoring and Reporting

Comment

Public Resources Code Section 21081.7, requires that, after a Lead Agency approves a project, Agency must submit transportation information generated from the reporting or monitoring program that the Lead Agency adopted at the time of approval. Please see the Department’s “Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the Department of Transportation” at the following website for more information: http://www.dot.ca.gov(hq/tpp/offices/ocp/igr_ceqa.html

The Mitigation Monitoring Submittal Guidelines discuss the scope, purpose and legal requirements for mitigation monitoring reporting and submittal, specify the generic content for reports, and explain procedures for timing, certification and submittal of reports. Please complete and sign a Certification Checklist form for each approved development project that includes transportation related mitigation measures and return it to this office once the mitigation measures are approved, and again when they are completed.

The City needs to consider measuring mitigation effectiveness and periodically evaluate transit utilization rate, headway reliability and quality of service to ensure transit is the most attractive mode of travel. (Lisa Carboni, District Branch Chief, Local Development, Intergovernmental Review, California Department of Transportation) [16.22]

Response

A Mitigation Monitoring and Reporting Program will be prepared for the Proposed Project based on the impacts and mitigation measures identified in the EIR. The Planning Department will follow the Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to Caltrans.