



City of Emeryville

INCORPORATED 1896

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VIA FIRST CLASS MAIL AND EMAIL (comments@I80Ashby.com)

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Re: Interstate 80/Ashby Avenue (Route 13) Interchange Improvement Project
("Project")

Dear I-80/Ashby Project team:

Congratulations on reaching this milestone stage of the Project. The Project has been included in City of Emeryville ("City") planning documents for many decades now, and we are excited to see this Project come to fruition. The City appreciates how the Project team has been engaging with the general public, City staff, and the bicycle and pedestrian advocacy groups during the project development and scoping throughout the current PA&ED phase.

The City will continue to work closely with and support Caltrans, Alameda CTC, and other stakeholders, in getting the Project to the finish line while also accommodating our local community/stakeholder needs.

The City is in full support of the Project's purpose, needs, expected outcomes, and expected benefits. We are also in support of the Mitigated Negative Declaration (MND) for the Project, its reasoning for the determination, and the Project team's use of avoidance and minimization measures.

The City Council of the City of Emeryville has the following comments to the Draft Environmental Document ("DED") for the Project:

1. MND for the project (Page 6 of DED)

The City is in support of the MND, reasoning for the determination, and use of avoidance and minimization measures. As part of the avoidance and minimization measures it's critical that thorough messaging and outreach efforts to the resident and business community are conducted. The City is also interested in creative ways that temporary bike and pedestrian detours could become leveraged into permanent facilities.

2. Purpose of the proposed project (Pages 15-16 of DED)

Revise the purpose bullet point as follows: "Provide safe bicycle and pedestrian connectivity across I-80 and Frontage Road to the Bay Trail"

3. Regarding the Build / No-Build Alternative (Page 16 of DED)

The City is in support of the "Build Alternative". The "No Build Alternative" is not consistent with the City of Emeryville General Plan, or ACTC regional goods and movement plans. The "No Build Alternative" would continue the lack of pedestrian and bike access from Shellmound to the Bay Trail.

4. S-3 Parks and Rec Facilities (Page 17 of DED)

Employ all practical measures to limit closure of Point Emery and Aquatic to vehicular access. Ensure bike and pedestrian access are available at all times.

5. S-5 Traffic and Transportation/Pedestrian and Bicycle Facilities (Page 19 of DED)

Bike and pedestrian diversions employed in traffic control plans shall not cause a significant or burdensome increase in travel distance.

6. AMM VIS 1 Visual/Aesthetics (Page 19 of DED)

Regarding: "The final design will include measures to discourage creation of encampments"

The project should follow appropriate policies and regulations concerning unhoused residents during the course of Project construction. Furthermore, during the June 15, 2021 Council study session the majority of Council members did not support a portal design option for the western conform of the Project due to safety associated with that design.

7. S-9 Air Quality (2.2.8) (Page 23 of DED)

Consider including the impacts of a shift towards bike and pedestrian modes in the statement about air quality.

8. Noise (Page 24 of DED)

During the construction phase of the project that the activities shall be complaint with the City of Emeryville Noise Ordinance, with particular sensitivity to the residents of 6701 Shellmound Avenue.

9. S-10 Energy (2.2.8) (Page 24 of DED)

Consider the benefits of a mode shift to pedestrian and bicycle travel in the statement about energy consumption

10. BIO-1 (Page 24 of DED)

As part of reducing the overall carbon footprint of the project, consider a tree removal/replacement ratio of 1:2 instead of 1:1.

11. TOAR summary (Pages 30-31 of DED)

Ensure the project is consistent and conforms with the latest plans from the Emeryville Rail Safety/Quiet Zone project in the existing conditions and lane configuration analyses.

12. Interchange Build Alternative (Page 43 of DED)

Please add a crosswalk to the Bay Street/Shellmound on-ramp.

13. BPOC build alternatives (Page 48 of DED)

In 2021, the Emeryville Transportation Committee and City Council supported the basket handle design since it mimicked the design of the recently opened South Bayfront Pedestrian Bridge. No discussions have yet taken place regarding maintenance responsibility for the various design alternatives. Maintenance remains an important concern of the City and needs to be weighed heavily as part of the design selection process.

14. Temporary Construction and Phasing (Pages 50-55 of DED)

The City Council, Emeryville Transportation Committee, Bike and Pedestrian Stakeholders, and City staff request that the bike/ped bridge is scheduled to an early phase of construction. This would facilitate bike and pedestrian detours needed during the course of construction for the interchange and provide critical access where there is currently none.

15. Construction Impacts and Design Variances:

Staff requested that the ACTC project team provide a summary of construction impacts and design variances. The following response was received:

“Construction of the proposed Ashby Ave. interchange and bicycle/pedestrian overcrossing (BPOC) structure will require temporary night-time and weekend closures of I-80 during false work erection, temporary ramp closures, and temporary mainline traffic shifts onto the shoulders. Traffic detours are anticipated during these closure periods to direct motorists to the nearest interchanges at Powell Street and University Avenue. The realignment and reconstruction of West Frontage Road will also require temporary closure of West Frontage Road between University Ave. and Powell St. Efforts will be made to maintain existing connections and provide detours where possible during construction to minimize impacts to traffic.

Implementation of the new Bay Street connector and realigned West Frontage Road will require design variances related to non-standard intersection spacing with local intersections. The on-ramp lane drop tapers are also nonstandard to maximize queue storage capacity. Enhanced lighting, advanced warning signage, and enhanced thermoplastic striping will be implemented to offset the effect of these nonstandard features.”

The City is in support of the temporary construction detours needed to construct the Project. We ask that the Project team move the bike/ped bridge construction to an early phase of construction to help facilitate bike and pedestrian detours needed during the course of construction for the interchange and provide critical access where there is currently none.

The City also supports the reasoning behind requiring design variances and the additional treatments selected to be used in the nonstandard design areas.

16. Transportation Committee comments from January 12, 2022 Meeting:

a. Connection of Bicycle/Pedestrian Overcrossing to the Point Emery/Bay Trail

On page 45 the report states: “Crossing West Frontage Road to these facilities would be accomplished at the at-grade crosswalk aligning with the Point Emery parking lot, or at a below-grade crossing under West Frontage Road just east of the T-intersection”. The Emeryville City Council supports an at grade crosswalk with safety features such as a hawk signal, raised crosswalk, and speed mitigation. The Council opposes the construction of a below grade crossing. A below grade crossing would present challenges such as flooding, maintenance costs, and safety concerns. Pedestrians prefer at grade crossings and will go out of their way to avoid underpasses:

<https://www.sciencedirect.com/science/article/pii/S1369847816303369>

We support this project creating a complete, usable bike and pedestrian crossing to the bay trail, and an at-grade crossing with safety infrastructure. It is still preferred, if feasible, to have the BPOC land on the west side of Frontage Road creating a zero-conflict connection.

b. Livability of Nearby Housing Units

Consider a sound wall or noise barriers to be included in the project along the parcel edges of the 6701 Shellmound Street development.

As part of reducing the overall carbon footprint of the project, to help the livability of the community surrounding the site, and to help the natural habitat of migratory birds that lack a tree canopy, please consider a tree removal/replacement ratio of 1:4. This will modify staff's #10 comment from above.

c. Tight-Diamond Configuration (EB I-80 exit at Shellmound)

Consider alternative alignment of the EB I-80 exit's connection at Shellmound Street. Current design has a horizontal curve that has been designed in way that would support high-speed turns of vehicles as they drive towards Shellmound Street. Consider a design that has two 90-degree turns to connect to Shellmound Street, which will slow down vehicle turning speeds and encourage full stops. Tighter intersections and smaller curb radii should be used to reduce the crossing distances of any crosswalks on this connector and anywhere else in the new interchange.

d. Complete Streets Infrastructure on Shellmound/Bay Street to Aquatic Park

There is inadequate bicycle/pedestrian infrastructure to connect people on Shellmound Street/Bay Street to Aquatic Park. This connection is a gateway to the northside of our Emeryville Community. Caltrans' recently revamped complete streets approach should be applied to this project. Please add additional complete streets infrastructure on Shellmound Street and Bay Street to help support the connection to and from Aquatic Park.

17. City Council comments from January 18, 2022 Meeting:

To be added to draft letter after meeting occurs.

In conclusion, the City of Emeryville is in full support of the Project's purpose, needs, expected outcomes, and expected benefits. The City also supports the MND for the Project, the reasoning for the determination, and the Project team's use of avoidance and minimization measures. We look forward to receiving Caltrans' response to this comment letter and to continuing to work with the agency on this and many other projects in and around Emeryville.

Very Truly Yours,

John Bauters
Mayor of the City of Emeryville

cc: *via email only*

Emeryville Mayor John Bauters, Vice Mayor Ally Medina, and City Council Members
Courtney Welch, Dianne Martinez, and Scott Donahue

Emeryville City Attorney Andrea Visveshwara

Emeryville Transportation Management Association Director Roni Hatrup

Alameda-Contra Costa County Transit General Manager Michael Hursh

City of Berkeley Mayor Jesse Arreguin, City Manager Dee Williams-Ridley and Public
Works Director Liam Garland

Alameda County Transportation Commission Executive Director Tess Lengyel

Metropolitan Transportation Commission Executive Director Therese McMillian

Bay Area Air Quality Management District Executive Gregory Nudd

Bike East Bay Advocacy Director Dave Campbell

California Air Resource Board Executive Officer Richard Corey

Alameda County Fire Department Chief Willie McDonald