

## APPENDIX A-1

### **REVISIONS TO ABAG EMPLOYMENT ALLOCATIONS ARE NOT ANTICIPATED TO SUBSTANTIALLY CHANGE EIR CONCLUSIONS FROM TRANSPORTATION MODEL ANALYSES**

This response addresses the concerns raised about the effects of the recently revised ABAG employment allocations on the results of the transportation analyses in the *Uptown Mixed-use Project EIR*. The text that follows responds to those concerns and makes three main points. First, the response explains that the recently identified inaccuracies in the original ABAG employment allocations do not affect the land use data for Oakland as the allocations of Oakland employment are not based on the ABAG data. Second, the validity of the Oakland land use data supports the adequacy and validity of the EIR transportation analyses and forecasts given the importance of the Oakland land use data to those analyses and their results. Third, the response goes on to explain that possible revisions to the allocations of employment in other cities in Alameda County outside of the EIR study area are not anticipated to substantially change the EIR conclusions drawn from the recent transportation model analyses.

### **ACCMA REVIEW OF MODEL LAND USE DATA IS CURRENTLY UNDERWAY IN LIGHT OF RECENTLY REVISED EMPLOYMENT ALLOCATIONS FROM ABAG**

Since the transportation analysis for the *Uptown EIR* was completed, the Association of Bay Area Governments (ABAG) found problems with its allocations of *Projections 2002* employment data to Census Tracts within cities in the region, and recently issued revised employment allocations. Citywide employment totals for jurisdictions remain the same as those originally provided by ABAG.<sup>1</sup> The *Projections 2002* household and population totals for jurisdictions and the allocations of households and population to Census Tracts within jurisdictions remain unchanged and are not affected by the recent ABAG revisions to the allocations of employment. The Alameda County Congestion Management Agency (ACCMA) is currently in the process of reviewing the employment data in the ACCMA model and revising the employment allocations in the model for those situations affected by the ABAG revisions.

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<sup>1</sup> Per communications with ABAG staff on October 23, 2003 (Hing Wong) and November 3, 2003 (Brian Kirking). Conversations with ABAG staff indicated that the Census Tract allocations of employment were revised because of problems with the methodology originally used to allocate *Projections 2002* employment to Census Tracts within cities. ABAG staff also indicated that employment totals for cities were not affected and should remain the same as the totals in the original data. (Analyses of the revised Census Tract allocations from ABAG show only small differences in employment totals for some cities as calculated for the revised Census Tract files compared to totals calculated for the original Census Tract files and totals in the ABAG *Projections 2002* publication.)

## **OAKLAND LAND USE DATA FOR TRANSPORTATION MODEL ANALYSES ARE NOT AFFECTED BY REVISED EMPLOYMENT ALLOCATIONS FROM ABAG**

### **Oakland Land Use Data in ACCMA Model are Based on Local Allocations, Not the ABAG Allocations**

The land use database for Oakland included in the ACCMA Travel Model was developed by the City of Oakland and its consultant, Hausrath Economics Group (HEG), and submitted to the ACCMA in January 2003 in response to the transmittal of preliminary land use data for city input and review prior to inclusion in the ACCMA's Travel Model 2002 (completed and released May 2003). Extensive work was done in Oakland to track and update growth assumptions and the locations of specific projects and development sites for use in the allocation of growth to traffic analysis zones (TAZs) throughout the city. Development projects, plans, and other changes were identified and updated based on input from City of Oakland and Port of Oakland staffs and on analysis of economic, demographic, and real estate market data and trends.

The land use database developed by the City of Oakland and submitted to the ACCMA for use in its Travel Model 2002 reflects the City's allocation of growth to Oakland TAZs based on extensive local information and analysis, as described above. The Oakland land use data are not based on the ABAG allocations of *Projections 2002* employment and households within the city. Although developed locally, the citywide totals for employment and households in Oakland are similar to and within one percent of the ABAG citywide totals for Oakland, as required by the ACCMA.

The recent revisions in ABAG's allocations of employment to Census Tracts within cities do not affect the Oakland employment data in the ACCMA model. That is because those data are not based on the original ABAG allocations of *Projections 2002* employment. The Oakland employment allocations are based on more extensive and in-depth local information and analysis than can be done across the region by ABAG.

### **Oakland Cumulative Growth Scenario Used in EIR Transportation Analyses is also Based on Local Allocations, Not the ABAG Allocations**

As described in Appendix D of the EIR, much of the cumulative analysis in the *Uptown EIR* assumes Oakland's cumulative growth scenario and land use database as updated for the *Uptown EIR* instead of the land use data in the ACCMA Model 2002. The updated cumulative growth scenario for Oakland builds on the land use database in the ACCMA model. Compared to the land use in that model, the cumulative growth scenario as updated for the *Uptown EIR* includes more specificity about the Uptown project and updated assumptions (through June 2003) for other development projects, primarily those in downtown Oakland surrounding the Uptown project. In addition, the totals for Oakland's cumulative growth scenario are not constrained to fall within one percent of the ABAG totals for Oakland, if higher projections are justified by recent and expected future development projects and other anticipated changes in land use, employment, and households/housing in Oakland. As described in Appendix D, the *Uptown EIR* growth scenario for Oakland is very similar to the projections and land use database in the ACCMA Model 2002, and slightly more

conservative, as total employment in Oakland under the Uptown scenario exceeds the ACCMA/ABAG total for 2025 by more than one percent.<sup>2</sup>

The allocation of employment in Oakland's cumulative growth scenario as updated for the *Uptown EIR* builds on that developed for the ACCMA model land use database. Differences reflect updated conditions through June 2003 as well as the location of some additional growth. Like the land use data in the ACCMA model, the employment data in Oakland's growth scenario are allocated to locations within the City based on extensive local information and analyses and not on the ABAG allocations of *Projections 2002* employment. Thus, the recent ABAG revisions to the allocations of employment within cities do not affect the Oakland employment data in the *Uptown EIR* cumulative growth scenario.

### **Communications With ACCMA Confirm that Oakland Land Use Data are Not Affected by Revised Employment Allocations from ABAG**

Communications with the ACCMA since the release of the revised ABAG employment allocations have confirmed that Oakland supplied the ACCMA with its own land use data for use in the Travel Model 2002, and that the Oakland data allocated employment and household growth within Oakland based on in-depth local information and analysis and not the ABAG *Projections 2002* allocations. Thus, the Oakland employment data in the ACCMA model are not being revised as a result of the recently revised employment allocations from ABAG.<sup>3</sup>

### **Validity of Oakland Land Use Data Supports Adequacy and Validity of EIR Transportation Analyses**

The results of the EIR transportation analyses and model forecasts are most sensitive to the land use data for Oakland. This is because of the location of the Uptown project in Oakland and the focus of the EIR transportation analyses on the Uptown Study Area including and surrounding the project. The study area is defined to include the proposed Project site and 40 study intersections in surrounding locations in Oakland (see pps. 85-88 of the *Draft EIR*). In addition, the transportation analysis also focuses on the regional and local street networks in Oakland that serve the Project site.

As the land use data for Oakland are based on in-depth local information and analyses and not the ABAG allocations (as described above), the recently revised employment allocations from ABAG do not affect the Oakland land use data in the ACCMA Model 2002 or in Oakland's cumulative growth scenario as updated for the *Uptown EIR*. The validity of the Oakland land use data supports the adequacy and validity of the EIR transportation analyses and forecasts, given the importance of the Oakland land use data to those analyses and their results.

The allocation of growth to TAZs in the Uptown Study Area is particularly important to the EIR transportation analysis because of the intersection and other localized analyses focused on assessing the impacts of the Project. The allocation of growth to TAZs outside the study area becomes less

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<sup>2</sup> Also see Response to Comment A2-2 for more explanation of the *Uptown EIR* growth scenario and of how it compares to other growth scenarios and projections.

<sup>3</sup> Communications with ACCMA staff (Jean Hart and Diane Stark) on November 3, 2003, November 4, 2003, and during the first part of December 2003. This is further confirmed in the December 22, 2003 letter from the ACCMA (Diane Stark) to the City of Oakland regarding ACCMA review of the revised *Projections 2002* employment allocations from ABAG.

important to the EIR analysis as the distance from the study area and Project site increases. Through the workings of the travel model, traffic from activity in areas outside of Oakland is combined onto major routes and freeways that may travel through the study area and affect the EIR forecasts and impact analyses. Because of this aggregation process, the allocation of activity to specific TAZs in areas outside of Oakland is much less important to the EIR transportation analysis than the allocation of activity to TAZs within the study area and the rest of Oakland. Since the detailed land use databases for Oakland TAZs are not affected by the ABAG revisions nor are the employment and population totals for jurisdictions outside of Oakland, the EIR's forecasts and analyses of impacts appear adequate. Further, they are not likely to be substantially affected by possible future changes in the allocations of employment to TAZs in other jurisdictions outside of Oakland as may result from ACCMA's current model review process. This issue is discussed further below.

### **Possible Revisions to Employment Allocations Outside of Oakland are not Anticipated to Substantially Change EIR Conclusions**

The ACCMA's current model review process could result in changes to the allocations of employment within other Alameda County cities outside of Oakland as a result of ABAG's recently revised employment allocations. However, such changes are not anticipated to substantially change the EIR conclusions drawn from the transportation model analyses for several reasons. First, as described above, the results of the EIR transportation analyses and model forecasts are most sensitive to the land use data for Oakland which are not affected by the changes in the ABAG data. Second, through the workings of the travel model, traffic from activity in other cities is incorporated into the EIR analyses focused on the Uptown Study Area, after having been aggregated onto streets, major routes, and freeways that may travel through the study area. Because employment totals for other cities have not been revised by ABAG, the *amount of traffic* associated with that employment also will not be affected. Possible changes in the allocation of employment in other cities, however, could affect the *allocation of associated traffic* to major routes and freeways, although such effects are moderated and can be negated by the model's aggregation process of combining traffic for numerous TAZs and Census Tracts onto a relatively limited number of major routes and freeways.<sup>4</sup> Third, although not anticipated to be substantial, the potential effects of possible changes in the allocation of employment in other cities are primarily associated with nearby communities that border Oakland, particularly the central areas of Oakland, including Emeryville, Piedmont, Alameda, and possibly Berkeley and San Leandro. Possible changes in the allocation of employment in other cities are much less likely to have effects on the *Uptown EIR* transportation forecasts and analyses because of their further distances from the study area.

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<sup>4</sup> The transportation model's process of combining traffic for different areas onto major routes could moderate or negate the effects of possible different allocations of employment and associated traffic in several ways. One is that by combining traffic from different smaller areas onto one or more major travel routes serving the larger area, the possible effects of different employment allocations to Census Tracts and TAZs can be negated if the traffic from those Census Tracts and TAZs ends up on the same routes regardless of where the employment is allocated. (In other words, less traffic for some TAZs can be offset by more traffic in other TAZs nearby.) Another is that by combining traffic from different areas onto major travel routes, differences in the allocation of traffic for one or more cities can be small when combined with the traffic from Oakland and other cities not affected by changes. This is particularly relevant because the Project site and Uptown Study Area are located in Oakland (which is not affected by the ABAG revisions), and because of Oakland's large size relative to its neighbors (which results in over 60 percent of the TAZs in the Inner East Bay being located in Oakland).

### **Considerations Relevant to Nearby Cities of Emeryville, Piedmont, and Alameda**

Although the ACCMA model review process is still underway, it is possible that there will be only limited or no changes in the allocations of employment in the nearby cities of Emeryville, Piedmont, and Alameda.

The City of Emeryville includes only one Census Tract within its boundaries. As a result, ABAG's revised allocations of employment to Census Tracts do not affect the allocation of employment in Emeryville. Thus, the revised ABAG employment allocations do not affect the land use data in the ACCMA model for Emeryville.

The City of Piedmont has very little employment within its borders, and includes only two Census Tracts. The City provided local inputs for the land use data currently in the ACCMA Model 2002 that substantially changed the employment allocations based on the original ABAG data. Thus, it is not anticipated that the recent ABAG revisions will affect the land use data in the ACCMA model for Piedmont.

Communication with the City of Alameda around the time that the ABAG revisions were released indicated that Alameda had provided local inputs for the land use data currently in the ACCMA Model 2002. As a result, City of Alameda staff did not anticipate that the revised ABAG data would require changes to the employment allocations in the land use database for Alameda. It also was noted by City of Alameda staff that the ABAG projections are considered to be conservative for analysis purposes by the City of Alameda, as they incorporate higher growth than anticipated locally, independent of where the employment is located.<sup>5</sup>

### **Considerations Relevant to Nearby Cities of Berkeley and San Leandro**

The ABAG revisions reflect changes in the allocation of employment within the cities of Berkeley and San Leandro that could affect the allocations of employment for those cities in the land use database in the ACCMA model once the current review process is completed.<sup>6</sup> Such changes in the allocation of employment could affect the allocation of traffic, resulting in more traffic in some locations and less traffic in other locations. Overall, the net effects on the results of the EIR transportation analysis are not anticipated to be substantial for all of the reasons described at the beginning of this subsection above. They include: the fact that the EIR analyses are most sensitive to the land use data for Oakland which are not affected by the changes in the ABAG data; the negating or moderating effects of the travel model's process of combining traffic for smaller areas onto major routes serving the larger area; and the fact that possible differences in the allocations of employment throughout Berkeley and San Leandro can occur in Census Tracts and TAZs that are a substantial distance from the Uptown Study Area that is the focus of the EIR impact analysis.

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<sup>5</sup> Communication with City of Alameda Planning Department staff (Andrew Thomas), November 5, 2003. Also see note 3 in Appendix D of the *Uptown EIR* regarding earlier communication with the City of Alameda.

<sup>6</sup> Per review of revised ABAG data by Hausrath Economics Group as of December 2003, and communication with ACCMA staff (Diane Stark) in early December.

