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BERKELEY, CALIFORNIA 94720-1380

July 2, 2007

Jim Cunradi
East Bay BRT Project Office
AC Transit
1600 Franklin Street
Oakland CA 94612

Re: AC Transit's Bus Rapid Transit (BRT) EIS – UC Berkeley comment letter

Dear Mr. Cunradi:

UC Berkeley recognizes that the environmental impact study (EIS) AC Transit published in May examines impacts across the entire BRT route, applies NEPA significance criteria for determining impacts, and is a concept-level analysis. The EIS is not an exhaustive or detailed account of aesthetic, experiential, or practical changes that might be expected *vis a vis* existing conditions in Berkeley.

Please note that the timing of the EIS publication, just after the close of the school year, limits our ability to formally consult with many campus interest groups, committees and stakeholders. Our comments result from a necessarily abbreviated consultation process. However, these comments have been coordinated among the campus planning office, parking and transportation office, informally with the campus design review committee and others among the campus community, and the ASUC (which has a keen interest in both student commutes and the southside retail environment and service delivery).

We understand further work will occur over the coming months between AC Transit and local communities and customers to determine the preferred alternative. UC Berkeley continues to support the principle of dedicated-lane BRT service but, as one of AC Transit's largest customers, we also believe some of the alternatives presented in the EIS have clear advantages over the others in terms of the service they provide to the University, and the contribution they make to the campus environs.

We believe that among the many criteria and interests to be considered, these factors are critical to the success of BRT:

1) The system must be legible and easily understandable to first-time users and conveniently serve regular transit users. It must be obvious where to access the system in either direction.

With this criterion in mind the University supports the two way transitway on Shattuck and Telegraph, and the Bancroft/Durant couplet. The Bancroft/Durant couplet largely reflects current operations, improves the system by eliminating the need for use by local services of Dana and

Dwight by creating a two-way Telegraph, and is likely to increase legibility of the overall system. Users transferring to or from BART at the downtown Berkeley station are likely to understand the system best if buses bound in either direction are clearly visible upon exiting the station.

2) The system must accommodate future extensions: for example, down North Shattuck or University Avenue.

With this criterion in mind the University supports the two way transitway on Shattuck. An extended system that included the downtown loop, as studied in the EIS, would be less legible for Berkeley visitors, or would require the removal and replacement of southbound stops when the route is extended. The Oxford loop as proposed in the EIS does not provide benefit to the University or to the eventual expansion of BRT, and is not supported.

3) The dedicated transitway must be usable by campus shuttles.

Among those studied in the EIS, Alternative 3 which allows use of the BRT transitways by campus shuttles and local-serving buses is the most compelling. All local transit service can benefit from lanes dedicated to transit, halting the steady deterioration in transit times experienced by public transit on surface streets.

4) The system must provide an attractive and quick connection between Downtown Berkeley BART and Telegraph Avenue.

Many transit-oriented visitors and commuters arrive in downtown Berkeley on BART with the south campus as their destination. Destinations within the southside include large classroom facilities, the student union, southside student housing, Sproul Plaza, and California Memorial Stadium. With the above criterion in mind the University supports the two way transitway at Shattuck, and the Durant/Bancroft couplet. The Dana Street southside option does not provide a direct link to Telegraph Avenue from downtown Berkeley, particularly for visitors who may not be familiar with Berkeley.

5) The public improvements associated with BRT must be leveraged to improve the pedestrian experience of Bancroft and Telegraph. Safety -- for pedestrians, bicyclists, disabled individuals -- must be addressed and assured.

Elsewhere in the system the BRT transitway is proposed for the middle of the street, to avoid the experiential impact of large, fast-moving buses with 3 minute headways in close proximity to the sidewalk (among other reasons). But at Telegraph and Bancroft, street width limitations allow little separation between the BRT transitway and the sidewalk.

Telegraph. As a result of dedicating street lanes to transit (and delivery and emergency vehicles) in the north Telegraph vicinity, in the EIS AC Transit suggests that the Telegraph commercial district would be made more attractive to the thousands of daily pedestrians there today and who would alight from buses at stations at either end of the district (see the EIS at page 2-36). There is no evidence to support this conclusion. Street festivals that close the street to traffic are not a comparable to a busy two-way transitway.

Since this option has the potential for significant land use and economic impacts to a retail district attractive to residents, university students and visitors, that is also a major source of tax revenue to the city of Berkeley, this assertion must be supported with examples from comparable urban environments.

There may also be impacts to the physical environment. AC Transit must identify exactly how noisy, how frequent, how much exhaust and breeze would be generated by buses in the transitway, must understand the likelihood of pedestrians of all ability levels trying to cross the transitway in this area, and must develop alternative design schemes or propose design guidelines for the district that could enhance bicycle travel, expand the sidewalks for pedestrians and street vendors, ensure safety, and buffer pedestrians appropriately from unpleasant or unsafe convergence with the transitway.

Bancroft. Today the University community commonly crosses Bancroft at multiple locations along the proposed BRT corridor. Under the proposal Bancroft may accommodate disoriented drivers rerouted to avoid the Telegraph transitway, and would continue to accommodate visitors dropping off patrons for Zellerbach Hall or southwest campus sporting events, or searching for short-term metered parking close to the University; vehicles also access and egress campus parking facilities at the Student Union , the RSF garage, and the Tang Center from Bancroft Way. Bicycles enter and leave campus along Bancroft, and bicyclists use Bancroft to travel west in a straight line, avoiding more circuitous campus routes.

Moreover, because of the heavy pedestrian volumes crossing Bancroft and Durant, we view the proposed configuration of sidewalk, auto lanes, and two-way transitway on Bancroft west of Telegraph as undesirable in terms of both pedestrian safety and environmental quality. Our preference for the Bancroft/Durant couplet includes a preference for transitways adjacent to the sidewalks in these locations. The capital investment that would otherwise go to BRT stations in the middle of the street should instead be leveraged to upgrade the visual and experiential quality of the sidewalk.

Given the critical nature of Bancroft Way as the 'seam' between campus and community serving so many functions, the University supports the Bancroft/Durant couplet to facilitate the many activities for this street, rather than the two-way transitway for Bancroft. Further, while AC Transit mentions the difficulties buses have taking Shattuck Avenue's northbound jog at Shattuck and University, the required bus movements to accommodate a two way transitway at Telegraph and Bancroft, which is also an inordinately busy pedestrian intersection, would seem more daunting.

We note too that the intersection of Bancroft and Telegraph has an important social and cultural history connecting the campus and the southside, most famously during the Free Speech Movement, and the ASUC retail node occurs at this intersection. Station improvements at the Bancroft/Telegraph station should be planned to graciously accommodate the many bus and shuttle lines that serve this location as well as protect and preserve the pedestrian connections between Telegraph and Sproul Plaza. The details necessary to ensure this station works for the campus community, pedestrians, shuttles and AC Transit are not yet in evidence.

The Bancroft/Durant couplet with a two-way Telegraph may warrant a similarly gracious station at Durant and Telegraph.

As we request in the above discussion of north Telegraph, AC Transit must identify exactly how noisy, how frequent, how much exhaust would be generated by buses in the transitway, must understand the likelihood of pedestrians of all ability levels trying to cross the transitway in this area, including individuals using metered parking on Bancroft, on Durant, and must develop alternative design schemes or propose design guidelines for Bancroft Way and Durant Avenue that could expand the sidewalks for pedestrians, ensure safety, and buffer pedestrians appropriately from unpleasant or unsafe convergence with the transitway. The design must recognize the volume of bicycle travel and bicyclist's preferred use of this corridor.

6) Local service that feeds the arterials should not be undermined by BRT.

AC Transit is a public agency and the University has an important customer base for AC Transit. In our consultation with the campus community we often heard the concern that AC Transit's BRT investment would undermine local service. The EIS presents information that BRT, and particularly Alternative 3, would eventually reduce AC Transit's costs of providing service, which may benefit the entire system. We share the concern expressed in the City of Berkeley's staff comments, that local bus service operations should not be adversely impacted by the capital and operating costs of BRT. A criterion for success of the BRT program should be to ensure the viability of the greater system.

Lastly, we have a number of specific concerns that we expect can be addressed with appropriate technical due diligence in the detailed design phase:

a) How do bicyclists travel on Telegraph and on Bancroft? The Berkeley campus has over 4000 regular bicycle commuters. The Final EIS must show clear and safe routing for bicycles upon, or in the vicinity of, any roadways impacted by BRT.
b) In our scoping comments (Lollini to Cunradi, 6.12.03) we asked about the possible effects on vehicle circulation due to limitations on cross traffic due to BRT. The preferred alternative analyzed in the Final EIS should closely analyze traffic flow in the vicinity of Telegraph, describe how streets that would pick up traffic flow displaced by transitways would be impacted, the influence upon access and egress to parking structures, and upon bicycle travel and bicyclists.
c) What are the implications of the Telegraph transitway for travel to, access, egress, and travel from parking structures accessed via Telegraph, such as the Underhill parking structure and the Telegraph/Channing city garage, or via Bancroft such as at the Student Union , the Recreation Sports Facility, and the Tang Center parking facilities? Changes to Bancroft Way should also allow continued access to campus roadways, service roads, and commercial vehicle access.
d) The Shattuck Avenue downtown district is fed by an intricate system of streets and prized pedestrian environments. Options examined for bus layover should include moving the layover to a mid-alignment location where street width and pedestrian amenities are at a lesser premium.
e) The future of the West Crescent is as an open space amenity serving a revitalized downtown, not as convenient parking for cars or buses. The West Crescent cannot be considered for bus layover.
f) While the EIS suggests funding support for potential future new parking to be developed (we might call this mitigation-by–a-player-to-be-named-later) we expect that AC Transit, the

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City of Berkeley and the University could discuss mitigations for the loss of parking that immediately reduce real or apparent parking demand. Possibilities include funding support for a parking information system, or subsidies for commuters who exchange a parking permit for a bus pass.

g) With regard to enforcing the transit-only use of the BRT lane, we wonder: who will have this responsibility?

h) On the two-way Telegraph transitway in the north Telegraph area where delivery vehicles would be allowed, would only delivery vehicles serving businesses in this area have access to the transitway? Or would all delivery vehicles have access? How would this be enforced?

In sum, UC Berkeley continues to support AC Transit's proposed dedicated lane Bus Rapid Transit. Applying criteria for a successful public transit investment in Berkeley the University supports the two-way north Telegraph bus-only transitway, the Bancroft/Durant transitway couplet, and the Shattuck Avenue two-way transitway. We believe Alternative 3 among the comprehensive BRT alternatives best serves the community by lowering costs per rider, and maximizing ridership and benefits for all routes that coincide with the BRT route. We anticipate that a number of significant technical and design considerations can be addressed in formulating the preferred alternative for analysis in the Final EIS.

We hope and expect that AC Transit and the City of Berkeley will invite the University to participate in establishing the preferred alignment in Berkeley portions of the BRT. Kira Stoll of Parking & Transportation (510-643-9276, stoll@berkeley.edu), and Jennifer McDougall of the campus planning office (510-642-7720, jmcdougall@cp.berkeley.edu), remain ready to participate in these discussions.

Sincerely,

Emily Marthinsen

Emily Marthinsen
Assistant Vice Chancellor
Physical and Environmental Planning

Noel Pinto

Noel Pinto
Director
Parking and Transportation

Cc: Vice Chancellor Brostrom
Vice Chancellor Denton
Campus BRT reviewers
Mayor and Council, City of Berkeley
Commissions, City of Berkeley:
Planning
Transportation
DAPAC