

Draft: September 21, 2009

Lina Velasco  
City of Richmond Planning Department  
450 Civic Center Plaza  
Richmond, CA 94804

RE: Pt. Molate Mixed Use Tribal Destination Resort and Casino –  
Draft EIR/EIS

Dear Lina:

On September 21, 2009, the Albany City Council reviewed the Draft EIR/EIS on the *Pt. Molate Mixed Use Tribal Destination Resort and Casino*. Based on our review of DEIR, we believe the document is inadequate, particularly as it relates to Transportation impacts on the City of Albany. We request that additional analysis be conducted and the draft EIR re-circulated if required by CEQA Guidelines.

The Traffic Study does not attempt to measure the project impacts on the operation of Interstate 80 and San Pablo Avenue (State Route 123) as they traverse through the City of Albany. It appears from Section 5.4 of Appendix S that at least 55% of the trips to the project will originate from the south and east of Albany, with I-80 through Albany serving as the most direct route to the proposed project. An analysis of impacts of the proposal on the I-80 south of the I-580 split is critical to mitigating the environmental impacts of the proposed project and the an improved public dialogue on the merits of the proposed project.

Furthermore, the analysis on page 3.8-4 states that “San Pablo Avenue provides an alternative access point to the project site via the Richmond Parkway.” Presumably, the assumption underlying this statement is that trips originating from the north will encounter congestion on I-80, and as a result use San Pablo Avenue. We request that the analysis examine the potential of San Pablo Avenue serving as an alternative access route for trips originating from the south. Thus, San Pablo Avenue in the Albany corridor, and key intersections such as San Pablo Avenue/Solano Avenue and San Pablo Avenue/Buchanan Avenue should be studied as well.

It also should be noted that trip generation information provided in Tables 4.8-3, 4.8-6, 4.8-9, and 4.8-12, as well as the DMJM Harris summary of the project alternatives on page 5-2 of Appendix S, does not include the 122,000 square foot conference facility that appears in Summary Table 2-2 of the DEIR, which describes the components of the project. Similarly, the trip generation from the police station and fire station components of the project also is missing from the transportation analysis. The City of Albany requests that the transportation impacts of the conference facility, police station, and fire station, be fully evaluated as part of the DEIR.

Finally, the transportation analysis relies on the laudable goal of significant trip reduction through transportation demand management (TDM) efforts and ferries. In addition, the internal trip reduction assumptions for the individual components of the mix of uses for the project (e.g., captured trips) appear to be based on a rough assumption of 50% reduction for retail uses and a 70% reduction for hotel uses. It is not clear from the documents in the appendix whether these assumptions came from an independent verifiable analysis. While the City of Albany supports TDM and captured trip efforts, we do not think that aggressive assumptions about the success of these efforts should be utilized for analysis of the traffic implications of the project.

Sincerely,

Marge Atkinson  
Mayor