



**Project Name:** Oakland Alameda Access Project  
**DIST-CO-RTE-PM:** 04-ALA- 880 (PM 30.47/31.61); 04-ALA- 260 (PM R0.78/R1.90)  
**EA:** 04-0G360  
**EFIS ID:** 0400000326

**CALIFORNIA DEPARTMENT OF TRANSPORTATION  
STATEMENT OF OVERRIDING CONSIDERATIONS  
FOR  
THE OAKLAND ALAMEDA ACCESS PROJECT  
IMPROVEMENTS ON I-880 FROM EAST OF I-980 TO 5TH AVENUE AND  
IMPROVEMENTS ALONG SR 260 AND/OR THE SURROUNDING AREA IN THE  
CITIES OF OAKLAND AND ALAMEDA**

The following information is presented to comply with State California Environmental Quality Act (CEQA) Guidelines (Title 14 California Code of Regulations, Division 6, Chapter 3, Section 15093), and the Department of Transportation and California Transportation Commission Environmental Regulations (Title 21 California Code of Regulations, Division 2, Chapter 11, Section 1501 et seq.). Reference is made to the Final Environmental Impact Report (FEIR) for the project, which is the basic source for the information.

The following impacts were identified as significant and not fully mitigable in the FEIR as resulting from the Preferred Alternative, the Build Alternative:

**Cultural Resources**

Caltrans determined the Posey Tube is individually eligible for the National Register of Historic Places (NRHP). The Posey Tube is listed on the California Register of Historic Resources (CRHR) and is designated as a City of Oakland Landmark. The Oakland Portal building, a key contributing element to the Posey Tube, is also listed on the NRHP as a contributor to the Oakland Waterfront Warehouse District. The Oakland Waterfront Warehouse District is listed on both the NRHP and the CRHR. The Build Alternative would result in a significant and unavoidable impact to the Posey Tube and the Oakland Waterfront Warehouse District.

In accordance with CEQA, Caltrans analyzed the potential impacts of the Build Alternative to these built environment resources. Under the Build Alternative, access to northbound and southbound I-880 from the Posey Tube would be improved by adding a right-turn-only lane from the Posey Tube to 5th Street and a new horseshoe connector at Jackson Street below the I-880 viaduct that would connect to the existing northbound



I-880/Jackson Street on-ramp. The Build Alternative would also include a two-way bicycle/pedestrian walkway through the Posey Tube.

The construction of a right-turn-only lane from the Posey Tube Approach to 5th Street would modify the Tube in Oakland by demolishing 175 feet of the eastern Approach wall and staircase for a new turn lane onto 5th Street. The Approach's extant straight wall would be replaced by a new curved wall that would extend onto 5th Street. The construction of the left-turn-only lane from the Posey Tube exit to 6th Street would modify the Tube by demolishing 93 feet of the Oakland Approach's western wall, including the existing western pylon base. The Approach's existing straight walls would be replaced by new walls that would extend onto 5th Street and 6th Street, respectively. There likely will not be sufficient room under the I-880 viaduct to relocate the existing western pylon base at the end of the proposed western wall. Relocation options will be evaluated following additional data collected during the project's design phase. The eastern pylon base will be preserved in place and stabilized as part of this project. The demolition of the Approach's eastern wall and stairs, the demolition of the western wall including its pylon base, the construction of the new wall with a different configuration, and the construction of the bicycle/pedestrian ramp around the Portal building would result in the partial removal of, physical destruction of, or damage to this historic property under 36 CFR 800.5(a)(2)(i) and (ii).

A two-way bicycle/pedestrian accessible ramp would be installed at the Posey Tube's Oakland exit. This ramp would replace the existing staircase attached to the Oakland Approach's eastern wall, and would transition to an at-grade path that wraps around the Oakland Portal building. The path would replace the existing concrete sidewalk and curb on the west (4th Street) side of the building. The construction of the bicycle/pedestrian walkway at or near the Portal building would result in the partial removal of, physical destruction of, or damage to this historic property under 36 CFR 800.5(a)(2)(i) and (ii).

Avoidance and minimization measures (AMMs) and mitigation measures (MMs) for the Build Alternative are contained in the approved Memorandum of Agreement (MOA) and Built Environment Treatment Plan (BETP) between the State Historic Preservation Officer (SHPO) and Caltrans. These measures would be implemented under the Build Alternative as follows:

**AMM-CUL-1  
WEAT and  
Sensitivity  
Training**

Before commencing construction, a qualified Caltrans-approved archaeologist will conduct a WEAT program for all on-site construction personnel. No construction worker will be involved in field operations without having participated in the WEAT program, which will include at a minimum:

- Review of archaeology, history, prehistory, and Native American cultures associated with historical resources in the project vicinity.



- Review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation and Native American resources.
- Discussion of procedures to be followed if unanticipated cultural resources or human remains are discovered during construction.
- Discussion of disciplinary and other actions that could be taken against persons violating applicable laws and Caltrans policies.
- All construction crew members and contractors who attend the WEAT program will sign a form indicating that they attended the training and understand the information. Follow-up training will be conducted, as needed, with at least one annual refresher. New workers and construction staff will participate in the WEAT program prior to beginning work on-site. A record of all trained personnel will be kept on-site with the resident engineer and will be available for review upon request.

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**AMM-CUL-2  
Pylon Base  
Preservation**

During construction, Caltrans will protect the eastern pylon base at the Oakland Approach of the Posey Tube with ESA fencing to mark the protected area. Caltrans shall clean, stabilize, and preserve in place the eastern pylon base, including its metal plaque. In the event that the western pylon base can be relocated, it will be protected by ESA fencing and measures outlined in the BETP will be applied regarding treatment.

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**MM-CUL-1  
Historic American  
Building  
Engineering  
Record Survey  
(HAER)  
Documentation**

HAER-Level 2 Documentation (or other level as designated by the National Park Service [NPS]) will be prepared by a Professionally Qualified Staff (PQS), or equivalent, per the guidelines outlined in the Secretary of Interior's Standards (SOIS) and Guidelines for Architectural and Engineering Documentation (NPS 1993). The report will document the Posey Tube as it exists prior to construction. It will include a written history and description of the tube as well as selected drawings and photographs that showcase the historic structure and its unique elements. Alameda CTC will make archival, digital, and bound library-quality copies of the documentation. Copies will be sent to the Caltrans Transportation Library in Sacramento, the California Office of Historic Preservation, and the Caltrans Cultural Studies Office. Additional copies will be offered to the project's Section 106 stakeholders, the California Preservation Foundation, the City of Oakland Cultural Heritage Survey, and other local Oakland and Alameda historical societies as stipulated in the MOA.



<b>MM-CUL-2 National Register Nomination</b>	National Register Nomination form for the Posey Tube will be prepared by a PQS or equivalent.
<b>MM-CUL-3 Façade Contribution</b>	A one-time monetary contribution will be made prior to the initiation of construction to the City of Oakland Façade Improvement Program under the project's MOA. The MOA will stipulate the dollar amount of the contribution and will limit usage to the current mapped boundaries of the Oakland Waterfront Warehouse District.
<b>MM-CUL-4 Professional Webinar</b>	Caltrans will develop and present a webinar on the Posey Tube and Oakland Waterfront Warehouse District to the California Preservation Foundation prior to the end of project construction.
<b>MM-CUL-5 Interpretive Panels</b>	Caltrans, in coordination with Jack London Improvement District, will develop and install up to two interpretive panels within the Oakland Waterfront Warehouse District. Content will be designed to be complementary to existing interpretive historic signage.
<b>MM-CUL-6 Educational Packet</b>	Caltrans will develop a grade appropriate teachers kit for use in local schools as an educational aid.
<b>MM-CUL-7 Digital Content</b>	Caltrans will contribute documentation on the historic context of the Posey Tube and the Oakland Waterfront Warehouse District for online platform use. This information will be distributed to Section 106 stakeholders and posted on Caltrans' and Alameda CTC's websites.
<b>MM-CUL-8 Posey Tube Tour</b>	Caltrans will provide access to the Posey Tube Portal Building and Tube for up to three small group tours per year during the term of the MOA. Tours will be free of charge. Tours will not be ADA accessible due to the lack of ADA accessibility in the Portal building.

Even with the implementation of AMMs and MMs, the destruction and replacement of portions of the Posey Tube would be considered significant and unavoidable impacts under CEQA.



**Overriding considerations that support approval of this recommended project are as follows:**

Overriding considerations are based on the engineering and environmental technical analysis, the project's impact on the environment, and the comments and concerns expressed during the public review period. The FEIR was prepared to address all public comments and incorporate any refinements made to the project design, environmental setting, and impacts that have been identified since the Draft EIR was completed.

The purpose of the proposed project is to:

- Improve multimodal safety and reduce conflicts between regional and local traffic.
- Enhance bicycle and pedestrian accessibility and connectivity within the project study area.
- Improve mobility and accessibility between the I-880, SR-260 (Tubes), City of Oakland downtown neighborhoods, and City of Alameda.
- Reduce freeway-bound regional traffic and congestion on local roadways and in area neighborhoods.

Access between the freeway and the roadway networks between I-880 and the Tubes is limited and indirect, and access to/from the cities of Oakland and Alameda is circuitous. Existing access to I-880 from Alameda and the Jack London District requires loops through several local streets and intersections, routing vehicles through the downtown Oakland Chinatown neighborhood, which has the following operational impacts on local streets:

- Streets in and around the downtown Oakland Chinatown area have a high volume of pedestrian activity and experience substantial vehicle-pedestrian conflicts, and the I-880 viaduct limits bicycle and pedestrian connectivity between downtown Oakland and the Jack London District.
- Southbound I-880 traffic heading to Alameda must exit at the Broadway/Alameda off-ramp, then travel south along 5th Street for more than a mile — through nine signalized and unsignalized intersections — before reaching the Webster Tube at 5th Street/Broadway.
- Westbound I-980 traffic heading to Alameda must exit at the Jackson Street off-ramp and circle back through Chinatown through seven signalized and unsignalized intersections to reach the Webster Tube.
- Northbound I-880 traffic heading to Alameda must exit at the Broadway off-ramp and form a queue on Broadway between 5th and 6th streets, which backs up onto the ramp. Alternatively, drivers may loop through Chinatown to access the Webster Tube.



Under the No-Build Alternative there would be no action. The local streets in the project study area would continue to be congested during the morning and evening peak commute hours, and there would be no connectivity improvements to bicycle and pedestrian facilities in the area. The No-Build Alternative would not meet the purpose and need of the project, and was therefore dismissed.

During early project scoping, additional alternatives were identified that would have avoided impacts to the Posey Tube. These alternatives were eliminated because of their extensive impacts and/or design/operational deficiencies. Reasons for their rejection included severe safety or operational impacts, impacts to multiple historic properties, impacts to multiple Section 4(f) resources, and/or substantial right-of-way acquisition that would have resulted in adverse effects to Environmental Justice (EJ) communities. As a result, these alternatives were determined not to be feasible.

Following circulation of the Draft EIR, careful evaluation of all comments submitted by the public, and in consideration of the whole record, the Project Development Team (PDT) selected the Build Alternative as the Preferred Alternative on December 9, 2020. The Build Alternative meets the purpose, needs, and goals of the project and is the Environmentally Superior Alternative (pursuant to CEQA).

Dina A. El-Tawansy

District 4 Director  
Caltrans  
NEPA/CEQA Lead Agency

Signature

8/20/2021

Date