
From: Richard Hall
Sent: Friday, January 03, 2014 11:29 AM
To: CEQA Guidelines
Subject: LOS Alternatives

I am a member of a group called Citizen Marin which represents leaders of neighborhood groups across Marin numbering thousands of residents.

I am deeply concerned by the proposed LOS service alternative for a number of reasons but would like to seek clarification.

1. Critical Background: Cities are Being Pressured & Coerced Against Residents Wishes to Designated TOD Development Sites

We are repeatedly discovering city and county officials "volunteering" areas against the wishes of the majority of residents to be targeted for high density infill near transit - as PDAs, as station area plans, etc... Through funding incentives (ABAG/MTC grants) and penalties - fear of lawsuit if RHNA housing quotas are unmet cities and counties are being coerced and pressured into designating areas against citizens wishes. Case in point - the City of San Rafael council nominated Civic Center to be a PDA admitting to conducting no outreach whatsoever. (See top of page 4 of the [city's FAQ on this PDA](#)).

2. 98%+ of Transport Movement in Marin Remains Car and Light Trucks

In Marin highway 101 at San Pedro Road carries 197,000,000+ cars each day representing 328,000,000 travelers (Assuming 1.67 passenger occupancy based on national survey, source [Caltrans Traffic Volumes Book](#) page 142, San Pedro Rd Back Peak). By comparison transit carried just under 7m passengers and is in decline (Source: [Golden Gate Transit Ridership Trends](#), July 2013).

Given that 98% of Marin uses cars and light trucks over transit I am shocked that the LOS alternative being proposed gives zero consideration to vehicular traffic. This methodology shows an unfair treatment and is likely to lead to a greatly diminished quality of life for residents.

It must be recognized that for very many trips, especially in suburban locations, transit is not only inconvenient but impractical - for instance:

- multi-point trips getting kids to school then traveling onto work
- carrying heavy shopping
- delivering goods

3. Significant Increased Investment in Transit Since the 1980s has Resulted in Diminished Per Capita Ridership

While SB 743 seeks to switch people to transit it disregards the historic lesson that in the Bay Area transit ridership has consistently decreased since the 1980s. (Source: American Public Transport Association Factbook 2012, Appendix A, see attached analysis by Thomas Rubin).

4. Transit Emits More Greenhouse Gases than Cars and Light Trucks

This LOS alternative propagates myths created by SB375 that focuses exclusively on reducing car and light truck emissions when transit emissions per passenger mile already exceeds cars and light trucks, and this gap is substantially widening.

(Source: American Public Transport Association Factbook 2012, Appendix A).

The figures in this factbook are misleading as they use US National averages, however cars and light trucks in the Bay Area have considerably lower emissions than this national average. For instance one must take into consideration that the San Francisco Metropolitan Area ranks #1 in hybrid vehicle sales with 1 in 10 new vehicles being hybrids (Source: [Forbes magazine](#)).

5. Traffic At Idol Surely Increases Emissions & Has Adverse Economic Impact

Planning approaches should recognize not only the emissions impact but the inconvenience and economic impact of development that causes delays in car and light truck traffic.

Proposed Solution

Given that locations such as Marin (which is not unique in California, but is perhaps more representative) are suburban and car and light truck use is 98% and transit just 2% we need a methodology that ensures delays to cars and light trucks are accounted for.

Consideration of emissions should be accounted for.

Consideration of economic impact of car and light truck delays should be accounted for.

Richard Hall

Table 9: Vehicle Revenue Miles Operated by Mode (Millions)

YEAR	BUS	COMMUTE R RAIL	DEMAND RESPONSE	HEAVY RAIL	LIGHT RAIL	TROLLEYB US	OTHER (a)	TOTAL (MODES REPORTED ONLY)
1996	1,910.3	221.5	542.2	527.8	36.7	13.1	41.9	3,293.5
1997	2,021.7	229.6	553.8	539.6	40.4	13.4	44.6	3,443.1
1998	2,009.0	241.9	605.0	549.3	42.5	13.1	53.0	3,513.8
1999	1,972.8	243.5	608.1	561.2	47.8	13.6	69.9	3,516.9
2000	2,001.7	247.9	645.8	578.2	52.1	13.9	72.2	3,611.8
2001	2,058.3	253.2	670.1	591.1	53.5	12.3	76.6	3,715.2
2002	2,091.9	259.3	688.0	603.5	60.0	13.3	81.6	3,797.6
2003	2,092.9	262.1	734.9	611.9	63.5	13.2	94.0	3,872.6
2004	2,150.5	268.9	767.3	624.6	66.6	13.0	90.3	3,981.2
2005	2,141.0	277.4	844.1	628.5	68.0	12.4	104.9	4,076.4
2006	2,154.8	287.1	869.1	633.8	73.0	11.8	121.4	4,151.0
2007	1,987.0	297.4	1,274.4	638.5	82.7	11.0	182.3	4,473.2
2008	2,052.2	310.2	1,290.1	655.4	87.3	11.2	217.3	4,623.7
2009	2,011.3	317.9	1,319.3	666.8	89.3	12.7	223.6	4,640.9
2010	2,090.9	317.6	1,447.7	647.4	92.0	11.7	229.2	4,836.6

[Return to
Table of
Contents](#)

Data Type and Sample:

Operating Data

Includes Entire Transit Industry

Notes:

(a) Ferry boat, aerial tramway, automated guideway transit, cable car, inclined plane, monorail, and

[\(b\) Data not continuous for Bus, Demand Response, and Other from 2006 to 2007, see Methodology](#)

other.

↳