



DEPARTMENT OF PUBLIC WORKS

People serving people.

Robert Beaumont
DIRECTOR

February 14, 2014

Administration
PO Box 4186
San Rafael, CA 94913-4186
415 473 6528 T
415 473 3799 F
415 473 3232 TTY
CRS Dial 711
www.marincounty.org/pw

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: Preliminary Evaluation of Alternative Methods of Transportation Analysis

Dear Mr. Calfee:

Thank you for the opportunity to provide early input on the proposed new ways to measure California Environmental Quality Act (CEQA) transportation impacts. Marin County Transportation staff has reviewed the "Preliminary Evaluation of Alternative Methods of Transportation Analysis." Our comments are as follows:

Accounting

Airport

Building Maintenance

Capital Projects

Certified Unified Program
Agency (CUPA)

Communications
Maintenance

County Garage

Disability Access

Engineering & Survey

Flood Control &
Water Resources

Land Development

Purchasing

Real Estate

Reprographic Services

Road Maintenance

Stormwater Program

Transportation &
Traffic Operations

Waste Management

- On pages 3, 4 and 5, the preliminary evaluation lists and identifies "Problems with using LOS in CEQA." The evaluation, however, does not discuss or identify the advantages or benefits of LOS analysis. It is difficult to compare the various levels of service alternatives when a baseline has not been established.
- On page 4 of the preliminary evaluation, it is noted that LOS is biased against "last in" development. Although it may seem that way, this is not necessarily true. CEQA requires comparisons of existing plus project, and existing plus cumulative scenarios. The CEQA analysis directs the assessment of the availability of existing and future transportation infrastructure to service the additional transportation demands of the proposed project. Whether level of service analysis or other alternative methods are used, projects proposed in areas with constrained transportation infrastructure would have transportation impacts identified in this analysis.
- On page 4, it is noted that "mitigation of LOS impacts typically involves reducing project size or adding motor vehicle capacity." This is often true for the mitigation of direct traffic impacts, because it is difficult to identify and implement short term alternative transportation improvements at an individual project level. Mitigation of cumulative traffic/transportation impacts, however, allows contributions toward identified improvement projects in short and long range transportation programs.
- Traffic impact fee programs have been developed in many jurisdictions as ways to mitigate cumulative transportation impacts before they become direct impacts of an individual project. These fairshare programs have been heavily focused on road and highway improvements. The development of fair share impact fee programs for transit projects and other alternative transportation modes can also be included, but are more difficult to develop

given their high cost and reliance on federal and state funding needed for both construction and ongoing operating costs. State and regional transportation agencies could develop more comprehensive fair share regional impact fee programs that include transit, carpooling, bicycle and pedestrian improvements that could then be used in the preparation of mitigation of individual traffic impacts.

- It is noted on page 5 that LOS is a measurement of delay/motorist convenience, but not a physical impact to the environment. Vehicles idling in traffic on congested highways and at intersections increase the amount of air pollutants/emissions that increase greenhouse gases. Congestion Mitigation and Air Quality (CMAQ) Program grants are often provided to synchronize traffic signals and make other congestion enhancement improvements and the benefits to air quality have been frequently documented. Here are, at least, indirect relationships between LOS and emissions/air quality.
- LOS is also a measurement of something the public readily experiences every day and affects their day-to-day lives. Similar to aesthetics as a CEQA impact it dramatically affects residents' quantity of life. Traffic is one of the most common issues that the public comments on during the review of proposed land use development projects. It is noticeable to them in the form of the length of queues that form, their travel time to the freeway (and/or final destination), or their ability to access the roadway from their driveway.
- On pages 5 and 6, a summary of the main provisions of SB 743 is provided. In this section, it should also be noted that SB 743 also states that the intent of the SB 743 legislation includes the provision to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation and the reduction of greenhouse gas emissions."
- On pages 6, 7 and 8, seven Goals and Objectives in developing Alternative LOS Criteria are identified. None of the goals and Objectives includes the assessment of available transportation infrastructure to accommodate the transportation needs of the proposed project. Any proposed alternative transportation impact assessment criteria should evaluate whether existing and proposed transportation infrastructure is available, and will be provided at a pace that meets the transportation needs of the proposed project, and other near-term projects in the vicinity of the proposed project.
- It is not clear how requirements for enhanced CEQA reviews, set forth in regional Congestion Management Plans, will continue to be implemented based upon any revised criteria. Any proposed revised criteria should be consistent or flexible enough to allow adequate congestion management. This was one of the highest concerns for the state when the Congestion Management Program legislation was adopted in the 1990's and will likely continue to be again as the economy improves and travel demand and transportation needs for the state increases.

- Many transit priority corridors and stops are located on or near regionally significant arterials that have established thresholds set forth in adopted Congestion Management Plans. Individual project transportation impacts to nearby streets will occur from increased use of alternative transportation modes such as pedestrian and bicycle that should be assessed. These would include additional time at traffic signals needed to accommodate the pedestrian and bicycle volumes, and the connectivity of available pedestrian and bicycle facilities in the corridor so that these modes do not have to mix with automobile traffic.
- It should also be noted that in-fill or transit-oriented development will generate automobile trips in addition to transit, pedestrian and bicycle trips, since not all persons living in these areas will use alternative modes. Many studies show that a large percentage of persons living in these areas will continue to use their automobiles for most trips. The effects and impacts of these trips on the adjacent streets should be adequately assessed.
- Alternative assessment measures that are based upon overall averages, such as vehicle miles traveled, automobile trips generated, fuel use, and motor vehicle hours traveled, do not allow for the ability to assess individual traffic impacts at a specific intersection road or roadway corridor. These measures, however, could be used as a basis to justify overriding findings from CEQA if appropriate. One way to balance the needs of congestion management with other statewide goals may be to provide some guidance, and perhaps program level overriding consideration, for projects meeting specified objectives in designated areas.
- Any proposed in-fill development or transit-oriented development project should be consistent with land use plans identified in a local jurisdiction's general plan and in the region's sustainable community's plans.
- It should be noted that the Complete Streets Act of 2008 requires the development of balanced multimodal transportation systems at the general plan level to be implemented at the individual project level.
- As discussed on page 9, the multi modal level-of-service alternative method of transportation impact assessment appears to provide the most promise to identify all transportation impacts and to assess the needs of all transportation modes (transit, bicycle, pedestrian and automobile).
- Traffic impact analysis on a corridor and intersection basis is needed to identify transportation needs and impacts that would result from individual projects. It also prevents jurisdiction from ignoring the transportation needs and impacts in adjacent jurisdictions that would be impacted through the development of a project outside their jurisdiction.

Thank you for your consideration of the above comments. If you have any questions, please contact me via email at rgoralka@marincounty.org or by phone at (415) 473 - 3076.

Respectfully,



Robert Goralka
Transportation Division Manager

cc: Bob Beaumont, Director, Marin County DPW
Craig Tackabery, Assistant Director Marin County DPW
Eric Steger, Assistant Director Marin County DPW
Brian Crawford, Director, Marin County CDA