

Memo

To: Bruce Dorfman, Joanna Julian; Thompson | Dorfman
From: Maclean Grosel, David Parisi; Parisi Transportation Consulting
Date: November 8, 2022
Subject: **Response to Questions from "Technical Report Review Comments for the Mallard Pointe Project" by Ascent Environmental**

This memo lists questions posed by Ascent Environmental in their "Technical Report Review Comments for the Mallard Pointe Project" specifically relating to the "Final Mallard Pointe Transportation Study" and responds to each question.

- 50) On pages 3 and 4, please provide details regarding existing pedestrian facilities for each of the roadways in the vicinity of the project.
- a) Section 2.3 "Pedestrian and Bicycle Conditions" on page 6 discusses the existing pedestrian facilities, including sidewalks, ADA curb ramps, and crosswalks. Mallard Road and Community Road are specifically discussed, with a general mention of the other surrounding roadways.
 - b) Additional discussion of pedestrian facilities was added to the study.
- 51) On page 7, Section 2.4 Public Transit Service, please provide the headways for the nearest transit stop servicing Marin Transit Route 219. This will tell us if the project could potentially be screened based proximity to transit as dictated by the OPR Technical Advisory.
- a) Additional information regarding transit headways was added to Section 2.4 "Public Transit Service." Approximate headway is 30 ± minutes.
- 52) On page 10, there is travel mode split data presented showing significant usage of alternative modes of transportation (i.e., transit, bike, ped). If this is not already accounted for in the VMT modeling it seems as though it should be incorporated into the trip generation and modeling to provide a more accurate (and lower) VMT estimate.
- a) The mode split information provided in Table 3, in section 4.2, is from the 2019 American Community Survey census, Table S0802.
 - b) The VMT assumptions were based upon the TAMDM 2040 rates for VMT per resident for the TAZ in which the Project is located.
 - c) The TAMDM was developed using several datasets to calibrate and validate the model, including several years of American Community Survey results (2012-2016). These years show similar results to 2019 data.
 - d) Thus, the VMT estimates do incorporate mode share considerations.
- 53) The Environmental Settings pertaining to bicycle and pedestrian facilities seems to suggest that there could be existing hazards due to lack of facilities in the area. Please address potential hazards in the analysis.

- a) Section 4.4.3 (now 4.6) of the Study discusses improvements the project is including that alleviate some of the existing deficiencies in the existing pedestrian network. Additionally, Section 4.5 (now 5.2) recommends improvements to further enhance facilities in the area.
- 54) Consistent with significance criteria used to evaluate project impacts on transportation under CEQA (based on Appendix G of the State CEQA Guidelines), please analyze compliance with City bicycle and pedestrian plans, policies, standards, and ordinances. For example, does the project conform to the Belvedere Municipal Code (BMC) 18.12.060 Streets and other public ways – minimum requirements which specifies right-of-way width standards, including for sidewalks along public ways? Additionally, analysis of if the project conflicts with general plan policies is needed.
- a) The project's frontage on Community Road (a public street) conforms with BMC 18.12.060. BMC 18.12.060 does not apply to Mallard Road (a private roadway) since this section outlines Streets and other **public** ways (emphasis added to "public"). However, Mallard Road has been reviewed and approved by the Tiburon Fire Department and the City of Belvedere's Department of Public Works and is consistent with California Code of Regulations, Title 19, Division 1, Section 3.05 – Fire Department Access and Egress. In addition, the proposed project does not conflict with general plan policies.
- b) Additional regulatory context is discussed in the study Section 3.
- 55) The Transportation Study does not include a discussion regarding emergency access. Please include text related to the project's improvements to Mallard Road to comply with City standards and provide emergency access.
- a) A discussion of emergency access was added to the report. The project maintains access to Community Road. The proposed Mallard Rd maintains a 20' clear horizontal width, meeting fire department requirements. The driveway shown in the plans is 18' and exceeds the minimum width for a driveway in this location.
- b) The Tiburon Fire Protection District has reviewed and approved the roadway and driveway design.
- 56) Would the preparation of a construction traffic management plan be required that addresses the need for any street closures, potential encroachment into the public right of way, equipment place, etc.? If not, how the project addresses these issues?
- a) The applicant submitted a Construction Management Plan, including proposed traffic control measures, as part of its housing application. The Construction Management Plan will be reviewed in detail with the City of Belvedere prior to construction commencement.

Specific comments related to VMT analysis Table 6, on page 16 (55-58):

- 57) It is unclear if the VMT being displayed is for the project or the TAZ as a whole without the project. If it is displaying the latter (as it appears to be), it would need to be revised to only report the VMT generated by the project as there could be other uses within the TAZ that effect this output.
- a) Table 6, in section 4.4.2 (now 4.5), shows the VMT per resident for TAZ 800,014 under existing (2015) conditions and 2040 conditions as forecast by the TAMDM model. It is assumed the modeled and forecast VMT per resident shown in the TAMDM model applies to the new residents of the project.
- b) TAZ 800,014, bounded by San Rafael Avenue, Acacia Avenue, Tiburon Boulevard, and Beach Road, encompasses mostly residential parcels, as well as parts of the Tiburon-Boardwalk Shopping Center, a few parks, and the Belvedere Lagoon.

- c) Due to the Project's close proximity to transit stops and high density, the VMT estimate in the TAMDM for the TAZ may be conservative for this specific project.
- 58) Further explanation needs to be given related to what the area the TAZ encompasses, and other land uses it includes.
- a) See response to question 8 above.
- 59) The table does not state what the numbers denote. Is this VMT/service population? VMT/resident? Other?
- a) Table 6 shows the VMT per resident, as stated in the table.
- 60) There needs to be a VMT comparison of the VMT generated by the project to that of the region (i.e., Bay Area) in both the existing and cumulative (2040) scenarios.
- a) The study has been revised to compare the 2040 VMT for the project to forecast 2040 VMT for the County or Marin and the City of Belvedere.
 - b) OPR guidelines recommends that, "residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT per capita, measured against the region or city, may indicate a less-than-significant transportation impact" and that the lead agency has discretion in determining an appropriate methodology for evaluating a project's VMT, including which VMT – city or regional – to use as a comparison to Project VMT. Based on this projects location and use case, it has been determined that a comparison to the city and county would be more appropriate than to the overall bay area.
- 61) On page 17, are the transportation network recommendations required by any policies, plans, programs, or ordinances? Are these solely recommendations or should they be considered mitigation under CEQA?
- a) The recommended measures listed in section 4.5 (now 5.2) "Transportation Network Recommendations" are not required mitigations under CEQA. These recommendations are intended to ensure consistency with the City's goals and policies and to further enhance multi-modal transportation facilities.
- 62) Attached to this memo are the CEQA thresholds for transportation impacts. This should be referenced as a general framework to revise the study and address the comments in this memo.
- a) The study was revised to better address this specific framework for determining transportation impacts.
 - b) The project was found to have less than significant impacts.