

## **Responses to Questions from Responsible Growth Marin (Jan 8, 2020)**

In January 2020, Responsible Growth Marin (RGM) presented a series of questions to the General Plan 2040 Steering Committee. San Rafael City staff has prepared responses to these questions below. We are grateful for the efforts of RGM to build a robust dialogue and facilitate community discussion on these important issues. Our responses are not intended to be the “final word” but are designed to set the agenda for further discussion and identify areas requiring attention moving forward.

For simplicity, the RGM questions/comments are listed numerically, and staff’s responses are shown below in red italics font.

1. How do we know how many employees and customers are coming to and from a particular San Rafael business and where they are coming from? What measurements or assumptions are these calculations of VMTs based on?

*VMT is estimated using transportation models that multiply average trip length by the total trips generated for a particular land use or development. The Technical Advisory on Evaluating Transportation Impacts in CEQA (a companion document to the new CEQA Section published in December 2018) developed by the California Office of Planning and Research (OPR) indicates that sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT. Data sources include household travel surveys (national, state, and/or local), Census and LEHD data, employee surveys, data obtained from GPS or cell phone devices, and new trip generation counts for comparable uses. The sources depend on the individual project and context as well as the methodology applied.*

*San Rafael has used the recently updated travel model developed by the Transportation Authority of Marin (TAM) as the basis for its analysis. The TAM model pivots off the regional MTC model and estimates both vehicle trip generation and trip length.*

2. Why is “total VMT” measure being used for the General Plan and “VMT per resident” and “VMT per employee” being used to evaluate residential and employment projects?

*The General Plan EIR assessment will focus on Total VMT per Service Population (total of population and employees) so that a comparison to the regional average may be provided. This is an efficiency metric that is similar in nature to those that are recommended for residential and office uses.*

- a. Why is there no VMT for retail category, as used in San Francisco and Oakland?  
*A VMT threshold and screening criterion have been added for retail.*
- b. How do these per capita VMT measures fit together with the total VMT measure?  
*The VMT efficiency metrics for residential and office uses are based on measuring a subset of Total VMT.*

3. Criteria for screening which projects are required to do VMT analysis have been advised by the California Office of Planning and Research (OPR). Do criteria such as exempting projects “within ½ mile of the SMART stations downtown and at the Civic Center, provided they have a floor area ratio (FAR) of at least 0.75 and do not displace/reduce existing rental housing” accomplish the goal of VMT, which is to create housing, mixed use and quality employment near transit?

*The purpose of the VMT screening process is to quickly assess projects to support the presumption that they would either reduce VMT or would generate VMT below the city’s threshold (e.g., “low VMT generators”). This determination is based on key project characteristics such as land use type, size, mix of uses, density, location, relationship to other land uses, effect on jobs/housing balance, proximity to transit, and area walkability. The 0.75 FAR has been determined by OPR to be an appropriate benchmark for efficient use of a transit-served site, and is an indicator that the project would be sufficiently intense to support transit use and minimize the portion of the site devoted to surface parking. The location of such a project within a 10-minute of a rail station and/or major bus transfer point would more easily enable travel by transit, walking, or bicycling, reducing the VMT impact.*

4. Does this not exempt from VMT large retail projects with low-paying jobs whose employees need to commute from areas outside San Rafael, increasing VMT and which displace potential new housing and mixed use?

*Large (50,000 SF+) retail projects would generally not be exempt. Such projects are not considered low VMT generators and would not be eligible for screening.*

5. City staff is recommending a significance threshold (level in VMT analysis that states a project has significant VMT impacts and must do mitigation measures) of 15% below San Rafael’s local conditions rather than regional conditions, as suggested by OPR. Should the implications of this recommendation be reviewed more carefully? Other cities, such as Pasadena, have established several significance thresholds for different types of residential and commercial projects. Should this be considered for San Rafael?

*The City is now considering a more refined set of significance thresholds that varies by land use (office, residential, retail, mixed use). These are referenced in the previously submitted Fehr and Peers memo. In general, these thresholds are now benchmarked to regional conditions rather than local conditions, consistent with OPR guidance.*

6. The purpose of VMT project studies is to assess the effect of the project on regional traffic. To determine if a new project has a significant impact on VMT, the TAM Travel Demand (VMT) model would be run with and without the project, under baseline conditions and cumulative conditions. How can the results of this modeling be independently verified?

*City Staff will require model assumptions and model outputs to be included with the VMT determination. Interested third parties may request the calculation sheet to independently review and verify the findings. This would be similar to the current procedure for trip generation and distribution calculations in traffic studies.*

*In the case of the General Plan analysis, the TAM Marin County Travel Model network is an activity-based model that is an expanded version of the MTC regional travel demand model. All network and land use inputs were either provided and/or reviewed by local agency staff in Marin County. A validation of the model base year was then performed and presented to the TAM Board for review and approval. VMT assessments prepared for individual project CEQA assessments, whether using the TAM model or other models, should document the VMT assessment methodology and data sources.*

7. The 2020 Plan goals of “Safe and Efficient Streets” and “Connections between Neighborhoods” have been combined into the 2040 Plan goal of “A Safe and Connected City”. We believe that the concept of “efficient streets” should be retained in the GP2040 Plan. Efficiency in the road network is important not only for safety and ease of movement but also for decreasing greenhouse gas emissions from idling vehicles.

*The concept of transportation efficiency remains in the 2040 Plan and is now included in Goal 2. Policy M-2.4 has been added to the Plan to emphasize transportation efficiency. Program M-2.4B addresses improvements to reduce vehicle idling.*

8. Proposed Policy M-2-5 (previously 2.4) states that LOS standards for intersections and road segments [will be] specified in Tables 1 and 2 [which are to be] developed after 2040 traffic model is run. Please clarify who is doing the LOS modeling and developing LOS standards. Is this done by City staff or by an outside contractor? It is important to know where these calculations are being done and how the information can be accessed.

*Please note that Policy M-2.5 as it originally appeared in draft General Plan 2040 documents between January and May 2020 has been completely re-written. A draft of the new policy has been separately provided.*

*Year 2040 traffic modeling was completed by Fehr and Peers using the TAM model. An LOS standard of “D” will remain in effect, with exceptions provided where the 2040 model indicates that current or anticipated future conditions preclude this standard from being attained. This is the same approach taken in General Plan 2020. The key difference is that the Downtown area will be exempt from the LOS requirements. 101 and 580 Freeway ramps also will be exempt, just as they are in General Plan 2020. This will not be treated as a CEQA issue, but rather as a merits consideration as part of the review of a project for consistency with the General Plan. In the event a project would exceed adopted LOS standards, an exception would be required, and public benefits would need to be demonstrated (this is the same process currently outlined by Circulation Element Policy C-5D Program C5-c).*

9. Proposed Program M-2.5 A (previously 2.4A) gives responsibility to the City Engineer for determining whether traffic impact studies are required for proposed projects.
  - a. Why is this responsibility with the traffic engineer instead of the Planning Department? If the City Engineer is given responsibility for making these determinations, by what process will the decisions be made public?

- b. What process will be in place for reviewing or appealing these decisions?
- c. In addition to “projections of future LOS, and assessment of the contribution of the proposed project to increases in congestion,” such studies should also include assessment of the contribution of projected increases in congestion to increases in greenhouse gas emissions.

- a. *Policy M-2.5 and its associated programs have been rewritten. The City Traffic Engineer is not specifically named as the party responsible for making this determination.*
- b. *No change to the current review or appeal process is proposed.*
- c. *Comment noted. This language has been included in Draft Policy M-2.5.*

10. Proposed Program M-2.6A (previously 2-5A) Traffic Mitigation Fee Updates)--How are costs for repair of damage to roads and infrastructure from construction vehicles recovered by the City? Do traffic mitigation fees contribute to these costs to the City caused by new development? If so, this should be mentioned in this program item.

*Traffic mitigation and road repair are funded separately. The traffic mitigation fee required for new development (as currently imposed and collected) is used specifically to address traffic circulation improvements and offset the impact of growth on transportation capacity. These fees are used to support specific projects included in the General Plan and are typically used to increase capacity, either through road improvements, operational improvements, or bicycle/pedestrian improvements.*

*Repair or damage to roads and infrastructure from construction vehicles is funded in one of two ways: 1) Regular pavement maintenance/capital improvement projects/ gas tax and 2) collection of a street maintenance impact fee that is levied on all building permits issued by the City of San Rafael. That fee is \$0.01 x (valuation of the construction project minus 1<sup>st</sup> \$10,000 in value) and is directed to Public Works to accelerate paving maintenance in areas where construction occurs.*

*On a related note, the City must balance the State mandate to reduce VMT with the potential induced demand associated with increasing road capacity to maintain its LOS standards. These could potentially be in conflict. For example, if an additional lane is needed to maintain a local LOS standard to accommodate a housing or office development, construction of this lane would increase road capacity which could increase VMT and be considered a significant impact under CEQA.*

11. Proposed Program M-2.5B (previously Policy 2.6, Exceptions to LOS Standards)--  
“Exceptions to LOS Standards may be granted [when] the City Council finds that the benefits of the project to the community, such as affordable housing, economic vitality, and desired community services, substantially outweigh the resulting traffic impacts.” This provision is an important policy which is open to many interpretations and which has been the source of heated debates under previous General Plans. There is need for inclusion of objective measures and process for evaluating community benefits, so the comparison with the deficits of traffic impacts is not left to a matter of personal judgment and opinion.

*Comment noted. An additional criterion has been added to the requirements for granting an exception, which is consistency with the [Guiding Principles of the General Plan](#).*

12. Proposed Program M-2.5A (previously Policy M-2.7 LOS Methodology): What process will be in place for reviewing or appealing the City Engineer’s decisions on choice of which LOS methodology (arterial or intersection) to use in particular locations in San Rafael?

*Policy M-2.5 has been revised to establish intersection LOS as the “default” choice and indicate the conditions under which it may be more appropriate to use arterial LOS (or both intersection and arterial LOS).*

13. Proposed Programs M-3.2 A and B (Using VMT in Environmental Review): For clarity, we recommend that requirements for determining if projects can be exempted from doing a VMT analysis be consistently called “screening criteria” and that indicators for determining whether a project meets acceptable VMT standards and whether VMT mitigation measures are required be consistently called “significance thresholds.” GP Policy documents, as well State documents, are inconsistent in the use of these terms, which is confusing.

*We concur. The text for M-3.2A and B has been edited to be consistent with this recommendation. To clarify, we will refer to exceedances of the VMT thresholds as a “significant VMT impact” rather than a “significant transportation impact.” This allows projects to adopt specific transportation demand management (TDM) measures to mitigate VMT impacts to less than significant levels.*