

## Letter 19

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Mayor  
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### **Comment 19-1**

Revise Appendix G: Transportation/Traffic to include questions on pedestrian and bicycle mobility, transit operations, or traffic safety.

### **Response 19-1**

In response to comments such as this, the Natural Resources Agency has further revised the transportation questions in Appendix G's checklist. Section XVI, subsection (f) now asks whether a project: "Conflict[s]with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities." Consequently, if a lead agency has a plan or policy in place relative to pedestrian or bicycle mobility, or transit operations, subsection (f) will provide suggested guidance on how a lead agency may approach analysis of potential impacts relative to the criteria and parameters contained in such policies or plans. Further, performance and safety may be considered by a lead agency when determining the potential for significant impacts from traffic.

### **Comment 19-2**

Revise Appendix G 's Air Quality Section and the preamble to include VMT as a metric to consider when assessing impacts to the transportation system.

### **Response 19-2**

See response to 16-8, 16-9, and 19-1. Traffic Question (b) asks whether a project: "Conflict[s] with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?" The Natural Resources Agency's proposed revisions to this subsection are intended to clarify that lead agencies have the discretion to, and therefore should, consider consistency with circulation system goals and policies beyond level of service, where such consideration is relevant, though that standard has been retained where it is applicable. Such standards may include vehicle miles traveled. As regional congestion management agencies move away from a pure "LOS" analysis, to other standards and travel demand measures (such as vehicle miles

traveled, etc.) these refined questions will provide flexibility so that impacts to a system can be fairly and adequately analyzed. Since the proposed language already provides an avenue by which lead agencies may be permitted to consider vehicle miles traveled, or any other standards for measuring congestion available to them if contained in an applicable congestion management program, the Natural Resources Agency rejects this comment.

### **Comment 19-3**

Revise Appendix G: Transportation/Traffic to clarify what is meant by “alternative transportation”

### **Response 19-3**

In response to comments, proposed Traffic section (f) now asks whether a proposed project: “Conflict[s] with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease[s] the performance or safety of such facilities.” Since the Natural Resources Agency has removed the phrase “alternative transportation,” this answers the ambiguity raised by the Commenter, and no further refinement or definition is necessary.

### **Comment 19-4**

Revise Appendix G: Transportation/Traffic to add two new questions specifically to address pedestrian and bicycle circulation and to evaluate the performance or availability of transit.

### **Response 19-4**

In response to comments, the Natural Resources Agency has refined Appendix G’s Traffic Section. Traffic question (a) changes the focus from an increase in traffic at a given location to the effect of a project on the overall circulation system in the project area. Traffic Question (b) asks whether a project: “Conflict[s] with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?” Finally, as was provided in response 19-1, traffic question (f) now asks whether a project: “Conflict[s]with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities.” Through these questions, the Natural Resources Agency intends to provoke a thoughtful analysis about potential impacts from a proposed project relative to all facets of a lead agency’s transit system. It further seeks to ensure that new standards for measuring impacts are not precluded. Since these questions promote the policies forwarded by the guidelines new approach to traffic analysis, the Natural Resources Agency rejects the Commenter’s proposed questions.