



As part of the CMP, Alameda CTC must develop a program to analyze the impacts of land use decisions made by local jurisdictions on regional transportation systems. The program must generally be able to estimate the costs associated with those impacts, as well as provide credits for local public and private contributions to improve regional transportation systems.

The CMP statute does not change the role of local jurisdictions in making land use decisions or in determining the responsibilities of project proponents to mitigate possible negative effects of projects. However, Alameda CTC has the ability to apply certain sanctions, as described in Chapter 8, "Capital Improvement Program," if the local agency does not comply with the requirements of the law.

The intent of the Land Use Analysis Program is to:

- Better integrate local land use and regional transportation investment decisions;
- Better assess the impacts of development in one community on another community; and
- Promote information sharing between local governments when the decisions made by one jurisdiction will impact another.

The Land Use Analysis Program works best when Alameda CTC is involved at the very early stages of the development process, maximizing intergovernmental contacts before major decisions are complete. The process is intended to work in a positive, cooperative fashion that supports the needs of local, county, regional, and state governments. Proactive responses to potential impacts can occur during environmental review of specific land developments, corridor, or areawide studies, and preparation of local or regional CIPs.

Since the passage of the CMP legislation in 1991, a variety of other state and regional legislative and regulatory actions, shown in Table 13, have strengthened the need for a Land Use Analysis Program. These policies share the common theme that they coordinate transportation planning and investment decisions with existing and future land use patterns.

While the Alameda CTC's Land Use Analysis Program was initially conceived as a program to meet a particular state legislative mandate, the growing interest in coordinating land use and transportation planning has resulted in the program's evolution. The program now also serves as an opportunity for strategic thinking about how to plan for development that

efficiently uses the transportation system, while ensuring that the mobility and access needs of residents and workers in Alameda County are fulfilled. Refer to Table 13 for legislative and regulatory actions. As such, the program includes:

- Legislatively required review of:
 - Land use actions of local jurisdictions by the Alameda CTC; and
 - Land use projections for use in countywide model database by local jurisdictions;
- Planning initiatives and programs that foster transportation and land use connections; and
- Strategic monitoring of transportation-land use coordination performance measures.

Review of Land Use Actions

A major component of the Alameda CTC Land Use Analysis Program is the legislatively required review of land use development projects. The review of development projects allows Alameda CTC to assess impacts of individual development actions on the regional transportation system and ensures that significant impacts are appropriately mitigated.

Table 13—Legislative and Regulatory Actions

Legislation/Regulatory Action	Description
California Assembly Bill 32 (AB 32)	The California Global Warming Solutions Act of 2006 requires the State of California to meet aggressive Greenhouse Gas emissions reduction targets.
California Senate Bill 375 (SB 375)	Redesigning Communities to Reduce Greenhouse Gas of 2008 synchronizes long-range regional transportation and land use planning and requires regional preparation of a Sustainable Communities Strategy that details how a region will house its population.
Metropolitan Transportation Commission (MTC) Resolution 4035	This resolution establishes the One Bay Area Grant Program, which links federal transportation funding to location in or proximate access to locally designated Priority Development Areas.
MTC Resolution 3434	The Transit Oriented Development (TOD) Policy for Regional Transit Expansion Projects of 2005 links the expenditure of regional capital funding for transit expansion to the density of households allowed around future mass transit systems.
Bay Area Air Quality Management District (BAAQMD) California Environmental Quality Act (CEQA) Guidelines	These 2010 guidelines set low thresholds of significance for acceptable exposure to toxic air contaminants for residents and other users of new developments.
San Francisco Bay Conservation and Development Commission (BCDC) Sea Level Rise Estimates	These estimates identify many key development areas and transportation assets as being vulnerable to sea-level rise and needing adaption planning.

Alameda CTC also plays a key interjurisdictional facilitation role, and when disputes arise between two agencies as a result of the potential impacts of a land use project, Alameda CTC may act as a mediator, if requested by one of the parties involved.

Scope of Review

Alameda CTC reviews two types of land use actions.³⁴

- **Projects requiring General Plan Amendments:** These projects require a change to the text or map of a city or unincorporated planning area's general plan. General Plan Amendments (GPAs) can be performed in conjunction with a General Plan update, a specific plan, or an area plan. GPAs can also be adopted for an individual development project that is not consistent with current land use designations and therefore requires a GPA.
- **Projects consistent with General Plan:** These plans or projects do not require any modification of the general plan text or map.

Alameda CTC limits the scope of its review of land use actions to those with the potential to cause countywide or regional scale impacts. Projects are reviewed if they will cause a net increase of 100 p.m. peak hour trips. The evening peak period is used, as this period generally experiences the highest travel demands. This threshold is applied differently, depending on whether a project requires a GPA or is consistent with an existing general plan. Mitigated Negative Declarations (MNDs) are also considered differently, depending on whether a GPA is required or not. Table 14 summarizes the

application of the 100 p.m. peak hour trip threshold and consideration of MNDs.

Alameda CTC performs project trip generation calculations to determine whether CMP Land Use Analysis Program review is required. Project trip generation is computed using an approved trip generation methodology (see the following "Methodologies and Standards" section). The threshold for CMP review is based on net change in trips, meaning that trips from reclassified uses or existing redeveloped buildings are subtracted out of the total.

Alameda CTC reviews all large development projects and plans for which a city or the unincorporated county in Alameda County is the lead agency.³⁵ Alameda CTC may also review large development projects from institutions, federal agencies, or neighboring counties if these are likely to impact the regional transportation system in Alameda County.

Review Process

Consistent with the CMP statute, Alameda CTC's review of plans and development projects through its Land Use Analysis Program is designed to occur alongside the CEQA review process to avoid duplication of effort. Alameda CTC strives to perform its review on the same timeline to offer early and proactive input that can aid in refining project design. A project is considered "complete" from a CMP review perspective once Alameda CTC notifies the project sponsor that the project is exempt or that CMP requirements have been met and that it has no further comments on the project.

Table 14—Exemption from CMP Land Use Analysis Project Review

	Project Requiring General Plan Amendment	Project Consistent with General Plan
100 p.m. Peak Hour Trip Threshold Assessed Relative to:	Existing General Plan land use designation(s)	Existing use(s) at project site
Mitigated Negative Declarations	Considered (if trip generation threshold exceeded)	Not considered

³⁴ Previous versions of Alameda CTC CMPs referred to Plans and Development Projects as Tier 1A and Tier 1B. The "Tier" nomenclature has been discontinued to avoid confusion with the Tiers of the CMP network arterials.

³⁵ For purposes of compliance with the Land Use Analysis Program, the Port of Oakland is considered a governmental subdivision of the City of Oakland. Therefore, the Port is required to submit environmental documents to Alameda CTC for review and comment.

Figure 10 illustrates the typical review process. Once Alameda CTC receives a GPA or Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR), it issues a response within 30 days. This response either indicates that the project is exempt from CMP Land Use Analysis Program review (if it does not exceed the 100 p.m. peak hour trip threshold) or provides comments on the scope of analysis to be performed in the DEIR to satisfy CMP requirements. If a project is not exempt, then once Alameda CTC receives a DEIR, it issues a response within 45 days. This response either indicates that the analysis contained within the DEIR adequately addresses CMP requirements or provides comments on changes or additional analysis needed to adequately address CMP requirements.

Use of the Alameda Countywide Travel Demand Model

The CMP statute assigns responsibility to CMAs to develop a travel demand model “that will be used by local jurisdictions to determine the quantitative impacts of development on the circulation system.” The Alameda Countywide Travel Demand Model is typically used to determine traffic volumes, transit ridership, and other information for future years. Jurisdictions are required to use the most current version of the Countywide Travel Demand Model for the CMP Land Use Analysis Program. Alameda CTC amended the CMP requirements in 1998, so that local jurisdictions are responsible for applying the travel model. All local jurisdictions have signed Master Use Agreements with Alameda CTC that outline the procedure for requesting the model for a specific application.

Per the CMP statute, jurisdictions may also use an approved subarea travel demand model. Alameda CTC has responsibility for approving subarea models based on whether these models demonstrate adequate consistency with the countywide model.

Appendix J describes Alameda CTC’s policy on subarea models and required documentation for approval.

Methodologies and Standards

Project sponsors should use the following methodologies and standards when conducting Transportation Impact Analyses for the CMP Land Use Analysis Program. Guidance on methodologies and standards may also be given as part of Alameda CTC’s GPA or NOP response to the particular project.

Transportation networks

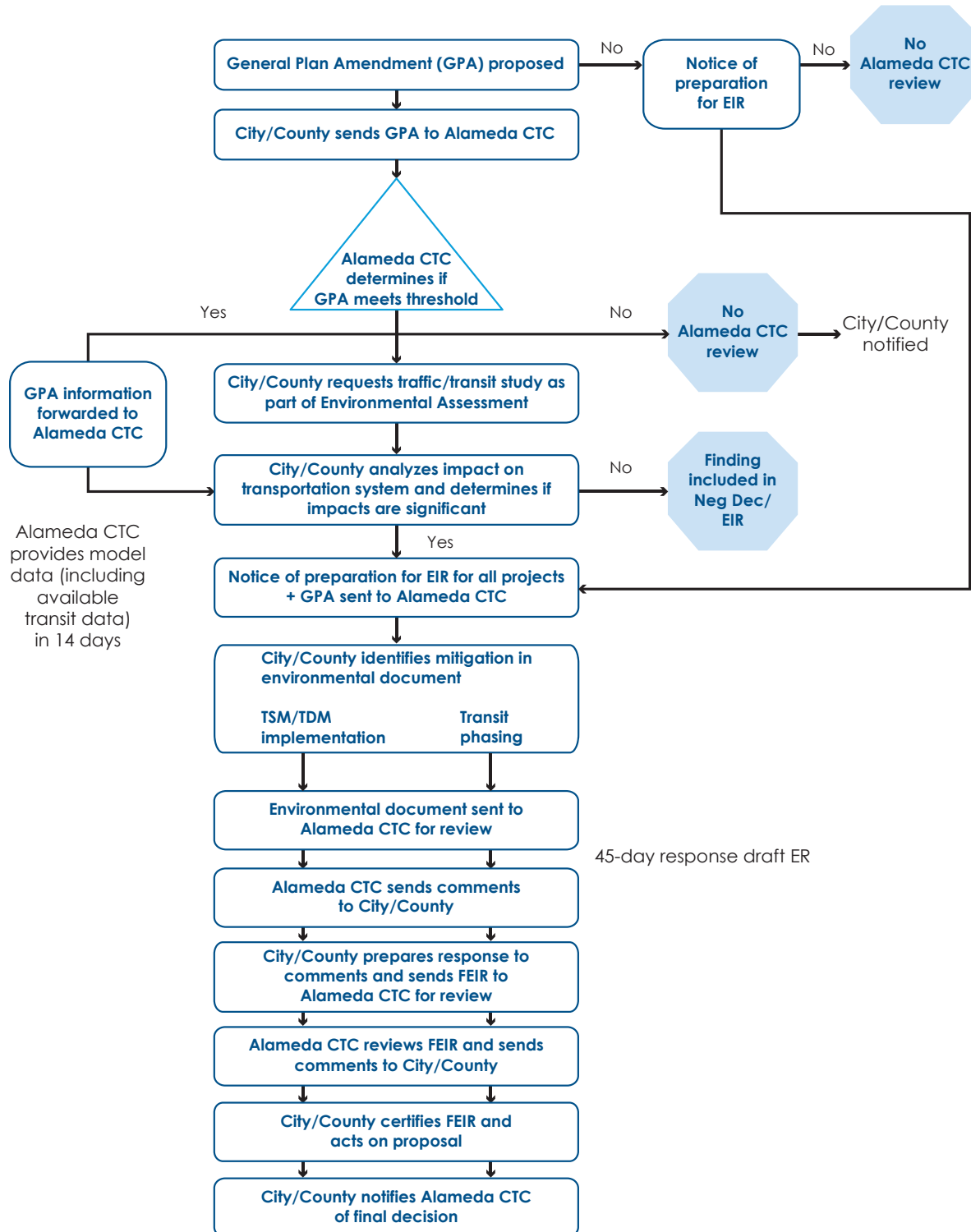
The CMP statute requires analysis of impacts of land use actions on regional transportation systems. For Alameda CTC’s CMP analyses, “regional transportation systems” is interpreted as follows:

- Autos: Study impacts to roadway segments on the 2002 Metropolitan Transportation System;³⁶
- Transit: Study impacts to Metropolitan Transit System (MTS) transit operators (ACE, AC Transit, BART, Capitol Corridor, LAVTA, Union City Transit, and WETA);
- Bicycles: Study impacts to cyclists on the Countywide Bicycle Network; and
- Pedestrians: Study impacts to pedestrians within the Areas of Countywide Significance identified in the Alameda Countywide Pedestrian Plan.

Use of the MTS network for the Land Use Analysis Program ensures that impacts on the CMP network will continue to be identified, since it is a subset of the MTS. The broader definition of regional transportation systems encourages early identification of impacts on a larger system of roadways and explicitly includes transit, bicycle, and pedestrian system impacts.

³⁶ With the passage of the federal Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, MTC was required to develop an MTS that included transit and highways. MTC contracted with the CMAs in the Bay Area to develop the MTS and to use the CMPS to link land use decisions to the MTS. Therefore, a distinction is made between the CMP network, which is used for monitoring conformance with LOS standards, and the MTS, which is used for the Land Use Analysis Program. In 2005, MTC updated the MTS to include Rural Major Collector classified streets and higher classifications based on the Federal Functional Classification System. MTC uses the updated MTS for the purposes of funding and programming as well as in estimating roadway maintenance needs. The Alameda County Technical Advisory Committee reviewed the updated MTS during the 2009 CMP update to determine its usefulness and applicability to the Land Use Analysis Program. Based on input from local jurisdictions and discussion with MTC, Alameda CTC determined that the updated MTS was not appropriate for the Land Use Analysis Program, because it was too detailed for planning purposes, and the previous version of the MTS would continue to be used.

Figure 10—CMP Land Use Analysis Program Project Review Process



Trip generation estimates

Alameda CTC conducts a trip-generation calculation to estimate how many new trips will be on the transportation network due to a development project or plan. Project trip generation is used to determine whether a project meets the threshold for CMP review and to assess impacts on the transportation system.

The Institute of Transportation Engineers (ITE) *Trip Generation Manual* is an acceptable method for estimating project trip generation. This methodology, which works by relating a variable describing the size of the project (e.g., square feet, number of units, number of gas pumps, etc.) to trips generated, is an established methodology widely used for CMP and other purposes in the transportation industry.

The 2011 CMP identified that ITE rates do not always perform well in dense or transit-rich areas such as Alameda County's Priority Development Areas or other infill development sites. In such areas, ITE rates may over-estimate vehicle trip generation. As part of the 2013 CMP update, Alameda CTC performed a review of alternative trip generation methodologies that adjust ITE rates to more accurately reflect particular project contexts. Three methodologies were identified that have been adequately validated and are reasonable to apply in Alameda County. Project sponsors have the option of using one of the following adopted alternative trip generation methodologies:

- EPA's Mixed Use Development (MXD) model
- Caltrans/UC Davis Smart Growth Trip Generation rates
- MTC's Station Area Residents Study (STARS) mode-share adjustment method

Appendix K contains the review of the methodologies, and Appendix L contains guidance on how to apply the rate adjustments.

Projects in areas with travel demand management (TDM) programs may also experience lower vehicle trip generation, as these programs provide information,

incentives/disincentives, and other mechanisms to shift auto trips to other modes, times of day, or closer destinations. Project sponsors may adjust trip-generation estimates to reflect the presence of TDM programs. The TDM element of the Alameda CTC CMP contains a menu of TDM programs with research-based expected ranges of trip reduction benefits that project analysts may use to adjust trip generation estimates. Assumptions should be clearly documented and justified.

Types of impacts and impact assessment methodologies

As part of the 2013 CMP update, Alameda CTC assessed the Highway Capacity Manual (HCM) 2010, including its new Multi Modal Level of Service (MMLOS) methodologies for transit, bicycles, and pedestrians to examine its utility for the Land Use Analysis Program. Appendix B fully documents this assessment. The findings of this assessment include:

- The HCM2010 auto LOS methodologies are suitable for use to study impacts to freeway and arterial segments, but there is a need for flexibility if project sponsors need to conform to local methodology requirements.
- The MMLOS methodologies are not well-suited to identify if a project causes impacts to transit, bicyclists, or pedestrians. Instead, Alameda CTC expanded and clarified language to standard responses to general plan amendments and development projects as to the types of multimodal impacts that project sponsors should consider.
- The assessment found that the HCM2010 MMLOS is well-suited to illustrate tradeoffs from different intersection and roadway segment design options. Many transportation impact analyses propose mitigation measures that change roadway design. Project sponsors should consider tradeoffs to all road users resulting from mitigation measures, and the HCM2010 MMLOS is encouraged in this analysis (see "Mitigation Measures" below).

Appendix L provides full information on impact types and impact assessment methodologies. Project sponsors should consider impacts to all modes, including:

- **Autos:** Vehicle delay using the HCM2010 methodology and consistency with adopted plans;
- **Transit:** Effects of vehicle traffic on mixed-flow transit operations, transit capacity, transit access/egress, need for future transit service, consistency with adopted plans, and Circulation Element needs;
- **Bicycles:** Effects of vehicle traffic on bicyclists conditions, site development, and roadway improvements, and consistency with adopted plans;
- **Pedestrians:** Effects of vehicle traffic on pedestrian conditions, site development, and roadway improvements, and consistency with adopted plans; and
- **Other impacts and opportunities:** Noise impacts for projects near state highway facilities and opportunities to clear access improvements for Transit Oriented Development projects.

Thresholds of significance

Alameda CTC has not adopted thresholds of significance for CMP land use analysis purposes.³⁰ Project sponsors should use professional judgment to 1) define a threshold that is appropriate for the project context; and 2) use this threshold to determine if segments are impacted.

Mitigation measures

Alameda CTC vs. local roles

The CMP statute requires that a Land Use Analysis Program assess the costs of mitigating impacts to the regional transportation system from local land use decisions. This authority must be balanced with the responsibility that local governments hold in the development review process under CEQA. Local governments have lead agency responsibility for preparing EIRs including transportation impact analysis.

In addition, the decision of whether to implement a mitigation measure or to adopt a statement of overriding considerations is a local decision.

Alameda CTC's role is to provide comments through the EIR process on the adequacy of analysis. Alameda CTC has authority under the CMP statute to require disclosure of impacts and mitigation measures, and to require local agencies to establish a program for securing funding to mitigate transportation impacts of land use decisions. The CMP statute does not grant Alameda CTC authority to require implementation of a mitigation measure.

Adequacy of mitigation measures

Inadequate and/or underfunded transportation mitigation measures may have significant implications for the regional transportation system. Either might result in failure to meet LOS standards, triggering potential non-conformance and the need for a deficiency plan. Furthermore, an environmental document may rely on state or federal funding of mitigation measures. Such funding may not be consistent with Alameda CTC's project funding priorities.

Alameda CTC's policy regarding mitigation measures is that to be considered adequate they must be:

- Adequate to sustain CMP roadway and transit service standards;
- Fully funded; and
- Consistent with project funding priorities established in the Capital Improvement Program of the CMP, the Countywide Transportation Plan (CWTP), and the Regional Transportation Plan (RTP) or the federal Transportation Improvement Program, if the agency relies on state or federal funds programmed by Alameda CTC.

Types of mitigations

A project can propose mitigation measures of several types to address CMP impacts, including but not limited to:

³⁰ Note that the LOS E threshold used to determine deficiency as part of the LOS monitoring CMP element does not apply to the Land Use Analysis Program. This threshold is used for biennial monitoring, not to determine whether impacts will be caused over the long term by an individual land use action.

- **Transportation network changes** including changes to roadway geometry (e.g., adding lanes, adding turn pockets, adding mid-block crossings) and intersection control (e.g., adding stop control or signalizing an intersection).
- **Transportation demand management measures and programs** including amenities, information, incentives, and disincentives designed to influence demand for peak-hour auto trip making. The TDM element of the Alameda County CMP contains a menu of TDM programs (see Appendix G) with research-based expected ranges of trip reduction benefits that project analysts may use to estimate the effectiveness of TDM mitigation measures.
- **In lieu mitigations** including implementing a part of an Areawide Deficiency Plan or paying into a Transportation Impact Fee program.

In the case of smaller projects, local governments may wish to require project proponents to enter an agreement to provide a “fair share” portion for mitigating a cumulative impact. This addresses the legislative requirement that the CMP must be able to estimate costs associated with mitigating transportation impacts.

Multimodal tradeoffs

In certain settings, mitigation measures designed to resolve an impact to one mode may cause undesirable secondary impacts to other modes. These secondary impacts may be contrary to adopted policy objectives. A typical example is adding a turn pocket at an intersection, to address an auto circulation impact in a downtown or infill development area, which may increase crossing distances and exposure to vehicles for cyclists, pedestrians, and transit riders.

Jurisdictions are encouraged to discuss multimodal tradeoffs associated with mitigation measures that involve changes in roadway geometry, intersection control, or other changes of the transportation network. This analysis should identify whether the mitigation will result in an improvement, degradation,

or no change in conditions for automobiles, transit, bicyclists, and pedestrians. The HCM2010 MMLOS methodology is encouraged as a tool to evaluate these tradeoffs, but project sponsors may use other methodologies as appropriate for particular contexts or types of mitigations.

Review of Land Use Projections³⁷

Alameda CTC has responsibility for developing a database of housing and jobs projections utilized in the Alameda Countywide Travel Demand Model (more detail on the countywide model is available in Chapter 7). The CMP statute prescribes that this land use database must be consistent with the regional land use database and assumptions of the regional travel demand model. The Association of Bay Area Governments (ABAG) develops the regional land use database for the nine-county Bay Area. This database (formerly referred to as the *Projections* series) includes numbers of households and jobs by sector for existing and future planning horizon years. Alameda CTC works with local jurisdictions to develop the countywide database by allocating ABAG’s housing and job projections to a refined-scale zone system for countywide model traffic analysis. For this reallocation to be deemed “consistent” in the sense of the CMP statute, the county-level totals from the two allocations must be within plus or minus 1 percent, per MTC’s established guidelines as described in Chapter 9.

Alameda CTC’s land use database development process typically happens as part of a Countywide Travel Demand Model update. During this process, local jurisdictions are required to review a draft allocation of ABAG totals to the Countywide Travel Demand Model transportation analysis zones (TAZs). Local jurisdictions then have 60 days to provide input on this draft allocation.

Alameda CTC is undertaking work to incorporate ABAG projections adopted as part of *Plan Bay Area*, the region’s RTP and Sustainable Communities Strategy, into the Alameda Countywide Travel Demand Model. This work is scheduled to be complete by June 2014.

³⁷ The review of housing and job projections was referred to as Tier 2 review in previous versions of the Alameda CTC CMP. This nomenclature has been eliminated to avoid confusion with the tiers of the CMP arterial network.

Historically, the review of housing and job projections has occurred biennially along with the release of an updated set of Projections from ABAG. Senate Bill 375 (SB 375) changed transportation and land use planning to synchronize preparation of regional land use projections with regional transportation plans. In 2013, per the requirements of SB 375, ABAG and MTC adopted their first Sustainable Communities Strategy (SCS), which will likely be updated every four years on the RTP timeline. Alameda CTC's review and allocation of housing and job projections will likely now occur every four years, unless otherwise directed by ABAG or MTC.

Fostering Transportation-Land Use Connections

Alameda CTC oversees a variety of programs and planning activities that strengthen connections between transportation and land use.

SB 375 and Sustainable Communities Strategy

Climate change awareness and the urgency to reduce greenhouse gases has become a driving force in the transportation realm. Adopted in 2008, SB 375 mandates an integrated regional land use and transportation-planning approach to achieve targets for reducing greenhouse gas emissions from automobile/light trucks. The purpose of SB 375 is to define more concrete implementation requirements for the emission reductions expected from the land use sector in Assembly Bill 32. The focus of SB 375 is on reducing vehicle miles traveled (VMT) and reducing greenhouse emissions by 7 percent by 2020 and 15 percent by 2035.

To comply with SB 375, development of *Plan Bay Area* by MTC and ABAG was a joint planning process. The SCS component of *Plan Bay Area* is designed to:

- Lay out how development patterns and the transportation network can be integrated to help reduce greenhouse gas emissions;
- Identify how the region's housing needs will be met;
- Improve modeling of land use and transportation; and
- Be congruent with local general plans, specific plans, and zoning.

Adopted in July 2013, *Plan Bay Area* is a 28-year plan, and the SCS component of *Plan Bay Area* focuses on promoting compact, mixed-use commercial and residential development that is walkable and bikable and close to mass transit, jobs, schools, shopping, parks, recreation, and other amenities. Through *Plan Bay Area*, for the first time the region has simultaneously addressed its long range transportation planning and strategy for meeting its Regional Housing Needs Allocation (RHNA), in anticipation that the synchronization of these planning tasks will result in better transportation-land use coordination.

A key feature of the SCS is the designation of Priority Development Areas (PDAs), which are locally-nominated areas near planned or existing transit designed to accommodate significant housing and job growth over the life of *Plan Bay Area*. PDAs represent 4 percent of the land mass of the Bay Area but are designed to take on 80 percent and 66 percent of housing and jobs, respectively. If successful, *Plan Bay Area* will give people more transportation choices, create more livable communities, and reduce the pollution that causes climate change.

Alameda CTC participated in the *Plan Bay Area* process through its 2012 CWTP update process. Land use considerations played a more direct role in the CWTP process than in past updates to this plan in two primary ways:

- The goals, objectives, and performance measures explicitly addressed land use.
- The demographic forecasts used in the evaluation process were based on the Alameda County Draft Land Use Scenario Concept developed locally through an extensive 18-month process coordinated by Alameda CTC and city planning directors. The local land use scenario was developed in coordination with ABAG and MTC's

efforts and helped to inform the SCS process. Ultimately, the land use scenario used for CMP analysis purposes is the same as the land use alternative adopted by ABAG and MTC in the final RTP/SCS.

Priority Development Area Investment and Growth Strategy

PDA's are designated infill sites where greater housing and commercial density can be accommodated near transit stops. They were identified by local governments as part of the regional Focusing Our Vision (FOCUS) program, a regional development and conservation strategy led by ABAG and MTC, in partnership with the BAAQMD and BCDC, that promoted a more compact land use pattern for the Bay Area. The FOCUS program subsequently became the basis for the region's current SCS.

Alameda CTC worked with local jurisdictions through the FOCUS process to designate 43 PDA's. These PDA's represent a wide range of place types and land use contexts. This process occurred in parallel to MTC/ABAG's regional planning work to inform the regional SCS for Alameda County. The FOCUS process also identified Growth Opportunity Areas (GOA's), which are additional areas that can accommodate growth and may one day be able to transition to PDA's and Priority Conservation Areas (PCA's), which are environmentally sensitive areas needing protection.

MTC and ABAG adopted the One Bay Area Grant (OBAG) program as Resolution 4035 on May 17, 2012. OBAG provides guidance for the allocation of the Cycle 2 Federal Surface Transportation Program (STP) and CMAQ funds for fiscal year 2012-2013 (FY12-13) through FY15-16. CMA's are responsible for distribution of these funds to local jurisdictions and other eligible project sponsors. OBAG includes specific policy objectives and implementation requirements that CMA's must meet as a condition of the receipt of OBAG funds.

With the OBAG funding cycle, MTC implemented a new approach that links the region's federal

transportation funding program with the Bay Area's first SCS efforts. In large counties, such as Alameda County, 70 percent of OBAG funding must be programmed to transportation projects or programs that support PDA's.

To ensure that CMA's have a transportation project priority-setting process for OBAG funding that supports and encourages development in the region's PDA's, MTC Resolution 4035 requires that Alameda CTC work with Alameda County jurisdictions to develop a Priority Development Area Investment and Growth Strategy. Alameda CTC's Commission adopted the Alameda County PDA Investment and Growth Strategy in March 2013.

The *Alameda County PDA Investment and Growth Strategy* fulfills the regional requirement and will guide the agency in supporting PDA development including facilitating implementation of PCA's over a longer time horizon than the current four-year funding cycle. The *Alameda County PDA Investment and Growth Strategy* describes existing conditions in the county's PDA's (including current level of market activity), explains how PDA's and projects were prioritized for the first OBAG cycle, and sets up a framework for additional work that the agency will undertake in the future to improve the link between transportation and land use within its PDA's.

The PDA Investment and Growth Strategy is designed to align with the Alameda CWTP. The most recent update of the CWTP included a goal of better coordinating transportation investments with the county's land use patterns. The PDA Investment and Growth Strategy will have the same time horizon as the current CWTP, through 2040, and will be updated every four years.

The PDA Investment and Growth Strategy contains an inventory of Alameda County's PCA's. Under the OBAG, MTC has also allocated \$5 million between five counties for distribution through a competitive application process to fund projects that promote open space preservation and access, land conservation, and habitat protection in PCA's.

Based on the recommendations made during the 2013 CMP update, Alameda CTC will work with MTC and ABAG to identify ways to support improvements to rural roadways that facilitate agricultural operations and agricultural tourism in East County and to develop more comprehensive approach to mitigating impacts from rural roadway improvements and efforts that support PCA goals and objectives.

Support of Infill Development

The CMP statute seeks to balance congestion management and maintain LOS standards on CMP facilities with the need to promote infill development. In particular, infill development areas are more likely to have higher baseline levels of traffic and are more likely to trigger deficiencies. Senate Bill 1636, California's Infill Opportunity Zone Law, which amended the regulations governing CMPs, allowed jurisdictions to identify infill opportunity zones (IOZs) in which the requirement to maintain LOS E or better would not apply; however, no Alameda County jurisdictions nominated IOZs before the December 2009 deadline. The 2011 CMP identified

a set of short-term and long-term strategies to promote infill development in the absence of IOZs. These strategies collectively could offset the difficulties faced by infill development projects under the CMP statute. Table 15, which follows, reports on Alameda CTC's progress toward implementing these strategies.

SB 743, passed in September 2013, institutes key changes to the CMP statute that will support infill development, including lifting the sunset date on designating IOZs and directing the governor's Office of Planning and Research (OPR) to develop new metrics for assessment of transportation impacts to replace vehicle delay-based measures such as LOS. Alameda CTC will closely follow implementation of and provide input on this law. Implementation of this law may take some time, and the strategies summarized in Table 15 should remain important over the life of the 2013 CMP.



Table 15—Implementation of Strategies to Support Infill Development

	Strategy	Alameda CTC Action
Short Term	Incorporate the use of LOS standards (qualitative and quantitative) for transit, pedestrian, and bicycles to allow a balancing of transportation performance goals	The 2013 CMP contains guidance on how development projects reviewed through Land Use Analysis Program should evaluate impacts to transit, bicycles, and pedestrians, including analyzing mitigation measures with respect to multimodal tradeoffs. It is anticipated that Alameda CTC's upcoming transit and multimodal arterial plans will consider performance measures to monitor non-auto modes as part of LOS monitoring.
	Establish policies and mitigation strategies aimed at congestion relief on a broader scale	The 2013 CMP contains updated areawide deficiency plan guidelines to apply where localized improvements are not workable or practical.
	Adopt urban trip generation rates that more accurately reflect automobile trip generation in areas well served by transit and other services.	The 2013 CMP contains list of approved alternative trip generation methodologies.
	Advocate for relaxation from traffic LOS standards to be extended to all designated "infill opportunity zones" statewide that meet established criteria, regardless of when the zones were established	SB 743, passed in September 2013, removes sunset date from designation of IOZs.
Long Term	Pursue legislative changes to eliminate strict requirements for the use of LOS standards to determine the performance of highways and roadways as part of the CMP	SB 743, passed in September 2013, directs OPR to revise CEQA guidelines to eliminate automobile LOS as a significant impact on the environment and to develop new criteria for determining significance of transportation impacts in transit priority areas that use metrics such as automobile trips generated or VMT per capita. Alameda CTC will monitor the development of these new impact assessment metrics and offer comment as appropriate.
	Adopt flexible standards for transportation impact assessment under CEQA in support of multimodal CMP goals	Alameda CTC currently does not have thresholds of significance for CMP analysis which permit analysts to respond to context sensitivity. As identified in the Countywide Bicycle and Pedestrian Plans Implementation Actions, Alameda CTC supports jurisdictions in attempts to reform local thresholds by sharing case studies of other cities that have revised CEQA thresholds in designated areas.
	Impose multimodal transportation impact development fees in support of multimodal CMP goals	Alameda CTC will explore the options, including conducting a feasibility study for a countywide transportation impact fee linked to auto trip generation as discussed in the next section "Areawide Transportation Impact Mitigation Fees" and also identified in the "Next Steps" in this chapter.
	Update conventional four-step models to provide a more accurate estimate of person trips by mode	Ongoing Alameda Countywide Travel Demand Model updates will incorporate enhanced responsiveness of bicycle and pedestrian mode choice to investments in these modes.

Areawide Transportation Impact Mitigation Fees

An areawide transportation impact fee and/or revenue measure such as establishing an assessment district could generate funds necessary to plan and implement transportation mitigation measures related to land development. Transportation impact fees are addressed in the CMP statute as a proactive method of addressing transportation needs arising from land development.

At present, Alameda CTC and most local jurisdictions in Alameda County review development projects and determine required mitigation measures on a project-by-project basis. If found to be feasible, a transportation impact fee could be designed to supplement current project-by-project review, in which case the fee would raise additional revenue to fund multi-jurisdictional mitigations. Another option is that a transportation impact fee could be designed to replace project-by-project review. In this case, the fee would be designed to generate revenues to fund both localized and multi-jurisdictional mitigations.

Alameda CTC conducted feasibility studies in 1997 and 2007 for a countywide traffic mitigation fee. These feasibility studies investigated a fee that would supplement the project review and mitigations required by local jurisdictions. These previous studies recommended that Alameda CTC not proceed with an areawide traffic impact fee due to concerns about discouraging development, particularly in urban areas where redevelopment projects already face higher costs than in suburban areas. The studies also recommended that Alameda CTC adopt the following policies:

- Support agreement among local jurisdictions to adopt an areawide fee within a planning area;
- Identify projects of countywide significance; and

- Consider integrating adoption of a countywide fee with a campaign for a sales tax extension or gas tax increase so the development community and the voters see a benefit in sharing costs with each other.

As part of the 2011 CMP update, Alameda CTC considered pursuing an areawide traffic impact fee, similar to the Tri-Valley Transportation Council Fee, for the other three planning areas in the county. Alameda CTC concluded that, given the weak local and national economic conditions at that time, an areawide traffic impact fee could adversely affect local development. As an alternative to a new areawide traffic impact fee, the 2011 CMP proposed exploring a fee based on automobile trip generation, such as San Francisco County is implementing. San Francisco's Fee, the Transportation Sustainability Program (formerly referred to as the Automobile Trip Generated, or ATG, measure) is an areawide fee unique in that it is designed to replace the city's current practice of reviewing individual development projects using auto LOS.

Rather than require individual project sponsors to study their impacts to intersection LOS and devise mitigations on a case-by-case basis, San Francisco has devised a countywide program of mitigations designed to accommodate all anticipated development over the next 20 years.

Developers will then pay for their portion of this full program of mitigations, according to a fee schedule based on motorized trips generated.³⁸ San Francisco is currently preparing an EIR for the Transportation Sustainability Program and, once completed, individual development projects will no longer be required to conduct cumulative transportation studies, as payment of the fee will constitute mitigation for their cumulative effects on the transportation system.

The 2011 CMP recommended that, pending availability of funding, Alameda CTC conduct a feasibility study

³⁸ The fee was initially based on Automobile Trips Generated. Nexus analysis revealed that the fee should also be extended to cover transit trips due to concerns with transit crowding in San Francisco. This finding resulted in the fee being restructured as the Transit Sustainability Fee, which is based on the projected generation of all types of motorized trips by development projects. Review of housing and job projections was referred to as Tier 2 review in previous versions of the Alameda CTC CMP. This nomenclature has been eliminated to avoid confusion with the tiers of the CMP arterial network.

for an areawide impact fee based on automobile trips generated. The study was postponed, while Alameda CTC sought passage of an extension and augmentation of its local transportation sales tax, but it will be carried forward as a next step for the 2015 CMP update.

The passage of Senate Bill 743 (SB 743) in September 2013 could heighten the importance of an areawide transportation impact fee feasibility study. This bill directs OPR to revise CEQA guidelines such that transportation impact analysis will no longer be based on automobile LOS. OPR is directed to develop alternative metrics for transportation impacts in transit priority areas, and the bill explicitly makes reference to metrics such as automobile trip generation and VMT per capita.

In addition to a feasibility study, an areawide transportation impact fee would likely require a nexus study in accordance with the Mitigation Fee Act as well as significant coordination and consensus building with the jurisdictions in Alameda County. In particular, a nexus study would be required to determine what share of transportation improvements are needed to correct issues associated with new development (as opposed to existing transportation system deficiencies) and to determine appropriate fee levels.

While it entails significant up-front study and coordination, an areawide transportation impact fee offers several key benefits:

- **Consistency with multimodal planning focus:** A variety of policy goals point to the need to respond to growing travel demand with mitigation measures such as improved transit service and non-motorized travel facilities. It is difficult for project sponsors to demonstrate how these improvements will fix a highly localized transportation system impact, which can lead to developers pursuing mitigations such as roadway capacity improvements that may be contrary to Alameda CTC's multimodal planning focus.

- **Adequately addresses regional impacts:** Project-by-project review of developments often results in underfunding of multi-jurisdictional improvements because Alameda CTC has no authority to require cities or developers to actually implement a mitigation measure, and local jurisdictions may not fully perceive the benefits of requiring a developer to pay for a mitigation measure outside of their boundaries.

If an areawide transportation impact fee is designed to replace project-by-project review that uses intersection LOS to determine impacts, additional benefits could accrue:

- **Simplicity, transparency, and predictability:** Transportation impact analysis is typically one of the most costly and time-consuming parts of developing and reviewing environmental impact reports. Under an areawide transportation impact fee, all of this analysis is conducted up front. Furthermore, developers can easily predict how much they will be required to pay for transportation system improvements.
- **Fixes "last-in pays" principle:** One feature of the project-by-project, LOS-based method of assessing transportation impacts used by most jurisdictions is that only projects that actually cause an intersection or a roadway segment to fall below a specified LOS threshold are forced to pay for mitigations. This fact results in a single project sponsor bearing the entire burden of mitigating a cumulative impact to an intersection or segment, or the jurisdiction adopting a statement of overriding considerations.

The Tri-Valley Transportation Council has adopted an areawide traffic fee. The fee is applied to regional transportation improvements in the Tri-Valley Transportation Expenditure Plan. Many local jurisdictions have also adopted transportation mitigation fees, some of which partially fund multi-jurisdictional mitigations. If such an areawide transportation impact fee is adopted in the future at a countywide level, it would include a system of credits, so that fees for

developments paid once for regional improvements are not unfairly “double billed” for contributions to the same improvement. Credits for some local impact improvements may also be considered.

Community Design and Transportation Program

The Santa Clara Valley Transportation Authority (SCVTA) has adopted a Community Design and Transportation (CDT) program as part of its CWTP to better integrate transportation and land use and augment its CMP Land Use Analysis Program. This program was developed in partnership with member agencies and communities and is endorsed by their elected bodies. The SCVTA Board promotes the CDT program as its policy tool and primary program to integrate transportation and land use. It includes a comprehensive toolkit for member agencies to use in all aspects of transportation and land use planning and for both public and private development projects. The CDT program also includes two grant funded programs and an incentive program designed to encourage better coordination of transportation and land use planning. One of the objectives of the CDT program is to support concentrated development in selected locations of the county.

In the 2011 CMP, Alameda CTC recommended exploring a similar approach to better integrating land use and transportation in Alameda County. Before the next update of the CMP, Alameda CTC will identify the level of interest from local jurisdictions and transit operators for implementing a similar program in Alameda County. Alameda CTC will develop a scope of work and the steps involved including the cost of developing and implementing the program.

Complete Streets Policy Development and Implementation

Complete streets are streets designed to accommodate all modes and all users. Complete streets can look different, depending on the local context, but broadly speaking, creating complete streets entails planning, funding, designing, and maintaining and operating transportation facilities and networks that drivers, transit users, pedestrians,

bicyclists, and goods movement purveyors can use, regardless of age or ability.

The Complete Streets Act of 2008 (Assembly Bill 1358) stipulates that during the next major update of their General Plan’s Circulation Element, all jurisdictions in California are required to incorporate complete streets principles. Alameda CTC required jurisdictions to adopt complete streets policies by June 30, 2013 as part of the Master Program Funding Agreements signed in 2012. All jurisdictions have now met this requirement, either in the form of a city council or Board of Supervisors resolution or an update to the Circulation Element of their General Plan that incorporates complete streets principles. Alameda CTC provides technical assistance to its jurisdictions, including identifying best practice examples, strong language, and recommended components to meet the General Plan component of this legislative requirement.

Implementation of complete streets policies is a multi-year process requiring organizational culture shift, participation from numerous city departments and other external stakeholders, and new levels of collaboration. Alameda CTC held a workshop in June 2012 on complete streets policy development and a workshop in July 2013 in which it provided information to local jurisdictions on implementing complete streets and highlighted examples of best practices. Alameda CTC will continue this effort by developing a series of targeted resources around specific complete streets implementation challenges.

Alameda CTC also implements the Complete Streets Checklist from MTC. All projects that apply for federal funds programmed by Alameda CTC must complete this checklist, which provides information when Alameda CTC evaluates projects for funding.

Corridor Planning

In 1994, Alameda CTC adopted a corridor/areawide transportation management planning process described in the CWTP. The process is based on cooperative planning and coordinated action by local governments, Caltrans, transit agencies, and MTC. Alameda CTC uses the corridor/areawide management

planning process to identify needed mitigation measures and for linking its funding decisions to needed mitigations. In a corridor/areawide management planning effort, participants address strategies to:

- Reconcile the competing demands that local and long-distance traffic make on the capacity of the freeway system;
- Reconcile continuing population and employment growth with the finite capacity of the freeway system;
- Reconcile the movement of people and goods;
- Prevent pass-through traffic from using local streets;
- Reconcile high occupancy vehicle and express lanes with plans to meter freeway ramps;
- Pair ramp metering with geometric metering at gateways to the metropolitan area; and
- Coordinate the operation of freeways and parallel arterials and to specify when and where to rely on transit as a corridor's primary strategy of traffic management.

As defined in the Alameda CWTP, the underlying principles for the planning process are based on the following:

- Alameda CTC should support, where appropriate, local plans to enhance the productivity of transit investment through such measures as supportive zoning, urban design/planning, and development approvals.
- Alameda CTC should give investment priority to those highway and transit operational improvements and major capital projects identified in the corridor/areawide management planning process.
- Alameda CTC recognizes that land use planning is solely the purview of local governments.

As part of the 2011 and 2013 CMP updates, Alameda CTC reviewed additional options for

improving mobility and identifying and funding mitigation measures along travel corridors, specifically ones that cross county boundaries. The following approaches were recommended as next steps.

- For congested cross county corridors, explore developing partnerships for sharing the costs of implementing mitigation measures in the corridor.
- For long-term corridor improvements, explore establishing cross county partnerships to identify mutually agreeable strategies for developing and implementing improvements. As a first step in this direction, a county line development study in partnership with either San Joaquin or Santa Clara counties could be considered.
- Explore developing corridor improvement strategies as part of Countywide Transit Plan and Countywide Arterial Mobility Plan.

Examples of corridor/areawide management planning efforts include:

- Central County Freeway Study (SR 238 Local Area Transportation Improvement Program)
- I-580 Corridor BART to Livermore
- I-680 Value Pricing
- I-880 Strategic Plan
- North I-880 Safety and Operations Study
- San Pablo and I-880 SMART Corridor Programs
- SR 84 Local Area Transportation Improvement Program
- Tri-Valley Triangle Study

Alameda CTC is also conducting three countywide modal plans including a goods movement plan, a transit plan, and an arterials plan. These long-range modal plans are intended to feed into the CWTP and will identify projects, funding priorities, and future corridor planning priorities.

State-level CEQA Modernization Advocacy

Public agencies have gained decades of experience in applying CEQA rules. As new issues (such as global warming) emerge that were unanticipated by the original legislation, a variety of actors show growing interest in modernizing CEQA. Ideas for modernizing CEQA focus on a number of aspects of how the law works including reducing the scope of which types of projects must conduct intensive analysis, eliminating duplication between CEQA and other environmental laws and standards, and containing litigation generated by CEQA. Since the last CMP update, the OPR has issued regulations to implement Senate Bill 226, which seeks to streamline environmental review for eligible infill development projects. SB 743 will also streamline and modernize transportation analysis, particularly for projects in transit priority areas.

Much can be done within the existing CEQA legislation to streamline the review of development projects and to reduce the greater likelihood of causing impacts from infill development projects. Strong specific plans and area plans with thorough program EIRs can reduce the analytic burden of future development projects that implement those plans, and Alameda CTC will support these specific plans through its Sustainable Communities Technical Assistance Program (SC-TAP). The recently adopted Plan Bay Area discusses the potential for projects in Transit Priority Project (TPP) eligible areas that meet certain other conditions to receive CEQA relief under SB 375, and Alameda CTC will assist jurisdictions in understanding this eligibility.³⁹

As previously discussed, Alameda CTC has made some modifications to its review of EIRs through the Land Use Analysis Program that will benefit infill projects, and will continue to support local jurisdictions in revising their own CEQA thresholds as appropriate through information sharing and other technical assistance.

Even with the passage of SB 743, there are other aspects of the CEQA statute that may require modernization (e.g., limiting litigation, strengthening tiering provisions). These aspects of CEQA generally require legislative action. Alameda CTC will continue to monitor CEQA modernization-related bills and consider

³⁹ Plan Bay Area, p. 58

whether it is appropriate to take positions on these as part of its legislative platform.

Parking Standards and Policies

Parking for automobiles is a significant but under-recognized factor in the relationship between land use and transportation. It has been customary for local jurisdictions to require development projects to provide a minimum number of parking spaces. Moreover, most parking is underpriced. These two factors encourage driving, leading to inefficient land use and more congestion. With the support of local jurisdictions, Alameda CTC plans to explore and review parking policies and standards as a way to develop parking management strategies as a land use tool for local jurisdictions to promote alternative modes and reduce greenhouse gases.

Regional Transit Expansion Program

The Regional Transit Expansion Program, originally adopted by MTC in 2001 as Resolution 3434 and updated as part of Plan Bay Area, identifies the regional commitment to transit investments in the Bay Area. Resolution 3434 identified \$18 billion in transit expansion investment projects. It includes a TOD policy to condition transit expansion projects funded under Resolution 3434 on supportive land use policies. There are three key elements of the regional TOD policy:

- Corridor-level thresholds to quantify appropriate minimum levels of development around transit stations along new corridors;
- Local station area plans that address future land use changes, station access needs, circulation improvements, pedestrian-friendly design, and other key features of TODs; and
- Corridor working groups that bring together CMAs, city and county planning staff, transit agencies, and other key stakeholders to define expectations, timelines, roles, and responsibilities for key stages of the transit project development process.

This policy is relevant within Alameda County for the following Resolution 3434 transit expansion projects:

- AC Transit Bus Rapid Transit in Berkeley/Oakland/San Leandro
- AC Transit Enhanced Bus: Grand-MacArthur Corridor
- BART/Oakland Airport Connector
- BART Warm Springs Extension to San Jose
- Dumbarton Rail
- Ferry service expansions in Alameda and Berkeley
- Tri-Valley Transit Access Improvements to/from BART

Alameda CTC is working with the local jurisdictions, transit providers, congestion management agencies in adjoining counties, ABAG, and MTC to address the policy in these corridors.

As part of *Plan Bay Area*, the region's \$660 million in federal new and small starts funding will be directed to Resolution 3434 projects that ranked highly in the RTP Project Performance Assessment. These include several Alameda County projects including BART Warm Springs Extension to San Jose, AC Transit Berkeley/Oakland/San Leandro Bus Rapid Transit, and AC Transit Enhanced Bus: Grand-MacArthur corridor.

A companion resolution, Resolution 3357, articulates rail extension and improvement criteria and regional express bus and rapid bus program criteria. These criteria will be considered during the funding process for the identified transit projects.

Strategic Monitoring of Transportation-Land Use Coordination

A core part of Alameda CTC's activities is monitoring trends in performance measures and transportation land use connections, and using this monitoring to inform planning and funding decisions.

Tracking New Development Activity

The 2011 CMP revealed that several other large

Bay Area CMAs have created a database of land use approvals, and recommended that Alameda CTC explore creating such a database. As part of the 2013 CMP update process, creating and implementing a database of land use approvals in Alameda County is included. Beginning with the 2014 Conformity Findings process, Alameda CTC will require local jurisdictions to submit:

- 1) a list of land use development projects approved during the previous fiscal year; and
- 2) a copy of the most recent Housing Element Annual Progress Report submitted to the state Department of Housing and Community Development.

This information will be used to populate a database of development approvals in Alameda County. This development approvals database will prove invaluable for a variety of applications. It will provide:

- Enhanced monitoring of how well transportation investments are being coordinated with new developments and demands for mobility;
- The ability to compare land use projections with historic trends;
- The ability to comply with new requirements that CMAs assess local jurisdiction efforts at approving sufficient housing for all income levels from the OBAG Program (see PDA monitoring below); and
- A consistent database for multi-jurisdictional planning efforts.

Liveable Communities Performance Measures

The 2012 Alameda CWTP identified a series of performance measures related to transportation-land use connections. These measures were used to compare different long-range transportation investment scenarios during CWTP analysis. The measures were also incorporated in the CMP multimodal performance element.

For the 2015 CMP update, Alameda CTC will perform a comprehensive review of its performance measures

and consider opportunities to streamline measures and to strategically align reporting timelines with data availability. Some of the liveable communities measures (e.g., activity center accessibility and public transit accessibility) are not based on annually published, longitudinal data. These measures are most suitable for comparing different long-range scenarios rather than annual monitoring. The comprehensive review of performance measures performed for the 2015 CMP will explore identifying shorter-term measures of transportation-land use coordination that could leverage the database of new development activity. For example, Alameda CTC could monitor performance measures such as what percent of new dwelling units or commercial square footage is within a half-mile of transit or within a walkable neighborhood.

Priority Development Area Performance Monitoring

The *Alameda County PDA Investment and Growth Strategy* outlines a preliminary PDA monitoring plan developed both to fulfill MTC and ABAG requirements and as a step toward implementing the land use and sustainability goals of the 2012 CWTP. Collecting and assessing data on the county's PDAs will help Alameda CTC gauge progress on meeting the objectives of the 2012 CWTP and *Plan Bay Area*, identify what might need to be modified or improved, help gauge the impacts of policies and investments, and inform the agency's future policy and investment decisions. A more robust information set will also help inform decisions about adjusting the boundaries of existing PDAs and designating new PDAs in the future.

Alameda CTC conducted an extensive PDA Inventory in 2012. Over the course of the next several years, the agency will build on this inventory to create a more robust baseline dataset that Alameda CTC can update over time. Some of the data will be updated annually or biennially as new data is generated by the jurisdictions and then compiled and released by ABAG or MTC. The frequency of updates to the data will also be determined by the pace of change in the county's PDAs and MTC and ABAG requirements. Alameda CTC will work closely with ABAG and other

⁴⁰ California Government Code Section 65089.3.

regional agencies to ensure that the data provided is best suited to Alameda CTC's monitoring needs. The agency's goal is to minimize data collection work for Alameda CTC and the county's jurisdictions and avoid duplicative data collection efforts.

Alameda CTC intends to analyze the following types of data for each PDA (or potential PDA) in Alameda County, though Alameda CTC may make some alterations to existing categories to include different data points.

- Current housing, jobs, and population data
- Growth projections for housing, jobs, and population
- RHNA allocations
- Market strength and development activity
- Transit orientation, urban form and bicycle/ pedestrian connectivity
- Policies (land use, housing, parking, and TDM)
- Impact of OBAG investments

Local Government Responsibilities and Conformance

Alameda CTC is responsible for monitoring conformance of local jurisdictions with the adopted CMP.⁴⁰ While Alameda CTC does not have the authority to approve or deny local land use projects, it may find the local jurisdiction in non-conformance. If it fails to comply with the requirements of the land use analysis program, a jurisdiction risks losing Proposition 111 funds. The detailed process for finding of non-conformance and resulting withholding of Proposition 111 funds is described in Chapter 8.

The following describes special circumstances related to conformance to the Land Use Analysis Program requirements. If a proposed development was specified in a development agreement entered into

prior to July 10, 1989, then it is not subject to any action taken to comply with the CMP, with the exception of those actions required for the trip-reduction and travel-demand element of the CMP.⁴¹

In some cases Alameda CTC may find that additional mitigation measures are necessary to prevent certain segments of the CMP network from deteriorating below the established LOS standards, before a conformance finding is made. In such cases, Alameda CTC will require the local jurisdiction to determine whether the additional mitigation measures will be undertaken as a condition of project approval, or whether they will be implemented as part of a deficiency plan for the CMP network segments affected.

Local jurisdictions have the following specific responsibilities under the Alameda CTC Land Use Analysis Program.

Throughout the year

Local jurisdictions are required to do the following to ensure conformity with the CMP Land Use Analysis Program requirements:

- Forward to the Alameda CTC all Notices of Preparation, draft and final Environmental Impact Reports, and Environmental Impact Statements, and final dispositions of General Plan Amendment and development requests.
- Analyze large development projects according to the guidelines in this chapter, including the use of the Alameda Countywide Travel Demand Model or an approved subarea model and disclosure of impacts to the MTS, if Alameda CTC determines the project exceeds the threshold for which CMP review is required.
- Work with Alameda CTC on the mitigation of development impacts on the regional transportation system.

During annual conformity findings process

Local jurisdictions are required to do the following to ensure conformity with the CMP Land Use Analysis

Program requirements during the annual conformity findings process which occurs from September to November:

- Review the record of Alameda CTC responses to environmental impact report documents for completeness and accuracy.
- Provide the Alameda CTC with:
 - 1) a list of land use development projects approved during the previous fiscal year; and
 - 2) a copy of the most recent Housing Element Annual Progress Report submitted to the state Department of Housing and Community Development.

As needed according to Alameda Countywide Travel Demand Model development schedule

During travel model updates, provide an update (prepared by the jurisdiction's planning department) of the anticipated land use changes likely to occur using ABAG's most recent forecast for a near-term and far-term horizon year. This land use information should be provided in a format compatible with the countywide travel model.

Next Steps

The following are next-step items for the CMP Land Use Analysis Program to strengthen the connection between land use and transportation.

- Develop Transportation Impact Analysis Guidelines that will assist project sponsors in analyzing and addressing project impacts to auto transit, bicycles, and pedestrians as described in this chapter.
- Develop a policy regarding tiering off of CMP analysis conducted as part of a Specific Plan or other Area Plan, if that analysis was conducted using a version of the Alameda Countywide Travel Demand Model that is no longer the most current version.

⁴¹ California Government Code Section 65089.7.

- Pending availability of funding, conduct a Feasibility Study for implementing an ATG-based areawide transportation impact fee.
- Determine if there is interest from local jurisdictions and transit operators for a program similar to the SCVTA's CDT program in Alameda County, and develop a scope of work, schedule, and budget for developing and implementing the program.
- Continue to provide technical assistance to local jurisdictions on potential options to revise CEQA thresholds to reduce barriers to infill development approvals.
- Continue to monitor state level CEQA modernization efforts and opportunities for streamlining within existing CEQA law.
- Implement the Sustainable Communities Technical Assistance Program including matching project applicants with technical assistance for planning efforts designed to advance the readiness of Priority Development Areas.
- Identify ways to address rural roadway improvement needs and efforts that support PCA goals.
- Consider establishing a means for projects that impact long travel corridors and traverse multiple jurisdictions within Alameda County to contribute their fair share of required mitigation measures throughout the corridor.
- Explore development of partnerships for sharing the costs for implementing related mitigation measures for congested cross-county corridors.
- Explore establishing cross-county partnerships with adjacent counties to develop mutually agreeable strategies for cross-county-corridor improvements.
- Explore developing corridor improvement strategies as part of Countywide Transit Plan and Countywide Arterial Mobility Plan.

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