

Types of impacts and impact assessment methodologies

Project sponsors should consider impacts to all modes as described below. Appendix J provides full information on impact types and impact assessment methodologies.

- **Autos:** Vehicle delay using the HCM2010 methodology (or HCM2000 methodology, if required for consistency with local requirements) and consistency with adopted plans (Note: Automobile delay cannot be deemed a significant environmental impact under current CEQA guidelines. The required LOS analysis, which can be limited to the MTS roadway network, may be included in an EIR appendix or a separate document provided to Alameda CTC);
- **Transit:** Effects of vehicle traffic on mixed-flow transit, 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.¹⁷

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

Roles of Alameda CTC vs. local jurisdictions

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:

¹⁷ 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.

- Sufficient to sustain CMP roadway and transit service standards, and/or reduce VMT below the applicable level of significance;
- Fully funded; and
- Consistent with project funding priorities established in the Capital Improvement Program of the CMP, the Countywide Transportation Plan, 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:

- **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 signaling an intersection). Since automobile delay can no longer be deemed a significant environmental impact due to SB 743, these types of changes are unlikely to be imposed as CEQA mitigation measures, but may still be included as part of a required deficiency plan.
- **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 or project features 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 multimodal level of service 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 Projections¹⁸

Alameda CTC has responsibility for developing a database of housing and job growth projections utilized in the Alameda Countywide Travel Demand Model (more detail on the countywide model is available in

¹⁸ 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.