



July 27, 2022

Mr. Jeremy Hoffman  
Eden Housing  
22645 Grand Street  
Hayward, CA 94541

## **DRAFT Focused Transportation Impact Study for the Pt. Reyes Coast Guard Housing Project**

Dear Mr. Hoffman;

W-Trans has completed an evaluation of the potential transportation impacts associated with the Point Reyes Coast Guard Housing project to be located at 100 Commodore Webster Drive in the County of Marin. The purpose of this letter is to set forth the project's anticipated trip generation and potential transportation impacts as identified in the California Environmental Quality Act (CEQA).

### **Project Description**

The project as proposed is the renovation of existing buildings to provide 51 affordable housing units, resident services, and a community education center on a 33-acre site that was formerly used as housing for Coast Guard personnel. The 51 units will be used for senior housing and will include re-use of 36 existing townhomes plus 15 units created by remodeling an existing barracks building that contained 21 sleeping rooms, offices, and bathrooms, so accommodated approximately the same number of adult residents as the proposed 15 units. The existing administrative building of 4,065 square feet would be converted to property management and resident service offices, mechanical facilities, a library, and a common room for resident use. Three staff members are anticipated to use the building. The education center would occupy a space previously used as a galley supporting the barracks with its footprint expanded to 3,198 square feet from the existing size of 1,822 square feet. Streets constructed as part of the previous use would be retained to provide access to the proposed project.

### **Trip Generation**

The anticipated trip generation for previous site uses as well as the proposed project were estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 11<sup>th</sup> Edition, 2021, for Single Family Attached Housing (LU #215) for the townhomes, Multi-family Housing (Low-Rise) (LU #220) for the barracks, and Recreational Community Center (LU #495) for the education center. These land uses were chosen as the closest approximations to the prior and proposed uses. For the barracks it was assumed that 1.5 sleeping rooms would be approximately equivalent to one apartment unit, or 14 apartments.

It is noted that any trips that would be generated by property management staff to and from the resident services building are presumed to be included in the estimate of the residential trip generation since resident services are a typical component of a multifamily housing project. Therefore, a separate trip generation estimate for the resident services building was not included.

It is also noted that the education center would attract residents of the homes on the project site as well as other residents of Point Reyes Station, so trips associated with this use would include some between the homes and the facility, thereby not affecting the surrounding street network. This type of trip that is

internally captured is typically deducted from the trip generation. To provide a more conservative assessment, such a deduction was not applied.

Based on application of these rates and assumptions, the proposed project is expected to generate an average of 481 trips per day, including 31 a.m. peak hour trips and 40 trips during the p.m. peak hour. After accounting for the trips associated with prior uses at the site, the project would be expected to result in a net increase of 128 daily trips, with 8 additional trips during the a.m. peak hour and 12 during the p.m. peak hour. These results are summarized in Table 1.

**Table 1 – Trip Generation Summary**

Land Use	Units	Daily		AM Peak Hour			PM Peak Hour				
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
<b>Previous</b>											
Attached Single-Family Housing	36 du	7.20	259	0.48	17	5	12	0.57	21	12	9
Multi-Family Housing	14 du	6.74	94	0.40	6	1	5	0.51	7	4	3
<b>Subtotal Previous</b>		<b>353</b>		<b>23</b>			<b>6</b>			<b>17</b>	
<b>Proposed</b>											
Attached Single-Family Housing	36 du	7.20	259	0.48	17	5	12	0.57	21	12	9
Multi-Family Housing	15 du	6.74	101	0.40	6	1	5	0.51	8	5	3
Education Center	4.2 ksf	28.82	121	1.91	8	5	3	2.50	11	5	6
<b>Subtotal Proposed</b>		<b>481</b>		<b>31</b>			<b>11</b>			<b>20</b>	
<b>Net New Trips</b>		<b>128</b>		<b>8</b>			<b>5</b>			<b>3</b>	

Note: du = dwelling unit; ksf = 1,000 square feet.

If the internally captured trips between the housing units and the education center were deducted from the trip generation, the project's trip generation would be even lower. Given the very low number of new trips even under the conservative assumptions applied as well as the acceptable service levels experienced on the surrounding street network (as detailed in the *Traffic Impact Study for the Grandi Hotel Renovation*, W-Trans, April 3, 2017), no operational analysis appears to be warranted and one was therefore not prepared.

## Alternative Modes

Given the proximity of commercial and recreational uses within one-half mile surrounding the site, it is reasonable to assume that some project residents will want to walk, bicycle, and/or use transit to travel from and to the project site.

## Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. A sidewalk exists on the southern side of Commodore Webster Drive and on both sides along the east-west segment of SR 1, though there are gaps.

Crosswalks are present on the south and west legs of the SR 1/Mesa Road intersection. Overhead streetlights exist along Commodore Webster Drive. Overall, existing facilities provide limited pedestrian access and connections between the project site and surrounding residential neighborhoods and commercial uses.

### **Bicycle Facilities**

There are existing Class III bicycle routes on Pt. Reyes–Petaluma Road between SR 1 and Platform Bridge Road and on Sir Francis Drake Boulevard to the west of Point Reyes Station. According to the Marin County Unincorporated Area *Bicycle & Pedestrian Master Plan*, 2018, Class II bike lanes are planned on SR 1, along with a Class I multi-use path along Commodore Webster Drive that meets an existing Class I path along Platform Bridge Road. Cyclists would also be able to share the travel lanes with motorists on minor residential streets surrounding the site or ride on sidewalks. As a result, adequate access for bicyclists is currently provided and would be improved upon completion of the planned facilities identified in the *Bicycle & Pedestrian Master Plan*.

### **Transit**

The transit stop nearest the project site is located on SR 1 approximately 500 feet west of the intersection with Mesa Road, which is 0.25 miles from the site. The stop is served by Marin Transit Route 68 on weekdays from 6:30 a.m. to 8:30 p.m. and on weekends from 7:30 a.m. to 8:30 p.m. Headways are one or two hours. Route 68 provides connectivity between the communities of San Rafael and Inverness. The existing transit facilities and routes provide adequate connections between the project site and other cities and unincorporated communities within the County.

**Finding** – Existing pedestrian, bicycle, and transit facilities provide adequate access to and from the project site for alternative modes of transportation.

### **Vehicle Miles Traveled**

Consideration was given to the project's potential generation of Vehicle Miles Traveled (VMT), using guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018. The OPR Technical Advisory states that "lead agencies can evaluate each component of a mixed-use project independently," so the new residential and educational uses were evaluated separately.

The OPR Technical Advisory notes that "a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less-than-significant impact for a 100-percent affordable residential development in infill locations." Because the project proposes only affordable housing, it is reasonable to conclude that the residential component of the project would have a less-than-significant impact on VMT.

The OPR Technical Advisory also indicates that local-serving land uses may be presumed by lead agencies to have a less-than-significant VMT impact. The guidance suggests that some retail uses may be considered local-serving if the addition of the land use would redistribute existing trips within the area instead of generating new trips to the region. Many trips to the education center or on-site amenities are anticipated to be "internal capture" trips originating from the homes on the project site and therefore not contributing significantly to VMT, while other trips are anticipated to consist of residents of Point Reyes Station traveling very short distances and not contributing significantly to VMT. Because most visitors to the education center

would be expected to reside either on-site or locally, and because the use would afford local residents with educational opportunities that they might otherwise have to travel longer distances to obtain, it is reasonable to conclude that the education center would be considered local-serving and have a less-than-significant transportation impact on VMT.

**Finding** – The proposed project would be expected to have a less-than-significant transportation impact on VMT.

## **Safety**

The project as proposed would include re-use of existing buildings and infrastructure facilities. As no new construction of roads or other transportation facilities is proposed, the project would not introduce any safety hazards and would therefore have a less-than-significant impact in terms of hazards.

## **Emergency Response and Access**

The existing roadways and driveways within the site have adequate widths for fire apparatus access, and a turnaround at the northern terminus of Commodore Webster Drive provides adequate emergency vehicle circulation. Two gates that exist along Commodore Webster Drive are proposed to be removed, so emergency access would be expected to function acceptably for emergency response vehicles.

**Finding** – Upon removal of the two existing gates along Commodore Webster Drive, emergency response and access would be expected to function acceptably.

## **Parking**

Jurisdiction parking supply requirements are based on the Marin County Municipal Code, Chapter 24-04.340; Minimum Required Parking Spaces, which requires 1.25 standard spaces per one-bedroom dwelling unit or one-half space per unit for senior housing, 1.5 standard spaces per two-bedroom unit, and two standard spaces for units with three or more bedrooms. Guest parking is also required at a rate of one space per five units for all the residential units on the site.

A supply of one quarter of the maximum occupant load for the education center is also required. The same parking ratio would typically be required for the resident services building, but a total of four spaces to satisfy the anticipated demand has been proposed and approved by the County instead.

The County requirements are summarized in Table 2.

**Table 2 – Parking Analysis Summary**

Land Use	Units	Supply (spaces)	County Requirements	
			Rate	Spaces Required
<b>Affordable Senior Apartments</b>				
Resident Parking	(15) 1-bdr		0.5 per 1-bdr	7.5
Guest Parking	15 du		1.0 per 5 du	3
<b>Affordable Townhomes</b>				
Resident Parking	(5) 2-bdr		1.5 per 2-bdr	7.5
	(24) 3-bdr		2.0 per 3-bdr	48
	(7) 4-bdr		2.0 per 4-bdr	14
Guest Parking	36 du		1.0 per 5 du	7.2
<b>Affordable Housing Total</b>		<b>96</b>		<b>88</b>
Resident Services (Building 100A)	92 OL	4	0.25 per OL	4*
Education Center, Former Galley, and Building 100C	78 OL	20	0.25 per OL	20
<b>Total</b>		<b>120</b>		<b>112*</b>

Notes: bdr = bedrooms; du = dwelling units; OL = occupant load; n/a = not applicable; Spaces required for Resident Services (Building 100A) reduced from 23 to 4 based on anticipated staffing demand and primary use by residents who have parking elsewhere.

The Federal Accessibility Guidelines require a total of four accessible spaces for the affordable housing and resident services land uses, as well as a single accessible space for the education center. The project would provide seven accessible spaces for the affordable housing land uses, including four that are van-accessible, as well as one van-accessible space for the education center.

**Finding** – The proposed parking supply would satisfy County requirements for supply and include an adequate number of accessible spaces.

### Conclusions and Recommendations

- The proposed project would be expected to generate an average of 481 trip ends per day, including 31 during the morning peak hour and 40 during the evening peak hour. After deducting trips that would have been generated by the Coast Guard housing, the project would have an average of 128 net-new daily trips, including 8 during the a.m. peak hour and 12 during the p.m. peak hour.
- Existing facilities for pedestrians, bicyclists, and transit users are adequate and will be enhanced upon completion of planned future improvements.
- The proposed project would be expected to have a less-than-significant transportation impact on VMT.
- Upon removal of both existing gates along Commodore Webster Drive, emergency access would be expected to function acceptably.

- A total supply of 112 parking spaces, including 92 for the affordable housing and resident services and 20 for the education center, should be provided to meet County requirements. The proposed parking supply would be adequate to meet these requirements.

We hope the above information is of assistance to staff in preparing the environmental clearance documentation for the project. If there are any questions, please contact us. Thank you for giving us the opportunity to provide these services.

Sincerely,

Siddharth Gangrade  
Assistant Engineer

Dalene J. Whitlock, PE, PTOE  
Senior Principal

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