

**Attachment A:
LIUNA Letter Exhibit A**

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Exhibit A in its entirety is considered Comment 7

EXHIBIT A

August 1, 2021

Michael Lozeau
Lozeau Drury LLP
1939 Harrison St Suite 150
Oakland CA 94612

Subject: Scannell Properties Project Draft EIR

Dear Mr. Lozeau,

You requested that Rock E. Miller & Associates conduct a review and provide comments regarding transportation and greenhouse gas analysis included in the Draft EIR for the subject project and documents. We are pleased to provide this response for consideration by Contra Costa County.

The proposed project traffic study was prepared based upon revisions to CEQA stemming from changes legislated by SB 743 that have evolved over the past few years. These revisions move the focus of traffic impact analysis away from Level of Service assessments for intersections and roadways. The emphasis is shifted toward Vehicle Miles Traveled, determining whether the net additional travel activity is higher or lower than a threshold of significance. These changes were developed in part to encourage infill development, especially in areas where transit service and other alternatives to private auto travel are attractive.

The proposed project is a warehouse industrial project. The site is an industrial area. It is in my opinion unserved by transit, and there are minimal pedestrian and bicycle facilities that connect the site to compatible land uses. The nearest developed residential area, North Richmond, is over one mile from the site, and there is no direct transit service, continuous walking route, or direct bicycle route. The proposed development will be highly reliant upon private automobiles and trucks for access and operations unless proper improvements are made.

In this comment letter, I first provide a summary of methods proposed by the EIR to mitigate traffic generation and VMT for the project. I then provide a summary of the alternative mitigation measures that could be proposed. I finally explain how an alternative approach to VMT could be achieved by focusing upon addressing local circulation deficiencies and meeting unique opportunities that can reliably reduce local VMT. These are alternatives that can be combined with or partially replace the measures proposed that rely heavily upon purchasing greenhouse gas credits in the global market but provide no localized benefits.

Greenhouse Gas Analysis

I reviewed the greenhouse gas analysis sections related to vehicle miles traveled (VMT). The greenhouse gas emission analysis indicates that the project will need to mitigate VMT by private autos. The EIR also identifies relevant Contra Costa General Plan Goals that should be

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considered in developing appropriate mitigation measures. The Plan includes goals to encourage use of transit, reduce single occupant auto commuting, and encourage walking and bicycling. However, the CEQA analysis does not consider, quantify, or propose VMT reduction through measures to improve walking, biking and transit.

The greenhouse gas analysis estimated that the project would generate over 5500 MT CO₂e/year compared to a baseline allowance of 660 MT /y, and that passenger vehicles alone would exceed the threshold, and mobile (Auto and Truck) would exceed 5100 MT/y. Operational changes to increase use of zero emission vehicles by 2023 would reduce the forecast to 4757 MT/y, and further changes for 2025 would reduce the forecast to 2783 MT/y. The reductions are mostly attributed to greatly increased electrification and use of off-road equipment and delivery equipment. A growing proportion of emissions that exceed thresholds will be from private automobile use and related vehicle miles of travel (VMT) for site access.

The project included proposed mitigation measures to assure that the site met commitments to provide electricity, charging stations, and infrastructure on site to meet the assumptions for power generation and service vehicles. The project did not propose measurable and reliably effective measures to reduce greenhouse gas emissions from private vehicles, but instead proposed to purchase carbon offsets to mitigate these effects.

The project offered to commit to less-defined transportation demand management programs to reduce reliance upon private auto transportation, but not to a level that would assure meaningful reduction in traffic that would be suggested by the County's General Plan goals. The 2027 forecast presumed near full electrification and self-power generation for the site, but it still forecast mobile sources (private autos) to be nearly 2000 MT/y compared to the threshold of 660MT/y. A buy-down by purchase of carbon offsets is essentially the proposed alternative to a reduction in personal auto use by about 2/3 of the forecast auto travel.

The project approach misses the opportunity to reduce private auto use both for the site and for the nearby region through provision of improved facilities to meet the goals of the general plan. Greenhouse gas and VMT mitigation does not need to reduce private auto use only as related to the site. Reduction of VMT and greenhouse gas is only needed equivalent to the significant increase associated with the site.

Traffic Study

A thorough and detailed traffic study was prepared and incorporated into the EIR by a qualified firm with experience in this type of study. I offer comments on the study only where issues merit raising. Their work to utilize a big-data approach to analyzing VMT is especially appropriate for a site with this location and operational characteristics.

The existing traffic volume analysis showed an unusual flow of about 600 PM peak hour trips northbound on Fred Jackson Way and on Goodrick Avenue. There is no comparable AM flow in the opposite direction. This normally means that the route is being used as an alternate bypass to avoid congestion on parallel routes, and the flow is likely impacting the North Richmond

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neighborhood. It appears that nearly 300 of these trips may be turning off Richmond Parkway at Gertrude and rejoining at Goodrick Avenue. Mitigation measures that focus upon this flow should be a priority. These would include greater emphasis upon traffic calming along Fred Jackson Way, focusing on both cars and trucks.

The traffic study did not identify an existing right turn lane for northbound Goodrick Avenue at Richmond Parkway. This lane has a beneficial effect upon intersection LOS and should be verified.

Public Transit

The project traffic study indicates that the site is served by transit. It also indicates that the nearest transit stops are approximately one mile away on Fred Jackson Street at Market Street. This distance exceeds all guidelines for effective walking distance to transit. Further, there are long gaps in potential walking routes from the site to transit, requiring pedestrians to walk along dirt shoulders for long distances. The frequency of the nearest transit service is every 30 minutes. It is improper and incorrect to suggest that the project has access to transit. A measure to establish adequate transit to the site and vicinity should be required.

The site is only about 2.5 miles from the Richmond BART station. A peak period transit service that connected the site to the BART station with stops in the nearby North Richmond neighborhood could be funded through an assembly of existing and future employers with developments in the vicinity. The provision of transit access to the site and vicinity would reduce traffic generation and VMT by the typical percent transit that is achieved by similar developments with more adequate transit service. This action would reduce the VMT for surrounding existing and proposed developments, in addition to the site. If transit access was funded solely by the site developer or tenant, the VMT reduction for the surrounding developments are an appropriate credit. If funded by a local traffic management association, the VMT reduction for the site would be appropriate, and the costs would be an appropriate credit against VMT impacts.

Bicycle and Pedestrian Facilities

The County General Plan includes policies to provide that new development shall be linked to and compatible with existing and planned roads, bicycle facilities, pedestrian facilities and pathways of adjoining areas, and such facilities shall use presently available public and semi-public rights of way where feasible. It indicates that new development shall contribute funds and/or institute programs to reduce parking demand or provide adequate parking. Funds shall be contributed to programs to provide adequate bicycle and pedestrian facilities where feasible. Efforts to develop alternative transportation system to reduce peak period traffic congestion shall be encourages. And use of alternative forms of transportation such a transit, bike and pedestrian modes shall be encouraged to provide basic accessibility to those without access to personal automobiles. There are other similar goal and policies to achieve these ends.

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The nearest residential areas to the site are the North Richmond neighborhood and areas of San Pablo. One-way walking distances to the site are generally over one mile, and walking routes are not suitably improved to these neighborhoods. There should be a low expectation that walking would be a substantial component of travel to/from the site but walking improvements to better serve proposed transit would be effective and worthwhile.

A plan to increase usage of pedestrian and bicycle facilities can reduce VMT and traffic generation for the site. It can also reduce VMT for the surrounding industrial area and reduce VMT for residential uses by making more attractive recreational trips from nearby residential areas to the Bay Trail. Since the baseline condition is relatively poor for walk/bike/transit, measures to improve these facilities can have a more powerful effect upon reducing VMT than site specific measures. Further, the VMT reduction can be measured and proven by measuring increases in these travel modes after improvements to provide a usable system are made.

Since VMT and traffic generation reductions can be introduced and provided readily for the nearby development area, a more specific focus upon the deficiencies and opportunities for improvement are offered with a special focus on biking as a stand-alone measure and as a first/mile last mile connection to existing or potential transit.

Parr Boulevard and Richmond Parkway

The project proposes to provide improvements along Parr Boulevard and at the Richmond Parkway/Parr Boulevard intersection. While the requirements for Parr Boulevard are described in the narrative, the cross section for the roadway should be clearly defined and analyzed. The roadway should include one vehicle travel lane in each direction, a westbound right turn lane at Richmond Parkway, a median of sufficient width to provide left turn lanes designed to prohibit outbound left turns, 8-foot sidewalks on both sides of the street, 6 feet of paving for a bicycle lane on the south side of the roadway and a 12-foot-wide walk/bike trail along the north side. This will require more pavement width than the existing north curb provides, and the utility poles will likely need to be relocated. The needs could affect site planning. The precise needs for Parr Boulevard should be resolved before site planning proceeds or early in the site planning process to assure that all needs are met.

Richmond Parkway / Parr Boulevard Intersection

In order to provide an appropriate and attractive bicycle route and pedestrian route from the site to Richmond Parkway, the northeast and northwest corners of Richmond Parkway at Parr Boulevard need to be reconstructed. There should be two access ramps on each corner, one for north/south and a separate ramp for east /west. An access ramp wide enough to meet bikeway needs is required for east west movements. The access ramps should be at least 8-foot wide at street level to accommodate two-way cycle traffic, and there should be sufficient area behind the curbs for users to wait behind the curb before beginning or continuing their crossing. The improvements should be accessible to and serve both pedestrians and bicyclists, but usage is more likely to be by bicyclists due to lack of compatible nearby walkable destinations. As a bicycle route, the direct link to the Bay Trail is an attractive connection.

Bikeways along Richmond Parkway

There is an existing bikeway along the west side of Richmond Parkway, and portions of the route are included in the San Francisco Bay Trail system. But segments are not in good condition, and it does not meet contemporary standards for attracting users. The paved trail along the west side of Richmond Parkway from Parr Boulevard south is especially not in good condition, and it does not meet the development standards of the Bay Trail. At minimum it should be resurfaced with added signs, markings, and wayfinding added from Parr Boulevard to the Wildcat Creek Trail.

Wildcat Creek Trail

The Wildcat Creek Trail connects to the Bay Trail by passing beneath Richmond Parkway, but the connection is currently posted as closed. There are apparently ADA or security issues that need to be resolved. The existing connection is not appropriate for attracting recreational users. It is shown on bikeway plans for both the City and County, and it is identified to be upgraded as a signalized at grade crossing or as a grade separation in planning documents. A high quality and direct connection to the Bay Trail from the North Richmond neighborhood via Wildcat Creek Trail would provide a Class I bikeway that would be attractive to all users and would likely increase use of the Bay Trail to the north by nearby residents. Any new use of the local portions of the Bay Trail system by nearby residents likely replaces a longer length of automobile trip by residents and ultimately encourages more bicycle usage.

There is a challenging and costly gap in the Wildcat Creek Trail from Rumrill west where the trail must cross two railroads to reach the Verde Elementary School area. Closure of this gap would greatly improve access to the project area from San Pablo as well as to the Bay Trail system for much of Richmond. This type of ambitious facility can often compete well for state funding through ATP and future funding sources. The development of a high-quality project information and benefit document would be a key to improving the chances of early funding,

Fred Jackson/Goodrick Avenue Connector

The Contra Costa County General Plan has a clear goal to provide walk/bike facility connections to new development. The development site is not appropriately connected to the North Richmond residential area. Fred Jackson Way / Third Street has bicycle lanes that end about 250 feet north of Wildcat Creek Trail. The roadway has sufficient right of way (based upon existing fence lines) to provide 6-foot-wide bicycle lanes in both directions continuing north to Parr Boulevard as indicated by the County Bikeways Master Plan, but these will require street widening. This should be a high priority improvement. It will provide some VMT reduction benefits based upon an equation developed for California Air Resources Board, but it may provide even greater VMT reduction benefits by providing an attractive bikeable link between the site and the North Richmond neighborhood.

The bikeway plan shows the proposed lanes on Fred Jackson Way to continue east along Parr Boulevard and north along Goodrick Avenue where they will eventually connect with Point

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Pinole Regional Park and gateway to an attractive section of the Bay Trail system. A recently constructed trail exists along Goodrick north of Richmond Parkway to Point Pinole Regional Park. It provides a direct connection to the Richmond Parkway trail, but there is no pedestrian crossing of Richmond Parkway to reach the trail. This crossing may not directly serve the site, but its ability to reduce VMT by encouraging recreational trips should be considered.

There are striped bicycle lanes along Goodrick Avenue from Parr Boulevard north for about 700 feet. There are width constraints and off-site parking issues that make it difficult to extend them further north, but these may be readily addressed through modest street improvements.

The existing land uses and development patterns pose challenges for implementing desired improvements on Parr Boulevard east of the site and along Goodrick Avenue. There may be publicly available land with private use encroachments especially west of Fred Jackson Way. If public land is available, Parr Boulevard should be improved to provide bicycle lanes in both directions, two travel lanes, and a 2-way left turn lane from the site to Fred Jackson Way. This improvement is essential to provide a direct and continuous bikeway from the North Richmond residential community to the site.

A plan should be prepared to indicate how future improvements could be provide to the east and north along Goodrick Avenue. This connection is not vital to the development, but it will provide access from the nearby community to the Bay Trail and encourage more use by nearby residents.

The site is only about 2.5 miles from the Richmond BART station along Fred Jackson and 7th Street to Barrett Avenue. Bicycling is generally accepted as an appropriate way to serve trips of up to 3-5 mile, so the site is within the bikeable service area of the BART station, but the route needs to be bikeable and comfortable to potential users. It is not bikeable and comfortable based upon the level of or absence of existing improvements.

Indefinite traffic calming improvements have been mentioned in the EIR in the north Richmond areas. There are opportunities to provide conventional bicycle lanes along much of this route, often through restriping only. There should be a clear plan for how to comfortably meet the needs of potential bicyclists from the North Richmond neighborhood to the site as well as connections to the Bay Trail system north and west of the site.

Net Effect upon VMT and Traffic Generation

Bicycling and trail connections and improvements discussed have the promise to bring walking, biking, and transit commuter use from near zero up to regional averages, not just for the site but for the nearby employment land uses and the nearby neighborhoods connected and served. They will also better prepare the site vicinity to see future VMT reductions by providing a circulation system that offers attractive options to motor vehicles for both commuter and recreational trips. More importantly the benefits can be measured by monitoring increases in walking, biking, and local transit along the improvements suggested.

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Because existing walk/bike/transit facilities are largely non-existent, the baseline is essentially zero for walk/bike/transit for the site and vicinity. Improving site facilities and connections up to typical current standards offers the measurable promise to reduce VMT for the site and nearby existing and expected future land uses. Key features recommended as mitigation measures include:

- Providing walk/bike facilities along Parr Boulevard, Fred Jackson Way, and Goodrick Avenue.
- Provide walk/bike connections across Richmond Parkway at Parr Boulevard and at Goodrick Avenue
- Provide transit connection from Richmond BART through North Richmond to the site vicinity.
- Provide bike facilities through the North Richmond neighborhood and south to Richmond BART
- Improve connections to the Bay Trail system that would pass through or around the development site and vicinity.
- Conduct Feasibility study of the Wildcat Creek Trail gap near Rumrill to help secure future funding

These improvements would increase bike and transit mode share from virtual zero to meet or exceed current regional averages. The mode share increases would directly offset VMT for the site and VMT for all existing and proposed industrial and employment land uses in the site vicinity. A reduction in VMT and traffic generation attributed to all the nearby employment generating land uses is appropriate.

These VMT reductions for the site vicinity can be fully credited to the site if the improvements are funded solely by the site. The reductions are incremental reductions for the site, if the site participates in a site area program to provide better walk/bike/transit facilities. The EIR and traffic study suggest that the site offset greenhouse gas by purchasing greenhouse gas reduction credits from the “market”. The cost of these offsets will not provide localized greenhouse gas reductions for the site and nearby neighborhoods. A more attractive measure would be to provide the required network to allow for walk/bike/transit to become viable, identify the amount of VMT reduced, and reduce the commitment to purchase greenhouse gas credits accordingly.

A more appropriate measure for mitigating traffic generation and VMT would be to provide or assist in providing an appropriate walk/bike/transit network to serve the development and the nearby industrial area, and to provide connections to nearby residential areas and make connections from nearby residential areas across the site vicinity to attractive recreational opportunities provided by the Bay Trail system. The benefits of these actions can be estimated prior to improvement, measured after they are improved, and credited against the need and cost to purchase future greenhouse gas reductions.

At this time, I would estimate the greenhouse gas reduction benefits of local walk/bike/transit to approach 10% of the traffic and VMT of the nearby employment uses and 2-3% of the VMT for the nearby residential uses, based upon typical walk/bike/transit of areas with “average” facilities to serve these trips. This will substantially offset the need to reduce VMT for the site alone, and the VMT reduction benefits will be concentrated into the site area rather than dispersed into the global greenhouse gas reduction offset market. My personal estimate of traffic and VMT

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reduction are based only upon my personal experience in reducing traffic generation by providing bicycle and transit facilities, but they can be estimated with greater precision if developed and approved by the public agencies charged with reducing VMT, including the City of Richmond, Contra Costa County and CCTA. The development only needs to be conditioned as follows:

- Participate in the local improvement program for walk/bike/transit improvements to reduce VMT. The development's fair share of local VMT reduction would be scaled to its cost participation in the programs implemented.

I am attaching my resume and qualifications to conduct this review and make comments. Please contact me if you have any questions.

Sincerely,
Rock E. Miller & Associates



Rock Miller, P.E.
Firm Principal / CEO

Resume

Rock E. Miller, P.E.

Mr. Miller is a registered Traffic and Civil Engineer in the State of California and has more than 45 years of transportation engineering, planning, design, and operations experience. He has formerly served as City Traffic Engineer for Costa Mesa and staff traffic engineer with the County of Orange. He is thoroughly familiar with the latest capabilities and requirements available and expected from cities and municipal governments. For more than 25 years, Mr. Miller has been a consultant at the senior or principal level in the field of traffic engineering, traffic safety, and circulation design.

Mr. Miller has completed a wide variety of unique transportation projects, including traffic impact studies, traffic signals, signing, striping, street lighting, work site traffic control, and the design of street and highway improvements. He has also prepared many transportation policy plans and completed controversial and complex transportation studies, including projects anticipating litigation by another public agency and projects with intense public opposition. Mr. Miller is well regarded for his ability to apply strong fundamental traffic engineering knowledge to custom situations. He has frequently been an invited speaker to regional and national conferences and committees on many topics, including pedestrian circulation and safety, urban bikeway design, traffic calming, traffic safety, and transportation policy.

Mr. Miller was elected and served as International President of the 15,000-member Institute of Transportation Engineers (ITE) in 2012. He received a Lifetime Achievement award from ITE's Western U.S. District in 2018. Mr. Miller is also an extension Faculty member for the University of California, Berkeley, Institute of Transportation Studies and teaches classes in Fundamentals of Traffic Engineering, the Manual of Uniform Traffic Control Devices (MUTCD), and Bikeway Design. He also serves as a voting member of the National Committee on Uniform Traffic Control Devices and as an alternate member to the California Traffic Control Devices Committee, two committees that oversee guidelines for use of traffic control devices in the U.S. and in California.

Mr. Miller has extensive expertise in providing enhanced facilities to encourage walking and biking, and he is recognized as a national expert in these fields. He has developed projects and programs that have measurably and substantially increased use of walking and biking on a local and City level in many communities.

EDUCATION

MS, Civil Engineering, UC Davis, Davis, California, 1976

BS, Civil Engineering, UC Davis, Davis, California, 1973

REGISTRATIONS

Professional Engineer #11271-PE (Civil), State of Hawaii
Professional Engineer #1139 (Traffic), State of California
Professional Engineer #29493 (Civil), State of California
Certified Professional Traffic Operations Engineer #205, Institute of Transportation Engineers

WORK EXPERIENCE,

Firm Principal, Rock E. Miller & Associates, Orange, CA (2018-present)
Senior Principal, Traffic and Transportation, Stantec Consulting, Irvine, CA (2010 – 2018)
Principal, KOA Corporation/Katz, Okitsu & Associates, Orange CA (1995-2010)
Owner/Principal, Rock E. Miller & Associates, Tustin, CA (1990-1995)
Principal Engineer, Basmaciyani-Darnell Associates, Irvine, CA (1987-1990)
City Traffic Engineer, City of Costa Mesa, CA (1979-1987)
Traffic Engineer, County of Orange, CA (1976-1979)
Instructor, UC Berkeley, Institute of Transportation Studies, Berkeley, CA (2002-present)

PROFESSIONAL ASSOCIATIONS

International President, Institute of Transportation Engineers (2012)
President, Institute of Transportation Engineers, Western District (2002)
Member, Association of Pedestrian and Bicycle Professionals
Member, American Society of Civil Engineers
Member, US Transportation Research Board: Bicycle Research Committee
Member, US National Committee on Uniform Traffic Control Devices
Associate, Congress for New Urbanism
Member California Zero Traffic Fatalities Task Force

SPECIALTY DISCIPLINES

Pedestrian Enhancement and Safety Studies
Bicycle Enhancement and Safety Studies
Modern Roundabout Application and Design
Traffic Signal System Design
Traffic Signal Timing Plans
Traffic Signs and Markings
Freeway Traffic Flow Analysis
Traffic Performance Improvements
Traffic Planning for Downtowns and Walkable Areas
Neighborhood Traffic Management

AWARDS

- 2005 43rd Annual Meeting Best Technical Presentation - : How Does the Chicken Cross the Road?
- 2001-2002 WesternITE Editors Award - In Pavement Flashing Crosswalks – State of the Art
- 2018 WesternITE Lifetime Achievement Award

PUBLICATIONS and PRESENTATIONS

- Traffic Signal Coordination, Myths and Realities. CA League of Cities Conference, 2008.
- Safety Experience with PPLT Conversions in California. ITE District 6 Annual Meeting, 2007.
- Designing Highway Facilities for Pedestrian Safety. Montana Joint Engineers' Council, 2005.
- Walkin' in L.A., Los Angeles Crosswalk Safety Study. For State of Utah, WASHTO-X, 2005.
- In-Pavement Flashing Crosswalks, State of The Art. TRB Urban Street Symposium, 2003.
- Can 25,000 Pedestrians Cross the Street Safely? ITE Spring Conference, 2003.
- Safety in Marked and Unmarked Crosswalks. Institute of Transportation Engineers, Traffic Engineering Council Newsletter, 2000
- What's Happening in Bicycle Friendly Long Beach, Institute of Transportation Engineers Northeast, Southern, Canadian, and Western Districts 2011-2012.
- Complete Streets and CEQA, Los Angeles County and San Diego Region Walk Symposiums, 2012.
- Pedestrians, Bicycles, and Roundabouts, Green Building Council, Long Beach, 2012.
- Separated Bikeways: Improving Safety and Operation through Design, Institute of Transportation Engineers Annual Meeting with CITE, 2017.
- Model Design Manual for Living Streets, Contributing Author, Los Angeles County Dept of Public Health, 2010.
- Complete Streets in LA, 1870-1980, Presentation to Los Angeles Regional Planning History Group Symposium, 2016
- New Technology in Bicycle Facilities. Presentation to SCAG Toolbox Tuesdays. 2015
- Bikeway Engineering in the 70s, a Turning Point. Transportation Research Board, 2018
- Divided by Design. Roads and Bridges Magazine, March 2018
- Width Requirements for Bikeways, A Level of Service Approach. Master's Thesis, UC Davis 1976.