



LARKSPUR SMART STATION AREA PLAN



FAQ

Revised March 4, 2014
Station Area Plan webpage: www.cityoflarkspur.org/SAP

This document presents answers to commonly asked questions by the community regarding the Larkspur SMART Station Area Plan, a land use and circulation vision plan for the area extending a ½-mile around the future Larkspur SMART station.

Questions about the Station Area Plan often overlap with other related topics largely regional in nature, including the relationship to regional land use and transportation planning (Plan Bay Area), Priority Development Areas, and State-mandated affordable housing requirements. For this reason, questions and answers have been grouped into three sections:

- Larkspur SMART Station Area Plan
- Regional Planning
- Transit-Oriented Development

Draft Larkspur SMART Station Area Plan

1. What is the Larkspur SMART Station Area Plan, purpose and scope?

Response: The **Draft Larkspur SMART Station Area Plan (SAP)** is a land use and circulation vision plan for the area surrounding the future Larkspur SMART station (which includes a portion of Greenbrae, the Larkspur Landing area, and the Redwood Highway area). As a vision plan, the Draft SAP recommends land use policy amendments (General Plan and zoning ordinance) and circulation system improvements in the station area. The draft SAP- to be released in March 2014- will be the culmination of over two years of work by the City of Larkspur, consultants, and a citizen advisory committee (16 community members and ex-officio representatives) to identify a community “vision” for future development of the station area. The Draft SAP is not a development project and does not grant land use entitlements to development of properties within the station area. (See question #5 for full discussion of the City’s development review process.)

In 2011, the City applied for and received \$480,000 in grant funding through the Station Area Planning program sponsored by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) to prepare the SAP and associated Environmental Impact Report (EIR). The City signed a funding agreement with MTC/ABAG in April 2012, which included a work program that established project deliverables (work products) and schedule. The grant has a lifetime of 30 months. The grant funding agreement between the City and ABAG/MTC does not obligate or require any of the development proposed by the draft SAP to be constructed (see question #5 which discusses the City’s development review process).

To date, preparation of the draft SAP has been informed by regular meetings of the Citizen Advisory Committee (7 meetings from May 2012-June 2013), three public workshops (a fourth workshop held December 3, 2013), and three meetings of a Technical Advisory Committee, in compliance the adopted work program and schedule. The City has completed five out of the eight project deliverables established in the work program. A draft SAP and draft SAP EIR will

be the sixth and seventh deliverables, respectively, to be released to the public and submitted to MTC/ABAG in January 2014. Adoption of the final SAP and certification of the final SAP EIR will be the eighth project deliverable due to MTC/ABAG by September 2014.

2. What does the Draft Larkspur SMART Station Area Plan recommend?

Response: The draft SAP presents a land use and circulation scenario for the station area as supported by the Citizen Advisory Committee and formulated based on community input and City long-range planning goals. The Plan will propose amendments to the Larkspur General Plan and zoning ordinance to allow a range of development intensities and densities. The table below represents a potential *maximum* buildout of the Plan:

Land Use	Total Existing in Study Area	New Development on Opportunity Sites	Total Development in Study Area (Existing + Proposed)
Office/Public	750,800 sf	39,500 sf	790,300 sf
Hotel	119,000 sf	60,000 sf	179,000 sf
Retail/Cinema	317,000 sf	77,500 sf	394,500 sf
Residential	1,350 dus	920 dus	2,270 dus
Industrial/ Auto-Serving	245,000 sf	0 sf	245,000 sf

The Land Use Alternatives Report (project deliverable 3) provides extensive detail regarding the proposed development in the SAP. The Report can be viewed online along with all other SAP documents here: www.cityoflarkspur.org/SAPdocuments

3. What is the relationship of the Draft Larkspur Station Area Plan to the Larkspur General Plan?

Response: The draft SAP recommends that the City amend the General Plan land use designations for certain parcels in the station area to allow a mix of land uses, rather than separate land use designations for separate uses. The proposed Mixed-Use land designation would allow residential, retail, and office uses at higher densities and intensities than are currently permitted by the City's General Plan and Zoning Ordinance. Thus, adoption of the policy recommendations in the SAP by the City Council would trigger a new, separate process to amend the General Plan. The General Plan amendment process would require public outreach and review, environmental analysis of the proposed amendments, and public hearings before both the Planning Commission and City Council for adoption.

Every local jurisdiction in California is required to prepare and adopt a General Plan, which presents a 'blueprint' or 'master plan' for the jurisdiction over a timeframe of 10-20 years. The State law governing General Plans is located in California Government Code, Article 5 (Authority for and Scope of General Plans), commencing at Section 65300. State law requires that General Plans contain seven elements that present a coordinated suite of goals, policies

and programs that:

- a. Reflect the key interests and priorities of the community to guide future growth;
- b. Establish land use designations with limitations on intensity and density (e.g., residential density of up to 20 dwelling units per gross acre) for all areas of the jurisdiction;
- c. Establish circulation and transportation standards to coincide with the projected land use that is envisioned by the Plan;
- d. Reflect standards that address, among others: maintaining the quality of life, community character, resource protection, safety and community services, and economic vitality; and
- e. Provide a guide for assessing development and land use.

As the General Plan is the backbone to many decisions that are made by a jurisdiction, it is adopted as a legislative act by the decision-making body (e.g., City Council). Further, a General Plan is subject to environmental review per the provisions of the California Environmental Quality Act (CEQA).

The Larkspur General Plan was adopted in 1990 with a projected timeframe to the year 2010. The City initiated a General Plan update process in 2010 that has been put on hold while the City undertakes station area planning process.

4. What growth is envisioned by the Larkspur SMART Station Area Plan? How many new residences does the Plan propose and where?

Response: The preferred land use scenario for the draft SAP was developed based on input from the Citizen Advisory Committee, station area residents, property owners, and business owners, as well as other interested Larkspur and Marin County residents. The preferred land use scenario proposes development of a maximum of 920 dwelling units and new commercial, retail, and office space (see table in question #2, above) at seven opportunity sites located in the Larkspur Landing and Greenbrae portions of the SMART station area. Please note that these figures represent the *maximum* buildout of the development proposed by the SAP and do not necessarily indicate the amount of development that may actually occur.

The SAP also proposes new public recreation areas and improvements to existing recreational facilities in the station area. Transportation infrastructure improvements are proposed throughout the station area to accommodate the growth anticipated in the SAP and to mitigate existing traffic congestion in the corridor.

The SAP does not propose land use changes in the Redwood Highway neighborhood due to significant infrastructure costs, adjacent sensitive environment and habitats, and safety hazards currently challenging development in that neighborhood. The City has identified General Plan update process as the best vehicle to address the future of this area.

Land Use Opportunity Sites

1. Larkspur Ferry Terminal. The Ferry Terminal site could accommodate a new residential neighborhood, replacement parking for ferry commuters, and an improved waterfront promenade and public park. Similar to other waterfront parks in southern Marin (Dunphy Park in Sausalito and Shoreline Park in Tiburon), this space could be the location for civic events or simply for daily enjoyment by residents and commuters. A small amount of ground-floor retail development, such as a café or convenience store, could be included for use by residents, park users, and ferry commuters.
2. Sanitary District #1 Site. Potential development on the Sanitary District #1 site at 2000 Larkspur Landing Circle would represent a significant change from the current condition, as the site is vacant at this time. Under the preferred plan, the allowable uses on the Sanitary District #1 site include residential, office, and hotel. This is consistent with the currently approved plan, with the exception that the preferred plan would allow for higher residential densities.
3. Marin Airporter. The Marin Airporter site is small but well-located close to the planned SMART station. It serves an important regional transportation role and also accommodates some ferry-related parking. The General Plan includes a goal to retain the Marin Airporter, and there was strong sentiment among community members to ensure the viability of this use. As a consequence, the site is proposed to remain in use for the Marin Airporter, with the opportunity to construct a parking structure to accommodate a variety of parking needs and ground-level office space or waiting areas.
4. Marin Country Mart. The Marin Country Mart site has the potential to accommodate new residential uses and additional retail. New residential development could be added around the periphery of the existing retail center, or the entire site could be redeveloped with vertical mixed-use (residential over a retail center). With the addition of residential on this site as well as others in the Larkspur Landing Area, a grocery store, desired by many residents, might become viable and would be logically located here. Parking to replace existing spaces and support additional development would be located in a new parking structure.
5. Larkspur Landing Offices and Cinema. The Larkspur Landing Offices and Cinema site is located directly adjacent to the planned SMART station site and adjoins the train tracks. These conditions make the site most suitable for additional office development in line with the plan goals to foster transit supportive development. There is also potential for expansion of the cinema and some additional retail amenities.
6. Drake's Landing Office Park and Offices on Drake's Landing Road. There is potential for some additional office and residential infill development on the two identified opportunity sites west of Highway 101 and south of Sir Francis Drake Boulevard. This development could occur on the existing surface parking lots or as part of site redevelopment over time.

Implementation of the Larkspur SMART Station Area plan would require amendments to the Larkspur General Plan and zoning ordinance. These amendments are discussed in detail in the Draft SAP and SMART Station Area Plan EIR, which will be released to the public in March 2014.

5. How would development proposals for individual properties within the station area be regulated by the City of Larkspur?

The draft SAP recommends that the City amend the General Plan land use designations for certain parcels in the station area to allow a mix of land uses, rather than separate land use designations for separate uses. The proposed Mixed-Use land designation would allow residential, retail, and office uses at higher densities and intensities than are currently permitted by the City's General Plan and Zoning Ordinance. Thus, adoption of the policy recommendations in the SAP by the City Council would trigger a new, separate process to amend the General Plan. The General Plan amendment process would require public outreach and review, environmental analysis of the proposed amendments, and public hearings before both the Planning Commission and City Council for adoption.

The draft SAP recommends retaining the existing **Planned Development zoning designation** for properties within the station area (excluding the Redwood Highway area, which will retain the existing L-1, Light Industrial, and MHP, mobile home park zoning designations, and the Greenbrae Hills residential neighborhood, which will retain its existing R-1, First Residential zoning district designation).

The **Planned Development (PD)** zoning district is a unique zoning designation in the Larkspur Municipal Code that requires a two-phase process of development review: adoption of a preliminary development plan by the City Council, by ordinance; and adoption of a precise development plan by the City Council, by ordinance.

- a. **A preliminary development plan** shows the proposed land uses and densities and their interrelationship; however, it does not establish the precise location of uses, configuration of parcels or the engineering feasibility of the proposed development.
- b. Following approval of a preliminary development plan or specific plan, **a precise development plan** is required showing in detail the design and location of all buildings and their relationship to functional areas (parking, recreation or open space, landscaping, etc.) and multi-modal circulation. The precise development plan may also include anticipated project phasing, deed covenants of parcel ownership, and a subdivision improvement agreement committing to the completion of public infrastructure improvements.

The precise development plan must be in substantial conformance with the approved preliminary development plan or specific plan. If recommended for approval by the Planning Commission and approved by the City Council, the precise development plan is incorporated into the previous ordinance approving the preliminary plan and further amendments to the zoning map may be adopted as necessary. Modifications to an adopted PD district must go through the same application process as required for establishment of the district.

Both the preliminary development plan and the precise development plan are subject to discretionary review before both the Planning Commission and City Council, as well as environmental review under the **California Environmental Quality Act (CEQA)**. In order to approve a Precise Development plan establishing development standards on a property zoned PD, the City Council must be able to make the following findings:

- (1) The proposed P-D district, or a given phase thereof, can be substantially completed within four years of the establishment of the P-D district;
- (2) That each individual phase of development, as well as the total development, can exist as an independent unit capable of creating an environment of sustained desirability and stability or that adequate assurance will be provided that such objective will be attained; that the uses proposed will not be detrimental to present and potential surrounding uses, but will have a beneficial effect which could not adequately be achieved under other zoning districts;
- (3) That the streets and thoroughfares proposed are suitable and adequate to carry anticipated traffic, and increased densities will not generate traffic in such amounts as to overload the street network outside the P-D districts;
- (4) That any proposed commercial development can be justified economically at the locations proposed to provide for adequate commercial facilities of the types proposed;
- (5) That any exception from standard ordinance requirements is warranted by the design and amenities incorporated in the precise site plan in accord with adopted policy of the planning commission and the City Council;
- (6) That the area surrounding said development can be planned and zoned in coordination and substantial compatibility with the proposed development;
- (7) That the P-D district is in conformance with the general plan of the City; and
- (8) That existing or proposed utility services are adequate for the population densities proposed.

These findings address, among other topics, **compatibility** of the proposed project with the surrounding neighborhood, **traffic impacts** of the proposed project, adequacy of **utility services** to serve the proposed project, and **consistency** with the City's General Plan. If these findings cannot be made, the project cannot be approved.

6. Will development proposed by the Station Area Plan be similar to that approved by the Town of Corte Madera at the former WinCup factory site (195 Tamal Vista Boulevard, Corte Madera)?

The City of Larkspur requires an extensive planning approval process for all development projects within the PD zoning district. (Please see question #5, above, for full discussion of the PD approval process). Any development proposal for any particular site within the station area would be subject to a public review process prior to granting of entitlements (development rights).

Development of the former WinCup property in Corte Madera at 195 Tamal Vista Boulevard, currently under construction, was approved by the Corte Madera Town Council in February 2012. Implementation Program LU-4.4.a of the Corte Madera General Plan (adopted in 2009) called for an amendment to the Zoning Ordinance to allow a Mixed-Use Gateway Overlay District (MUGD) at the former WinCup property, which would allow redevelopment with 180 dwelling units of high density residential with local serving commercial uses as a Permitted Use (allowed by right).

By amending the zoning of the site to MUGD, with the mix of uses, densities, and intensities specified in the General Plan, the Town of Corte Madera ensured that redevelopment of that site would only require a design review permit from the Corte Madera Planning Commission, so long as the proposed development complied with the development regulations established in the General Plan and zoning ordinance.

In September 2011, the MacFarlane Development Company, LLC, submitted an application for redevelopment of the site that complied with the development regulations for the site established in the Corte Madera General Plan. Accordingly, the project was subject only to design review permits from the Corte Madera Planning Commission.

In November 2011, a study session for the project was held before the Corte Madera Planning Commission to allow an opportunity for the Commission and the public to weigh in on the project's proposed design. Following the study session, the developer revised the plans in response to the feedback received and the final design was presented at a formal public hearing before the Corte Madera Planning Commission in December 2011. The developer presented an environmental evaluation and a new Traffic Report and Acoustical Analysis Report to evaluate the potential project impacts and compare the results of the report to those prepared for the General Plan Program EIR. Both of these studies concluded that the applicant's proposed Project would not result in any new impacts beyond those previously identified in the 2009 General Plan Program EIR.

The Corte Madera Planning Commission approved the proposed project in December 2011. In February 2012, the Corte Madera Town Council upheld the project's approval on appeal. The Town Council required the developer to pay a sum of \$250,000 to be placed in the Traffic Improvement Fund to be used for transportation improvements.

7. If high density housing is built as a result of implementation of the Station Area Plan, what are the tax consequences, particularly to schools and public safety?

Response: If the SAP is adopted by the City Council, and the recommended amendments to the General Plan and zoning ordinance are subsequently adopted (see discussion under questions #3 and #5 above), there is potential for new residential development to occur in the station area at higher densities than currently exist. The tax consequences of any new housing development is not based on the density of the housing but based on the ownership of the housing. All privately owned housing units in Larkspur (whether market rate or below market rate) are leveraged property taxes and special assessments including payments for parcel taxes for Tamalpais Union High School District and Larkspur-Corte Madera School District, Ross Valley paramedic tax, and others. Rental developments that are owned by non-profit housing organizations are exempt from property taxes but are charged for special assessments including school parcel taxes.

All new housing developments are required to pay school impact fees per State Law, as determined by the impacted school district. The fees are intended to fund necessary physical or programming improvements to the impacted schools to mitigate the impact of additional students.

Currently, students in the Larkspur Landing area (north of Corte Madera Creek and east of Highway 101) attend schools in the San Rafael City Schools District. Students in the Greenbrae area attend schools in the Kentfield School District and Tamalpais Union High School District. Students in the Redwood Highway area attend schools in the Larkspur-Corte Madera School District and Tamalpais Union High School District.

During preparation of the Draft SAP, the City’s environmental consultants communicated with the various school districts with jurisdiction in the station area to inform them of the potential for new students over the lifetime of the Plan, and to consult with them regarding capacity for these students. The SAP EIR analyzes the number of new students that would be generated at maximum buildout of the Draft SAP, as follows:

District	New Students Generated by Maximum Buildout
San Rafael City Schools	Elementary/Middle: 311
	High School: 78
	Total: 389
Tamalpais Union High School	6
Kentfield School	25
Larkspur-Corte Madera	0

As shown in the above table, the majority of new students that could potentially be generated over the lifetime of the Draft Plan at maximum buildout would fall within the San Rafael City Schools District. An analysis of school district capacity in the Draft SAP EIR finds that capacity exists to accommodate the potential growth in high school students, but that existing facilities both in the San Rafael City Schools and Kentfield School Districts are not sufficient to accommodate the potential growth in elementary and middle school students. The San Rafael City School District is currently in the early stages of a master planning process to address existing and anticipated facility constraints and capacity issues.

8. The Larkspur SMART Station Area is designated as a “Transit Neighborhood” place type. What is this place type, and is it appropriate for the Larkspur station area?

Response: The Station Area and Land Use Planning program (renamed the PDA Planning program in 2012; please note, the Larkspur SMART Station Area is not a PDA) is a planning assistance grant program offered by MTC to local jurisdictions interested in **transit-oriented development (TOD)**. The program identifies specific types of station areas, or “place types,” differentiated by the desired mix of land uses in the area and their density and intensity (as described in the *Station Area Planning Manual*¹). Station area place types range from dense, urban mixed use neighborhoods (e.g., Downtown San Francisco and Oakland) to low-density, semi-rural neighborhoods (e.g. Windsor).

When a jurisdiction applies for a planning grant under this program, a place type must be identified that is suitable to the conditions and environment of the area being designated. The “Transit Neighborhood” place type was identified by the Larkspur City Council as being the

¹ Metropolitan Transportation Commission, October 18, 2007

most appropriate and applicable for the Larkspur Station Area. The Transit Neighborhood place type is described as follows:

“Transit Neighborhoods are primarily residential areas that are served by rail service or multiple bus lines that connect at one location. Transit neighborhoods have low-to-moderate densities, and the transit stations are often a more minor focus of activity than more intense place types. Secondary transit service is usually less frequent and well-connected. Transit Neighborhoods usually do not have enough residential density to support a large amount of local-serving retail, but can be served by nodes of retail activity. Transit Neighborhoods can be found in both older urbanized areas developed as “streetcar suburbs” or in more recently developed suburban areas. Transit Neighborhoods often have significant development opportunities, so, if desired by the surrounding community, there is the potential to transform these areas into Urban Neighborhoods. Transit Neighborhoods are usually just as intense within a 1/4-mile radius of the transit station as they are within 1/2-mile.”

The Larkspur SMART station area differs slightly from this place type definition in that its transit nodes (ferry, bus lines, and planned train station) are not located in a central location.

Suggested development guidelines for the transit neighborhood place type include:

- A mix of low-rise, townhomes, some mid-rise and small lot single family housing units.
- A target range of 1,500 - 4,000 housing units within a half-mile of the primary transit station (Existing development + projected growth)
- A net residential project density of 20-50 dwelling units per acre (note: **applies to new development only**; gross density is lower)

The place types presented in the station area planning guidelines are not a perfect fit for every community. In light of that fact, the guidelines emphasize that planning decisions should be based on local conditions and community vision, and the guidelines themselves are not binding or mandatory.

It is important to clarify/note that the target range described for each place type represents existing housing units plus projected growth (range of 1,500-4,000 units). The SMART station area currently has 1,456 built and/or approved housing units.²

9. What is the relationship between the Station Area Plan and SMART ridership?

Response: The SMART EIR, certified in 2008, projects a daily weekday ridership for the Larkspur SMART station at approximately 400 daily weekday riders (combined north and southbound). In formulating these development projections, SMART did not anticipate the increased residential or employment development in the SMART station area that is contemplated in the draft SAP.

10. How will water be provided for new residents? Is there an adequate water supply to accommodate the projected growth?

² Larkspur Station Area Plan Existing Conditions Report, 31 July 2012.

Response: Larkspur's water provider is the Marin Municipal Water District (MMWD). Water service and capacity for the City's projected growth under the current General Plan was analyzed in the Larkspur General Plan Environmental Impact Report (1990). The draft Station Area Plan EIR will include an analysis of water service capacity for the household and employment growth projected in the draft SAP.

MMWD's 2010 *Urban Water Management Plan* addresses the following:

- Existing water supplies and transmission system
- Projected water demands in the MMWD's service area over the next 25 years
- Projected water supplies available to MMWD over the next 25 years, the reliability of that supply, and general plans for water supply projects
- Current and planned water conservation activities
- A water shortage contingency analysis
- A comparison of water supply and water demand over the next 25 years under different hydrological assumptions (normal year, single dry year, multiple dry years)

This 2010 *Urban Water Management Plan (UWMP)* concludes that there is adequate water supply to meet demand for the next 20-25 years based on projected growth in existing adopted General Plans, as well as the most recent available household growth projections provided by ABAG, throughout its service area.

The MMWD will publish a new UWMP in 2015, and they anticipate inclusion of updated growth estimates for the City of Larkspur based on the Station Area Plan. At this time, it is estimated that current MMWD storage facilities and distribution network are adequate to accommodate the projected growth; however, MMWD will require that water supply be confirmed for specific projects as they are proposed.

11. Does placement of high density housing adjacent or close to US 101 expose new residents to health hazards? What are the health effects on new residents and how will this be analyzed?

Response: Depending upon the specific location of housing and its proximity to US 101, residents could be exposed to particulates and air pollutants that would be a health hazard or increased cancer risk. High concentrations of pollutants are typically found and documented along freeways (e.g., US 101) and along diesel- fueled rail service lines (e.g., SMART), so air pollutant exposure to "sensitive receptors" (e.g., residential land use, schools and day care) is a concern for the lands within the Larkspur Station Area Plan.

In 2005, the California Air Resource Board (CARB) published the, *Air Quality and Land Use Handbook: A Community Health Perspective*. This handbook was prepared to present information and data on health risks and recommendations on siting certain sensitive land uses near sources of air pollutants. This handbook reports that on a typical urban freeway (truck traffic of 10,000- 20,000/day), diesel particulate matter (PM) represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate

matter and premature mortality in those with existing cardiovascular disease. This handbook cites several studies including one Southern California study³ which showed measured concentrations of vehicle-related pollutants, including ultra-fine particles, drop dramatically within 100 meters (approximately 300 feet) of the 710 and 405 freeways. Another study looked at the validity of using distance from a roadway as a measure of exposure to traffic related air pollution⁴. This study showed that concentrations of traffic related pollutants declined with distance from the road, primarily in the first 150 meters (or about 500 feet).

State law restricts the siting of new schools within 500 feet of a freeway, urban roadways with 100,000 vehicles/day, or rural roadways with 50,000 vehicles with some exceptions. However, no such requirements apply to the siting of residences, day care centers, playgrounds, or medical facilities. In the traffic-related studies the additional health risk attributable to the proximity effect was strongest within 1,000 feet.

Around the time this handbook was published, CARB adopted a policy that recommends that local jurisdictions avoid siting a “sensitive receptor” use within 500 feet of a freeway/highway and within 200 feet of a rail line or rail station. However, this does not mean that sensitive receptor uses are prohibited within these setback zones; rather, if such uses are proposed within these areas, CARB and the Bay Area Air Quality Management District recommend that a Risk and Hazards Assessment be prepared to determine resident exposure to health and cancer risks.

As the Larkspur Station Area Plan includes recommendations that would allow residential use and development within close proximity to US 101 and the SMART rail line and station, a Risk Hazards Assessment will need to be prepared when or if additional land use planning is conducted for this area, or when an individual development project is proposed. A Risk and Hazards Assessment would be prepared in conjunction with environmental review required for any General Plan Amendment, Rezoning or development project proposed within these setback zones.

It should be noted that the Diesel multiple unit (DMU) vehicles to be used for the SMART passenger rail system are contain both passenger accommodations and propulsion (diesel engines located below the passenger compartment). Because they are self-propelled, no large locomotive engine is required. As a result, a DMU has less noise and lower emissions when compared to a locomotive-hauled train system. SMART is also considering the use a biodiesel, a clean-burning alternative fuel produced from domestic, renewable resources (most commonly soybeans). Biodiesel contains no petroleum, but can be blended with petroleum diesel. The environmental and public health impacts of emissions from the SMART rail line are analyzed in SMART’s Final Environmental Impact Report and Final Supplemental Environmental Impact Report, which are available for public review on SMART’s website: <http://www2.sonomamarintrain.org/index.php/docs/eir/>

³ Zhu, Yifang et. al. “Concentration and Size Distribution of Ultrafine Particles Near a Major Highway.” Journal of the Air & Waste Management Association, Vol. 52. September 2002.

⁴ Roorda-Knape, Mirjam C. et. al. “Traffic related air pollution in city districts near motorways.” Science of the Total Environment, Volume 235. September 1999,

Regional Planning

12. What is the Association of Bay Area Governments (ABAG)?

Response: All nine counties of the Bay Area are voluntary members of the **Association of Bay Area Governments (ABAG)**, which serves as the Bay Area's **Council of Governments (COG)** as mandated by state law. Metropolitan regions across the state are similarly governed by regional COGs, as mandated by state law.

ABAG is governed by a 38-member Executive Board of local elected officials, and an elected official from each member city, town, and county serves as a delegate to ABAG's General Assembly. The Executive Board makes operating decisions, appoints committee members, authorizes expenditures, and recommends policy. The General Assembly determines policy, adopts the annual budget and work program, decides how ABAG's resources will be allocated, and reviews policy actions of ABAG's Executive Board. Each delegate has one vote, and a majority of city and county votes are required for action.

As a COG, ABAG: a) Projects and monitors jobs and housing growth for the region; and b) administers the State- mandated Regional Housing Need Allocation (RHNA).

- a. Since 1978, ABAG has been responsible for developing and publishing jobs and housing growth projections for the region. The projections are based in part on the growth and development projections of local general plans, input from local agencies and trends in the economy. Historically, ABAG published the jobs and housing projections every two to four years. Beginning in 2013, the jobs and housing projections will be updated every four years. Local jurisdictions are not bound by or required to comply with the jobs/housing projections.
- b. The **Regional Housing Need Allocation (RHNA)** is determined for each municipal region of California (e.g., the Bay Area) by the State of California **Department of Housing and Community Development (HCD)**. Required by State law since 1981, RHNA represents a target number for planning and accommodating new housing units at a broad range of affordability levels.

The RHNA for the Bay Area is provided by HCD and it is the job of ABAG, in coordination with the nine Bay Area counties and respective cities/towns, to distribute this allocation to each community. While RHNA does not require municipalities to build housing to meet this allocation, each jurisdiction's Housing Element of the General Plan must demonstrate, to the satisfaction of HCD, that the local municipality's zoning and property inventory can accommodate the allocation⁵. Approved and proposed housing development projects are counted toward meeting the RHNA. Once incorporated into the local Housing Element and adopted by the local municipality, the Housing Element must be certified by HCD. There is no legal obligation for housing units identified in the RHNA to be constructed.

⁵ Government Code Section 65583 et seq

13. What is the Metropolitan Transportation Commission (MTC) and what is its role?

Response: MTC is a statutorily created regional transportation planning agency⁶ that oversees and manages transportation planning and coordination for the Bay Area region. MTC is designated by Federal law⁷ as the Metropolitan Planning Organization for the nine-county San Francisco Bay Area and as such, MTC must adopt and regularly update a long-range **regional transportation plan (RTP)**.

The RTP establishes the long-term transportation needs and improvements for the Bay Area and allocates funding for their implementation. In addition, MTC is responsible for coordinating with the State (Caltrans) on transportation projects for the region, and administering funds and grants received from the State and Federal level to the congestion management agencies throughout the nine Bay Area counties. The majority of Larkspur road and infrastructure improvements are funded by funds and grants provided by MTC through the RTP.

MTC's work is guided by a 21-member policy board, with 18 of the commissioners designated as voting members. Sixteen of the voting commissioners are appointed by local elected officials in each county. The two most populous counties, Alameda and Santa Clara, each have three representatives on the Commission: the county board of supervisors selects one member; the mayors of the cities within the county collectively appoint another; and the mayors of the biggest cities in these two counties (Oakland in Alameda County and San Jose in Santa Clara County) each appoint a representative.

14. What is the Transportation Authority of Marin?

The Transportation Authority of Marin (TAM) is designated as both the congestion management agency and the transportation sales tax authority for Marin County. As the **Congestion Management Agency (CMA)**, TAM addresses Marin's unique transportation issues, fulfilling the legislative requirements of Propositions 111 and 116, approved in June 1990. TAM was designated the sales tax authority in 2004, for the purpose of administering the 1/2 cent transportation sales tax in Marin County, passed by voters in November 2004 as Measure A.

The Authority is responsible for managing a variety of transportation projects and programs in Marin County, receiving federal, state, regional, and local funds, working closely with all eleven cities and towns as well as the county. The TAM Board includes representatives from each of the cities and towns in Marin County, plus the five members of the Board of Supervisors. The TAM Board meets monthly and operates under a variety of committees. TAM does not construct or manage infrastructure projects; rather, it facilitates project coordination and funding.

15. What is Plan Bay Area?

Response: Plan Bay Area is a regional land use and transportation plan prepared in response

⁶ Government Code Section 66500 et seq

⁷ Title 23, United States Code, Section 134 (d)

to two state laws (AB32 and SB375) adopted to combat global warming and achieve statewide reductions in GHG emissions by 2035.

- a. Origin and Intent of Plan Bay Area - AB32 (2006) and SB375 (2008). Assembly Bill 32 (AB32), the California Global Warming Solutions Act of 2006, requires a statewide reduction in **greenhouse gas (GHG)** emissions to 1990 levels by 2020. In 2008 Senate Bill 375 (SB375) was adopted, which requires all regional metropolitan transportation organizations in the state (including MTC) to develop a **Sustainable Communities Strategy (SCS)**, a new element of the Regional Transportation Plan (see question #13, above). The Bay Area's target for GHG emissions reductions is 7% per capita by 2020 and 15% reduction per capita by 2035.

The transportation sector is the primary contributor of GHG emissions in California and nationwide. The SCS presents a coordinated land use and transportation framework intended to reduce the amount of vehicle miles traveled, including planning for more housing and jobs in already developed areas and around or near transit.

While the SCS presents population and jobs projections for each metropolitan region in California, local jurisdictions retain local control over land use planning and are not required to adopt the land use and transportation policies contained in the SCS.

- b. "Plan Bay Area" = Sustainable Communities Strategy (SCS) for the region. As required by SB375, ABAG and MTC partnered with the Bay Area Air Quality Management District (BAAQMD) and the San Francisco **Bay Conservation and Development Commission (BCDC)** to develop the SCS for the Bay Area region, entitled "Plan Bay Area." Plan Bay Area aims to focus future growth in and around a sustainable transportation system in the inner or urban areas of the Bay Area, thus reducing the need to accommodate housing growth in the undeveloped "greenfield" areas of the region. This development model is intended to reduce reliance on vehicle travel, consequently reducing GHG emissions. Plan Bay Area is an element of MTC's RTP, which sets the long-term transportation needs (infrastructure and transit improvements) for the region and the funding to implement these needs. The percentage of growth projected by Plan Bay Area for Marin County represents a small percentage of the total growth projected for the region.

- c. Elements of Plan Bay Area

- 1) Land Use- The land use component of Plan Bay Area addresses two policy areas: the Regional Housing Need Allocation (RHNA), and the long-range, 2040 growth projections for jobs and housing. Under SB 375 and the SCS mandate, the RHNA cycle will synchronize with the update cycle of the RTP (every 8 years beginning in 2014). This synchronization is critical as the RHNA cycle represents local jurisdictions' obligation to update the Housing Element of the General Plan. In order to receive transportation funding through the RTP, a local jurisdiction must have a certified Housing Element.
- 2) Resource Protection- A key tool in Plan Bay Area is the designation of **Priority Conservation Areas (PCAs)**. A PCA is a geographic area designated for

conservation/protection because of its significant resource value to the region. Federal **Surface Transportation Program (STP)** funds are available to support projects that will preserve and enhance the natural, economic and social value of these lands, including productive agricultural lands, recreation opportunities, unique ecosystems and areas critical for climate protection. Plan Bay Area allocates \$1.25 million to Marin County PCA's.

- 3) Transportation Plan and Investment Strategy- This component of the Plan covers planned regional transportation improvements and investments to support projected growth, as well as the funding needed to achieve the improvements/investments. The Plan recommends that investments be focused toward: a) maintaining the existing road and bridge system; b) maintaining existing transit; c) expanding the existing road and bridge system; and d) expanding transit (e.g., SMART rail service for the North Bay).

16. How has the City tracked and participated in the Plan Bay Area process? How is the City of Larkspur represented on ABAG and MTC?

Response: The City has closely tracked the Plan Bay Area process since it was initiated in 2008. A Marin County SCS Ad Hoc Committee was formed to track, review and report-out to the Transportation Authority of Marin (TAM) on countywide issues, recommendations and positions during all phases of the Plan Bay Area process. The SCS Ad Hoc Committee is comprised of elected officials from each Marin city/town/county, and met regularly as the SCS was being developed. Mayor Dan Hillmer represents the City on this committee and is also the City's TAM Board representative.

Larkspur city staff spent many hours during the Plan Bay Area process reviewing materials as they became available and reporting to the City Council and Planning Commission on findings and recommendations. During this process, the City commented to ABAG/MTC on specific recommendations, projections and studies that were prepared. The following are several milestones in the Plan Bay Area process for which the City Council took action or responded:

- a. On January 31, 2012, City submitted written comments to ABAG/MTC on the Plan Bay Area alternatives.
- b. On April 20, 2012, the City submitted written comments to ABAG/MTC on the Jobs-Housing Connection Scenario ("Preferred Scenario").
- c. On May 15, 2013, the City Council was presented with a summary of the Draft Plan Bay Area and Draft EIR.
- d. On May 16, 2013, the City submitted written comments to ABAG/MTC summarizing comments on the Plan Bay Area Draft EIR.

Through all phases of tracking and written comments on the Plan Bay Area, the City expressed concerns to ABAG/MTC on the aggressive jobs and housing growth projections that had been identified for Larkspur. Early comments to ABAG/MTC effectively resulted in some reductions to these growth projections.

The City of Larkspur's representative to the ABAG General Assembly is Council member Catherine Way (alternate, Councilmember Kevin Haroff). Supervisor Rice serves as the ABAG

Executive Board member for Marin. Supervisor Kinsey serves as the MTC Commissioner for Marin. All voting on ABAG/MTC actions are done by the ABAG Executive Board and the MTC Commission.

17. What is a Priority Development Area (PDA)?

Response: A **Priority Development Area (PDA)** is a jurisdiction-designated area (i.e., a jurisdiction must choose to establish it) that is close to, along, or within transit nodes and connections and is earmarked for concentrated growth, particularly housing growth. Examples of transit nodes and connections include rail stations (e.g., SMART rail), major transportation corridors (e.g., US 101) or transit centers (e.g., the Larkspur Ferry Terminal). Promoting growth in the already-developed areas of the Bay region reduces pressure for growth to continue outward into undeveloped “greenfield” areas, which has been the historic pattern of growth in the region. Further, concentrating growth in already developed areas provides greater opportunities for people to live closer to work and use transit, which results in fewer vehicle miles traveled and GHG emissions.

The PDA program was established as a component of Plan Bay Area as a funding tool for communities. PDA’s receive a higher percentage of projected growth in Plan Bay Area (due to proximity to transit), in exchange for better access to funding for infrastructure and other improvements. Plan Bay Area estimates that in most Bay Area counties, 80% of the projected growth will occur in the PDA’s. By comparison, 37% of the projected Marin County housing growth to 2040 would occur in the PDA’s. While it is the intent of a PDA to provide concentrated, higher density development, how this projected growth is planned is fully controlled by the local jurisdiction.

The PDA concept essentially mirrors the land use concept of “transit-oriented development,” with mixed use and higher densities concentrated around transit. (See Transit-Oriented Development questions in the third section of this document.)

18. What are the potential benefits available by designating a PDA? What are the obligations of a PDA designation for an area?

Response: Per Plan Bay Area, the “benefits” of a PDA designation are: a) a greater opportunity for funds and grants to implement transportation and land use projects to address the local impact of a regional transit project; and b) the potential for development projects within the PDA to qualify for a more streamlined CEQA review process. Specifically:

- a. For the North Bay, 50% of the funds/grants that are made available for transportation projects on a countywide level are earmarked for PDA’s and projects that are contiguous and feed into the PDA’s. The remaining 50% of the funds/grants are set aside for all other projects throughout the County that are located outside of a PDA. So, simply stated, transportation projects within a PDA have less competition, and are given high priority to receive such funds/grants.
- b. CEQA streamlining is available, should a jurisdiction elect to do so, for a development project located within a PDA. However, it is not mandatory for a local jurisdiction to exercise or offer such streamlining.

Ten million dollars in One Bay Area grant (OBAG) funds are available to Marin County in the current funding cycle (through 2016). The Transportation Authority of Marin will distribute these funds among a number of transportation and planning projects within Marin. Fifty percent of OBAG funds available in Marin are earmarked for projects in PDA's.

There are no tangible "obligations" contained in Plan Bay Area or in grant funding agreements if a city commits to a PDA designation. While the intent of the PDA designation is to plan for higher density and more concentrated development within PDA's, how this is achieved is at the discretion of each local jurisdiction. Local jurisdictions are not required to plan or zone for the employment or population growth projected in Plan Bay Area, nor obligated or required to build high density affordable housing within the designated PDA.

19. Does designation of a PDA change the zoning designations in the area?

Response: There is no "zoning" associated with a PDA designation. A PDA is a designation that allows a local jurisdiction to apply for dedicated funding to address the local impact of regional transit such as SMART, or a specific area around transit. Plan Bay Area assigns a percentage of projected housing and job growth (through 2040) to PDA's throughout the region. However, growth is not assigned to any specific sites within a PDA, and Plan Bay Area does not mandate that sites within the PDA be re-zoned to accommodate this growth, nor does it require that high density or affordable housing be built. Local jurisdictions have full discretion to plan for and/or rezone properties in a PDA.

20. Would a PDA designation result in more housing and commercial development in the area than areas without the designation?

Response: The intent of a PDA is to promote concentrated housing and commercial development within a geographic area than if the area were not designated as a PDA. However, unless there are major changes in a city's transportation/traffic policies (major amendments to the General Plan) and changes to the zoning of properties, a PDA designation would *not result* in the development of more housing and commercial use for jobs than without the PDA for the following reasons:

- a. While the Plan Bay Area projects higher growth in jobs and housing by 2040 for PDA's, there is no mandate under SB375 or Plan Bay Area that this growth be zoned by the local jurisdiction. Further, there is no mandate or certainty that the extent of housing or commercial use for jobs projected in Plan Bay Area will be built.
- b. Even though a local jurisdiction has control over and implements the planning and zoning of an area, actual development and construction is also dictated by the market. Local jurisdictions (cities and counties) are not property developers. Local government is not required to build the housing units but is required to provide the regulatory framework, generally zoning, that will allow the private sector to build the units that are necessary to address the needs of each income category.

21. What are the implications for a local jurisdiction if it does not meet or plan for the 2040 jobs/housing projection numbers presented in the Plan Bay Area?

Response: Plan Bay Area is intended to offer incentives to local jurisdictions to plan for the

2040 jobs/housing projections by encouraging the designation of PDA's. The incentives are to encourage CEQA streamlining and offer first priority access to funds and grants to promote planning and development for PDA's. However, how a local jurisdiction plans for future development within its community is locally-controlled.

It is important to note that ABAG has published jobs and housing growth projections for the region for nearly 40 years. Although, in part, the growth projections are derived from local jurisdiction input (e.g., through local General Plans), the ABAG growth projections have never been imposed as a mandate on local jurisdictions. However, the ABAG growth projections do inform the Regional Housing Needs Allocation (RHNA) released for each jurisdiction in the Bay Area. Jurisdictions must demonstrate in the Housing Element that zoning regulations are adequate to meet the RHNA.

22. How does Plan Bay Area impact local land use control?

Response: Plan Bay Area does not directly impact local land use control. While it is the intent of Plan Bay Area to promote the PDA concept of concentrating growth as a means of reducing vehicle miles traveled and GHG emissions, how local jurisdictions are planned for growth is fully controlled by the local jurisdiction. Plan Bay Area, particularly the jobs and housing growth projections and RHNA elements, as well as the incentive for "CEQA streamlining" have generated a great amount of concern that local land use control is undermined. Staff presents the following response:

- a. The RHNA has been a State-mandate since 1981. Local jurisdictions have and will continue to be required to adopt a Housing Element that complies with RHNA.
- b. The Plan Bay Area Draft Environmental Impact Report (DEIR) includes the following statements regarding local control over land use decisions:

"MTC and ABAG have no direct control over local land use planning. Nonetheless, regional efforts will be made through OBAG funding to assist local plan alignment with the Plan." (DEIR page 2.3-33)

"Local jurisdictions have local land use authority, meaning that in the case where the proposed Plan conflicts with local zoning or specific plans, the local jurisdiction would have ultimate land use authority." (DEIR page 2.3-42)

"The proposed Plan will only be implemented insofar as local jurisdictions adopt its policies and recommendations." (DEIR page 2.3-42)

Plan Bay Area presents incentives (primarily financial through the designation of PDA) offered to local jurisdictions for promoting concentrated growth around transit. Setting aside the incentive of potential CEQA streamlining, the true incentive is the ability to secure transportation dollars. More money for transportation projects is provided to local jurisdictions that have designated PDA's.

23. Plan Bay Area supports streamlining environmental review (referred to as "CEQA Streamlining") for certain development projects ("Transit Priority Projects"). Are local

jurisdictions required to implement streamlined environmental review for projects located in a PDA?

Response: Local jurisdictions are not required to implement streamlined environmental review for projects located in a PDA. The CEQA streamlining guidelines explained below are optional for the jurisdiction to pursue, should the project in question meet specific criteria (see discussion below). The extent and scope of environmental review that is conducted on a development project proposed within a PDA is at the full discretion of the local jurisdictions.

SB375 mandates that a Sustainable Communities Strategy incorporate environmental review streamlining provisions for assessing "Transit Priority Projects" (TPP) and certain mixed-use residential projects (must designate at least 75 percent of the total square footage for residential use and be consistent with Plan Bay Area) . Transit Priority Projects are defined as projects that: (a) have at least 50% residential use, (b) have a density of at least 20 units per net acre, (c) are within a half mile of a regional transit corridor with 15 minute service at peak times (called a "Transit Priority Area"). The Transit Priority Project meet specific environmental criteria, including but not limited to:

- The project is not more than 8 acres and not more than 200 residential units.
- The project must be adequately served by existing utilities
- The project site must not contain wetlands, riparian areas, endangered species or significant habitat.
- The project is subject to a preliminary endangered assessment by a registered environmental assessor to determine hazardous substance release.
- The project does not contain significant historical resources.
- The project does not contain significant public health risks, such as seismic activity, as defined in the statute.
- The buildings on the site are 15 percent more energy efficient than as required by Title 24, chapter 6 and landscaping is designed to achieve 25 percent less water usage.

These projects are not required to analyze growth-inducing impacts, project and cumulative impacts from vehicle trips on global warming and the regional transportation network, and a reduced residential density alternative. All other environmental impact areas under CEQA will need to be analyzed.

Since the exemption standards are specific and numerous, most development in Larkspur (including that proposed in the Draft Station Area Plan) would not be eligible for such exemptions. In addition, the exemption standards themselves require review of certain types of environmental impacts such as public services, biological impacts, historic resources, health risk and hazardous substances. So, the City will retain authority to analyze environmental issues in these areas even if the "exemption" applies.

Other recent streamlining provisions that the Legislature has enacted to promote infill and transit-oriented development include SB 743, enacted in October, which states that for projects located within a transit priority area, lack of adequate parking, aesthetic impacts,

and vehicle delay (as measured by level of service or other similar metrics) are not considered a significant environmental impact under CEQA. This bill also permits, for projects within a transit priority area, measurement of vehicle miles traveled as an acceptable metric to quantify transportation impacts.

However, to date, none of these CEQA provisions have usurped local powers to require environmental review in a way that is broadly applicable and significantly narrows the types of environmental impacts that a local agency may analyze under CEQA.

Transit-Oriented Development

24. Is there evidence that transit-oriented development (TOD) reduces traffic and highway congestion? Have there been any studies or special traffic generation rates developed that are unique to TOD?

Response: When preparing traffic studies for development projects, traffic engineers typically rely on the *Institute of Transportation Engineers (ITE) Trip Generation Manual*. The ITE manual provides trip generation rates for individual types of land use based on surveys of actual development projects.

What is typically employed in Larkspur when studying traffic for such projects is an individual assessment of each use in the project (as it provides a more conservative approach). However, as TOD has become a more common planning and development practice in recent years, there has been focus on studying the unique traffic generation characteristics of this type of development.

The transportation engineering firm Fehr & Peers has done extensive research on this topic and has developed a trip generation model referred to as “MDX” that factors in transit proximity and availability of services, and which supports a lower trip generation than the ITE manual. The model is based on surveys of TOD’s throughout the Bay Area and the nation, and Fehr & Peers has used the MDX model successfully in the preparation of Environmental Impact Reports (EIR) throughout California.

Although many available case studies take place in more urban settings with access to more robust transit than the Larkspur SMART station area, the studies show that a mix of concentrated residential development and supporting commercial services near transit reduces trip generation. These findings are published in *Getting Trip Generation Right-Eliminating the Bias Against Mixed-Use Development*, by Jerry Waters, Brian Bochner and Reid Ewing, transportation engineers (APA, 2013). Based on a study of 27 mixed-use development sites throughout the US, the publication reports:

- a. On average, the land uses in a mixed-use development would generate 49% more traffic if they were distributed among single-use sites in suburban settings.
- b. The current mixed-use trip generation rate that is published in the *ITE Trip Generation Manual* overestimates peak hour traffic by an average of 35%.

These findings are based on a combination of factors (referred to as the “D Variables”), that include, among others, density (higher densities shorten trip lengths), diversity of uses (including destination uses such as places of employment and local-serving retail) and demographics. This model has been approved for use by the EPA, peer-reviewed in the ASCE Journal of Urban Planning and Development and is recommended for use on mixed-use TOD projects by the San Diego Association of Governments.

In gathering traffic data for the Draft SAP EIR, Fehr & Peers found that *current* trip generation rates for the Larkspur SMART station area are less than what would be predicted using the trip generation rates in the ITE manual. This is likely due to the existing transit options available in the station area for residents, and the mix of uses that help to reduce multiple automobile trips to and from the area. (Existing trip generation rates for the station area are discussed in detail in the draft SAP EIR.)

25. What evidence is there that residents of TOD located in suburban locations similar to the Larkspur SMART station area will use transit (e.g., SMART, bus service, ferry)?

Response: Numerous studies show that locating housing near transit reduces vehicle trips and car ownership rates, and increases transit ridership. One study found a 15-25 percent decrease in vehicle trips per dwelling unit for TOD in low-density suburbs. It is difficult to find a similar case of suburban location examples showing evidence proving transit use because research findings vary depending on relative travel times with automobiles, the extensiveness of transit service, and links to job centers, educational opportunities, and cultural facilities. However, most studies do find that transit use increases with more links to these activity centers.

Sources:

- “Vehicle Trip Reduction Impacts of Transit-Oriented Housing” by Robert Cervero and G. B. Arrington, *Journal of Public Transportation*, Vol. 11, No. 3, 2008:
<http://www.nctr.usf.edu/jpt/pdf/JPT11-3Cervero.pdf>
- “Transit-Oriented Development in the United States: Experiences, Challenges, and Prospects”: http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_102.pdf
- “Effects of TOD on Housing, Parking, and Travel” by Robert Cervero and G. B. Arrington, Transportation Research Board, 2008:
http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_128.pdf

26. What evidence is there that TOD or high density housing reduces GHG emissions?

Response: The shape our cities take through development, infrastructure and transportation has a powerful effect on GHG production. Transportation contributes an estimated 38% of all GHG emissions in California, 48% of Marin’s GHG emissions, and 59%⁸ of Larkspur’s community emissions.

⁸ City of Larkspur Climate Action Plan, 2010.

Numerous studies show that locating housing near transit reduces vehicle trips and car ownership rates, resulting in decreased GHG emissions and transportation costs in comparison to suburban development without transit linkages.

Sources:

- <http://www.arb.ca.gov/cc/inventory/data/graph/graph.htm>
- http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ashx
- http://docs.cityofsanrafael.org/CityMgr/Green/San%20Rafael%202010%20GHG%20Inventory%20Report%2006%2025%2013_FINAL.pdf
- http://www.chpc.net/dnld/FullReport_CHPCAffordableTOD013113.pdf
- <http://www.cnt.org/repository/TOD-Potential-GHG-Emissions-Growth.FINAL.pdf>
- <http://reconnectingamerica.org/news-center/reconnecting-america-news/2012/tod-and-climate-change-webinar/>