



One Shields Avenue
Davis, California 95616-8579

May 20, 2005

Katherine Hess, Community Development Administrator
City of Davis, Community Development Department
23 Russell Blvd
Davis, CA 95616

Dear Ms. Hess:

Based on the FEIR responses to Unitrans comments on the DEIR, we would like to offer a few additional comments for the Planning Commission, as part of their deliberation.

Our initial comments (designated as 95-3 and 95-9) questioned the methodology used to estimate trips, suggesting that the transit trips were greatly underestimated and that a potentially significant impact was therefore missed. The response to comment 95-3 states that the new added bus line can “accommodate an even higher number of trips than estimated” and “therefore... transit impacts...are not anticipated.” Based on this statement, the new bus line is being characterized as a mitigation measure which pre-empts the need to accurately estimate the impact of the project on transit services. Therefore, it would seem appropriate to include the funding of the bus line in the mitigation measures (and in the mitigation monitoring plan). This would provide the necessary assurance that bus line will indeed mitigate the impact of the added ridership, since the DEIR did not provide an adequate analysis of what the impact on transit may be.

Related to the funding of the transit line, several responses (including 95-9) state that the bus line will be funded “indefinitely” as a condition of the City’s approval. It is not clear whether that is supposed to mean “in perpetuity” (as suggested by some comments) or if it means for an “undefined period of time.” It would seem that the intent is the former, and we ask that this be clarified both in the mitigation measure and when the development agreement is drafted.

Finally, I do not understand the response to 95-2 (2nd paragraph), which states that the policies of the City of Davis prevent any roadway facilities from being overbuilt. That is clearly not accurate. There are many examples of roadway facilities that would be consistent with the city’s policies but would not be necessary given higher rates of bicycling and transit use (such as four lanes where two would be adequate or a double turn lane where a single lane would suffice). Consequently, it is equally important for an EIR not to over-estimate traffic demand, since providing facilities

with excess capacity runs counters to the encouragement of alternative modes. It is inappropriate to argue that a highly auto-centric travel model is "conservative" (because the actual traffic may be less than estimated), as this does not recognize that there is also a negative impact from the expanded roadway facility itself.

Thank you for the opportunity to comment.

Sincerely,

Anthony Palmere
Assistant General Manager, Administration

c: Geoff Straw, Unitrans General Manager