

City of Oceanside Bicycle and Pedestrian Committee

BikeWalk Oceanside

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March 26, 2020

Mr. Russ Cunningham, Principal Planner
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

RE: Input on Draft Implementing Ordinances for Oceanside Climate Action Plan

Dear Mr. Cunningham,

The Oceanside Bicycle and Pedestrian Committee is a citizen's advisory committee whose role is to advise the City on programs and projects which improve bicycling and walking in the community. The Committee's membership includes over 75 Oceanside residents who are concerned about bicycling and walking infrastructure and opportunities. We are also very concerned about the climate change crisis and have discussed this issue with City staff on numerous occasions, in particular as it relates to cycling and walking as alternative modes to reduce VMT and greenhouse gases.

In our advisory capacity, Committee members attended the City's March 3 Open House on the Climate Action Plan draft implementing ordinances and spoke at length with staff about the draft Transportation Demand Management Ordinance. The Committee subsequently discussed this item at our March 9 monthly meeting and authorized the Chairman to submit formal comments on the draft. Our comments follow:

- The draft TDM ordinance needs an introductory or preamble paragraph that explains/justifies why the City is adopting this TDM ordinance. Perhaps something like the following would be appropriate:

Oceanside's Climate Action Plan recognizes that 48 percent of the total greenhouse gas emissions generated in the City are the result of private motor vehicle operation. Therefore, it is critical that measures be taken to reduce motor vehicle miles traveled (VMT) and thereby reduce greenhouse gases. The Transportation Demand Management Ordinance establishes requirements for larger-sized employers to develop TDM Plans, as a means to reduce one of the largest sources of private motor vehicle VMT – the commute trip.

For reference, I am including a copy of Carlsbad's ordinance implementing the TDM elements of their Climate Action Plan, in which they spell out the specific purposes of the Plan in implementing the CAP. Carlsbad has also developed a TDM Handbook for use by developers of applicable projects in coming up with their Plans.

- The draft TDM ordinance does not go far enough in reducing solo-occupant auto driving at the City's larger employers. First, the draft only applies to "new" industrial and

commercial developments that generate more than 100 daily employee trips”. We believe the ordinance should apply to ALL employers of this size in the City, as a matter of equity as well as in support of the effort to reduce VMT. This is not a big “ask”.

SANDAG’s iCommute program can provide much of the assistance required to establish each employer’s TDM plan, if they will permit SANDAG outreach staff to visit their site, conduct a transportation survey, and help identify viable alternative modes and strategies for that site. I have included a copy of the SANDAG iCommute Employer Services brochure for reference.

- The ordinance should use clearer language as regards “100 daily employee trips”. Either state that this is 100 one-way employee trips (i.e., 50 employees), or state it applies to employers with 50 or more employees.
- The draft Ordinance only calls for a 10 percent reduction in solo-occupant auto trips. If each employee at a company would just commit to taking alternative modes one day a week, that would produce a 20 percent reduction in vehicle miles travelled and associated greenhouse gases. That seems like a reasonable goal to establish. At a minimum, this should be established as a “stretch” goal in the ordinance.
- The City should be setting an example by establishing its own Transportation Demand Management (TDM) Plan for City employees, not just requiring it of NEW employers. This includes demonstrating leadership in strategies to reduce single-occupant auto driving, such as employee incentives to use transit or alternative modes, and instituting revised parking policies that incentivize alternative modes such as Dividend Account Parking or other comparable programs.

The Committee supports the City’s effort to establish a Climate Action Plan with quantifiable goals and strategies that support all transportation modes through a stronger TDM ordinance. We thank the City for the opportunity to provide input.

Sincerely,



Tom Lichterman
Chairman

cc: Members of the Oceanside Bicycle and Pedestrian Committee

ATTACHMENTS:

City of Carlsbad TDM Ordinance
SANDAG iCommute Employer Services Brochure