



August 20, 2009

Christopher Calfee, Special Counsel
ATTN: CEQA Guidelines
California Resources Agency
1017 L Street, #2223
Sacramento, CA 95814
CEQA.Rulemaking@resources.ca.gov
Facsimile: (916) 653-8102

ATTN: CEQA Guidelines Amendments

Dear Mr. Calfee:

The Santa Clara Valley Transportation Authority (VTA) appreciates this opportunity to comment on the CEQA guidelines, particularly the transportation checklist. VTA is the Congestion Management Agency for Santa Clara County as well as the transit operator; as such we are very committed to multimodal planning (transit, roadway, bicycles and pedestrians).

The existing transportation section of the checklist has no questions pertaining to pedestrian or bicycle mobility, transit operations or traffic safety. This has resulted in less than adequate attention being given to impacts to bicycle, pedestrian, and transit operations.

VTA staff supports many of the changes proposed by the OPR in the *Preliminary Draft CEQA Guidelines Amendments*. However, the amendments proposed by OPR do not contain new questions on impacts to nonmotorized or transit operations. We strongly support the recommended revisions to the transportation checklist as submitted by the State Department of Transportation in its letter dated February 2, 2009. Moreover, we have some slight wording modifications, particularly items d), f), g), h) and i).

In summary, VTA staff would like to recommend the following, which was unanimously supported by the VTA Technical Advisory Committee (TAC) and the VTA Bicycle / Pedestrian Advisory Committee (BPAC): (1) add a new preamble to Appendix G - Initial Study Checklist; 2) add a new question on Vehicle Miles Traveled (VMT) in Section VII. Greenhouse Gas Emissions; and 3) changes to the transportation checklist. These are described more fully below.

1) New preamble to Appendix G - Initial Study Checklist

VTa supports OPR's recommendation for the inclusion of the preamble to the initial study checklist.

2) New question on Vehicle-Miles Traveled (VMT) in Section VII Greenhouse Gas Emissions

We strongly support Caltrans' recommendation for the inclusion of a question regarding vehicle miles of travel (VMT). We think this question would be appropriate in *Section VII - Greenhouse Gas Emissions* since green house gases such as CO2 are produced in direct proportion to vehicle-miles traveled.

3) Proposed Changes to CEQA Checklist, Section XVI. Transportation/Traffic

We support all the changes recommended by Caltrans with some minor wording changes. Please consider the following changes and additions to the Checklist, which were based on Caltrans' letter and our analysis, particularly d), f), g), h) and i).

a) ~~Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?~~

Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all modes of transportation including nonmotorized travel and all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian walkways, bicycle paths, and mass transit?

b) Exceed, ~~either individually or cumulatively,~~ a Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

c) Result in a change in air traffic patterns, including either an increase in air traffic levels or a change in flight patterns or location that results in substantial safety risks to vehicles, bicycles or pedestrians?

d) ~~Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?~~ Substantially decrease traffic safety due to a design feature (e.g., sharp curves or additional and/or inadequate intersections) or incompatible uses (e.g., farm equipment)? (e.g. due to adversely affecting sight distance, facilitating high speeds or by mixing incompatible uses, such as farm equipment)?

e) Result in inadequate emergency access?

f) ~~Result in inadequate parking capacity?~~

g) ~~Conflict with adopted policies, plans, or programs supporting or expanding regarding public transit or non-motorized transportation? alternative transportation (e.g., bus turnouts, bicycle racks)?~~

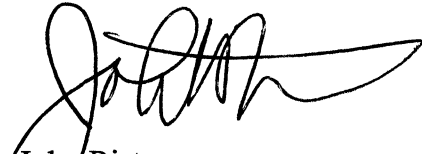
g) (Would the project) Affect the quality of service for nonmotorized and transit modes based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.) for multimodal performance of the highway, street, rail and/or bike path (nonmotorized) transportation facilities?

h) (Would the project) Reduce, sever, eliminate or decrease the safety of pedestrian or bicycle circulation or access, or preclude future planned or approved bicycle or pedestrian circulation?

i) (Would the project) Cause a degradation of the performance or availability of all transit including buses, light or heavy rail for people or goods movement?

In conclusion, we appreciate your consideration of incorporating our recommended changes in the CEQA Guidelines Amendments. Please feel free to contact me or Michelle DeRobertis (408-321-5716) of my staff should you have any questions regarding this letter.

Sincerely,



John Ristow
Chief CMA Officer

cc: Jay Norvell, Ken McGuire Caltrans HQ
VTA Board of Directors
VTA TAC members
VTA BPAC members