

Lockey, Heather@CNRA

From: Jeffrey Lacap <jlacap@smcgov.org>
Sent: Thursday, March 15, 2018 3:10 PM
To: CEQA Guidelines@CNRA
Subject: Comment Letter
Attachments: CCAG Comments on Resources Agency CEQA Rule-making_March2018_FINAL.pdf

To Whom It May Concern,

Attached is the City/County Association of Governments of San Mateo County's comments to the CNRA regarding the amendments and additions to the State CEQA guidelines. Please let me know if you have any questions.

Thanks,
Jeff Lacap

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March 15, 2018

Christopher Calfee, Deputy Secretary and General Counsel
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
Fax: 916-653-8102
Email: CEQA.Guidelines@resources.ca.gov

RE: Amendments and Additions to the State CEQA Guidelines – January 26, 2018

Dear Mr. Calfee:

Thank you for the opportunity to provide comments and suggestions regarding the proposed amendments and additions to the State CEQA Guidelines dated January 26, 2018. Our comments are on the proposed new Section 15064.3 Determining the Significance of Transportation Impacts and issues related to the implementation of Senate Bill 743 (Steinberg 2013) followed by comments on the technical advisory on evaluating transportation impacts in CEQA.

Page 11, (c) Applicability If any unexpected delays occur, we would request that the implementation date should be set for one year after the CEQA adoption process concludes. To allow ample time for the implementation of SB 743, lead agencies will need at least a one-year period from the adoption of the new CEQA guidelines to prepare for implementation. This could potentially lead an extension of the required implementation date beyond January 1, 2020 if the CEQA adoption process is not concluded in 2019.

Page 68, Appendix G: Link to Congestion Management Programs The draft guidelines propose removal of the reference to the Congestion Management Program (CMP) and any conflict with the CMP included in the existing CEQA checklist, Appendix G, Item B. The CMP legislation requires a Congestion Management Agency (CMA) to use automobile level of service (LOS) in the bi-annual monitoring of a County's network of freeway and arterial routes and has a land use analysis program that assesses impacts of development on the regional transportation system. The CMP legislation also states that the land use analysis program should be coordinated with CEQA efforts. Therefore, a statement that requires projects sponsors to consider the CMP land use analysis program requirements related to the project should continue to be included in the CEQA checklist. This could be accomplished by modifying language in the existing language to read 'Conflict with an applicable Congestion Management Program element such as land use analysis program established by the county congestion management agency for designated CMP roadways.'

Comments pertaining to the Technical Advisory on Evaluating Transportation Impacts in CEQA (November 2017)

C/CAG recommends that flexibility be included for lead agencies to use countywide average VMT per capita rather than the proposed regional VMT per capita or city VMT per capita. The overall region that includes San Mateo County is the nine-county San Francisco Bay Area, which ranges from counties that are largely rural and suburban (Napa, Sonoma) to the highly urbanized City/County of San Francisco. San Mateo County falls in between with rural communities like Half Moon Bay along the coast and urbanized areas such as San Mateo and South San Francisco. We believe that measuring average VMT at the county level would be more appropriate given the diverse area such as the Bay Area. This will help the projects in unincorporated areas by providing a clear and streamlined method for assessing the threshold of significance.

We appreciate including a list of projects that would not likely lead to a substantial or measurable increase in VMT. We also appreciate the case study of the highway capacity expansion project; however we would appreciate more examples of other types of transportation projects in the technical advisory. We recommend that OPR develop additional case studies that demonstrate the application of the CEQA guidelines which include analysis of modification to the following types of roadway projects: local arterial roadways, conventional highways, and freeway interchanges.

While reviewing the technical advisory we feel that the methodology for roadway projects seems oversimplified. An example is estimation of VMT impacts from roadway expansion projects on page 20. The equation doesn't consider the type of roadway project, where the project is located, or the usage of the proposed project (Roadway capacity project in rural vs. urban areas produce different VMT). We would like to see example methodologies that account for these factors.

Much emphasis was put on lead agencies to make the final decision on how to approach the guidelines. We think it would be helpful if different approaches were presented to help local agencies come to a final decision that is comprehensive and addresses the goals of the guidelines. A section within the technical advisory that presents various options would be helpful for lead agencies to construct customized guidelines.

We appreciate the opportunity to comment on the proposed amendments and additions to the CEQA guidelines and the proposed technical guidance proposed by OPR.

Thank you for your consideration.

Sincerely,


Sandy Wong
C/CAG Executive Director