

Lockey, Heather@CNRA

From: Saravana Suthanthira <SSuthanthira@alamedactc.org>
Sent: Wednesday, March 14, 2018 10:46 AM
To: CEQA Guidelines@CNRA
Cc: Chris Ganson; Tess Lengyel; Carolyn Clevenger
Subject: Alameda CTC's response to additions and amendment to CEQA guidelines
Attachments: ACTCResponse_26Jan2018CEQAGuidelines_SB743_20180313.pdf

Hi Chris,

The attached letter includes Alameda CTC's comments in response to the Notice of Proposed Rulemaking regarding amendment and additions to the CEQA Guidelines, released on January 26, 2018. We commend the extensive outreach efforts of OPR to make this significant milestone updating the CEQA guidelines to implement SB 743. We certainly appreciate the opportunity to participate in this process.

Please let me know if there are any questions. Thank you.

Saravana Suthanthira, AICP

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March 13, 2018

Christopher Calfee
Deputy Secretary and General Counsel
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

**Subject: Notice of Proposed Rulemaking Regarding
Amendments and Additions to the State CEQA
Guidelines, January 26, 2018**

Dear Mr. Calfee:

Thank you for the opportunity to provide comments regarding the proposed amendments to the California Environmental Quality Act (CEQA) Guidelines dated January 26, 2018, related to the implementation of Senate Bill 743 (SB 743). The comments from the Alameda County Transportation Commission (Alameda CTC) are related to the proposed new Section 15064.3 "Determining the Significance of Transportation Impacts" and issues and related changes to Appendix G of the guidelines.

Overall, Alameda CTC commends the Governor's Office of Planning and Research (OPR) for its extensive and participatory process to engage various stakeholders to update the CEQA Guidelines for evaluating transportation impacts, as required by SB 743. Alameda CTC appreciates OPR for developing several versions of the guidelines prior to finalizing them for the rulemaking process by incorporating numerous stakeholder comments from across the state over a four-year period. We again appreciate the opportunity to participate in the entire guidelines development process through the State Working Group and the Bay Area SB 743 Working Group, which Alameda CTC convened. Alameda CTC reaffirms its commitment to achieving regional and state goals related to greenhouse gas (GHG) emissions reductions by supporting transportation options that reduce vehicle miles traveled (VMT).

Alameda CTC has the following comments on the updated CEQA Guidelines released on January 26, 2018 as part of the rulemaking process:

- **Appendix G:** The revision to Appendix G of the CEQA Guidelines removed the reference to Congestion Management Program (CMP) consistency. While we understand that the prior checklist language referred to the CMP Level of Service, which is fundamentally in conflict with the objective of SB 743, many CMPs include multimodal performance standards that should be referenced as part of land development review. Many CMPs have expanded to also monitor performance of alternative transportation modes. Further, we anticipate that the CMP statute will be reformed soon to be consistent with SB 375 and SB 743. Therefore, we recommend that Appendix G retain a specific reference to the CMPs to ensure that lead agencies continue to assess consistency as part of CEQA, ensuring coordination of analysis and efficiency of review. We suggest the following language be added to the “Transportation” section of Appendix G:

“Would the project conflict with an applicable multimodal transportation infrastructure management program and related standards that are consistent with SB 375 and SB 743 established by the local congestion management agency?”

- **Threshold of Significance:** The Technical Advisory released in November 2017 identifies specific thresholds of significance for the VMT metric for various types of projects. Page 12, “Recommended Thresholds for Residential Projects” identifies significance of threshold as “exceeding a level of 15 percent below existing VMT per capita.” It further defines that “existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita.” For projects in the unincorporated county areas, the guidelines state that the local agency can compare a residential project’s VMT to (1) the region’s VMT per capita, or (2) the aggregate population-weighted VMT per capita of all cities in the region. In many instances, for a very diverse region such as the Bay Area, applying a regional-level VMT average may be either too penalizing (for suburban areas) or may lead to evading meeting the VMT objective (for core urban areas). Adding the option of a county-level VMT average to the different geography level threshold options would provide a balanced middle-ground option to avoid these extremes while aligning with the climate change goals of SB 743. This will also help the projects in the unincorporated areas with a clear and streamlined method for assessing the threshold of significance. Therefore, Alameda CTC requests that a county-level VMT threshold be added to the baseline or existing VMT threshold options for comparison.

Thank you for your consideration of Alameda CTC’s comments in this important rulemaking process to finalize the CEQA Guidelines. Please contact Tess Lengyel, Deputy Executive Director of Planning and Policy (tlengyel@alamedactc.org; 510.208.7428), if you have any questions.

Sincerely,



ARTHUR L. DAO
Executive Director
Alameda County Transportation Commission

cc: Chris Ganson, Office of Planning and Research