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Via email: CEQA.GHG@opr.ca.gov

Ms. Terry Roberts
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Office of Planning and Research
P.O. Box 3022
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Dear Ms. Roberts:

Introduction

Thank you for the opportunity to submit comments concerning the Office of Planning and Research's (OPR) **Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions**. AC Transit believes that responding to greenhouse gas emissions and climate change should be a top priority at all levels of government. While the District is generally supportive of the changes which OPR proposes, it is concerned about the Guidelines' failure to address the impact of road narrowing on transit operations. AC Transit believes that this concern could be addressed by adding an item to the transportation section of the checklist that would require cities and reviewing jurisdictions to assess the impacts that a project may have on transit. The suggested language is repeated later in this comment letter, but is provided here for ease of reference: "(Would the project) Substantially interfere with, or cause delay to, existing transit bus operations and/or preclude planned transit improvements?"

AC Transit provides bus public transportation to a service area of some 1.5 million people in Oakland, Berkeley, Fremont and Western Alameda and Contra Costa Counties. AC Transit is an independent special district which includes 13 cities and the unincorporated portions of 2 counties.

AC Transit believes that the agency's mission and sphere of concern extends beyond simply providing bus service to approximately 200,000 passengers daily, important as that service is. AC Transit seeks to not only provide transit, but to create conditions which allow for the most environmentally beneficial and cost effective use of transit. For this reason, AC Transit has been an advocate of smart growth and transit-oriented development (TOD) for over 25 years, since a time when those terms were not in common use. The District sees transit-oriented development as critical to reducing fossil fuel use and achieving reductions in both conventional pollutants and greenhouse gases.

Changes to the CEQA Guidelines

As a supporter of TOD, AC Transit sees the benefits of the changes that OPR has proposed for the CEQA Guidelines, Appendix G, Environmental Checklist form. In the transportation section, OPR proposes to eliminate exceeding Congestion Management Agency roadway standards as a potentially significant environmental impact. OPR also proposes to eliminate inadequate parking capacity as a potentially significant environmental impact. The District understands how automobile Level of Service and parking standards have hindered desirable infill

development and made such development more costly. These proposed changes are useful and important steps.

The Guideline changes would also remove the following item from the transportation section of the checklist: "(Would the project) 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 the roads or congestion at intersection)." It would replace this roadway capacity criterion with the following one: "(Would the project) Result in a substantial increase in either the number of vehicle trips, roadway vehicle volume, or vehicle miles traveled." This change puts the focus on projects which would increase the level of vehicle activity. These increases are in fact the root cause of a great many traffic problems. The changes would also benefit Bus Rapid Transit projects by focusing on the project's overall transportation impacts rather than potential intersection level private vehicle congestion.

The Changes and "Road Diets"

However, the criteria as stated do not address an issue of considerable importance to AC Transit as a bus transit operator. Some cities have reduced the number of vehicle lanes on their roadways, a practice sometimes called a "road diet." In some instances, reducing the number of vehicle travel lanes has caused roadway congestion and substantial slowing of bus service. Road diets can also make it impossible to operate more efficient and effective forms of bus service, such as Rapid bus lines. These outcomes discourage people from using the bus and therefore can increase the generation of greenhouse gases and pollutants from cars. The current Level of Service (LOS) provisions only partially address the needs of bus transit, but they can serve to highlight roadway changes which would negatively impact bus operations. If those provisions are simply eliminated, the District, as a transit operator, would have no recourse under CEQA in a road-narrowing situation. It seems likely that other transit operators will encounter this issue, if they have not already done so.

This issue could be dealt with if the checklist had an item explicitly requiring cities and reviewing jurisdictions to assess the impact of projects on transit. AC Transit suggests the following item be added to the transportation section of the checklist: "(Would the project) Substantially interfere with, or cause delay to, existing transit bus operations and/or preclude planned transit improvements." With this provision, OPR could eliminate language about roadway capacity while still requiring analysis of the impact of road capacity reductions on transit.

Thank you for your consideration of these comments. If you have any questions about this letter, please contact Nathan Landau, Senior Transportation Planner, at 510-891-4792.

Sincerely,



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