



November 14, 2014

Christopher Calfee
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: SB 743/CEQA Guidelines Update

Dear Mr. Calfee,

Thank you for the opportunity to review the "Updating Transportation Impacts Analysis in the CEQA Guidelines" Preliminary Discussion Draft Report dated August 6, 2014. We commend the Governor's Office of Planning and Research (OPR) for undertaking such a large planning effort leading to a more sustainable development pattern and a reduction in greenhouse gas emissions. In general, AMBAG supports the change from level of service (LOS) to vehicle miles travelled (VMT) as the new measurement in CEQA and we look forward to OPR for guidance on implementing SB 743 in our planning initiatives for the near future. We believe this change will help further advance and improve our 2035 Metropolitan Transportation Plan (MTP)/Sustainable Communities Strategy (SCS) for future updates. The following comments and concerns are offered for your consideration.

Though we support using a metric such as VMT that better assesses the environmental impacts of a project as proposed in the draft CEQA Guidelines under SB 743, we are concerned about our limited resources and ability to calculate VMT at a sub-area, community, and/or project level. As one of the smaller Metropolitan Planning Organization (MPO) in California, AMBAG receives limited planning funds. In addition, our current Regional Travel Demand Model (RTDM) has limited capability to analyze VMT associated with local development projects and instead was developed to analyze impacts at the region or countywide level. For this reason, we request additional clarity in the final guidelines as to how these guidelines can be used by MPO to evaluate the environmental impact of their regional plans (MTP/SCS). Given that it is the responsibility of the MPOs to prepare each region's SCS, OPR should provide more details and specific examples as to how these guideline applies to MPO's plans and program to evaluate VMT and can be used or apply at a project level VMT by local agencies for the specific project(s).

Additionally, as a rural area, we have concerns regarding rural VMT analyses and incentives for transit in small towns. We encourage OPR to preserve local agencies' flexibilities to assess VMT impact.

Again, thank you for the opportunity to provide input on the draft guidelines. We hope that this new method of assessing VMT impacts through CEQA will help enable and positively influence future development and transportation projects in the Monterey Bay Area. Please feel free to contact me at (831) 264-5086 or via email at hadamson@ambag.org if you have any questions.

Sincerely,

Heather Adamson, AICP
Principal Planner