

**From:** Brett Walinski  
**Sent:** Tuesday, August 19, 2014 5:06 PM  
**To:** CEQA Guidelines  
**Subject:** Comments on New CEQA Guidelines

Hello,

Transportation planning and traffic engineering is my profession and I have authored hundreds of transportation studies.

Page 13, Section b1: Consider applying a lower threshold to the number of trips added for a new development. For example, it is likely that 5 single family homes in a remote part of a City could have higher than average VMT. Should this be considered an impact? The relative contribution of such small projects should be excluded from this type of analysis.

Page 14, Section b1: Clarify types of land uses - Commercial, residential, office. Is the proposed average VMT threshold relative to all residential uses in the regional planning area? If this is the case, then a suburban City may find it difficult for any project to achieve VMTs lower than the average if they are in the same region as major Cities. The average VMT should use a baseline at the local (City) level, not the regional level. In addition, single family homes generate more trips than multi-family. Are these land use types lumped together into one average, or are they considered separate land uses? This should be clarified in the text.

Page 14, Section 2 and Section 3d: Nearly every roadway widening project that relieves traffic congestion will increase vehicle speeds. Increasing speeds in major corridors decreases vehicle emissions. Section 3D, "Increase Vehicle Speeds" should be eliminated. The discussion of safety improvements on roadways are adequately described in Section 2. In addition, in areas with dense land uses and congested traffic conditions, a travel model will almost always show that increasing roadway capacity will induce some trips. The proposed guidelines should not make it more difficult to reduce congestion on roads by making physical improvements. Their purpose should be to allow sustainable development to more easily move forward.

Thank you for considering my comments.

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