



November 20, 2014

Mr. Ken Alex, Director
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

RE: Preliminary Discussion Draft of Proposed Changes to the California Environmental Quality Act Guidelines Implementing Senate Bill 743

Dear Mr. Alex:

The Rural Counties Task Force (RCTF) submits the following comments in response to the *Preliminary Discussion Draft of Updates to the California Environmental Quality Act (CEQA) Guidelines Implementing Senate Bill 743 (Steinberg, 2013)* prepared by the Governor's Office of Planning and Research (OPR). The RCTF represents the 26 Rural Regional Transportation Planning Agencies and Local Transportation Commissions in California that coordinate with local, state, and federal agencies to plan, fund, design, and construct transportation projects that address statewide sustainability and environmental goals. The RCTF was established in 1988 in partnership with California Transportation Commission (CTC) to provide a direct opportunity for the rural counties to remain involved with changing statewide transportation policies and programs and serve in an advisory role.

The RCTF recognizes the need to establish an alternative to Level of Service (LOS) as a criteria for determining the significance of transportation impacts of projects. We also recognize the need to promote infill, transit oriented development, and a diversity of land uses within Transit Priority Areas (TPAs) to assist in the reduction of greenhouse gas (GHG) emissions. However, the RCTF has significant concerns about the applicability of Vehicle Miles Traveled (VMT) as an alternative to LOS in rural areas.

It is critical that the distinct differences that exist between the rural and metropolitan areas are acknowledged and that additional time is taken by OPR to carefully analyze the applicability of the proposed VMT metric in rural areas. In order to avoid unintended consequences, we encourage you to conduct rural area case studies and research prior to application of the VMT metric statewide. The RCTF also recommends that OPR include flexibility in the guidelines to allow for lead agencies to optionally select VMT analysis, as appropriate, for a specific project type. We also encourage that you work with the RCTF, Rural County Representatives of California, California State Association of Counties, and the California League of Cities to develop a pilot

program to determine the applicability of VMT analysis in rural areas before implementing it statewide.

Many Rural Regional Transportation Agencies do not have trip based travel demand models, and even for the rural agencies that do, differentiating the project level VMT by land use on the model network would be very difficult. In addition, the mitigation suggestions recommended for inclusion in CEQA Guidelines for a project that reaches the level of a significant impact under the proposed VMT metric are not applicable in most rural locations. The potential mitigation measures should be re-evaluated in reference to rural areas to prevent the unintended consequence of leaving a project without a way to mitigate the potential impact(s).

The RCTF also has concerns in relation to the application of the proposed use of a regional average VMT by land use type as a threshold of significance in rural areas. In rural counties, the regional average VMT does not account for the distinct differences between incorporated cities and the geographically disperse unincorporated rural communities. We suggest that you consider a more flexible approach that allows lead agencies to set the appropriate significant threshold for defined geographic areas.

With regard to the proposal to include induced demand as a significant impact under CEQA, there needs to be more substantial evidence developed to justify including rural capacity increasing projects, and to determine where to draw the line in relation to impacts versus benefits. Each project and location is unique. When applying induced demand analysis in a rural county you will find that, due to sparse population, geography and terrain, the travel patterns tend to be more established and static as compared to urban areas. Adding capacity to a roadway in a rural area would not necessarily result in a large increase in trips being made on the new facility.

Given the low level of transit availability and difficulty of biking or walking over long distances, there is very little existing non-auto travel for the induced demand to “come from.” In addition, due to the longer distances traveled, studies show that in rural areas drivers tend to combine most of their shopping, banking, and other required activities as a part of one trip (trip chaining) versus multiple trips. Key corridors in rural areas generally are the most direct route between locations and if allowed to degrade as congestion increases, drivers will most likely look for alternative routes that are not as direct and result in higher VMT.

It should be noted that the current mode split for alternative modes of transportation in rural areas is generally low and the longer distances between destinations and terrain tend to limit bicycling and walking as viable alternatives to the automobile. Due to funding constraints, transit in rural areas, although it is available, is limited in its coverage and frequency and is not a convenient alternative to the automobile. Moreover, expanding transit services is often not possible within current funding levels.

The RCTF appreciates the opportunity to comment on the Preliminary Discussion Draft and look forward to additional opportunities to work collaboratively with OPR to address these concerns as you move toward the adoption of the guidelines.

Sincerely,



Jerry Barton

Chair, California Rural Counties Task Force

Copies:

Patricia Megason, Executive Vice President, Rural County Representatives of California

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Lisa Davey-Bates, Chair, North State Super Region

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