



- 
- San Bernardino County Transportation Commission
  - San Bernardino County Transportation Authority
  - San Bernardino County Congestion Management Agency
  - Service Authority for Freeway Emergencies
- 

November 12, 2014

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

Dear Mr. Calfee:

San Bernardino Associated Governments (SANBAG) appreciates the opportunity to comment on the Office of Planning and Research's "Updating Transportation Impacts Analysis in the CEQA Guidelines" (Guidelines).

SANBAG is the Council of Governments, County Transportation Commission, and Transportation Planning Agency for San Bernardino County. As such, we are responsible for planning and implementing an efficient multi-modal transportation system to serve the 2.1 million residents of our county. SANBAG also administers Measure I, the half-cent transportation sales tax approved by county voters in 1989 and reaffirmed in 2004. These responsibilities include the preparation of documents under the California Environmental Quality Act (CEQA) for applicable projects.

SANBAG is also part of the Southern California Association of Governments (SCAG) region. SCAG is the metropolitan planning organization (MPO) responsible for the adoption of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as required under SB 375 (Chapter 728, Statutes of 2008).

SANBAG concurs with the need to reduce barriers to transit oriented development (TOD) implementation and level of service (LOS) is one of those barriers. At the same time, vehicle mobility for our citizens and for the goods movement and logistics industry is critical to the future economic health of San Bernardino County and the SCAG region.

Our principal concern is that procedures and data are not yet ready to implement vehicle miles traveled (VMT) as the primary metric for defining the impacts of land development and transportation projects. SANBAG strongly recommends the development of a pilot program which would generate data and case studies which could be used to properly develop and evaluate these new tools and build credibility for this new metric. The pilot program would effectively provide the opportunity to phase in the use of VMT as the primary criteria for defining the significance of transportation impacts. The examples that have been provided to

CC141112 - TB

date are over-simplified and do not address the range of land use types, contexts, and threshold concepts that will be needed for defensible VMT-based methodologies. Due to the implications on CEQA documents, it is imperative that practitioners be given more time for the models, data, and methodologies to be demonstrated as ready for the task. In the meantime, LOS could still be eliminated as a CEQA impact for developments within transit priority areas, removing this barrier to TOD development. SANBAG would request 3 years as a reasonable pilot period for demonstration in transit priority areas.

SANBAG has reviewed the Guidelines and has the following specific comments:

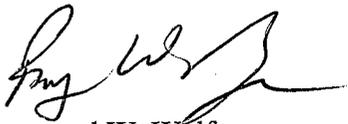
- The definition of “Regional Average” (Subdivision (b)(1)) – the document contains references to the metropolitan planning organization area, the regional transportation plan area, and the regional transportation planning agency area for the purposes of determining the VMT regional average. In the SCAG region, the first two areas are potentially different data sets than the third. Additionally, the SCAG region has specific provisions to allow for the preparation of sub-regional SCS’ and it is unclear how those sub-areas would be treated. It is recommended that the guidelines remain flexible in allowing local agencies the opportunity to define the appropriate average that will be applied to determine significant impacts. San Bernardino County is the largest county in the contiguous United States, and as such, there is a wide range of geographic areas and many of these areas vary significantly from the “Regional Average”. Subregional measure of effectiveness averages would likely be more appropriate to determine impact significance levels.
- Delay statewide implementation (Section 15064.3 (d) applicability) – given the timeline to develop the guidelines and enter into the formal rulemaking process, there will be insufficient time to evaluate the implementation effort for the transit priority/high quality transit corridor areas and determine whether changes are needed before the statewide application is instituted as implied in the Guidelines in 2016. As noted above, development of a pilot program would generate data and case studies to properly evaluate these new tools and build credibility for this new metric. In order to sufficiently allow this pilot program process to unfold and subsequent implementation of the new metrics and procedures, it is recommended that the statewide implementation be delayed at least three years after the VMT metric takes effect in transit priority/high quality transit corridor areas, which would be in addition to the three year pilot program.
- Applicability of Guidelines outside of transit priority areas (Subdivision (C) and Appendix F) - the focus of the Guidelines appears to be the implementation of the VMT metric for transit priority/high quality transit corridor areas. As much of the text within the Guidelines focuses on applicability to these areas, a more refined definition of transit priority/high quality transit corridor areas would be appropriate for suburban and rural communities, which comprise much of San Bernardino County. In addition, SANBAG seeks guidance on language that expands the metric statewide. The ‘Text of Proposed Amendments to Appendix F’ provides sample mitigation measures but most

of these do not pertain to areas outside of transit priority/high quality transit corridor areas. Therefore additional guidance is necessary for these areas when the Guidelines are implemented statewide.

- Availability of data (Subdivision (b)(4)) – the guidelines propose to use trip length as part of the calculation to determine the VMT for a project. SANBAG questions whether there is sufficient data available to conduct such an analysis. Aside from data availability for trip lengths by trip purpose by geographic area, other data gaps would include the specific benefits that can be expected with implementation of the sample mitigation measures included in the ‘Text of Proposed Amendments to Appendix F’.
- Consistency with SB 375 (Section 15064.3 (b)(1)) – since the passage of SB 375, which required the development of a SCS in conjunction with the RTP, the concept of being “consistent with SB 375” or “consistent with the SCS” has never been well defined. Is simply being contained within the adopted SCS for the region sufficient for determining a less than significant impact under CEQA for the purposes of this analysis?
- Interchanges (Section 15064.3 (b)(2)) – these projects can be more complex than the Guidelines contemplate. New or improved interchanges provide access to new development and improve connectivity. The new VMT metric may not appropriately capture overall project benefits.

Thank you for the opportunity to provide comments on the draft Guidelines. If you have questions about these comments please contact Wendy Strack, Director of Legislative and Public Affairs, or Steve Smith, Director of Planning, at (909) 884-8276.

Sincerely,



Raymond W. Wolfe  
Executive Director