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MICHAEL J. SCANLON  
EXECUTIVE DIRECTOR

1250 San Carlos Ave.  
San Carlos, CA 94070  
(650) 508-6200

November 18, 2014

VIA EMAIL AND U.S. MAIL

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

Re: Comments on "Preliminary Discussion Draft of Updates to the CEQA Guidelines  
Implementing Senate Bill 743"

Dear Mr. Calfee:

The San Mateo County Transit District (The District) is pleased to provide comments on the Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Draft Guidelines) requested by the Governor's Office of Planning and Research (OPR).

The District is the principal provider of fixed-route and Paratransit bus transportation in San Mateo County and is also the administrator of Caltrain, a commuter rail system providing services from San Francisco to San Jose. As a transit provider, the District has continually promoted transportation planning that is linked to land use, decreasing greenhouse gas emissions and reducing congestion.

The District strongly supports the direction being taken by the Draft Guidelines, which changes the focus of analyzing transportation impact from vehicle delay to greenhouse gas emissions reduction, creation of multimodal networks and promotion of a mix of land uses. The District is also pleased to see the Draft Guidelines incorporating impacts to pedestrians, bicyclists and transit, which have not often been considered. We support the OPR recommendation to include "vehicle miles traveled" (VMT) as a basis for transportation analyses in the CEQA process. The focus of VMT provides an effective alternative to successfully implement mixed-use projects and transit, consistent with the intent of SB 743.

The following provides the District's specific comments on the proposed Draft Guidelines:

- **Transit Priority Areas:** The Draft Guidelines refer to places "within one-half mile of an existing major transit stop." The District suggests replacing it with "within one-half mile of an existing *or planned* major transit stop."
- **Transit Effects:** The Draft Guidelines refer to "the effects of the project on transit." This is an open statement without further clarification that can generate a number of interpretations and/or unintended consequences. To support SB 743's intent to reduce driving and GHGs, the focus should be on impacts that might cause a net decrease in transit usage (and as a result,

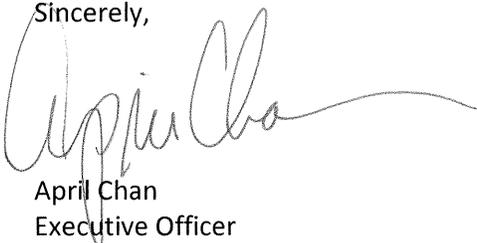
increase in GHG and driving). Examples of project effects that may reduce transit use may include:

- Impeding access to transit stations
  - Reducing the average travel speed of transit vehicles
  - Reducing the reliability of transit operations
- **Presumption of Less Than Significant Impacts:** The Draft Guidelines presume less than significant transportation impacts for broad categories of development projects. Developments built near transit or that decrease VMT generally produce fewer traffic impacts. However, lead agencies should provide transit agencies early notice in the environmental review process for proposed projects within half-mile of major transit facilities to ensure that there are no unintended adverse impacts. This issue was the subject of our comment in a letter transmitted to OPR in May 2, 2014.
  - **Statewide Applicability:** The Draft Guidelines state that “After January 1, 2016, the provisions of this section shall apply statewide.” The District supports applying the revised Guidelines statewide as it would benefit mixed-use projects and transit, consistent with the intent of SB 743. It would also provide a single set of Guidelines for a simpler and straight forward CEQA process.
  - **VMT Mitigation:** The Draft Guidelines include a list of VMT mitigation measures, including item “o,” “Providing Transit Passes.” The District suggests modifying item “o” to read: “Providing free and/or subsidized transit passes.”

There could be instances where it may be beyond the reach or need for smaller projects to fully implement any of the suggested VMT mitigation measures. In such cases, it could be more effective for the project sponsor to partially pay for one of the VMT mitigation measures by contributing to a fund. The District suggests adding a VMT mitigation measure that allows an in-lieu fee or a contribution to a mitigation fund to achieve the above items.

The San Mateo County Transit District and Caltrain will be looking forward to implementing SB 743 through the CEQA process as we carry out our capital programs.

Sincerely,



April Chan  
Executive Officer  
Planning and Development

cc: Douglas Kim (SamTrans)  
Hilda Lafebre (PCJPB)  
Michael Conneran (Hanson Bridgett)