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November 18, 2014

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 purpose of this letter is to respond to the proposed updates to the CEQA guidelines for analyzing transportation impacts that were released on August 6, 2014.

The San Mateo County Transportation Authority (TA) is responsible for the management and administration of a voter approved half-cent sales tax for a wide variety of county-wide transportation projects and programs, known as Measure A. Measure A provides funding for a range of transportation projects, including transit, grade separation, pedestrian and bicycle, alternative congestion relief, and highway improvements. For the projects contained in the Measure A Highway program, there are some projects which will increase capacity that could be subject to induced vehicle travel analysis, which we believe could lead to mitigation above and beyond current CEQA requirements.

We would support clarifying language in the final guidelines to provide that increased roadway capacity would generally not need to be re-evaluated for later projects if the need for the increase is contained in an adopted Regional Transportation Plan (RTP) and if the proposed needs have been adequately considered in an environmental impact report that analyzed and addressed induced vehicle travel.

We also support the recommendation drafted by the Institute of Transportation Engineers (ITE) to exempt roadway projects from induced vehicle travel analysis that are contained within a Sustainable Communities Strategy (SCS). The San Mateo County Measure A highway program projects are already included in the MTC Regional Transportation Plan (RTP) Plan Bay Area, which contains the required SCS mandated by SB 375.

We'd like to note that if additional induced vehicle travel analysis is required for increased capacity roadway projects that are contained in RTPs before the roadway projects precede with implementation, the impact of potential mitigation measures could result in delays and cost increases for vital congestion reducing roadway improvements.

We request revising the draft guidelines to address potential conflicts between the need for adding roadway capacity and meeting the intent of SB 743 by analyzing transportation impacts using VMT. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "April Chan", with a long horizontal flourish extending to the right.

April Chan, Executive Officer
Planning and Development

cc: W. Abrazaldo, C/CAG
J. Hurley, TA