



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

February 29, 2016

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

Subject: Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA

Dear Mr. Calfee:

Bay Area Air Quality Management District (Air District) staff would like to offer its support for the Governor's Office of Planning and Research's (OPR's) Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Revised Proposal). The Revised Proposal provides an important transformation away from focusing on vehicle congestion to focusing on vehicle miles traveled (VMT) associated with a project. The Revised Proposal's goals to reduce per capita VMT and promote transit and active transportation options align with the Air District's mission to create a healthy breathing environment for every Bay Area resident while protecting and improving public health, air quality and the global climate.

The Revised Proposal draws on multiple state policies to establish a reduction target per capita or per employee of 15 percent VMT below that of existing development for residential and office projects. These policies include AB 32's target to reduce levels of greenhouse gas (GHG) emissions to 1990 levels by 2020; Executive Order B-30-15's target to reduce GHG emissions 40 percent below 1990 levels by 2030; ARB's target to reduce GHG emissions by 13 percent to 16 percent below 2005 levels by 2035; and Executive Order B-16-12's target to reduce GHG emissions 80 percent below 1990 levels by 2050 specifically for transportation. The recommended reduction target in the Revised Proposal of 15 percent VMT below that of existing development is not, however, tied to a particular date. The Air District recommends that OPR clarify the time range in which the VMT target is applicable. Projects with a longer-term planning horizon beyond 2020, for example, should show greater reduction in per capita VMT than those with a shorter-term planning horizon in order to meet the long-term reduction targets enumerated in state policy.

The Air District supports the presumption in the Revised Proposal that development projects located within one-half mile of either an existing major transit stop or stop along an existing high quality transit corridor may have a less than significant transportation impact. However, proximity to transit itself is not

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the only factor that influences the use of transit. Poor connectivity to transit can hinder the use of transit by future residents and employees. Research shows that pedestrian- and bicycle-oriented design generally encourages non-auto travel. The Air District recommends that OPR encourage local governments to implement transportation demand management (TDM) measures in these areas located within one-half mile of a transit stop to enhance the possibility that residents/employees from new development will actually use available transit options. OPR could require inclusion of TDM measures in transit priority areas in the guidelines themselves, or add TDM measures on the list of "Presumption of Less than Significant Impact Near Transit Stations" on page 22 of the Revised Proposal. These measures can include:

- Bicycle amenities such as bike parking in residential projects and bike parking, lockers, and showers at office projects;
- Requiring mixed use elements and densification for new developments;
- Designing streets, sidewalks and bicycle routes to ensure safe and convenient access for pedestrians and bicyclists;
- Designing individual development projects to provide safe, convenient pedestrian and bicycle access to transit stops and nearby services;
- Reducing residential/employee parking requirements or setting parking maximums;
- Requiring transit subsidies for employees;
- Promoting the use of flextime, alternate work schedule, compressed work week, telecommuting, ride sharing, vanpooling, and guaranteed ride home programs for employees;
- Use of traffic calming design features; and
- Park and ride lots to encourage transit uses.

The Air District looks forward to working with OPR to support implementation of the Revised Proposal in the Bay Area.

Air District staff is available to assist OPR staff in addressing these comments. If you have any questions, please contact Josh Pollak, Environmental Planner, at 415-749-8435 or jpollak@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer