



February 29, 2016

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814  
VIA EMAIL: [ceqa.guidelines@resources.ca.gov](mailto:ceqa.guidelines@resources.ca.gov)

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

Dear Mr. Calfee,

Thank you for the opportunity to provide feedback on the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* ("Revised Proposal"). TransForm is the state's largest non-profit focused on sustainable communities. TransForm promotes walkable communities with excellent transportation choices to connect people of all incomes to opportunity, keep California affordable, and help solve our climate crisis. Spurred by SB 743, OPR's efforts to revise how transportation impacts are analyzed under CEQA are perfectly aligned with this mission.

This *Revised Proposal* is a tremendous improvement from the last iteration and will help cities and transportation agencies have greater ability to provide sustainable transportation choices. TransForm has signed on to a joint letter with numerous other organizations commenting on numerous changes our groups collectively support in the Revised Proposal, as well as expressing some concerns and recommending some changes in language.

In addition, we are submitting this separate letter to comment on a particular aspect of the Revised Proposal with which we have particular experience.

TransForm strongly supports the following two elements of the revised guidelines:

1. Inclusion of "Conversion of existing general purpose lanes (including ramps) to managed lanes or transit" in the list of "projects that would not likely lead to a substantial or measureable increase in VMT, and therefore should not require analysis." (*Revised Proposal*, pp.26-27)
2. Inclusion of "Converting existing general purpose lanes to HOV or HOT lanes" in the list of "appropriate mitigation and alternatives that a lead agency might consider" when considering "increased travel induced by capacity increases." (*Revised Proposal*, p.34)

These guidelines confirm what experience and highway analyses have already demonstrated: widening highways increases vehicle-miles-traveled (VMT) and therefore environmental impacts. By contrast, converting general purpose lanes to HOV or HOT lanes, or to transit lanes, will not induce significant new single occupant vehicle travel and should not require additional transportation analysis. Further,

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because these conversions may increase use of carpooling and transit while using existing infrastructure they may also be considered as a mitigation or alternative to highway widening.

We have particular experience with the potential for converting existing general purpose lanes. For years, we have commented on the development of the express lane network in the San Francisco Bay Area. In many of these comments, we have recommended that the Metropolitan Transportation Commission (MTC) consider converting existing general purpose lanes to express lanes instead of creating new express lanes through highway widening. The most comprehensive set of these recommendations was included in our 2013 report, *Moving People, Not Just Cars: Ensuring Choice, Equity, & Innovation in MTC's Express Lane Network*.<sup>1</sup> This report recommended that MTC, the relevant county Congestion Management Agency, and Caltrans should consider what we have called an "Optimized HOT" approach: convert one existing general purpose lane in each direction to an HOT lane, use HOT revenues to dramatically increase transportation choices along the same corridor, and ensure low-income families equally receive the benefits of the resulting changes.

In December 2013, we published a report and began working with relevant agencies and stakeholders to encourage analysis and a pilot project of this approach on one specific highway segment: the Highway 101 corridor in San Mateo County. We published *Innovation Required: Moving More People with Less Traffic*.<sup>2</sup> This report analyzed several alternatives to providing HOV or HOT lanes for one segment of Highway 101 and found that the Optimized HOT approach would move more people with less traffic, put solutions in place more quickly, and cost much less.

In 2014, the San Mateo City/County Association of Governments (C/CAG) decided to consider this option, and began work with agencies including the San Mateo County Transportation Authority (SMCTA), MTC, and Caltrans. In 2015, MTC completed an analysis that confirmed that the Optimized HOT approach – convert an existing general purpose lane and use revenues to increase transit and transportation demand management along the same corridor – would be the best of several options considered.<sup>3</sup> All of the relevant agencies are now meeting regularly, with significant interest from the business community along this crucial corridor linking San Francisco and Silicon Valley.

The importance of this experience is that extensive analyses have confirmed that converting an existing general purpose lane to an HOT lane, and using the revenues for transit along the corridor, is a viable option. To date, these analyses have been completed without reference to the guidelines in the *Revised Proposal*, but those new guidelines may inform future work as this project starts the environmental review process soon.

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<sup>1</sup> Clarrissa Cabansagan and Jeff Hobson, TransForm. *Moving People, Not Just Cars: Ensuring Choice, Equity, & Innovation in MTC's Express Lane Network*, May 2013. Available at: <http://www.transformca.org/resource/moving-people-not-just-cars>.

<sup>2</sup> Jeff Hobson and Joseph Kott, TransForm. *Innovation Required: Moving More People with Less Traffic*, December 2013. Available at: <http://www.transformca.org/resource/innovation-required-moving-more-people-less-traffic>.

<sup>3</sup> See detailed writeup in Clarrissa Cabansagan, TransForm, "MTC Analysis Confirms: Optimized HOT is the Best Choice for Highway 101", July 31, 2015. TransForm blog post available at <http://www.transformca.org/transform-blog-post/mtc-analysis-confirms-optimized-hot-best-choice-highway-101>. This post is based on a presentation by MTC, "San Mateo 101 Corridor Strategies: An Innovative Partnership in the Making." Available at: <http://www.transformca.org/sites/default/files/062515%20San%20Mateo%20101%20Corridor%20Strategies.pdf>.

As importantly, the *Revised Proposal* will be relevant to several other agencies that may wish to consider converting a general purpose lane. Both the Valley Transportation Authority (VTA) in Santa Clara County and the San Francisco County Transportation Authority have indicated their interest in exploring the possibility of converting existing general purpose lanes to an HOV or HOT lane.

For these other agencies, as with the San Mateo project as it nears environmental review, the importance of the *Revised Proposal* guidelines is clear. In situations where the agency does not also want to study lane widenings, the new guidelines mean they may not be required to conduct a transportation impact analysis in CEQA. Even when a particular project does conduct that analysis, as the San Mateo project is likely to, using the metric of VMT instead of the metric of LOS will be important to providing a fair picture of the environmental impacts. Further, the explicit mention of this option as a valid alternative to study will reassure agencies that it is okay for them to *study* converting an existing general purpose lane, even if that conversion is not yet allowed to proceed to construction.

Finally, we'd like to repeat a comments we made in 2014 as OPR was starting this revision. As we shift away from LOS, it is important to ensure that localized impacts associated with increased traffic – such as pedestrian safety, noise and local air quality – remain a priority for CEQA analysis. As part of the CEQA guidelines update, we encourage OPR to carefully review how the guidelines address these impacts and recommend any needed changes to ensure impacts are fully addressed and mitigated.

Thank you for your consideration of our input. We are happy to discuss any of these concepts further.

Sincerely,

Stuart Cohen  
Executive Director

Jeff Hobson  
Deputy Director

Clarrissa Cabansagan  
Community Planner

cc: Secretary Brian Kelly, California State Transportation Agency (CalSTA)  
Director Malcolm Dougherty, Caltrans