



June 15, 2022

TO: Board of Directors

FROM: Heather Adamson, Director of Planning

SUBJECT: Materials on 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy and its Environmental Impact Report Submitted after the Close of the Public Comment Period

Attached to this memorandum is a new email that was submitted to AMBAG after the close of the Draft 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and Draft Environmental Impact Report (EIR) public comment period and after the posting of the June 15, 2022 AMBAG Board of Directors agenda.

The attached email was submitted by: Rick Longinotti, Campaign for Sustainable Transportation, June 15, 2022

Response to Mr. Longinotti Email dated June 15, 2022

The comment incorrectly asserts that the Final EIR does not meet CEQA requirements. It first states that the EIR violates state policy to reduce per capita vehicle miles traveled (VMT). The 2045 MTP/SCS does slightly increase per capita VMT, as disclosed in Impact T-2 (see Final EIR p. 4.15-26), and this impact is judged significant and unavoidable. However, a significant and unavoidable impact does not make an EIR inadequate, and the Board is being asked to adopt a statement of overriding considerations for this and other significant and unavoidable impacts.

The comment then asserts that the EIR did not examine an alternative recommended by the commenter's organization, to combine Alternative 2 with Alternative 3. It states the rationale for not analyzing this alternative is unconvincing. However, Response 6.22 in the Final EIR (Appendix H p. 147) fully describes several reasons why this alternative was not selected for detailed analysis in the EIR. In summary, the commenter's suggested alternative is a combination of two alternatives already evaluated in the Draft EIR, would not substantially reduce MTP/SCS GHG emissions, and is not detailed enough for analysis. The comment does not offer any specific reasons on why these reasons in Response 6.22 are unconvincing.

HAD

Attachment:

1. Rick Longinotti Email dated June 15, 2022

Attachment 1

From: Rick Longinotti <longinotti@baymoon.com>
Sent: Wednesday, June 15, 2022 7:42 AM
To: Ana Flores <aflores@ambag.org>
Cc: CFST Working Group <cfst-working-group@googlegroups.com>
Subject: Public Comment for the June 15, 2022 Board of Directors Meeting

From: Campaign for Sustainable Transportation
Re: item 9. Certification of Final EIR

Dear Directors,

The Final EIR for the MTP/SCS does not meet CEQA requirements and should not be certified.

The EIR finds that per capita vehicle miles traveled will increase due to this project. This is not an acceptable outcome. It violates state policy to reduce per capita VMT. The resolution you are asked to approve includes an inaccurate statement:

“The AMBAG Board of Directors finds that no other mitigation measures or alternatives are feasible that would reduce this impact to less than significant levels. “

The EIR did not examine the alternative recommended by my organization in comments on the Draft, which was to combine Alternative 2 that prioritizes active transportation with Alternative 3 that prioritizes transit and infill development. The rationale explained in the Final EIR for not analyzing this alternative is unconvincing.

If this whole exercise of creating a Metropolitan Transportation Plan is to be meaningful, then we need to prioritize transit, active transportation and infill development.

Please send the EIR back to the consultant with the instruction to develop an alternative that better represents the community's values.

Thank you,
Rick Longinotti, Chair
Campaign For Sustainable Transportation