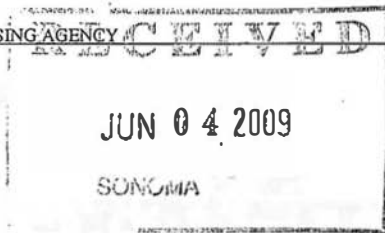


DEPARTMENT OF TRANSPORTATION

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June 2, 2009

Letter A

SON-GEN-0.0
SON000155
SCH#2008082011

Ms. Seana Gause
Sonoma County Transportation Authority
490 Mendocino Avenue, Suite 206
Santa Rosa, CA 95401

Dear Ms. Gause:

Sonoma County Transportation Authority (SCTA) Comprehensive Transportation Plan (CTP) Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review for the above-referenced project. The Department has reviewed this document and we provide the following comments:

Impact 4.3-1 notes that this CTP supports growth from Vehicle Miles of Travel (VMT), and that the impact is "significant and unavoidable." However, the mitigation measures noted for this impact are that SCTA will seek additional funding for pricing projects and Transportation Demand Management (TDM) programs to reduce VMT, as well as encourage local governments to implement VMT reduction strategies. It appears that although the SCTA acknowledges the need for pricing and TDM strategies to reduce VMT, there is not enough commitment to these strategies to make a difference. It should be noted that the Metropolitan Transportation Commission's (MTC) T2035 commits to much more than this in their document.

A-1

It should also be noted that on Page 4.3-14, Table 4.3-9 uses data from 2002. The MTC/Department State of the System Report 2007 provides much more current data and is available on the MTC website.

A-2

If you have any questions or need further information, call Alice Jackson at (510) 286-5988.

Sincerely,



for

CARBONI
t Branch Chief

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

3.5 INDIVIDUAL RESPONSES

Letter A Lisa Carboni, California Department of Transportation

Response A-1: The 2009 CTP identifies two goals to address reductions in both VMT and GHG. Of the four goals the second is to relieve traffic congestion, which directly addresses a reduction in VMTs, which in turn reduces GHGs. The SCTA has also listed the reduction of greenhouse gas emissions among the four goals of the CTP (p. 46.) Moreover, the 2009 CTP identifies a strategic list of GHG reduction projects which includes strategies and actions, implementing parties implementation needs, time frames and examples of implementation for these impacts.

The mitigation measures proposed in the Draft EIR are limited by the current funding and SCTA authority limitations (e.g., SCTA does have land use authority to require land use strategies that would reduce VMT) which inhibit the CTP's ability to fully implement these strategic projects (see CTP pages 95 through 99) to meet this VMT reduction (see CTP page 50). VMT increases identified Draft EIR Table 4.3-15 (see Draft EIR page 4.3-29) for year 2035 are based on continued growth and land uses in the County and its cities associated with their general plans that will continue to generate traffic and impact VMT that SCTA has no authority to regulate. However, it is important to note that the proposed CTP would result in reduced VMT under year 2035 conditions as compared to the no project scenario.

Response A-2: The following textual revisions are made to the Draft EIR to include the Weekday Congestion Locations on U.S. 202, Ranked by Delay (2007).

- Draft EIR page 4.1-13, Table 4.3-9 is removed and the following Table will replace Table 4.3-9:

**TABLE 4.3-9
WEEKDAY CONGESTION LOCATIONS ON U.S. 101, RANKED BY DELAY (2002)**

Rank in County	U.S. 101 Segment	Direction	Time Period	Delay (Vehicle Hours)
1	Santa Rosa Ave. & N. Todd Rd. to Steele Ln.	Northbound	2:30 PM — 6:45 PM	1,420
2	Hopper Ave. to Route 12	Southbound	2:35 PM — 6:25 PM	860
3	Golf Ave. to Baker Rd.	Northbound	7:10 AM — 9:15 AM	630
4	Redwood Hwy to Kastania Rd.	Southbound	5:45 AM — 8:05 AM	570
5	At Steele Ln.	Southbound	7:15 AM — 8:55 AM	210
6	Airport Blvd. to River Rd.	Southbound	7:15 AM — 8:50 AM	200
7	At Route 12	Southbound	6:25 AM — 9:20 AM	160
8	At Redwood Hwy	Northbound	3:50 PM — 6:10 PM	120
9	E. Washington Ave.	Northbound	4:25 PM — 6:25 PM	100

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Source: Caltrans, District 4 Office of Highway Operations. Information Memorandum, Year 2002 Bay Area Freeway Congestion Data, Tables 4A and 4B (accessed September 12, 2008)

TABLE 4.3-9
WEEKDAY CONGESTION LOCATIONS ON U.S. 101, RANKED BY DELAY

<u>Rank in County</u>	<u>U.S. 101 Segment</u>	<u>Direction</u>	<u>Time Period</u>	<u>Delay (Vehicle Hours)</u>
<u>1</u>	<u>East Washington St. to Kastania Rd.</u>	<u>Southbound</u>	<u>5:25 AM – 7:15 AM</u>	<u>1,880</u>
<u>2</u>	<u>Baker Ave. to College Ave.</u>	<u>Northbound</u>	<u>2:05 PM – 6:30 PM</u>	<u>1,220</u>
<u>3</u>	<u>Mendocino Ave. to 5th St.</u>	<u>Southbound</u>	<u>2:40 PM – 6:20 PM</u>	<u>1,180</u>
<u>4</u>	<u>Route 12 to College Ave.</u>	<u>Northbound</u>	<u>7:00 AM – 9:15 PM</u>	<u>590</u>
<u>5</u>	<u>At East Washington St.</u>	<u>Northbound</u>	<u>2:50 PM – 6:30 PM</u>	<u>290</u>
<u>6</u>	<u>Shilo Rd. to south of Mendocino Ave.</u>	<u>Southbound</u>	<u>7:30 AM – 9:00 AM</u>	<u>270</u>
<u>7</u>	<u>Route 116 to Wilfred Ave.</u>	<u>Northbound</u>	<u>2:30 PM – 4:50 PM</u>	<u>260</u>
<u>8</u>	<u>Steele Ln. to College Ave.</u>	<u>Southbound</u>	<u>7:20 AM – 9:30 AM</u>	<u>180</u>
<u>9</u>	<u>At Old Redwood Hwy</u>	<u>Northbound</u>	<u>3:10 PM – 5:00 PM</u>	<u>50</u>

Source: MTC, Congested Freeway Locations – Morning and Evening Commutes, 2008. http://www.mtc.ca.gov/news/press_releases/congestion/2008/am_pm_peak_period_congestion.pdf. (accessed July 20, 2009).