

Letter I

June 17, 2009



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Seana Gause, Program and Project Analyst
Sonoma County Transportation Authority
490 Mendocino Avenue, Ste. 206
Santa Rosa, CA 95401
sgause@sctainfo.org

SUBJECT: Comments on the Sonoma County Transportation Authority 2009 Comprehensive Transportation Plan Draft Environmental Impact Report

Dear Ms. Gause,

The Town is concerned that the DEIR identified significant and unavoidable adverse environmental impacts resulting from adoption of the 2009 Comprehensive Transportation Plan (the project). Plan adoption will accommodate an increase of about 3 million miles vehicle trips (VMT) per day by 2035 for the County area. What was the methodology used to promote a project that will lead to the significant increase in VMT?

I-1

The DEIR identifies the Environmentally Superior Alternative among the alternatives including the project as Alternative 3: "VMT Reduction-Transit Expansion/Smart Growth Scenario." Please provide additional documentation that Alternative 3 is feasible as defined by CEQA and can meet the objectives of the project. Will any of the identified significant and unavoidable adverse environmental impacts be reduced or eliminated by implementation of this alternative?

I-2

The Town supports city center development and the ABAG Focused Future Smart Growth population forecasts. The Town is seeking funding to prepare a Station Area Plan that will plan for increased residential densities and Smart Growth in the vicinity of the Town's Intermodal Transit Center.


I-3

The Town requests that we receive notice of availability of the Response to Comments/Final EIR and notice of the SCTA Board of Directors meetings to certify the EIR and consider adoption of

I-4

the 2009 Comprehensive Transportation Plan. Please send notice to the Town Manager and Planning Director at Town of Windsor, P.O. Box 100, Windsor, CA 95492.

I-4



Peter Chamberlin
Building & Planning Director

cc: Town Council
Town Manager
Public Works Director

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Letter I, Peter Chamberlin, Town of Windsor

Response I-1: The Draft EIR analysis does acknowledge that VMT is anticipated to increase by approximately 26% over existing conditions. The proposed CTP has identified its desired intent of meeting the VMT reduction target through transit, roadway improvements, land use improvement (smart growth and supportive transit), transportation technology improvements and transportation pricing policies. However, current funding and SCTA authority limitations 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). Thus, the environmental impact analysis in the Draft EIR is conservatively based on projects and improvements that are feasible for SCTA to implement and have known existing and planned funding sources (e.g., Measure M and funding from the Metropolitan Transportation Commission) (see CTP page 35 and Draft EIR pages 3.0-10 through -13). The methodology and traffic modeling associated with the proposed CTP that was utilized in the Draft EIR is summarized on Draft EIR pages 4.3-27 and -28 and described in detail in Appendix C, vi. Sonoma County Travel Model Update & Analysis of the CTP (see CTP pages 167-199).

The commenter is also referred to Master Response 3.4.5, [i.e., employment and population growth as a factor that leads to increases in VMT (Climate Change and Greenhouse Gas Emission Impacts).]

Response I-2: The commenter is referred to Master Response 3.4.6 (Adequacy of Alternatives Analysis) regarding the development of the range of alternatives (including Alternative 3) evaluated in the Draft EIR that meet the purpose and objectives of the CTP. Final determination of the feasibility of the alternatives evaluated in the EIR will be documented in the CEQA Findings of Fact that will be made at the time of project approval (should the proposed CTP be adopted). However, it should be noted that Alternative 3 includes transportation improvements that are not currently funded, and actions that are outside SCTA's direct control that will likely limit its ability to be determined a feasible alternative pursuant to State CEQA Guidelines Section 15091 (a)(3).

Draft EIR pages 6.0-38 through -42 provide an analysis and comparison of Alternative 3 to the proposed CTP, including improvements in air quality and traffic. Section 4.0 of this provides an updated analysis of energy and greenhouse gas emission estimates for the proposed CTP and the alternatives that includes identification of improved energy and climate change effects as compared to the proposed CTP. As identified in Draft EIR Table 6.0-21, Alternative 3 would reduce significant impacts identified for the proposed project, but would not eliminate these significant impacts.

Response I-3: Comment noted. Since no comments regarding the analysis in the Draft EIR were provided, no further response is required.

3.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Response I-4: The commenter request the Notice of Availability of the Response to Comments/FEIR and Notice of the SCTA Board of Director's meeting certifying the EIR adopting the 2009 CTP. SCTA will provide noticing of future meetings when the Final EIR and CTP will be considered by the Board of Directors.