



November 26, 2014

Via E-mail: (CEQA.Guidelines@ceres.ca.gov)

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

Re: Comments on Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (September 2014)

Dear Mr. Calfee:

Thank you for the opportunity to submit comments and suggestions on the Governor's Office of Planning and Research (OPR's) *Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, dated September 6, 2014).

SB 743 needs to be implemented in a way that is both consistent with the new law and with other, existing laws, regulations, and practices for measuring and addressing the impacts of land use, development, transportation, and other projects on the ability of Californians to travel to jobs and for other purposes. The goal should be to minimize negative impacts, including those that worsen traffic congestion.

Guidelines or policies that categorically waive the requirements for preparing engineering and planning studies that analyze the full traffic impacts of proposed land uses using level-of-service (LOS) to demonstrate the available and needed capacities for all modes of travel on streets and highways will be counterproductive and will harm the state's economic competitiveness and quality of life.

SB 743 does not preclude, prevent, or exempt developers and municipalities from fulfilling this obligation as required by other provisions in state law and regulations. Municipalities in California have a continuing fiduciary and legal responsibility and obligation to prepare traffic studies using LOS analysis for streets and highways to fully assess and demonstrate the traffic impacts of proposed developments.

The Automobile Club of Southern California (AAA), with more than 6 million members, supports multi-modal transportation projects and services that effectively improve mobility, traffic safety, and the environment. This includes quality public transit, safe bicycling and walking facilities, effective traffic safety laws and enforcement, and good roads capable of safely and efficiently handling traffic demand.

Thank you for your consideration of our comments as you finalize the guideline for implementing of SB 743.

Sincerely,

Hamid Bahadori
Manager, Transportation Policy and Programs

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