

February 14, 2014

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

Re: LOS Alternatives

Dear Mr. Calfee,

Thank you for the opportunity to comment on LOS Alternatives pursuant to SB743. Glendale is committed to sustainability as detailed in its Greener Glendale Plans for Community Activities and for Municipal Operations (2011). These adopted policies are consistent with greenhouse gas (GHG) reduction goals and policies of the Southern California Association of Governments (SCAG) Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS).

Much of Glendale is considered both a High Quality Transit Area (HQTA) and a Transportation Priority Projects (TPP) area by SCAG, the Metropolitan Planning Organization (MPO) with whose standards, land use policies, and emissions reductions the City of Glendale must comply. The City of Glendale supports the goals of SB743, but remains concerned with the environmental review costs necessary to implement state, regional and local transit-oriented policies through general plan element updates, zone changes and individual projects. Given the City's financial constraints, the cost of CEQA review and requiring updates to the City traffic model severely hinder Glendale's ability to adequately implement transit-oriented policies, plans and projects without placing Glendale at CEQA risk.

The City of Glendale would like to offer the following suggestions to OPR as it develops alternatives to LOS:

- Provide a CEQA exemption for policy and zone changes that implement transit-oriented development within HQTA and TPP areas consistent with an adopted MPO Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) for which an EIR was prepared and adopted by the MPO.
- If not exempt from CEQA, allow policy and zone changes that implement transit oriented development within HQTA and TPP areas to use an EIR prepared for the MPO's RTP/SCS as the legally valid and defensible transportation analyses on

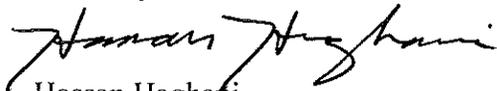
behalf of localities (i.e. allow use of regional transportation analyses in lieu of local analyses, if local land use plans are consistent with regional land use plans.)

- If tiering from an MPO's EIR for an RTP/SCS isn't allowed, then there is no CEQA cost savings incentive for local government to comply with the RTP/SCS policies because local governments will still need to run a standard traffic analysis to comply with other impact analysis (such as air quality) which is dependent upon traffic data.
- It would be helpful if LOS alternatives clearly provided a methodology for identifying mode splits that would not require local traffic studies. There is no cost incentive for cities to identify a local mode split or methodology if such a methodology would be subject to the same CEQA challenge as projects that use LOS methodology for determining level of impact. It would be helpful if appropriate mode splits or mode split options within transit priority areas were clearly identified by the MPO as part of the RTP/SCS and included in the EIR analysis by the MPO, then localities should be provided an opportunity to determine which multi-modal option would apply as local projects are reviewed.

Thank you for continuing to provide assistance on implementing new state law changes. With rising local government costs and dwindling resources, CEQA costs become impediments to local adoption of sustainable development policies, particularly with regards to transit-oriented development and densities.

Should you have questions concerning our comments, please contact Laura Stotler, Principal Planner at (818) 937-8158.

Sincerely,



Hassan Haghani
Director of Community Development

CC: Laura Stotler, Principal Planner
Michael Nilsson, Mobility Planner