



November 20, 2014

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(Sent via e-mail to [CEQA.Guidelines@ceres.ca.gov](mailto:CEQA.Guidelines@ceres.ca.gov))

RE: Comments on the proposed changes to the California Environmental Quality Act (CEQA) Guidelines to implement SB 743

Dear Sirs:

Thank you for the opportunity to comment on proposed modifications to the California Environmental Quality Act Guidelines to implement the recently enacted SB 743. The City of Goleta supports the purpose of the law which is to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land use. However, the City has concerns with the proposed regulations as follows:

- 1) The City questions some of the assumptions/presumptions made in crafting the regulations. The assumptions that underlie the regulations that are of concern include:
  - a) High quality transit is available everywhere within the State. While this may be true in the urban core of the State's largest cities (e.g. San Diego, San Francisco, Oakland, and Los Angeles), this is not the case for the majority of the communities. Most jurisdictions have minimal public transportation opportunities that have limited capacity.
  - b) Increasing density will decrease Vehicle Miles Travel (VMT). This is not the case if a site is not near transit opportunities and/or the community does not robust transit opportunities. It is possible that if densities are increased in areas without transit, VMT will go up so that residents can access goods, services, and employment.
- 2) While Goleta recognizes the State's intent to shift away from the Level of Service Standard to focus on reducing Vehicle Miles Traveled (VMT), the regulations need to reflect the reality of the difference in transit opportunities that exist across the State. A one size fit all

program/regulatory framework as proposed by the Guidelines is not realistic or fair. The regulations should be revised so that the focus is on reducing greenhouse gas emissions while improving and enhancing multi-modal forms of transit based on community context.

Further, the emphasis within the proposed Guidelines seems to be on residential land uses being placed along transit corridors. For communities that lack high quality transit, we suggest that the focus/incentives be on adding retail, employment or educational opportunities within existing residential areas so that residents might have the goods and services easily accessible without the need to drive, thereby reducing VMT.

- 3) The regulations need to either restate the definitions outlined in Sec.3 and Sec. 5 of the SB 743 (Referenced as Section 65088.1 of the Government Code and Section 21099(a) of the Public Resources Code) in the text of new Section 15064.3 or provide the citation to the Codes where the definitions will be/are. It would be more beneficial to restate the definitions within the CEQA Guidelines for ease of use and to add clarity to the regulations.
- 4) The regulations need to be adjusted to reflect that there might be high traffic generating uses that should not be placed along/near transit corridors because they are incompatible from a land use/aesthetic standpoint and/or their placement would not reduce VMT.
- 5) Clarification should be added to the language of Appendix F Subsection D6 a-o so that it is clear that some of the proposed measures by themselves will not reduce VMT but need to be done as part of a package of measures. For example, simply limiting parking supply without improving transit access or increasing access to desired uses will not reduce VMT.

Again thank you for the opportunity to comment on the draft CEQA Guideline revisions. If you wish to discuss the City's comments further, please contact either myself at 805-961-7541/ [jcarman@cityofgoleta.org](mailto:jcarman@cityofgoleta.org) or Current Planning Manager Lisa Prasse at 805-961-7542/ [lprasse@cityofgoleta.org](mailto:lprasse@cityofgoleta.org) .

Sincerely,



Jennifer Carman, AICP  
Director of Planning and Environmental Review Director

cc:

Lisa Prasse, Current Planning Manager  
Heidi Aten, Senior Management Analyst