

# CITY OF REDDING



## OFFICE OF THE CITY COUNCIL

777 Cypress Avenue, Redding, CA 96001  
P.O. Box 496071, Redding, CA 96049-6071  
530.225.4447 FAX 530.225.4463

**Rick Bosetti**, Mayor  
**Francie Sullivan**, Vice Mayor  
**Missy McArthur**, Mayor Pro Tempore  
**Gary Cadd**, Council Member  
**Patrick Jones**, Council Member

November 19, 2014  
B-050-100/W-010-450

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 10<sup>th</sup> Street, #100  
Sacramento, CA 95814

**Subject:** Comments on OPR's Preliminary Discussion Draft Updating  
Transportation Impacts Analysis in the CEQA Guidelines

Dear Mr. Calfee:

Thank you for the opportunity to provide comments and suggestions regarding your efforts to update guidelines regarding transportation analysis in CEQA, as required by Senate Bill 743. This letter specifically responds to the Update Transportation Impact Analysis in the CEQA Guidelines, as released for comment by the Office of Planning and Research (OPR) in August of 2014.

The City of Redding has concerns regarding the above referenced document and related implementation. The document proposes fundamental changes in the way a project's transportation impact is analyzed and mitigated under that may work in the larger urban areas of the State but doesn't necessarily work in Redding and other rural areas. Following is a summary of our concerns along with a recommendation:

- **Legislative Intent Exceeded.** OPR has gone far beyond the intent of the legislation from a change in measuring traffic impacts around transit priority areas to requiring projects in all areas of the State to change to a VMT based transportation impact measurement and mitigation. Although the legislation has some largely hidden discretion, it is very clear by the content of the legislation and related response to the guidelines from agencies like the City of Redding that the legislature did not intend for the extremely broad application of the new CEQA VMT based transportation impact metric proposed by OPR.
- **One Size Doesn't Fit All.** The "one size fits all" OPR guidelines does not recognize the small city and rural transportation constraints the City of Redding and other similar areas and smaller will face in trying to plan and implement projects and mitigation measures to meet the VMT based analysis and mitigation measures. Many of the various transit oriented solutions and other solutions included in the guidelines have not been tried, are not affordable, and/or generally will not yet work in most of Redding.



- **Value of LOS Analysis.** Roadway capacity analysis and LOS methodology, with or without its flaws, has been in use for many years and has undergone extensive evaluation to allow for its use in transportation analysis. One alternative LOS based concept might be to implement guidelines allowing more congested operations in infill areas that have viable alternative transit options while retaining guidelines that encourage less congested roadways in areas where transit does not meet the needs and the automobile is the primary method of travel.
- **Double Studies.** Because of safety and other potential project impacts, it is likely that many local agencies will prefer to utilize LOS thresholds in policy documents such as general plans. This is particularly true in small to midsize communities that have few, if any, viable options for reducing congestion through TOD and similar developments. Project proponents may thus be required to perform an analysis on VMT impacts to satisfy CEQA and a parallel analysis to determine project impacts on LOS.
- **Impact Fees.** The elimination of LOS could potentially impact the City's ability to collect traffic mitigation fees that meet growing congestion experienced in the City with mitigation including motorized, non-motorized and transit related improvements. And if we understand the guidelines correctly, constructing a project using impact fees may, in itself, be considered a significant impact under CEQA if it increases capacity of an intersection or road segment. This is problematic.
- **Unfunded Mandate.** The elimination of LOS will likely cause Redding to undertake a General Plan Update, Traffic Impact Fee Nexus Study Update, and result in potential mitigation measures the City has no means to finance. More cost and time analysis on these impacts should be considered before any change is adopted.
- **Recommendation.** The City recommends a more measured, reasonable approach that would implement the revised VMT metric near transit priority areas consistent with the intent of the legislation, evaluate over a period of time, and then consider expansion through future legislation. It is important to understand the VMT based analysis and mitigation impacts within transit priority areas before extending their reach to areas that are not and may not reasonably be adequately served by public transit.

If you have any questions concerning our letter, please do not hesitate to contact our Public Works Director, Brian Crane, at (530) 225-4170.

Sincerely,



Rick Bosetti  
Mayor