



November 20, 2014

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

Re: Updating Transportation Impacts Analysis in the CEQA Guidelines
Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing SB 743

Dear Mr. Calfee:

Thank you for the opportunity to provide comments and suggestions regarding your efforts to amend CEQA (California Environmental Quality Act) Guidelines, as required by Senate Bill 743 (SB 743). This letter specifically responds to the report titled "Updating Transportation Impacts Analysis in the CEQA Guidelines" written by the Office of Planning and Research (OPR) dated August 6, 2014 (hereafter called the "Draft Guidelines").

The City of San Marcos is a City with a population of approximately 87,000 residents located 35 miles north of the City of San Diego within San Diego County. The City is home to Palomar College, California State University San Marcos (CSUSM), Coleman University, and the University of St. Augustine and therefore has become the heart of education in San Diego North. The North County Transit District Sprinter line has three stops (CSUSM, Palomar College and the Civic Center) that serves San Marcos within its City limits.

In order to achieve a more successful implementation of SB 743, we are providing comments to the draft SB 743 Guidelines (August 8, 2014) as follows:

1. SB 743 requires a shift in transportation analysis from driver delay to reduction of greenhouse gases through the creation of multimodal networks and the promotion of a mixture of land uses. The guidelines are proposed for change to the use of Vehicle Miles Traveled (VMT), a more geographical and regional based tool than Level of Service (LOS) for CEQA traffic impact analysis. The analysis methodology update may be problematic for local Cities where localized or cumulative impacts need consideration. SB 743 leaves out a critical counter-balance measure to assess and try to mitigate the impacts of infill on local communities due to displacement and other localized impacts.
2. The proposed Mitigation Measures provided in the draft guidelines have not yet been fully vetted to determine potential effectiveness in the reduction of VMT for all project areas, and project types. Other threshold standards should be considered as an alternative to address the intent of SB 743. Any



recommended VMT measures should not be contained directly within the CEQA guidelines. Implementation strategies that are appropriate at a regional or local level will need to be developed after the measures are vetted for effectiveness in the ability to reduce localized VMT.

3. The City recognizes that SB 743 may streamline the CEQA process for projects proposed within a *Transit Priority Area* (TPA), an area within a half mile of a major transit stop – which can be bus, multi transfer area, train, or ferry station - or near a major transit corridor to streamline . However for areas outside of a defined TPA within the City of San Marcos, the guidelines will add a layer of impact analysis to the project CEQA review. The City currently experiences operational deficiencies along major roadway segments and at most major intersections. The CEQA guideline changes relative to LOS will require an update to the transportation threshold impact standards within the General Plan policies to address localized LOS impacts that had previously been addressed and mitigated through the CEQA traffic impact analysis review process. As a result it appears the City would need to develop a Traffic Impact Fee (TIF) Program to address the incremental and cumulative project affects that will ultimately result in an impact the City General Plan LOS policy standards.

4. The City General Plan Mobility Element as updated February 14, 2012 does include minimum Level of Service (LOS) acceptable levels, however the City will need to determine an implementation strategy to update the General Plan policies to address VMT and also establish a funding structure fund multi-model infrastructure projects as a mechanism for projects to pay their fair share for individual project impacts that can cumulatively reduce General Plan LOS standards.

5. The proposed guideline changes remove a majority of the language previously considered for traffic impact assessment based upon LOS with the replacement of language, including within Appendix G, for use with VMT that is less robust LOS standards. Although the updated guidelines do afford the City the ability to develop City VMT threshold standards, the updated checklist will require consideration of impacts relative to a regional average for land use. The City requests additional guidance in this effort including direction as to the development of General Plan policy, specifically to address the role of VMT and LOS in project impact analysis, and policy direction to facilitate the development of multi-modal infrastructure that can be directly funded by, and serve, the City of San Marcos.

6. The City will need to either develop its own standards or work with other agencies to develop regional traffic impact study (TIS) preparation standards that will address traffic impacts in a two prong approach, project analysis of VMT in accordance with SB 743, and project analysis of LOS impacts in terms of demonstrating General Plan policy compliance. Updated TIS preparation standards will serve to provide the level of project impact disclosure intended by CEQA and the City of San Marcos. The January 1, 2016 timeline does not afford the needed time to implement new TIS standards along with the needed General Plan policy updates and TIF Program development.

7. The City requests consideration of additional time beyond the January 1, 2016 to complete the General Plan update policies, develop two-prong TIS preparations standards, and establish a Traffic Impact Fee Program (TIP) Program not currently in place in our City to address direct and cumulative level of service impacts.



The City may have additional remarks once the draft guidelines are updated, and prior to guideline adoption. The City requests notification when the draft is updated to address all public comments, and prior to adoption of the updated CEQA guidelines. Please feel free to contact Susan Vandrew Rodriguez in the Planning Division at (760) 744-1050 extension 3237 or svandrew@san-marcos.net to discuss our comments.

Sincerely,

A handwritten signature in blue ink that reads "Jerry Backoff". The signature is fluid and cursive.

Jerry Backoff
Planning Division Director

cc: Lydia Romero, Deputy City Manager
Michael D. Edwards, City Engineer
Omar Dayani, Principal Civil Engineer, Traffic
Peter Kuey, Principal Civil Engineer, Land Development
Susan Vandrew Rodriguez, Associate Planner