
From: Natalie Porter

Sent: Friday, February 14, 2014 4:24 PM

To: CEQA Guidelines

Cc: David Defanti; Adam Baughman; Claudia Wade; Kimberly Kerr; Dave Johnston; Janet Postlewait; Shawna Purvines

Subject: LOS Alternatives

El Dorado County Community Development Agency and Air Quality staff have the following comments regarding the topics to be addressed in the 2014 CEQA Guidelines update and the Preliminary Evaluation of Alternative Methods of Transportation Analysis.

- --We disagree with: Section 15065 (Mandatory Findings of Significance) Add roadway widening and the provision of excess parking as examples of projects that may achieve short-term environmental goals (congestion relief) to the disadvantage of long-term environmental goals (reducing greenhouse gas emissions). In and of themselves, widening roads and increasing parking do not increase greenhouse gas emissions. As the use of alternative fuel zero emission vehicles becomes more and more prevalent, the use of those vehicles will not increase greenhouse gas emissions.
- --Of the potential metrics to use instead of LOS, the Multi-Modal Level of Service (MMLOS) would be the easiest to incorporate in conjunction with existing criteria required by El Dorado County's General Plan. Vehicle Miles Traveled (VMT) and Automobile Trips Generated (ATG) are also suggested as potential metrics, however, these metrics are based on just as many if not more assumptions than LOS.
- --There needs to be a recognition that rural or growing areas do not function the same way as urban or infill areas. As such, separate rules need to be established to accommodate the differences.
- --Any significance criteria or the model used to analyze the impact should be selected at the local jurisdictions level. Having a single significance criteria or mandating the use of one particular methodology or model for analysis would be detrimental to rural or nonurban areas.
- --If the adopted criteria results in a significant unfunded mandate to local jurisdictions, i.e., creation or purchase of new models or software, increased staff time to collect and analyze data, will the state be reimbursing local jurisdictions for the cost?
- --Will there be an implementation adjustment period for the new rules? If not, what happens to environmental documents that began prior to the implementation date? Will they have to redo the environmental document, and if so, who pays for the additional work? If there is no implementation adjustment period, it could trigger an unintended delay and increased cost for projects - who will pay for those costs?

Thank you for your consideration in these matters.

--

Natalie K. Porter

CONFIDENTIALITY NOTICE: *This electronic communication with its contents may contain confidential and/or privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, or authorized to receive for the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your consideration.*

NOTICE: This e-mail and any files transmitted with it may contain confidential information, and are intended solely for the use of the individual or entity to whom they are addressed.

Any retransmission, dissemination or other use of the information by persons other than the intended recipient or entity is prohibited.

If you receive this e-mail in error please contact the sender by return e-mail and delete the material from your system.

Thank you.