



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

November 20, 2014

IN REPLY PLEASE
REFER TO FILE: **T-4**

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

Dear Mr. Calfee:

SENATE BILL 743

Thank you for the opportunity to review and submit comments on the "Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg, 2013)."

We reviewed the preliminary discussion draft of updates to the California Environmental Quality Act (CEQA) Guidelines for Implementing Senate Bill (SB) 743 prepared by the Governor's Office of Planning and Research (OPR).

We generally agree with the OPR's draft updates to the CEQA Guidelines to establish alternative criteria for analyzing transportation impacts as required by SB 743. We concur that the alternative criteria must promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. Lastly, we support the use of vehicle miles traveled as the metric for analyzing transportation impacts.

As a national leader in the principle of sustainability, we are committed to preserving the long-term well-being of our communities and the environment. We are presently investing in and promoting economically sound, socially desirable, and environmentally healthy projects, programs, and services to achieve multiple benefits. Consequently, we request OPR include updates to the CEQA Guidelines, which will enable agencies to maintain their sustainability programs intended to enhance the mobility and quality of life for its communities while still adhering to the goals of SB 743.

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We also believe one of the primary components for meeting the goals of SB 743 is to establish uniform criteria to be used by all agencies within a defined region for analyzing transportation impacts. Currently, agencies utilize the *Highway Capacity Manual* to uniformly define, measure, and assess an intersection's level of service (i.e., vehicle delay); they also consistently apply the same level of service threshold of significance for determining a project's traffic impact. We believe the prior practice whereby agencies within a region applied uniform methods for analyzing transportation impacts resulted in uniform development standards, as well as less variations in traffic conditions across jurisdictional boundaries.

Specifically, we support the Los Angeles County Metropolitan Transportation Authority's proposal to use the First/Last Mile Strategic Plan as the basis for this type of regionally consistent mitigation plan. As the lead transportation planning agency for this region, the Los Angeles County Metropolitan Transportation Authority is a respected leader in the planning and development of the region's transportation network. We believe the Los Angeles County Metropolitan Transportation Authority's First/Last Mile Strategic Plan outlines a comprehensive and feasible plan to mitigate impacts from projects while still adhering to the goals of SB 743.

Public Works, the California State Association of Counties, and the Institute of Transportation Engineers-Western District generally support each other's concerns and proposed revisions related to the specific implementation of the OPR's draft updates to the CEQA Guidelines.

We also exchanged draft review comments with the City of Los Angeles and the Los Angeles County Metropolitan Transportation Authority. We support the following comments prepared by the City of Los Angeles regarding the need for:

- Additional time for sufficient review, development, and implementation of SB 743 requirements, including an extension of the timeline for implementation and the need for the development of appropriate travel demand models that account for vehicle miles traveled.
- Flexibility within each region for establishing the transportation impact analysis procedures, metrics, and mitigations, which are sensitive to each region's physical and political environments.

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If you have any further questions, please contact Mr. Dean R. Lehman of Traffic and Lighting Division at (626) 300-4700.

Very truly yours,



GAIL FARBER
Director of Public Works

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cc: Chief Executive Office (Angela Ovalle)
Los Angeles County Metropolitan Transportation Authority (Marie Sullivan,
Michael Turner)
Los Angeles Department of Transportation (Tomas Carranza, Jay Kim, Daniel
Mitchell)