

County Of Santa Barbara

Mona Miyasato
County Executive Officer



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Executive Office

November 20, 2014

Governor's Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

Re: Updated Transportation Impacts Analysis in the CEQA Guidelines – Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743

To Whom It May Concern:

Thank you for the opportunity to comment on the Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743. At this time, the County is submitting the attached letter from the County Planning and Development Department.

The County has no further comments on this project at this time and looks forward to hearing more about the project's progress. If you should have any further questions, please do not hesitate to contact my office directly, or Matt Schneider, Deputy Director in the Office of Long Range Planning at (805) 568-2072.

Sincerely,

A handwritten signature in blue ink that reads "Mona Miyasato". The signature is stylized and cursive.

Mona Miyasato
County Executive Officer

cc: Glenn Russell, Ph.D., Director, Planning and Development Department
Matt Schneider, Deputy Director, Long Range Planning Division
Brian Tetley, Senior Planner, Long Range Planning Division

Attachments: November 14th Letter, Planning and Development Department

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County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director
Dianne Black, Assistant Director

November 14, 2014

Mr. Ken Alex, Director
Governor's Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

**RE: Comments on the Preliminary Discussion Draft of Updates to the CEQA Guidelines
Implementing Senate Bill 743**

Dear Mr. Alex:

Thank you for the opportunity to comment on the Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743. Our comments are stated below.

1. The provisions and metrics of SB 743 seem to be geared towards the downtown, transit conducive areas of larger metropolitan areas. The metrics would seem to be a difficult fit for small to medium communities, and especially rural areas.
2. Allowing congestion to increase as a means of encouraging increased alternative transportation use may work within transit priority areas where congestion routinely exists, but using this tactic in small/medium communities and more rural areas would probably have minimal impact on alternative transportation use, and cause delays that would likely increase GHG levels.
3. Local agencies should have the option of retaining proven local impact thresholds in their toolboxes in addition to new state proposed guidelines and metrics. Local jurisdictions would be better positioned than the state to determine which impact assessment tools are most appropriate for specific areas and land uses.
4. The Office of Planning and Research should further explore the use of alternative metrics to LOS and follow the lead of other transportation advisory groups (TRB, AASHTO, ITE, ULI) by providing a recommended practice rather than a mandated change to current CEQA analysis methodologies. By providing a parallel path for analysis, agencies would be able to independently choose which metric best suits their needs/goals and would provide a more comfortable transition as more and more agencies either prove/disprove the effectiveness of the alternative metrics.

5. A potentially significant issue with new non-LOS approaches is the current status of the General Plan Circulation Element and Community Plans, which rely on maintaining particular LOS levels in a number of policies. If a non-LOS traffic analysis methodology is adopted, a number of potential problems would be encountered, including:
 - The need to revise the General Plan to include traffic policies that rely on the new methodology and remove policies that are based on LOS. This would be an expensive effort for which funding is not currently available.
 - If the LOS policies are not changed, it might require applicants to do expanded and more costly traffic analysis that includes both analytical methodologies, one for CEQA and one for General Plan policy conformity.
 - There may be significant opposition from the public, who have come to rely on LOS levels and associated policies to protect perceived community character.
6. The State should consider grant opportunities for local jurisdictions to revise existing LOS-based transportation policies
7. The impact of the new parameters on AB1600 Traffic Mitigation Fees is unknown and would need to be evaluated.
8. The draft mitigation list in Appendix F should be revised to include measures more applicable to rural areas.
9. Safety impact examples should include adding additional trips to rural roads not up to urban standards.

Please consider these comments when further developing your proposal. If you have any questions or comments regarding this letter, or would like to discuss these issues further, please call Brian A. Tetley (805) 884-6848.

Sincerely,



Glenn S. Russell, Ph.D., Director

c: File