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November 21, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 10th Street
Sacramento, California 95814

**Preliminary Discussion Draft of Updates to the CEQA Guidelines
Implementing Senate Bill 743 (Steinberg, 2013)**

Dear Mr. Calfee:

North County Transit District (NCTD) appreciates the opportunity to comment on the *Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg, 2013)*.

NCTD supports the shift of transportation analysis from driver delay [or level of service (LOS)] to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses specifically in Transit Priority Areas.

This shift will likely cause a long-term increase in demand for public transit services, including bus and various forms of fixed guideway transportation. In the short-term the increase in ridership may benefit transit agencies by helping to meet ridership targets without exceeding capacity. Over the long-term, and in cases where transit systems are currently strained, demand may exceed capacity.

NCTD would like to ensure that the shift from LOS does not result in negative impacts to transit. To ensure the ability of public transit systems to accommodate this shift, the CEQA guidelines should provide for consideration of impacts to transit systems under "transportation impacts" in CEQA documents for projects relying on transit to reduce projected Vehicle Miles Traveled (VMT). Examples of mitigation measures provided in Appendix F of the CEQA Guidelines, or other State guidance, should include funding for transit service enhancements including infrastructure and ongoing operations.

NCTD also supports a CEQA framework that allows for analysis of impacts related to active transportation facilities. Associated mitigation measures should support creation of complete streets and facilitate first and last mile access to transit.

State guidance regarding implementation of the updated CEQA guidelines should also recommend that transit-related significance thresholds and mitigation measures be developed in coordination with local and regional transit agencies.

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November 21, 2014

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Thank you for your consideration of NCTD's comments. If you have any questions or concerns, please don't hesitate to contact me at (760) 966-6654 or via email at dlynch@nctd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Dahvia Lynch", with a long horizontal flourish extending to the right.

Dahvia Lynch
Chief Planning Officer