



November 21, 2014

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

VIA EMAIL: CEQA.Guidelines@ceres.ca.gov.

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

On behalf of the Port of Long Beach, I would like to thank you for the opportunity to review the preliminary discussion draft of changes to the California Environmental Quality Act (CEQA) Guidelines implementing Senate Bill 743 (Steinberg 2013). Respectfully, I am submitting the following comments for your consideration:

- Section (a) Purpose and (b) Criteria for Analyzing Transportation Impacts – These sections refer to automobile travel. It should be clarified that separate and acceptable criteria for regional vehicle miles traveled (VMT) for automobiles versus trucks.
- Section (b) (1) – Consideration is needed for special trip generators and land uses, such as seaports, airports, intermodal freight facilities, railyards, distribution centers, and other freight and logistics facilities. Case studies should be conducted for these types of land uses to accommodate their particular travel patterns and characteristics in the CEQA guidelines.
- Section (b) (3) – The discussion on Local Safety should be clarified to explain that the examples of objective factors provided are suggestions only and non-exclusive. It is up to the lead agency to address local safety criteria and to identify relevant specific factors, if any.
- Section (c) Alternatives and Mitigation – Compatibility with other programs at the federal, state and/or regional level, in which congestion reduction is a main criteria or consideration -- such as the California Congestion Management Program (CMP), the U.S. Department of Transportation's Projects of National and Regional Significance (PNRS) and other similar programs -- should be taken into account.

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The Port of Long Beach is the premier U.S. gateway for trans-Pacific trade and a trailblazer in innovative goods movement, safety and environmental stewardship. As the second-busiest container seaport in the United States, the Port handles trade valued at \$155 billion annually and supports hundreds of thousands of jobs.

The Port began its second century of service with a \$4.5 billion capital improvements program, the largest in the nation. It is building some of the most modern, efficient and sustainable marine facilities in the world. The proposed changes to the CEQA guidelines implementing Senate Bill 743 could have significant effects on our project development and deliveries.

I would like to meet with appropriate staff of the Governor's Office of Planning and Research in the near future to discuss the draft changes to the CEQA guidelines. Our team is willing and eager to work with you to develop potential refinements needed to address our concerns. We would be glad to come to your office and/or could arrange for a meeting at the Port administration office combined with a tour of the Port, to facilitate a better understanding of the Port's land uses, development and operations.

We look forward to collaborating with you on the CEQA guidelines changes to address SB-743. If you have any questions or need additional information, please do not hesitate to contact me at 562-283-7175 or eric.shen@polb.com.

Sincerely,



Eric C. Shen, P.E., PTP
Director of Transportation Planning