

From: Ron Sissem
Sent: Monday, October 13, 2014 3:52 PM
To: CEQA Guidelines
Subject: Comments - Preliminary Discussion Draft - SB 743

Christopher:

Some basic comments/observations regarding the preliminary draft:

VMT and Land Use Types

Pages 8, 13, and 20

The text under Subdivision (b)(1) on page 8 does not make reference to regional VMT average *per land use* as a potential threshold. However, this average is then referenced as relating to a particular land use type on page 13 under 15064.3(b)(1) and page 20 under XVI.b). Will identifying average VMT based on whatever metric be problematic for “non-traditional” land use types such as mixed use where the proportion of different uses within a project can vary widely? Would multiple averages be needed based on thresholds for the percentage of types of uses within the project (e.g. 10-25%, 25%-50%, or 75%-90% commercial)? Similarly, the location of all land use types has a significant effect on average VMT. Would similar “graded” thresholds for VMT be established based on, for example, urban, semi-urban, or rural locations as is similarly used by CAPCOA for assigning GHG reductions based on particular project settings?

Pedestrian/Bicycle Safety

Pages 10, 14, and

Page 10, Subdivision (b)(3): Local Safety; page 14, (3) Local Safety; and page 20, XVI.c) discuss bicycle and pedestrian safety. Some clarification is needed regarding the term “many” as referenced on page 10. More importantly, do concerns about unsafe conditions apply only to existing pedestrian/bicycle users or users that a lead agency hopes to cultivate with improved related facilities/safety as may or may not be included in a pedestrian/bicycle plan? Further, in this regard, it seems that standards XVI.a) and XVI.c) on page 20 are at least partially redundant.

Thanks for the opportunity to comment.

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