



401 B Street, Suite 800
 San Diego, CA 92101-4231
 (619) 699-1900
 Fax (619) 699-1905
 www.sandag.org

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

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Dear Mr. Calfee:

SUBJECT: Comments on Preliminary Discussion Draft of Updates to the California Environmental Quality Act Guidelines Implementing Senate Bill 743

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the Preliminary Discussion Draft of Updates to the California Environmental Quality Act (CEQA) Guidelines Implementing Senate Bill 743 (SB 743) (Steinberg, 2013). SANDAG appreciates the time and effort that staff from the Governor's Office of Planning and Research (OPR) has taken to conduct outreach regarding the implementation of the SB 743 draft CEQA Guidelines and supports tools and streamlining provisions that enable the region to implement the Sustainable Communities Strategy.

SANDAG submitted comments to OPR in a letter dated February 14, 2014, regarding the Preliminary Evaluation of Alternative Methods of Transportation Analysis, and while OPR staff has answered many of the questions SANDAG had regarding implementation of SB 743, a few issues remain which are outlined below.

Transportation Metric and Threshold

There appears to be some uncertainty about the metric that will be used by local agencies when implementing SB 743. While vehicle miles traveled (VMT) seems to be the likely metric, careful consideration should be given to the threshold, if one is recommended. The current language describes the 'regional average' as a potential threshold to evaluate a project's impacts to the transportation system. This threshold may be useful in some instances, but given the diversity of regions in the state, regional average may not be the best threshold to determine a project's impacts. SANDAG recommends that local agencies maintain the discretion of developing their own threshold, taking into consideration guidance that will be provided by OPR, but not required to be considered compliant with the law.

Implementing the New Guidelines in Transit Priority Areas

SANDAG continues to encourage OPR to restrict the elimination of Level of Service (LOS) in CEQA to Transit Priority Areas, before applying the new standard statewide. Such a broad change to the CEQA Guidelines would be best implemented incrementally to better understand the implications of the new VMT metric.

Further, SANDAG recommends that case studies be fully evaluated before applying a new transportation impact analysis methodology statewide. SANDAG is aware of case studies being conducted by the Institute of Transportation Engineers and supports a full review and understanding of the results before the LOS methodology is eliminated from areas of the state (outside of Transit Priority Areas) where transit or alternative modes of transportation may not be an option now or in the foreseeable future.

Impacts to Public Transit

SANDAG builds transit projects that are operated by the Metropolitan Transit System and North County Transit District. Efforts to increase ridership are hampered when reliability and frequency are compromised. SANDAG would like to better understand what tools would be needed to ensure transit services and performance are not negatively impacted by eliminating LOS standards.

Impacts to Goods Movement

Goods movement stakeholders in the San Diego region have expressed concerns about port improvements that will likely generate VMT at levels higher than the regional average. These types of projects are trip generating projects and will likely exceed regional averages in all cases. SANDAG seeks clarification regarding whether the chosen metric will be used to evaluate all projects similarly, or if the average VMT metric is based on land use type.

Text of Proposed Amendments to Appendix F

While it is helpful to provide examples of potential mitigation measures to reduce VMT (Appendix F, [D][6][a-o]) and alternatives (Appendix F, [E][1-6]), SANDAG suggests outlining these on a website or a separate document to avoid the possibility these examples be construed as mandatory requirements, rather than a list of potential measures to consider.

SANDAG looks forward to working with OPR to implement the new CEQA Guidelines once they are adopted.

Sincerely,


GARY L. GALLEGOS
Executive Director

RRU/pch