

February 13, 2014

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

Re: SB 743 – Comments on “Preliminary Evaluation of Alternative Methods of Transportation Analysis for CEQA”.

Dear Mr. Chafee:

Thank you for the opportunity to comment on your efforts to update California Environmental Quality Act (CEQA) guidelines as directed by Senate Bill 743 (Steinberg).

The Sonoma County Transportation Authority/Regional Climate Protection Authority (SCTA/RCPA) acts as the countywide planning and programming agency for Sonoma County, and coordinates climate protection activities countywide. SCTA/RCPA represents nine incorporated cities/town and the unincorporated areas of Sonoma County.

SCTA/RCPA directors discussed the Office of Planning and Research's (OPR) approach to updating CEQA guidelines as set forth in the “Preliminary Evaluation of Alternative Methods of Transportation Analysis for CEQA” document on February 10, 2014. SCTA/RCPA Directors requested that the following comments be forwarded on to your agency for your consideration:

1. Although SCTA/RCPA recognizes that OPR is required to submit draft guidelines by July 1, 2014, the Board requests that the comment period on the “Preliminary Evaluation of Alternative Methods of Transportation Analysis for CEQA” be extended to allow the issue to be considered by local City Councils and Board of Supervisors. Local governments and local decision-makers would like to have the opportunity to carefully consider and discuss how the proposed changes could impact local processes and if the proposed alternative metrics would support or undermine local goals and policies.
2. It is critical that any alternative methods or metrics be easy to understand and be well defined. SCTA/RCPA requests that OPR provide guidance on how thresholds would be set, what possible mitigation could be required for each metric, and how specific metrics would be calculated and applied.
3. Sonoma County is very diverse with development types ranging from sparsely populated rural areas, small walkable villages, small-medium towns and cities, and larger cities with built-up central areas. SCTA/RCPA is concerned that a single alternative metric or measurement method would not be able to adequately measure transportation impacts at the local and regional level considering the diversity of development types statewide. SCTA/RCPA cautions



that a "one size fits all approach" is not appropriate, and alternative thresholds of significance and measurement techniques should be provided depending on project setting and location.

4. Sonoma County jurisdictions are concerned that the proposed alternative metrics would expose local governments to additional litigation. SCTA/RCPA recommends that OPR consider and discuss how alternative metrics would increase local risk of litigation in their final recommendation.
5. SCTA/RCPA is pleased to see that OPR is prioritizing safety and encouraging multi-model transportation. We would like to see a final metric which provides a way to measure progress in these areas.

Thank you again for the opportunity to comment on the "Preliminary Evaluation of Alternative Methods of Transportation Analysis for CEQA".

Sincerely,

A handwritten signature in cursive script that reads "Sarah Glade Gurney".

Sarah Glade Gurney
Chair, SCTA/RCPA

Cc: Sonoma County Legislative Delegation
SCTA/RCPA Directors, TAC, PAC