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November 20, 2014

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

Dear Mr. Calfee,

Thank you for the opportunity to review and provide comments on the "Preliminary Discussion Draft of CEQA Guidelines Implementing Senate Bill 743." As an agency that has approval authority for many types of multi-family, commercial, tourist, other residential, and transportation projects in the Lake Tahoe Region, we are in support of the changes proposed in the draft CEQA guidelines to implement Senate Bill 743.

As described in your discussion draft, Senate Bill 743 requires the Governor's Office of Planning and Research to amend the California Environmental Quality Act (CEQA) Guidelines to provide an alternative to level of service (LOS) as a criterion for evaluating transportation impacts. The alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." In our recent update to the Lake Tahoe Regional Plan, approved in December 2012, TRPA has already taken action in this direction by modifying our own roadway level-of-service requirements to allow flexibility where multi-modal transportation options are in place. We feel that OPR's revision to the transportation impacts section of CEQA that proposes to replace the LOS measurement with a measurement of VMT is reasonable, will help achieve the stated goals, and does not add an additional burden to reviewing agencies or project proponents. This proposal is consistent with the direction that our agency has been headed to support development in town centers that encourages walking, biking, and transit use, and achievement of environmental thresholds.

Thank you for providing a very well-written discussion draft that concisely described the issue at hand and the changes proposed, as well as providing ample time for review.

Sincerely,

A handwritten signature in blue ink that reads "Joanne S. Marchetta".

Joanne S. Marchetta
Executive Director