

From: Terry Farmer
Sent: Friday, November 14, 2014 11:10 PM
To: CEQA Guidelines
Subject: SB 743 Transportation Impact Analysis

Thank you for the opportunity to comment on the proposed changes to the analysis of transportation impacts per SB 743. After reviewing the proposed updates to the CEQA Guidelines and associated materials, I have a few comments.

1) It is my understanding that the proposed changes would make clear that LOS would no longer be used to evaluate CEQA impacts regarding transportation. However, LOS may still be used for planning purposes. This brings me to CEQA Guidelines Appendix G, CEQA Checklist X.b), which indicates that a project may have a significant impact if it conflicts with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect. Most general plans and specific plans have transportation policies and implementing measures, ostensibly established to reduce traffic impacts on the environment, based on LOS. I am wondering if this portion of the Checklist should be revised to make clear that policies and measures related to LOS are not included in the evaluation of potential conflicts with applicable land use plans.

2) Based on the discussion above, should CEQA Guidelines Section 15192(a)(1) also be revised to clarify that policies and measures based on LOS are not included to determine if a project meets the criteria set forth in this subsection?

3) The Class 32 CEQA categorical exemption applies to infill projects that, among other criteria, would not result in any significant effects to traffic. If a project is shown to have a VMT that is below the regional average VMT or some other relevant threshold, would that provide adequate justification for a finding of no significant traffic impacts for the purposes of the Class 32 CE?

4) Are there definitions for a "major transit stop" and "high quality transit corridor"? If a bus transit stop is merely a post with a sign on it, would it be a "minor transit stop"? If the purpose of the VMT analysis is to encourage more transit use, should any distinctions for transit stops be made?

Again, thank you for the opportunity to comment. I look forward to the end result of this process.

Terry Farmer