



# TRINITY COUNTY

## PLANNING DEPARTMENT

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Terry Roberts  
Director of the State Clearinghouse  
Governor's Office of Planning and Research  
P.O. Box 3022  
Sacramento, CA 95812-3044

SENT BY FAX (916) 323-3018  
AND EMAIL [CEQA.GHG@opr.ca.gov](mailto:CEQA.GHG@opr.ca.gov)

**RE: Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions**

Dear Ms. Roberts:

Trinity County Departments of Planning and Transportation appreciate the opportunity to participate in the OPR's SB 97 Local Government Focus Group and to comment on the Draft CEQA Guideline Amendments for Greenhouse Gas Emissions (GHG). We have reviewed the Preliminary Draft Guideline Amendments, and find most of the document to be well considered, and an excellent step in reducing greenhouse gasses in the State. However, we are concerned about the changes to Section XV (now Section XVI) *TRANSPORTATION AND TRAFFIC*.

It is common knowledge that idling vehicles and trucks accelerating from a stop emit more greenhouse gases than traffic moving at a constant speed. Because of this, it would seem that traffic congestion is a question that is very relevant to GHG emissions, and should not be removed from consideration under CEQA, especially in the name of modifying CEQA to address GHG.

Though our participation in the Focus Group, we have read the letter to you dated August 25, 2008 City of Los Angeles Office of Zoning Administration, which seems to be the impetus for these proposed changes. We understand the points in that letter. However, our point of view from Trinity County, with its widely dispersed small communities, no incorporated cities, no freeways and, to date, no traffic signals, is obviously a lot different from the situation in the City of Los Angeles. In fact, we are just beginning to experience significant level of service (LOS) problems and implement some of the LOS mitigation strategies for which Los Angeles has already "crossed the threshold" to a position where benefits of such LOS improvement measures are now greatly diminished. For example, we are only now starting to seriously consider charging traffic mitigation fees to developers who impact Level of Service.

Level of Service at intersections is our main problem. We have three State Highways (not freeways, and none exceed two lanes except for the occasional passing lane). The State Highways flow freely, with only minor congestion on State Highway 299 through our largest community and county seat, Weaverville, where roadway LOS, measured by volume to capacity ratio, functions at LOS D or E during the summer. Most County roads are dead-end, connecting

only to a State Highway. Almost all developments (mostly minor residential subdivisions) result in adverse LOS impacts at the intersections of County roads and the State Highways, particularly in Weaverville, where delays for a left turn entering State Highway 299 can exceed one minute.

We are in the process of updating our Regional Transportation Plan, in which we intend to include a traffic model for Weaverville, with updated LOS calculations and possibly a signalization study to determine the best locations for traffic signals along State Highway 299 in Weaverville. When developers come in with a project that will result in a LOS D or E at a County Road/ State Highway intersection, rather than requiring a signal wherever that development happens to feed onto the highway, we would like to be able to require an impact mitigation fee to contribute to the signalization plan. We understand the CEQA Checklist can be customized by a lead agency, but we are concerned that removing all reference to LOS in Appendix G, we could lose a challenge to the impact fee due to a lack of nexus.

Los Angeles may have reached their tipping point as far as signalization and freeway widening, but not all areas of the state are in that same position. The letter from Los Angeles acknowledges our reluctance to "downgrade" LOS intersection evaluations as part of CEQA review. Because of this acknowledgement they recommend that OPR not completely "downgrade" LOS intersection analysis in all CEQA review, but give Lead Agencies the flexibility to exempt LOS impact analysis for projects that can implement feasible and effective VMT reducing measures. Their suggestion is to leave the LOS questions in the guidelines, but follow them up with "that is not offset by comparably significant reduction in VMT".

Therefore, Trinity County Departments of Planning and Transportation respectfully request you restore both Traffic questions that relate to Level of Service; Question XVa, including the reference to volume-to-capacity ratio, and Question XVb, in its entirety. We suggest you do as the LA Planning Department suggests, and add a phrase to those questions that allows the impact to be offset by reduction in vehicle miles traveled, or add another question to the Traffic Section regarding increasing regional vehicle miles traveled (unlike Question a, which focuses on the load on the adjacent receiving streets).

Sincerely,



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Director of Planning and Transportation



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