



THE CITY OF SAN DIEGO

November 10, 2009

Christopher Calfee, Special Counsel
ATTN: CEQA Guidelines
California Resources Agency
1017 L Street, #2223
Sacramento, CA 95814

Dear Mr. Calfee:

Subject: Proposed Amendments to the State CEQA Guidelines

The City of San Diego has reviewed the revised text of the Proposed Amendments to the State CEQA Guidelines for Greenhouse Gas Emissions, as described in the Notice of Proposed Amendments dated July 3, 2009. The following comments are specifically regarding the proposed modifications of the CEQA Initial Study Checklist under the Transportation/Traffic Section. The Natural Resources Agency's proposed changes are as follows:

XVI. TRANSPORTATION/TRAFFIC -- Would the project:

a) ~~Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?~~ Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

b) ~~Exceed, either individually or cumulatively, a~~ Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?



Development Services

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d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

e) Result in inadequate emergency access?

f) Result in inadequate parking capacity?

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The City's Development Services Department's comments to the Natural Resources Agency's proposed revisions are as follows:

1. Regarding item a), the City's Development Services Department wishes to reiterate our comments of January 26, 2009. We propose that the existing language be retained with the addition of vehicle miles traveled to the list of measures to be considered.
2. Regarding item b), the City's Development Services Department suggests that the language be changed to "Exceed either individually or cumulatively, a level of service standard established by the local agencies."
3. Regarding item f), the City's Development Services Department proposes to retain the existing language for the reasons stated in our comments of January 26, 2009. Deleting parking capacity is essentially ignoring parking demand in our communities. Providing too much parking or not enough parking can both be a problem for communities and a region; therefore, neglecting to acknowledge a need is not recommended. We propose to maintain the "Result in inadequate parking capacity" measure as originally stated.

Sincerely,



Ann French Gonsalves, P.E.
Senior Traffic Engineer
Development Services Department

cc: Cecilia Gallardo, Assistant Deputy Director, Environmental Analysis,
Development Services Department
Patti Boekamp, Director, Engineering and Capital Projects Department