

Letter 30

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Comment 30-1

Commenter recommends changes to CEQA Guidelines Initial Study Checklist, Transportation/Traffic section (a). These changes would remove the word “capacity” and add “performance measure threshold” and “cumulative” to determine the significance of a potential impact to the transportation system. In addition, three minor changes are suggested.

Response 30-1

The Natural Resources Agency has revised the text of question (a) to refocus that question from the capacity of the circulation system to the performance of the circulation system as indicated in an applicable plan or ordinance. While not identical, the revision to question (a) is similar to the suggested text in many respects, and appears to accomplish the same objective. The Natural Resources Agency declines to add the word “cumulative” because the question as revised asks about a project’s consistency with adopted policies, which by nature address cumulative conditions. Additionally, the section of Appendix G entitled “Evaluation of Environmental Impacts” already instructs lead agencies to address direct, indirect and cumulative effects for all of the Appendix G questions, so addition of the word “cumulative” as suggested is not necessary. The comment does not provide explanation supporting the use of the word “facilities” instead of “paths,” or “public” instead of “mass,” and the Natural Resources Agency finds that making such changes would not result in a substantive benefit. Appendix G provides a sample checklist only, and as explained in the Note preceding the checklist, agencies may revise the checklist as appropriate for their own circumstances. Thus, if an individual agency prefers the phrase “bicycle facilities,” it may use that term in its checklist. No further revisions are required in response to this comment.

Comment 30-2

Commenter recommends new changes to CEQA Guidelines Initial Study Checklist, Transportation/Traffic section (c). These changes would remove “safety risks” and expand the question to ask a lead agency to determine if a project is inconsistent with a list of factors.

Response 30-2

The Natural Resources Agency has focused this rulemaking package primarily on changes necessary to implement SB97, relating to the analysis and mitigation of greenhouse gas emissions. The proposed amendments would not alter question (c) in the transportation section of Appendix G, relating to air safety. Such changes may be considered in a future update of the CEQA Guidelines, but the Natural Resources Agency declines to incorporate such changes at this time because they exceed the scope of this rulemaking package.

Comment 30-3

Commenter recommends changes to CEQA Guidelines Initial Study Checklist, Transportation/Traffic section (d). These changes would replace and expand the existing question to consider demand on the transportation system, as a whole, as currently designed or create a conflict with adopted design or placement standards.

Response 30-3

The Natural Resources Agency has focused this rulemaking package primarily on changes necessary to implement SB97, relating to the analysis and mitigation of greenhouse gas emissions. The proposed amendments would not alter question (d) in the transportation section of Appendix G, relating to roadway hazards. Such changes may be considered in a future update of the CEQA Guidelines, but the Natural Resources Agency declines to incorporate such changes at this time because they exceed the scope of this rulemaking package. Moreover, the suggested changes would eliminate safety considerations from the transportation section, which the Natural Resources Agency would not support. The suggested text is, therefore, rejected.

Comment 30-4

Commenter recommends changes to CEQA Guidelines Initial Study Checklist, Transportation/Traffic section (e). These changes would expand the existing question to consider emergency vehicle response times according to a list of factors.

Response 30-4

The Natural Resources Agency has focused this rulemaking package primarily on changes necessary to implement SB97, relating to the analysis and mitigation of greenhouse gas emissions. The proposed amendments would not alter question (e) in the transportation section of Appendix G, relating to emergency access. Such changes may be considered in a future update of the CEQA Guidelines, but the Natural Resources Agency declines to incorporate such changes at this time because they exceed the scope of this rulemaking package.

Comment 30-5

Commenter recommends changes to CEQA Guidelines Initial Study Checklist, Transportation/Traffic section (f). These changes would address “non-automotive” transportation and expand the included list of such modes of transportation.

Response 30-5

Recognizing that non-automotive transportation is a key component of reducing statewide greenhouse gas emissions, the Natural Resources Agency has revised question (f) in response to this and similar comments. The revised text of question (f) is substantially similar to the suggested text, except the revised text also addresses the performance and safety of non-automotive facilities. Because the revised text would achieve the same objective as the suggested text, no further revision is required in response to this comment.