

## Letter 44

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August 27, 2009

### **Comment 44-1**

Clarify Appendix G: Transportation/Traffic term “measure of effectiveness” is limited strictly to environmental impacts.

### **Response 44-1**

Existing CEQA law precludes analysis of non-environmental effects like social or economic effects unless they cause an indirect change to the physical environment. (*Citizens Ass. For Sensible Development of Bishop Area v. County of Inyo* (4<sup>th</sup> Dist. 1985) 172 Cal.App.3d 151, 170.) This is because CEQA itself only contemplates analysis of a project’s environmental impact. (State CEQA Guidelines section 15131.)

Appendix G, Section XVI , subsection (a) changes the focus from an increase in traffic at a given location to the effect of a project on the overall circulation system in the project area. This change is appropriate because an increase in traffic, by itself, is not necessarily an indicator of a potentially significant environmental impact. Similarly, even if some projects may result in a deterioration of vehicular level of service – that is, delay experienced by drivers – the overall effectiveness of the circulation system as a whole may be improved. This section, as all sections being added, amended, or deleted, focuses solely on the affects of a given project on the environment, as such focus remains within the permissible scope of CEQA itself. (Pub. Res. Code section 21000 *et seq.*) As the Commenter is not seeking any substantive change, the Natural Resources Agency will take no further action on this comment.