

Letter 85

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Comment 85-1

Commenter expresses overall support for the proposed amendments to Appendix G.

Response 85-1

The Natural Resources Agency appreciates the support for the amendments to Appendix G. No revision is required in response to this comment.

Comment 85-2

Typical transportation impact analysis under CEQA practice too frequently prioritizes automobile level of service to the detriment of other modes. Commenter supports amendments to existing questions (a) and (g) in the transportation section of Appendix G that call for consideration of the overall performance of the circulation system.

Response 85-2

The Natural Resources Agency appreciates the support for the amendments to Appendix G. No revision is required in response to this comment.

Comment 85-3

Commenter supports removing the question regarding parking from Appendix G.

Response 85-3

The Natural Resources Agency appreciates the support for the amendments to Appendix G. No revision is required in response to this comment.

Comment 85-4

Additional changes to the Guidelines should be adopted to minimize the unintended consequences of pursuing congestion relief as a strategy for minimizing environmental impacts.

Response 85-4

The primary purpose of the proposed amendments is to update the CEQA Guidelines on the analysis and mitigation of greenhouse gas emissions. While certain changes to Appendix G were proposed pursuant to the Natural Resources Agency's general authority to update the CEQA Guidelines, those changes were modest and were intended to address certain misapplications of CEQA in a way that hinders the type of development necessary to reduce greenhouse gas emissions. Transportation planning and impact analysis continues to evolve, as new multimodal methods of analysis and guidelines on the integration of all modes of transportation and users into the circulation system are being developed. Additional updates to Appendix G may be appropriate in the future to address those developments. The comment did not propose any specific revisions, however, and the Natural Resources Agency does not intend to make any additional revisions as part of this rulemaking package. Therefore, the suggestion to make additional changes to Appendix G is rejected.