

Letter 106

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Public

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**Comment 106-1**

Commenter expresses overall support of the amendments and revisions.

**Response 106-1**

The Natural Resources Agency appreciates the commenter's support.

**Comment 106-2**

Commenter offers further informational evidence to support removing "parking" from the Appendix G, Initial Study Checklist.

**Response 106-2**

The Natural Resources Agency appreciates the commenter's effort to provide factual evidence to support amendments to Appendix G, Section XVI. The Natural Resources Agency believes its record is sufficient and adequately supports the amendments.

**Comment 106-3**

Commenter disagrees that the subject of parking be added back to the Appendix G, Initial Study Checklist.

**Response 106-3**

The Natural Resources Agency agrees.

**Comment 106-4**

Commenter brings to the attention a statutory exemption for restriping a roadway to add capacity, suggesting the Natural Resources Agency reconsider or amend it to allow restriping for the addition of non-automobile transportation capacity.

**Response 106-4**

The Natural Resources Agency declines to alter State CEQA Guidelines subsection 15282(j). Subsection (j) provides: “a project for restriping streets or highways to relieve traffic congestion as set forth in Section 21080.19 of the Public Resources Code.” Nothing in SB 97 indicated to the Natural Resources Agency that the Legislature intended to alter this exemption.

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 the Guidelines 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 reduction greenhouse gas emissions.

With respect to amendments made in Appendix G, Section XVI: Transportation/Traffic, the Natural Resources Agency recognizes 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 is rejected.