

Letter 92

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Comment 92-1

Commenter supports revisions to the Appendix G, Section XVI: Transportation/Traffic checklist questions. Revisions will support a more consistent approach to transportation analysis with environmental and public health goals, including non-motorized safety, traffic-related air pollution, and GHG emissions.

Response 92-1

The Natural Resources Agency appreciates the support for the revisions to the Appendix G transportation questions. Specific suggestions for revisions are responded to below.

Comment 92-2

Commenter generally agrees with the Natural Resources Agency's Initial Statement of Reasons relating to the Appendix G, Section XVI. However, the wording of questions could be more precise in the interest of clarity and consistent interpretability.

Response 92-2

The Natural Resources Agency appreciates the general support for the revisions to the Appendix G transportation questions. Specific suggestions for further revisions are responded to below.

Comment 92-3

Revise question (a) in Appendix G, Section XVI: Transportation/Traffic to refocus the question on changes in circulation system performance based on established performance indicators. This would shift the question away from the consideration of a project conflicting with a plan, policy, or ordinance. The commenter's concern is that these planning tools may not have an established measure of performance.

Response 92-3

As explained in its Notice of Proposed Changes (October 23, 2009), the purpose of the revisions to question (a) is to “refocus the question from the capacity of the circulation system to the performance of the circulation system as indicated in an applicable plan or ordinance” in order to “recognize a lead agency’s discretion to choose its own methodology for determining transportation-related impacts of a project while ensuring that all components of a circulation system are addressed in the analysis.” Because the Government Code requires all cities and counties to include plans for their circulation systems in their General Plans, focusing on a project’s consistency with such plans and policies is appropriate. (Government Code, § 65302(b).) While the comment appears to express concern that not all plans will establish thresholds or measures of effectiveness, the Natural Resources Agency notes that the General Plan Guidelines do suggest the development of such measures in the circulation element. (General Plan Guidelines, at p. 60.) The Natural Resources Agency also notes that the language proposed in the comment similarly assumes the existence of an adopted measure of effectiveness, and so finds no advantage in that language compared to the revised text published on October 23, 2009. Therefore, the Natural Resources Agency declines to incorporate the precise text suggested in the comment.

Comment 92-4

Revise question (b) Appendix G, Section XVI: Transportation/Traffic to directly refer to standards, remove “level of service”, and encourage lead agencies to develop multi-modal measures.

Response 92-4

The Natural Resources Agency declines to remove the phrase “level of service” from question (b) of the transportation section of Appendix G. That question, as revised, would ask whether a project would conflict with the provisions of a congestion management program. The Government Code requires that a congestion management program contain level of service standards for particular roadways. (Government Code, § 65089(b)(1)(A).) Therefore, deletion of that phrase is not appropriate. Moreover, the Natural Resources Agency finds no advantage in the language suggested in the comment compared to the text as proposed. Therefore, the Natural Resources Agency declines to incorporate the precise text suggested in the comment.

Comment 92-5

Revise proposed question (f) Appendix G, Section XVI: Transportation/Traffic to recognize “sidewalks and intersections” relevant to the safety of pedestrians. Commenter specifically calls for ensuring all roadway users are sufficiently taken under consideration.

Response 92-5

As explained in the Notice of Proposed Changes, revisions to question (f) of the transportation section of Appendix G were intended to “clarify and update language regarding safety considerations and other mass transit and non-motorized transportation issues.” The suggested addition of the words “sidewalks and intersections” and references to all facilities users is not necessary because the Government Code requires that circulation elements “plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel”, and that such plans specifically address the needs of “bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors.” (Government Code, § 65302(b)(2).) Thus, the plans referred to in question (f) will already address the specific concerns raised in the comment. Therefore, the Natural Resources Agency declines to incorporate the precise text suggested in the comment.