

## Lockey, Heather@CNRA

---

**From:** Linda Johnson <LJohnson@anaheim.net>  
**Sent:** Thursday, March 15, 2018 10:24 AM  
**To:** CEQA Guidelines@CNRA  
**Subject:** Comment Letter  
**Attachments:** SB743 Comment Ltr\_Anaheim\_RE\_03\_15\_18.pdf

Please see the attached comment letter.

### Linda Johnson

Principal Planner

City of Anaheim

[Public Works Department](#) | [Traffic and Transportation](#)

200 South Anaheim Boulevard | Suite 276

Anaheim, CA 92805

(714) 765-4957

[LJohnson@anaheim.net](mailto:LJohnson@anaheim.net)



---

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAWS. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, forwarding, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by e-mail or telephone, and delete the original message immediately. Thank you.



City of Anaheim  
**DEPARTMENT OF PUBLIC WORKS**

March 15, 2018

Christopher Calfee, Deputy Secretary and General Counsel  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

**RE: Comments on Office of Planning and Research (OPR) Proposed SB 743  
Implementation Guidelines**

Dear Mr. Calfee,

City of Anaheim staff has reviewed the proposed SB 743 Implementation Guidelines and offers the following comments:

Please revise the guidelines to indicate the methodology for non-traditional office, commercial and residential land uses. For instance, the question of how a hotel project would be modeled for vehicle miles travelled (VMT) has been raised to OPR more than once at OPR workshops, however, this question has not yet been answered. Please also revise the guidelines to consider other similar uses that serve larger geographic areas such as hospitals, colleges, tourist-oriented destinations, concert and sporting venues, etc.

Staff understands the Southern California Association of Governments (SCAG) will be requesting an extension of the timeline to implement the proposed guidelines and concurs with this request. It is critical that lead agencies be provided sufficient time to adequately prepare for the methodological changes that will be required through implementation of SB 743. The currently targeted implementation date of January 1, 2020, as prescribed in the proposed new Guidelines Section 15064.3(c) entitled "Applicability", should be revised to allow for a minimum full two-year implementation opt-in period from the effective date of the final rule-making.

Thank you for addressing our comments. If you have any questions or need any further information, please contact me at [REmami@anaheim.net](mailto:REmami@anaheim.net) or 714-765-5065.

Sincerely,

Rudy Emami, P.E.  
Public Works Director

ATT  
CC: File