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To:	CEQA Guidelines@CNRA
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Subject:	CEQA Guidelines Update/SB 743: SAFETY
Date:	Thursday, March 15, 2018 4:43:57 PM

To:
CA-Natural Resources Agency
CA-Governor's Office of Planning and Research

I'm writing to provide comments on the subject document. Specifically, revisions to: Appendix G - XVII. TRANSPORTATION~~/TRAFFIC~~

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1. The 1-20-16 proposal included the following revision which reflected the safety language in SB 743, *"...addressing the safety or…"*. The 11/2017 revisions removed this addition. With that removal, the safety intent of the SB 743 is no longer reflected in Appendix G which is a critical tool for local jurisdiction in reviewing projects. I urge the State to re-insert that statement in to the Checklist in order to fulfill the intent of the legislation.
2. I was unable to locate the public comment which suggested the removal of that language in the public comment files on your website. Please identify the individual, agency or other organization which requested the language be removed and the rationale provided.
3. The language in the November 2017 Technical Advisory on Evaluating Transportation Impacts in CEQA that begins on Page 21, *"Because safety concerns result from many different factors…best addressed at a programmatic level"*. Presents several problems, **a)** the accuracy of this statement is, on the face of it, incorrect. Safety concerns are regularly if not most often identified at the project level, **b)** the statement presents an internal conflict with State planning documents. In Appendix B: SB 743 Safety Technical Advisory in the 2017 General Plan Guidelines, the discussion of applicability of SB 743 safety elements begins with project level elements ("sharp curves or dangerous intersections") and continues to focus on project level impacts throughout the new Appendix.
4. Stepping back from the specifics above, it bears explanation as to how the **original**, pre-SB743 Appendix G language could have **more** references to safety than the proposed revisions. Not only was the 11/2017 language (*"…addressing the safety or…"*) removed, but the safety language under the **current** Appendix G ("*f) Conflict with adopted policies…or **safety** of such facilities?"*) was removed as well. It would appear that despite the passage of SB 743, the proposed revisions are a step backward in terms of safety.
5. The County has experienced schools being sited in exurban and rural areas, outside the voter approved urban limit line, with very limited connecting transportation infrastructure. This practice is in glaring contrast to local (growth management, complete streets, safe routes to school), state (GHG reduction legislation, complete streets legislation, health in all policies, safe routes to school, etc.), and regional planning policies (priority development areas) which is allowed under permissive State school siting guidelines. These specific conflicts are in addition to the more obvious, general need to have coherent land development as espoused throughout the State's General Plan Guidelines.

   The safety elements in SB 743, as reflected in the original Appendix G revisions, gave the County

a tool to address this widely acknowledged problem. I understand there is an ongoing process at the Department of Education to address this issue. However, as anyone who has experience with this topic will attest, **a)** success in solving the seemingly intractable problems with school siting practices is far from guaranteed, and **b)** new regulations, assuming they will be effective, will not be in place for years at best.

The original implementation guidance for AB 32 (Global Warming Solutions Act of 2006) included guidance for improved school siting in the original draft, that language was removed in the final version with no explanation. The Health in All Policies initiative included school siting solutions in its original charge. That issue was removed in subsequent documents without explanation. When CDPH staff was questioned on the removal, it was stated, "I'm not allowed to discuss that topic". OPR and CDE held a symposium in 2012 acknowledging the conflict between school siting practices and the new, prevailing land use planning paradigm and indicated that changes were coming. I bring this history up for several reasons, **a)** to highlight how much time has passed since the intent to solve the problem has been expressed, and **b)** to observe that there appears to be some very effective opposition to addressing the school siting problem. In the interest of transparency, and in order for interested jurisdictions to more effectively engage on this topic, the State should disclose the specific source of the opposition.

The original Appendix G language at least gave local jurisdictions the tools to indirectly address the issue. Again, the County respectfully requests that the language be reinserted.

Thank you for this opportunity to comment on these policies.

- John

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