

Lockey, Heather@CNRA

From: Brian Holt <BHolt@ebparks.org>
Sent: Thursday, March 15, 2018 2:53 PM
To: CEQA Guidelines@CNRA
Cc: Kristina Kelchner; Erich Pfuehler
Subject: Comments - Proposed CEQA Guidelines Amendments
Attachments: EBRPD Comments CEQA Guidelines Amendments 031518.pdf

Hello –

Please accept the attached comments on the proposed amendments to the State CEQA Guidelines. Please feel free to contact me with any questions.



Brian Holt
Chief | Planning/GIS
East Bay Regional Park District
2950 Peralta Oaks Court, Oakland, CA 94605
T: 510-544-2623 | F: 510-569-1417
BHolt@ebparks.org | www.ebparks.org

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March 15, 2018

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

Sent via email to: CEQA.Guidelines@resources.ca.gov

RE: Notice of Proposed Rulemaking – Amendments and Additions to the State CEQA Guidelines

Mr. Calfee –

The East Bay Regional Park District (“District”) appreciates the opportunity to provide comments on the proposed amendments and additions to the State California Environmental Quality Act (CEQA) Guidelines. The District is a special district charged with protecting open space and providing public access throughout Alameda and Contra Costa County. The District currently manages over 121,000 acres of open space in 73 regional parks and over 200 miles of regional trails.

The District supports the goals of the amendments and additions to the State CEQA Guidelines, particularly as it relates to analysis of transportation impacts, to support development that is accessible to transit. However, the District remains concerned that the lack of guidance and specificity in the guidelines regarding analysis of park and open space improvements exposes the agency and similar agencies to potential challenges arising from analysis of transportation impacts.

Currently, the Institute for Transportation Engineers does not publish trip generation rates for park projects. This, coupled with the lack of published guidance from the Office of Planning and Research (OPR), leaves projects intended to protect the environment, provide for healthful outdoor recreation, and manage demand for public access to regional parklands at risk.

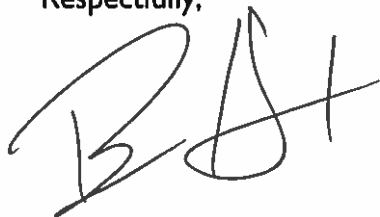
We recognize the requirement for analysis of transportation impacts using Vehicle Miles Traveled (VMT) methodology is optional until January of 2020. The District would welcome the opportunity to work with the OPR and similar agencies to develop guidance necessary to ensure such projects can adequately evaluate transportation impacts without undue burden and exposure to legal challenge arising from ambiguity.

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Thank you for the opportunity to provide comments. Please feel free to contact me at (510) 544-2623 or bholt@ebparks.org should you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'B. Holt', written in a cursive style.

Brian W. Holt
Chief, Planning/GIS

Cc: Robert Doyle, General Manager
Erich Pfuehler, Government Affairs Manager