

Lockey, Heather@CNRA

From: Hentrich, Katie <Katie.Hentrich@sandag.org>
Sent: Thursday, March 15, 2018 3:44 PM
To: CEQA Guidelines@CNRA
Cc: Martin, Andrew; Clementson, Coleen; Litchney, Seth; Stoll, Muggs; Curry, Rick; Arias, Elisa; Trom, Philip
Subject: Senate Bill 743 Proposed Language Updates and Technical Advisory - SANDAG Comments
Attachments: Senate Bill 743 Technical Advisory - SANDAG Comments.pdf

Dear Mr. Calfee,

Thank you for the opportunity to comment on the Senate Bill 743 Proposed Language Updates and Technical Advisory. Please see the attached comment letter from SANDAG. If you have any questions or concerns, please feel free to contact me.

Thank you,

Katie Hentrich
Regional Energy/Climate Planner

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March 15, 2018

File Number 3300300

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

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Dear Mr. Calfee:

SUBJECT: Comments on Comprehensive California Environmental Quality Act Guidelines Package and Senate Bill 743 Technical Advisory

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the Proposed California Environmental Quality Act (CEQA) Guidelines Implementing Senate Bill 743 (Steinberg 2013) (SB 743) and the Technical Advisory on Evaluating Transportation Impacts in CEQA. SANDAG also appreciates the time and effort that staff from the Governor's Office of Planning and Research (OPR) has taken to conduct outreach regarding the updates pursuant to SB 743 and the proposed updates to CEQA.

SANDAG previously submitted comments to OPR in three separate letters. The first was dated February 14, 2014, and addressed the Preliminary Evaluation of Alternative Methods of Transportation Analysis. The second was dated November 20, 2014, and addressed the Preliminary Discussion Draft. The third was dated February 29, 2016, and addressed the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. While OPR staff has answered many of the questions and concerns SANDAG has had regarding implementation of SB 743, a few issues remain, which are outlined below.

Technical Advisory

Considerations for all Projects

On page 4, the Technical Advisory states that, "lead agencies should not truncate any [Vehicle Miles Traveled (VMT)] analysis because of jurisdictional or other boundaries." SANDAG suggests clarifying this language to apply to development projects and plans for cities and counties; currently, the language could be interpreted to apply to all CEQA projects.

Section F

On page 18 of Section F of the Technical Advisory, the second bullet point discusses the addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within the existing public right-of-way (ROW). SANDAG suggests amending this bullet point so that the language applies to bike or pedestrian facilities within or adjacent to existing ROW. Whether or not a bike or pedestrian facility is located within existing ROW, it is not likely to result in a substantial or measurable increase in vehicle travel.

Mitigation and Alternatives

On page 21, the Technical Advisory refers to “tolling new lanes” and “converting existing general-purpose lanes to [high-occupancy vehicle] or [high-occupancy toll] lanes” as “appropriate” mitigation and alternatives for increased travel induced by capacity increases. This mitigation measure appears in contrast to previous State guidance and legislation (e.g., Senate Bill 1330 [Committee on Judiciary, 2009], Assembly Bill 744 [Torricono, 2009], Assembly Bill 1023 [Wagner, 2011]). Furthermore, SANDAG currently has no legal authority to implement these types of road pricing policies.


Quantifying Induced Vehicle Travel Using Models

Pages 28 and 29 of the Technical Advisory characterize travel demand models as inadequate for performing analysis of induced vehicle travel. They assert that, generally, the “most accurate assessment” of induced vehicle travel involves “applying elasticities from academic literature,” adding that “if a lead agency chooses to use a travel demand model, *additional analysis* would be needed to account for induced land use” (emphasis added). The Technical Advisory also states that “proper use of a travel demand model” captures some components of induced VMT, and then offers options for supplementing travel demand model analysis to incorporate VMT effects of “subsequent land use change,” which are to “employ an expert panel...adjust model results to align with empirical research...[and] employ a land use model, running it iteratively with a travel demand model.”

Elasticities from academic literature must be applied carefully, as there often is a distribution of impacts from improved accessibility that a “one size fits all” approach does not capture. There are circumstances in which applying a generalized “rule of thumb” is inappropriate and would not accurately reflect the local socioeconomic outcomes of land use changes. For example, application of a generalized elasticity measure might overlook important local variations in household composition, employment patterns, student/military status of household members, or other non-family household behaviors. Induced demand forces many behavioral changes into the decision-making process for both transportation and land use development, as well as for home/work location choices. Activity-based models capture a larger share of transportation decision-making changes that are characterized as “induced demand.” Induced demand has different impacts depending on the geographic scale of analysis. New land use developments around a facility may have shifted from other locations in the region. What may be an increase in demand for a new facility could result in a decrease in demand around other locations in the area of analysis. Any application of elasticities would need to consider the geographic scale of analysis. SANDAG suggests clarifying this language to incorporate these aspects into the Technical Advisory’s discussion of the analysis required when choosing a travel demand model.

SANDAG appreciates the opportunity to comment and looks forward to working with OPR to implement the new CEQA Guidelines.

Sincerely,



for

CHARLES "MUGGS" STOLL
Director of Land Use and Transportation

MST/KHE/AMA/kwa