



ASSOCIATION OF  
ENVIRONMENTAL  
PROFESSIONALS

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 10<sup>th</sup> Street  
Sacramento, CA 65814

Subject: Updating Transportation Impacts Analysis in the CEQA Guidelines (SB 743 Changes to CEQA Guidelines)

Dear Mr. Calfee:

The Association of Environmental Professionals (AEP) is pleased to provide the following comments on the Draft CEQA Guidelines addressing transportation impacts.

1. Overall, we are concerned about the level detail and direction that is provided in the draft guidelines. While the guidelines state that there is flexibility for lead agencies, by putting in so much detail the risk of straying from the detail in the guidelines is significantly elevated.
2. The thresholds/guidelines would benefit from some overarching objectives and require that any methodologies adhere to those objectives. Otherwise, there is room to manipulate the traffic modeling to achieve specific outcomes, without a meeting the stated objectives.
3. The use of the "regional average" for a significant threshold is undefined. In addition, it appears that projects that are above the regional average (49 percent) could be found to have significant impacts. As a result, the use of Negative Declarations for infill projects where impacts are found to be significant because they that fall above the regional average would be limited, thereby increasing the overall cost and time to achieve CEQA clearance.
4. The revised guidelines should include a discussion on appropriate mitigation measures to provide better guidance to agencies on how to address potential impacts. The mitigation measures included in the proposed revisions to Appendix F should be moved into the new §15064.3 for that purpose.
5. We recommend that OPR provide examples or case studies to demonstrate how a CEQA Transportation Impact Analysis would be conducted to demonstrate how projects with potential impacts under the proposed "Average VMT" threshold could be reduced to less than significant with incorporation of mitigation measures.

AEP appreciates the efforts undertaken by OPR on this substantial effort, and we would be happy to assist OPR in anyway in drafting the revisions to the Guidelines.

Sincerely,

Gene Talmadge  
President

