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June 7, 2019

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: Transportation Committee

Dear Honorable Members:

SUGGESTED TECHNICAL CORRECTIONS TO THE PROPOSED CALIFORNIA ENVIRONMENTAL QUALITY ACT TRANSPORTATION SECTION UPDATE; CF 14-1169

In consultation with the Department of Transportation (LADOT) and the Office of the City Attorney, the Department of City Planning has prepared the enclosed suggested technical corrections and clarifications to the proposed California Environmental Quality Act (CEQA) Transportation Section Update for consideration by the Transportation Committee. These modifications are technical in nature. The updates align the proposed Thresholds Guide with the State guidance as published in the recent Office of Planning and Research (OPR) Technical Advisory, provide greater clarity, and reflect local conditions.

Specifically, OPR updated the formerly recommended land use plan threshold in the recent update to the OPR Technical Advisory. The proposed modification would revise the Thresholds Guide to align with the Technical Advisory update by applying an efficiency-based threshold, as opposed to solely relying on a consistency check with the SCAG RTP/SCS. The modification would evaluate if VMT per service population (which is the combination of VMT per capita and VMT per employee) exceeds 15% below the regional average, as consistent with State guidance, per SB 743.

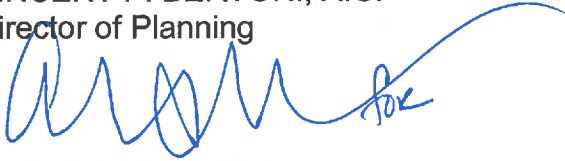
Other minor technical edits would also serve to add language in introduction to clarify the authority provided in the State CEQA guidelines; update the order of the screening questions for land use projects; detail the types of regional-serving projects that may be considered, including retail, entertainment, and event centers; and provide further clarity on the definition of transit qualification, which more accurately consider local conditions,

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such as fixed guideway transit options operating in the City of Los Angeles (Orange Line Bus Rapid Transit), which provides transit service more similar to rail than to bus.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

A handwritten signature in blue ink, appearing to read 'Vincent P. Bertoni', with a long, sweeping flourish extending to the right.

Kevin J. Keller, AICP
Executive Officer

VPB:KJK:ALV:rg