



Kick Off Meeting and Survey Summary

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RE: **Transportation Impact Analysis Guidelines Update Kick Off Meeting and Survey Summary**

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INTRODUCTION

The Planning Department hosted a Transportation Impact Analysis Guidelines Update kick-off meeting with local and regional government stakeholders and environmental and transportation consultants on July 27, 2017. The purpose of the meeting was to provide an overview regarding the guidelines update and solicit feedback on key questions, as they relate to California Environmental Quality Act (CEQA).

At that meeting, the department also distributed a survey for the same stakeholders to complete by August 25, 2017. The department also held an informational hearing at the Planning Commission on September 28, 2017. At that hearing and until November 3, 2017, the department sought feedback on the scope of the guidelines update from the commission, consultants, and the public.

The department summarized verbal and written comments received into the following two categories:

- CEQA: comments that the department will consider for the guidelines update
- Non-CEQA: comments that do not relate to CEQA (e.g., policies, regulations, etc.) and the department will not consider these comments within the scope of the guidelines update

The department further categorized these two categories by each transportation topic. Please see below for a summary of comments. The summary is not exhaustive, and the department will continue to engage with stakeholders throughout the guidelines update.

CEQA

The following are comments that the department will consider as part of the guidelines update. While the department will consider these comments, this category does not imply the department will incorporate the suggestions from the comments into the guidelines update.

General

Connection between transportation topics

Comments stated that a connection exists between the analyses for many of the transportation topics. In particular, comments stated a connection exists between hazards and impacts to people walking, including people with disabilities, bicycling, and driving, including accessing parking and loading zones. A comment stated the department should provide standard language for the impact discussion and mitigation measures given that connection. A comment stated that the department could cross-analyze hazards in one transportation section. A comment stated the department should use a consistent geographic extent for the assessment across modes that accounts for land use context. A comment stated that the department should add a people with disabilities topic under CEQA separate from the other transportation topics.

Plan and Policy Consistency

Comments stated that the department should provide guidance regarding the Municipal Code, city policy, and CEQA impacts. Some comments stated the department should separate the Planning Code compliance section (or other codes, such as Police and Fire) from the CEQA analysis, potentially in a separate study, including identifying the particular code sections to study. Comments justified this approach by stating that non-code compliance is not necessarily a significant impact on the environment. Other comments stated the department could use policy consistency for impact analysis. If a project is consistent with these policies, then, comments stated, no significant impacts would occur. Examples include: General Plan roadway designations (e.g., different types of transit analysis for different types of streets), Vision Zero high injury corridor or planned improvements, Better Streets Plan (e.g., obstacles and access), Muni Forward (e.g., planned transit lanes and stops).

Data Collection

Comments stated a desire for the department to improve access to existing databases (e.g., maintain a database from past projects on collected counts, partner with private firms on surveys of existing conditions).

Events

A comment stated the department should define the situations (e.g., frequency, size, and type) where studying the consideration of events is appropriate, acknowledging that “worst-case” is not a likely or probable condition often.

Baseline

A comment stated the department should define the situations where using a future baseline is appropriate, acknowledging that the department should not use this approach regularly.

Cumulative

The department should formalize the process for determining the list of development and transportation projects to include in a transportation study, making sure to account for projects not permitted through Planning (e.g., former redevelopment agencies, state and federal agencies). The department should consider visualizing this formal process (e.g., shared data).

Process

Comments stated the department should include particular agencies in the update process (e.g., transit providers, emergency responders).

Comments stated the department should set criteria for different types of transportation review, based on location, size, and land uses, and clarify the scope expectations for those types. A comment stated the department could move to a checklist type version of a study, depending upon the circumstances of the project, and could simplify the graphic requirements for studies (e.g., provide templates).

Comments stated the department can do a better job on the consultant selection process and communicating with consultants. A comment stated the department should share more resources and materials with consultants so consultants provide more consistent data and quality across studies. A comment stated that most developers only look at the cost of scope from consultants and not the quality. Therefore, the department should provide more direction on what the scope entails earlier the process to consultants (e.g., the transportation study determination form) and only give the developer one option for a consultant or have a scoping meeting with the consultant and developer prior to the consultant

selection occurring. A comment stated that the department should inform the consultant at least a week prior to the department missing a deadline for returning comments on a deliverable. The comment stated the department expects consultants to do the same and the department should extend the same professional courtesy. A comment stated the department should provide a consistent level and type (e.g., substantive versus editorial) and medium (e.g., electronic, including tracking) of comments back and forth with consultants. A comment stated the department should respect the prior work the consultant and the department conducted on a project if planner assignment changes in the middle of the process (e.g., at screencheck). A comment stated the department needs to communicate with consultants right away if practices, standard language, etc. from the department change. A comment stated that the department should clarify the consultants' role and protocols to all parties and apply it consistently (e.g., other departments, preparation of plans, etc.).

Comments stated they appreciated the streetscape design advisory team review, but the department needs to provide more clarity regarding that process (e.g., timing, who submits, information required) and consider allowing developers to participate in the meetings. Comments stated the earlier this review occurs, the better.

A comment stated that the department and the San Francisco Municipal Transportation Agency (SFMTA) need to coordinate regarding off-street versus on-street loading. The comment stated the department also needs to coordinate with Recology and the Department of Public Works on waste collection.

A comment stated that the department should identify a contact person(s) at relevant city agencies for emergency access questions and at Recology for waste collection.

Travel Demand

A comment questioned the need for trip distribution because the comment assumed the department was not using that information in the analysis. Separate comments stated the department should the San Francisco County Transportation Authority's model runs by each of the defined neighborhoods within the model for trip distribution. A comment further stated the department should make a visualization tool available of those runs for consultants.

A comment stated the department should define the situations where accounting for internal trip capture and linked trips are appropriate. A comment stated the department could use Mission Rock and Pier 70 as examples for guidance.

Comments stated the department needs additional data to estimate transportation network companies (TNCs) impacts and newer delivery companies, including loading demand (e.g., data from transportation network companies (TNCs), data on frequency and duration, etc.). A comment stated that the department may be able to partner with developers to obtain such data. A comment stated the City of Dublin, CA is conducting a before/after modal share study of TNCs.

A comment stated that the department may be able to use Institute of Transportation Engineers, version 10, as a resource.

Comments stated the department is overestimating general retail and restaurant and residential pm peak hour trips and that the parking demand rates are misleading. Regarding parking demand, a comment suggested using census district or neighborhood parking rate maps as an estimate for demand.

Planning commissioners stated the department should continue to update the commission as new data is available regarding travel demand and that the department should use new data within environmental studies as soon as possible.

Walking/Accessibility

Quantitative Analysis

Comments differed on whether the department should require a quantitative analysis and establish a well-defined threshold of significance (i.e., quantitative). A comment that opposed stated that quantitative thresholds could have an unintended consequence of discouraging flows of people walking on desired routes as one means to reduce conflicts. The comment stated that the most environmentally friendly development is dense development, which inherently means more conflicts and the issue is whether the project handles those conflicts safely or not. A comment cautioned the department using collision data for analysis, as the City is and should work on high injury locations, and these countermeasures should address hazards. A comment stated that level of service capacity analysis is not useful, except in extreme conditions.

Comments in support of a quantitative analysis stated the department should account for risk factors (e.g., number of crossing vehicles, design features, etc.) to determine if a project is creating inherently risky configurations and try to use predictive/systematic safety analysis tools to quantify those risks, exposure, or incidents. Comment stated the department should limit the geographic analysis to aspects of the project that the sponsor has control over (e.g., curb-cuts, setbacks, driveways, crossing of goods across sidewalks, etc.). A comment stated the department could use the Statewide Integrated Traffic Records System to quantify existing hazards and determine whether the project does any further harm (e.g., San Jose, Hayward).

A comment stated a quantitative threshold would provide more transparency. Comments related to ideas for potential quantitative thresholds of significance and resources included:

- Varying the thresholds by location, type of street, number of people walking, etc.
- Setting the threshold at a certain exposure or incident rates and then identify measures that can quantitatively reduce that exposure or incident rate, based upon research. The project can then build those measures can into its design (e.g., like the transportation demand management ordinance). A comment acknowledged quantifiable measures may not be available now, but the department should not preclude using them in the future.
- Using the Highway Safety Manual for that quantification.

Qualitative Analysis

A comment stated that the department should consider impacts to people walking, based on other transportation topics. Specifically, the department should analyze the impacts of designs such as loading docks and long curb cuts.

Accessibility Analysis

Comments stated that the department needs to provide better clarity regarding Americans with Disability (ADA) compliance. As examples, the comments posed a question whether a significant impact would occur if a developer located a project at a site without existing adequate ADA facilities (e.g., adequate effective sidewalk widths), as the comment assumes that ADA compliance is a requirement regardless of CEQA.

Terminology

Comments stated that the department should better define hazards, including existing hazards, and vulnerable populations.

Bicycling

Quantitative Analysis

Comments differed on whether the department should require a quantitative analysis and establish a well-defined threshold of significance (i.e., quantitative). A comment that opposed stated that each project and project location is unique, so it would not be beneficial to broadly establish well-defined thresholds of significance. Each project requires a case-by-case analysis of the different variables and site considerations.

Comments in support of a quantitative analysis should account for risk factors (see walking category above). A comment suggested establishing a baseline by quantifying the number of people using existing routes adjacent to the project site.

Comments related to ideas for potential quantitative thresholds of significance included:

- Quantifying the length of detour and evaluating whether the detour involves an unreasonable increase in incline
- Examining heavily trafficked arterials routes
- Establishing a threshold for projects within a certain distance of a Class I or Class II bicycle facility (i.e. is the project well-connected to the City's bicycle network/infrastructure)
- Basing a threshold on whether the project helps the City achieve target rates for bicycle travel
- Basing a threshold on the potential for a TNC to block a bicycle lane

Qualitative Analysis

A comment stated the department could improve its qualitative analysis to consider crowding. More specifically, a comment stated that people bicycling may face crowded conditions on popular routes (such as Market Street), which may create a hazard when people bicycling get crowded out of protected bicycle facilities and into general vehicular traffic. The comment suggested the department could require this type of analysis for streetscape or larger development projects in congested bicycling corridors. A comment referenced the Highway Capacity Manual, which has a qualitative methodology to assess this impact, as a potential resource for the guidelines update.

Terminology

Comments stated that the department should better define hazards. Ideas include conducting visual observations of conflicts between bicycles and loading and/or an analysis of the number of vehicle turns into a bicycle lane.

Transit

Delay Analysis

Comments proposed criteria for screening projects from transit delay analysis including: multimodal transportation projects (presuming their net benefit), consistency with Muni Forward's defined future transit delay conditions, or location on a high versus low service frequency corridor.

Comments provided conflicting comments regarding the use of level of service (LOS) for transit delay (e.g., requiring LOS for larger projects, as opposed to the validity of LOS calculations as reliable predictors of delay). A comment suggested the department should use intersection and re-entry delay for the analysis, but not passenger boarding delay.

Some comments related to the use of modeling and forecasting tools for transit delay. For example, the department could use SF-CHAMP travel demand model to estimate the macro effects of traffic congestion to calculate link-based transit delay for longer travel distances. The department could use microsimulation to calculate the immediate/localized effects of traffic congestion on transit delay or microsimulation and field observation to develop an incremental delay factor to transit speed and reliability from project generated auto trips.

Capacity Analysis

Comments stated varying opinions about the goals of the analysis for CEQA purposes, its applicability, and its methodology. Some comments stated that the department should consider project generated transit trips leading to severe rider overcrowding (although rare). Other comments stated that the use of capacity utilization conflicts with San Francisco's Transit First policy, in that the City should be encouraging people to ride transit.

Comments stated that if the department continues to consider capacity utilization, then the department should develop screening criteria from requiring the analysis (e.g., the project is consistent with adopted land use zoning and Muni Forward and contributes to the Transportation Sustainability Fee) and should update the ridership and capacity numbers regularly.

Comments regarding the methodology stated that the current capacity of vehicles presented by the department (85 percent) does not represent design or crush load; the department should provide more guidance on analysis for locations outside of downtown (e.g., lines or corridors, not screenline), particularly for larger projects near major lines that do not pass through downtown or for lines that have a maximum load point on a segment outside downtown; and the department should analyze station capacity.

Other Analyses

Travel Time

Comments stated interest in using transit travel time as a methodology. A comment suggested this would consider the cumulative effects to transit travel times associated with increased congestion, not just project-specific effects. Comments also stated transit travel times should account for travel between stations and a project site. A comment suggested creating a transit competitiveness ratio to compare modeled transit to auto travel time with/without project for a subset of project trips. The department could then determine significance if the ratio increases by a specified percentage or upper bound. General comments stated if transit is not competitive with other way of travel, people will drive.

Measurements for Transit Impacts Outside of Downtown

Several suggestions were received on how to measure transit impacts outside of Downtown including: travel time/speed (either generally, or relative to auto travel time/speed), reliability/headway adherence, volume-to-capacity, or total households or employment within a 30-minute radius.

Defining Decreasing Transit Performance or Safety

Comments stated how the department should determine when a project decreases transit performance or safety. Suggestions included: decreased reliability, increased transit delay, slower travel times, degradation in stop amenities or visibility. Comments also stated that the analysis should consider the number/intensity of conflicts between transit operations and project vehicles entering/exiting a driveway or loading zone.

Accessibility via Transit

A comment stated the department should consider a metric for 'reach.' For example, can you get everywhere from a project site using transit?

Secondary Impacts to Transit

A comment recommended that the department should analyze the secondary effects of Transportation Demand Management (TDM) measures on transit.

Time Period/Scope of Analysis

Comments asked for re-considering the time period (e.g., time of day) the department analyzes for transit impacts and the department should develop criteria to determine which time of the day to study.

A comment asked whether the guidelines update would define simultaneous events and consider the effects of a combination of events on transit.

Loading

Analysis

Comments stated a variety of items that the department should take into consideration for loading analysis including:

- the path of travel for vehicles loading and unloading;
- passenger waiting and package holding/storage areas;
- number of building entrances more than a certain distance (to be defined) from nearest loading space (i.e., those likely to result in double-parking even if supply is adequate);
- frequency and duration of double-parking associated with for-hire vehicles, including TNCs, with emphasis on the context of where double-parking would occur. For example, if double-parking occurs in a bike lane, it may be considered a worse impact than if blocking one lane of a four-lane street with no transit service for 30 seconds occurs;
- key streets where loading issues occur most often;
- whether the on-street or off-street loading spaces are likely to be used, or whether loading vehicles are likely to just double-park;
- the passenger loading demand for people with disabilities;
- counts/observations of on-street parking and loading; and
- turning templates for new curb cuts and loading facilities.

A comment questioned the need for detailed waste collection information in the impact analysis (e.g., frequency, collection protocols, and proof of correspondence with Recology).

Mitigation

Comments stated that the department should require loading plan mitigation measures for both passenger and commercial loading and for scheduled and unscheduled deliveries, including standard language for both. Comments also stated the department should consider adopting a monitoring program where, after implementation of the project, if there is a documented loading impact, then project sponsor shall fund the SFMTA to convert additional on-street parking spaces into loading spaces.

Terminology

Comments stated that the department should better define hazards. Potential definitions should consider:

- the number and type of vehicles that are accessing a loading area;
- the number of people walking and bicycling that people driving need to cross to get to and from loading zone;
- the amount of time it takes for large service delivery vehicles to maneuver into and out of loading docks; and
- blocking other vehicles or bicycles, particularly near intersections

The department should define the term convenient on-street loading zones as it relates to the significance criteria. For example, the department should set a distance for convenient and define whether on-street can mean existing, planned, and proposed.

Emergency Access*Criteria*

A comment stated that the current significance criteria and methodology adequately address emergency access impacts under CEQA, while another comment stated the language "Result in inadequate emergency access" was somewhat unclear.

Quantitative Analysis

A comment stated that setting quantitative thresholds would lead to undesirable outcomes, although the comment did not indicate those outcomes.

Qualitative Analysis

Comments concerned the level of information and elements to focus on for the analysis. A comment stated the department should be consistent in the type and amount of information required about emergency access and its analysis. Comments stated the analysis should identify all first responders and focus on whether design elements or additional vehicle traffic could affect emergency access to the project site from emergency responders/service locations.

Vehicle Miles Traveled/Induce Auto Travel*Quantitative Analysis*

Comments indicated that the department should maintain its current vehicle miles traveled (VMT) analysis because it is consistent with Senate Bill 743 and guidance from the state. However, one comment suggested that the VMT analysis does not address issues based on context (e.g., one VMT in an uncongested area is not equivalent to one VMT in a congested area) and the analysis should account for that.

Comments stated the department should provide more clarity on the types of projects that would require a detailed VMT analysis and the methods for such analysis. Ideas for methods or components of the methods to account for include:

- TDM measures (see Mitigation sub-heading below for additional details);
- land use characteristics such as land use mix and density;
- for projects with non-typical land uses, the use surveys or big data to assess VMT of similar uses; and
- using SF-CHAMP as the comment stated that VMT estimation tools are not accurate.

Qualitative Analysis

Comments stated that the department could account for additional VMT-related elements qualitatively (e.g., on-site retail, healthy food retail in underserved area, or other non-typical land use characteristics).

Measures that affect VMT

Comments stated the department should quantify the effects of TDM measures on VMT and associated inputs (e.g., trip generation). In particular, comments suggested the department should examine the correlation between parking supply and VMT. A comment suggested that an upcoming version of SF-CHAMP may be useful for such analysis.

A comment stated the department should identify VMT reduction measures besides TDM measures.

Traffic Hazards

Quantitative Analysis

Comments stated the department should set a quantitative threshold. Ideas for that threshold included a 95th percentile driveway queue, queues that create substantial speed differentials between travel lanes, or result in vehicle weaving. Comments stated, however, that the department should not consider congestion caused by queuing as a hazard.

Mitigation

Comments stated the department should establish design standards or toolkits for design solutions, particularly related to driveways. Comments about references the department should consider for these standards or toolkits included: Vision Zero, Better Streets Plan, American Association of State Highway and Transportation Officials guides, and National Association of City Transportation Officials guides. Comments about standards the department should consider included:

- site distance and visibility of driveways (e.g., obstructions such as plantings)
- auditory and visual signals (e.g., signage)
- number, width, length, and location of driveways
- operational or programmatic measures

Terminology

Comments stated that the department should better define hazards and reconsider the term traffic for this impact topic.

Construction

Criteria

Comments stated the existing construction criterion is sufficient but could benefit from more specific details and regularity in impact determinations against the significance criterion.

Analysis

Comments stated that the department needs to account for the secondary accessibility impacts from construction. Examples of secondary impacts included a project provides a sidewalk detour that is along a significant slope or a project temporarily relocates or removes a transit stop, blue zone or loading zone).

Data

A comment questioned requiring estimates of construction traffic rates, such as number of workers and trucks, because the comment stated the department does not use that information unless a quantitative analysis is prepared. Comments also stated that it is challenging for consultants to obtain construction traffic rates and construction phase information from project sponsors at an early stage of the project. Therefore, comments requested the department conduct research and provide construction traffic rates that consultant can apply to projects.

Cumulative

Comments discussed ideas for improving the analysis of cumulative construction projects. Ideas included creating an available database of overlapping construction projects or evaluating construction on a citywide level to develop more details about what level of overlapping construction impacts create a cumulative impact. A comment cautioned though that additional layers of analysis may be inadvisable.

Parking*Criteria*

Comments differed on whether the department should retain the existing parking criterion. Those who stated the department should remove the criterion stated that other analyses address secondary impacts (e.g., hazards). Those who stated that the department should keep the criterion stated that the analysis should analyze the secondary effects of parking deficits, including on people with disabilities, or of parking on other ways of travel. Comments stated that if the department does keep the criterion, then the department should prepare a map where a substantial parking deficit would typically not occur (e.g., transit priority area map or other maps that account for access to sustainable ways of travel) or add VMT to the criteria to account for secondary impacts from people circling for parking or conversely secondary impacts from increased VMT from too much parking.

Analysis

Comments differed on whether the department should estimate parking demand and the methods for those estimates. A comment stated that the department cannot quantify parking demand because it is dependent on many variables that change quickly over time, and therefore, the department should not attempt to quantify its demand. A comment stated that the department's current analysis incorrectly assumes that a certain amount of development plus mode share equals parking demand. If the department does quantify parking demand, comments stated the department should account for other variables and estimated demand for different types of vehicles (e.g., general, scooter, car-share, etc.), needs (e.g., people with disabilities), and land uses (e.g., residential, office, retail, seniors, etc.), only if data is available to do so. Comments also stated the department needs to provide clearer direction regarding the assessment of off-site parking facilities operated by valet at the project site. Comments suggested the department should not assess those impacts as those off-site parking spaces are already in use and anyone can use those spaces an existing condition. Instead, the department should assign trips to the project site and then make trip distribution assumptions based upon nearby parking facilities but should not require emails or agreements with nearby parking facilities as documentation.

Terminology

Comments stated that the department should better define substantial parking deficit and hazards and significant delays if a substantial parking deficit occurs.

NON-CEQA

The following are comments that do not relate to CEQA (e.g., policies, regulations, building or street designs, etc.) and the department will not consider these comments within the scope of the guidelines update. However, the department may forward these comments to agencies or divisions within the department who may be responsible for addressing these comments. In some instances and in [bracketed text], the following provides resources and rationale for including the comment in the Non-CEQA heading.

General*Accessibility*

The department received comments across transportation topics related to accessibility. Comments stated that agencies should provide ADA accessibility when designing bicycle facilities (e.g., accessible transit stops, passenger loading zones, and parking). A comment stated that designs should account ADA accessibility for transit and the importance to consider the impact on accessibility for intermodal transfers. A comment stated that loading and parking facilities should account for people with disabilities. A comment offered to provide data regarding the types of disabilities people in San Francisco are living with, which could influence design decisions. [Note: designs are the responsibility of private project sponsors and city agencies responsible for street design; CEQA analyzes the impacts of proposed designs]. A comment stated that people abuse blue color curb zones and that TNCs do not adequately serve people with disabilities. [Note: various agencies are responsible for enforcement and regulation of zones and TNCs].

Bicycling*Accessibility*

Comments stated a desire for guidance on designing bicycle access within a building. [Note: refer to Zoning Administrator Bulletin No. 9: Bicycle Parking Requirements: Design and Layout.]

Loading*Policy*

A comment stated the City should create new policies in the General Plan tied to the provision of on-site or off-site loading facilities. Criteria to consider for these policies include: roadway designations, loading districts/corridors, and newer land use typologies. [Note: a component of Connect SF is the transportation element update.]

Enforcement

A comment stated the City should adopt an enforcement program to complement the Color Curb Program. [Note: the Color Curb Program is under the purview of the SFMTA.]

Vehicle Miles Traveled/Induce Auto Travel*Level of Service/Automobile Delay*

Comments stated the department should still consider level of service analysis and congestion for major projects or ones in particular geographic areas. A comment stated this analysis may be appropriate for construction truck traffic as well. Comments stated the department can conduct this analysis outside of the CEQA analysis. [Note: the department shall no longer consider automobile delay as part of CEQA in compliance with Planning Commission resolution 19579, which is consistent with California Senate Bill 743. The Planning Commission staff report for the resolution discusses the use of level of service by other agencies (e.g., SFMTA and the San Francisco County Transportation Authority).]

Modal Share Goals

A comment stated that the department should conduct a nexus study to determine development projects costs of funding measures (e.g., TDM measures) to meet San Francisco targeted modal share rates. [Note: the department conducts nexus studies for all impact fees, which occurs independently of CEQA].

Construction*Codification/Regulation Changes*

A comment stated that projects are subject to Department of Public Works local regulations and requirements (e.g. Public Works Code Sec. 724) to maintain accessibility under the ADA. However, a comment stated that opportunities for projects to expand their public accessibility services and facilities through construction improvement measures for the site (e.g., Guidelines for Barricade Placement DPW Order 167,840). A comment stated that the City could codify the City of San Francisco's Regulations for Working in SF (the Blue Book) to add certainty to the process and determine short-term impacts to transportation. [Note: Any legislative changes will require agencies responsible for code to work with legislators, outside of CEQA review on an individual project.]

Parking*Codification/Regulation Changes*

Comments stated various measures to better manage parking. Ideas for measures included: standardized design criteria, on and off-street sensor technology indicating parking availability to the public, pricing parking, unbundling parking, and determining parking rates based on unit size (e.g., one vs two vs. three bedrooms). [Note: Any legislative changes will require agencies responsible for code to work with legislators, outside of CEQA review on an individual project.]