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Christopher Calfee, Special Counsel  
Attn: CEQA Guidelines  
California Resources Agency  
1017 L Street, #2223  
Sacramento, CA 95814

RESOURCES AGENCY OF CALIFORNIA

**Re: Comments on Draft Amendments to CEQA Guidelines Appendix G**

Dear Mr. Calfee:

I write to express my strong support for changes to the draft CEQA Guidelines Appendix G that would facilitate local government decisions to choose impact measures other than Level of Service (LOS) and parking capacity to assess transportation-related environmental effects. Such changes would greatly assist our local efforts to reduce greenhouse gas (GHG) emissions, improve transportation alternatives to private automobile use and support "smart growth" near existing transit service. The traditional emphasis on LOS as a measure of transportation impacts under CEQA has seriously hampered such projects.

For transit-rich, high-density jurisdictions like San Francisco, intersection LOS and parking capacity are outdated, inaccurate measures of the true transportation-related environmental effects of local projects. To address this problem, I have directed City agencies to develop a new CEQA methodology to better measure these effects based on the number of net new "Auto Trips Generated" (ATG) from projects. Shifting from LOS to ATG as a means of measuring environmental impacts is consistent with CEQA's requirements and more likely to result in project decisions and mitigation programs that reduce vehicle miles traveled (VMT) and GHG, improve pedestrian safety and neighborhood livability and promote smart growth and transit first policies.

The current draft amendments to CEQA Appendix G, while an improvement over existing language, could be further improved by eliminating a specific reference to local transportation system "capacity." Transportation system capacity is only one of several measures of the performance of local transportation systems. The Guidelines should recognize that local jurisdictions—through General Plans, Countywide Transportation Plans, and other official policy—apply a variety of measures to assess performance. Rather than suggesting that "capacity" be the exclusive measure, we would prefer that Appendix G expressly allow local jurisdictions to focus more broadly on overall "system performance" when analyzing transportation impacts. Consequently, we suggest the following changes to subsection (a) of the transportation impact section:

Exceed the capacity of the existing Conflict with an applicable local plan, ordinance or policy that establishes a measure of effectiveness for the performance of the circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

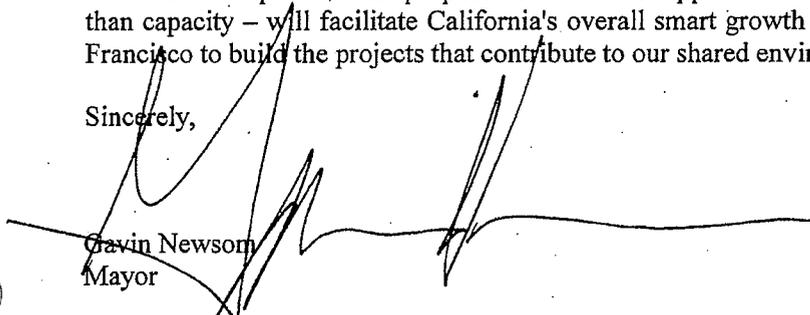


In addition, we request that the heading for Section XVI of the proposed Appendix G be changed to "Transportation," rather than "Transportation/Traffic." Use of the word "traffic" is redundant and reinforces an automobile-oriented perspective that inhibits critical efforts under AB 32 and SB 375 to reduce reliance on private automobiles and to make significant cuts in statewide VMT.

These amendments more fully support the objective stated at the introduction to the proposed amended Appendix G, which recognizes local variation in each "lead agency's individual circumstances" and concomitant variation in local measures of environmental impact. Most importantly, this allows for greater flexibility throughout California for local jurisdictions to measure project impacts in a way that is most environmentally protective within the local context.

San Francisco stands in strong support of AB 32 implementation efforts and a statewide smart growth strategy to reduce transportation-related GHG emissions. Adoption of the proposed amendments to Appendix G would remove outdated language that has undermined efforts by local jurisdictions to reduce transportation-related environmental impacts through implementation of transit first policies and transit-oriented development. The proposed revisions to Appendix G – including a focus on performance rather than capacity – will facilitate California's overall smart growth strategy, and will help cities such as San Francisco to build the projects that contribute to our shared environmental efforts.

Sincerely,

  
Gavin Newsom  
Mayor

cc: Commissioner Bevan Dufty, Chair, San Francisco Transportation Authority (SFCTA)  
M. Cohen – Director, Mayor's Office of Economic & Workforce Development  
J. Rahaim – San Francisco Planning Director  
J.L. Moscovich – Executive Director, SFCTA  
N. Ford – Director, San Francisco Municipal Transportation Agency