



August 18, 2009

Christopher Calfee, Special Counsel  
Attn: CEQA Guidelines  
California Natural Resources Agency  
1017 L Street, #2223  
Sacramento, CA 95814  
[emailed to CEQA.Rulemaking@resources.ca.gov]

**re: Proposed CEQA Guideline Amendments for Green House Gas Emissions**

Dear Mr. Calfee:

On behalf of the 10,000 members of the San Francisco Bicycle Coalition, I am writing to express our qualified support for the proposed modifications to the CEQA Guidelines checklist ("Appendix G") recommended to the California Natural Resources Agency by the Governor's Office of Planning and Research (OPR) on April 13, 2009.

As in many cities and counties across California, San Francisco's declared and adopted policies (including our City Charter, General Plan, and Climate Action Plan) are poorly supported, indeed often confounded, by transportation impact analysis under current CEQA practice. In particular, intersection congestion analyzed and prioritized via automobile level of service analysis ("auto LOS") causes significant burdens and obstacles, directly and indirectly, to planning efforts for policy-coherent land use and transportation.

While we would prefer to have auto LOS struck entirely from the language of the CEQA Guidelines, as initially proposed by OPR in January 2009, we support broadening the Guideline-endorsed array of measures and standards for transportation system analysis beyond auto LOS, as expressed in the currently proposed modification to subsection (b) of the Transportation section of the checklist. This broadening would be beneficial to San Francisco's efforts to align its transportation and land use planning with its own adopted policies and goals, as well as statewide goals for climate protection as mandated in AB 32 and related law.

Of course, the proposed formulation leaves untouched the questionable legitimacy of congestion management as an environmental concern, a troubling contradiction to the manifold and well documented environmental injuries

wrought by privileging the free flow of motor traffic. To that end we join with the City of San Francisco in recommending changes to subsection (a) of the Transportation section of the checklist that replace the focus on roadway capacity with a broader direction to consider locally-adopted measures of effectiveness for circulation system performance, thus:

~~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.

We likewise concur with the City of San Francisco in their suggestion that the heading for the "Transportation/Traffic" section of the checklist be changed to "Transportation." The word "traffic" is either redundant, in its fullest sense, or inappropriate to the purposes of CEQA in reinforcing an automobile-oriented perspective for the consideration of circulation and access matters.

The proposed modifications to the Appendix G checklist will complement San Francisco's efforts to establish and adopt a substitute transportation impact measure in the form of Automobile Trip Generation (ATG) to replace auto LOS in San Francisco's CEQA practice. Like many jurisdictions across California, San Francisco binds its own initial study checklist to the state guidelines, and these amendments would both expedite and endorse San Francisco's use of ATG as a CEQA-compliant environmental indicator and metric.

I would also like to express our strong support for the proposed elimination of automobile parking supply as an environmental concern under CEQA. As you know, San Francisco has effectively established that concern for "parking deficit" *per se* is a social matter, not an environmental matter for CEQA review (*San Franciscans Upholding the Downtown Plan v. City & County of SF*, 2002). As with the recommendation to eliminate auto LOS, striking parking capacity from the Appendix G checklist would essentially codify this understanding and extend it to the entire state, and bring significant benefits to the practice of CEQA analysis for the sake of greenhouse gas emission reduction and climate protection, as well as other important policy objectives for transportation and land use.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Thornley', with a long, sweeping flourish extending to the right.

Andy Thornley  
Program Director  
San Francisco Bicycle Coalition

cc: Mayor Gavin Newsom  
Commissioner Bevan Dufty, Chair, SF County Transportation Authority  
Jose Luis Moscovich, SF County Transportation Authority  
John Rahaim, SF Planning  
Nathaniel Ford, SF Municipal Transportation Agency