February 14, 2014

Ken Alex, Director
Governor’s Office of Planning and Research
1400 10th Street
Sacramento, California
95812-3044

Subject: Preliminary Evaluation of Alternative Methods of Transportation Analysis

Dear Mr. Alex:

Thank you for the opportunity to provide feedback on the Preliminary Evaluation of Alternative Methods of Transportation Analysis. Senate Bill 743 (Steinberg) provides an important opportunity to better align the California Environmental Quality Act (CEQA) with the overarching goals of improving mobility, reducing greenhouse gas emissions, and building healthy communities. We appreciate the Governor’s Office of Planning and Research’s (OPR’s) attention to an open and collaborative process towards identifying a more suitable metric to evaluate transportation system performance under CEQA and command their efforts to date.

With respect to the Goals and Objectives of the new metric, we recommend that the goal of transparency be incorporated under the ‘Simplicity’ factor discussed on page 7. We also suggest that the objective of identifying clear and meaningful mitigation measures that are consistent with State and local policies and support the goal of maximizing environmental benefits and minimizing environmental harm be incorporated into the factors being considered.

We strongly support the selection of Vehicle Miles Traveled (VMT) metric. Specifically, we recommend Variant 2: VMT per person-trip metric for all projects as it is supportive of the development patterns promoted in SB 375 in order to reach greenhouse gas targets set forth in AB 32. We are not supportive of metrics like Motor Vehicles Hours Traveled or Multimodal Level of Service because we don’t believe them to be the best indicators of the impacts on the physical environment.

Thank you for your consideration of our input. If you have any questions or would like to discuss potential metrics further, please contact Viktoria Wise, Viktoriya.wise@sfgov.org or (415) 575-9049.

Sincerely,

John Rahaim
Planning Director

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