February 14, 2014

Christopher Calfee, Senior Counsel
Governor’s Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: SB 743 Implementation Efforts

Dear Mr. Calfee,

On behalf of the San Diego Regional Chamber of Commerce (Chamber), I am writing to submit comments regarding the efforts by the Governor’s Office of Planning and Research to develop a new way to measure environmental impacts related to transportation. The Chamber is the largest nonprofit advocate for the San Diego regional business community. With more than 3,000 members representing 400,000 employees, the Chamber is the most influential business network, advocate and resource for growing commerce in the San Diego region.

The Chamber greatly appreciates the opportunity to comment on these efforts, as we have a group of members within our Infrastructure, Housing, and Land Use Committee that are committed to being involved in transportation policy and reforms. A brief list of our recommendations is outlined below.

**In the interim time period before the new guidelines become effective, the lead agency should have the option to use current guidelines or new guidelines in preparation of the environmental analysis.**

In order to provide certainty to all entities involved in the approval process for projects, when any project files a notice of preparation for an environmental document prior to the point in time when the new guidelines become effective, the lead agency should have the option of using the current guidelines or the new guidelines in preparation of the environmental analysis.

**A variety of analytical tools should be used to allow a complete and objective picture of a road network.**

SB 743 shifted the focus of environmental review of transportation projects from metrics surrounding driver delay, or “level of service” (LOS), to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses. In order to encourage growth and development in all areas of the state, whether urban or rural, a variety of analytical tools should be used in order to allow a complete and objective picture of road networks and impacts. The business community appreciates certainty, but recognizes that all regions of the state need access to tools and measures that are objectively informative in order to achieve greater growth and development.
New guidelines should not prevent lead agencies from imposing conditions on projects to pay for portions of transportation improvements.

Although LOS will no longer be the primary focus of transportation analysis under CEQA, the new guidelines should not prevent lead agencies from imposing conditions on projects to pay for their fair share of transportation improvements, as is the current practice throughout the state. These transportation improvements include infrastructure such as roadways, transit, bicycle, and pedestrian improvements.

The Governor’s Office of Planning and Research should implement a stakeholder working group to allow all interested parties who comment by the February 14th deadline to review the draft in its preliminary stages.

In order to provide for an effective first draft of guidelines, the Governor’s Office of Planning and Research should convene a working group of individuals and organizations to comment on and contribute to the working draft before its release on July 1. This opportunity should be limited to those entities who submitted comments by the February 14 deadline.

Thank you for the opportunity to comment on the proposed guidelines, and we look forward to engaging further on the implementation efforts of SB 743 this year.

Sincerely,

Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce