



SF Environment

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A Department of the City and County of San Francisco



Edwin M. Lee
Mayor

Deborah O. Raphael
Director

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

Dear Mr. Calfee:

Thank you for the opportunity to provide input on the [Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 \(Steinberg, 2013\)](#), published on August 6, 2014. The City and County of San Francisco (City, San Francisco) commends the Office of Planning and Research (OPR) for a thoughtful draft of the *CEQA Guidelines* Section 15064.3. We appreciate that prior to publication of the document, OPR staff consulted with a wide variety of potentially affected stakeholders, including San Francisco staff directly involved in Level of Service (LOS) reform. The City believes that the proposed draft Guidelines carry out the mandate of SB 743, and that, by aligning transportation analysis under the California Environmental Quality Act (CEQA) with broader environmental policy goals, such as reduction of greenhouse gases (GHGs), they represent an important tool for encouraging growth in locations that will result in the least impact on the environment.

The City has been working for a number of years towards LOS reform. Most recently, this effort has occurred under the auspices of the [Transportation Sustainability Program](#) (TSP). The TSP is a joint effort between the San Francisco Planning Department, the San Francisco County Transportation Authority, the Office of Economic and Workforce Development, and the San Francisco Municipal Transportation Agency. It was created to better support the City's longstanding Transit First policy by modifying the City's development review practices to ensure that development impacts to the transportation system are offset by improvements to the system as a whole, with a primary focus on transit and multi-modal solutions.

The LOS reform work of the State and the City has converged and shares many of the same goals such as minimizing environmental harm, aligning environmental review with City and State policies, and preserving mobility so that access to destinations for people and goods can be maintained through improvements to overall efficiency of the network. As such, San Francisco supports the overall goal of SB 743 and the fundamental framework of the draft Guidelines. Specifically, the City supports replacing LOS with a Vehicle Miles Traveled (VMT) – based metric. A VMT-based metric appears to be the most appropriate way to measure environmental impacts. Additionally, the City strongly supports the proposed amendments to the way transportation projects are assessed under CEQA.

While the City supports the overall framework of the draft Guidelines, OPR should consider a number of revisions as well as clarifications. Under a separate cover you will be receiving a detailed comment letter from the

Directors of City Departments that would be directly affected by the proposed changes. Please work directly with our Planning Department staff to address the City's concerns and proposed revisions. If you have any questions, please don't hesitate to contact the Deputy Environmental Review Officer, Viktoriya Wise (Viktoriya.Wise@sfgov.org).

Sincerely,

A handwritten signature in blue ink that reads "Deborah O. Raphael". The signature is written in a cursive, flowing style.

Deborah O. Raphael