



November 25, 2014

Mr. 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 comment on the Preliminary Discussion Draft of Updates to the California Environmental Quality Act (CEQA) Guidelines Implementing Senate Bill 743 (Steinberg, 2013). The City and County of San Francisco commends the Office of Planning and Research (OPR) for a thoughtful draft of the CEQA Guidelines Section 15064.3. I 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. San Francisco believes that the proposed draft Guidelines carry out the mandate of SB 743, and that, by aligning transportation analysis under CEQA with broader environmental policy goals, such as reduction of greenhouse gases (GHGs), the draft Guidelines represent an important tool for encouraging growth in locations that will result in the least impact on the environment.

San Francisco has been working for a number of years towards LOS reform. Most recently, this effort occurred under the auspices of the Transportation Sustainability Program (TSP). The TSP was created to better support San Francisco's longstanding Transit First policy by modifying its 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.

While San Francisco has been working on the TSP, the State of California has also been moving toward CEQA-related LOS reform. The LOS reform work of the State and the City have converged and share many of the same goals: 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. San Francisco supports the overall goal of SB 743 and the fundamental framework of the draft Guidelines.

Attached, please find specific comments to the draft Guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read "Edwin M. Lee".

Edwin M. Lee
Mayor

cc: John Rahaim, City Planning
Ed Reiskin, SFMTA
Tiffany Bohee, OCII
Mike Scanlon, Caltrain
Tilly Chang, SFCTA
Steve Heminger, MTC

Enc.: June 19, 2014 letter from CP, SFMTA & OCII