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via email to CEQA.Guidelines@ceres.ca.gov

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

Re: Preliminary Evaluation of Alternative Methods of Transportation Analysis

Dear Mr. Calfee:

Thank you for the opportunity to provide input into this important subject. By way of background, I am an individual who has a long-time involvement in public transportation and civil rights matters, and I am active in several statewide and national public transit and environmental organizations.

SB 743 (Steinberg, Chapter 386, Statutes of 2013) provides a "mixed bag" of updates to the California Environmental Quality Act (CEQA). "Streamlining" environmental review can provide the opportunity to move forward projects that benefit the public and the environment, but it should not be used as a mechanism to ramrod projects that have questionable value except perhaps to developers.

The draft document entitled "*Preliminary Evaluation of Alternative Methods of Transportation Analysis*" provides good thoughts to begin implementation of SB 743. But a statewide application of such standards is problematic. The broad definition of "transit priority areas" is left to individual Metropolitan Planning Organizations (MPOs) with widely differing geographic and demographic communities, and unique policy body compositions and philosophies. According to at least one map, nearly the entire City and County of San Francisco qualifies as a "transit priority" area, with the apparent exception of the top of Twin Peaks, and ironically, parts of the traditionally underserved community of Hunter's Point. How is this equitable, or help to achieve fundamental State goals of reducing Greenhouse Gas (GHG) emissions?

At a minimum, the "*Evaluation*" document and resulting guidelines should specify reduction of GHGs as an overriding State objective. Further, there does not appear to be any mechanism for members of the public to challenge a "transit priority" designation. Why not?

Under SB 375 (Steinberg, Chapter 728, Statutes of 2008), the definition of a "transit priority project" (or area) depends on proximity to what is described with the statute as "frequent and reliable" public transit service. So why not have the "*Evaluation*" process

define and apply **transit** “levels of service?” The statute applies a metric for a “high-quality transit corridor” of “fixed route bus service with service intervals no longer than 15 minutes during peak commute hours” (Pub Resources Code Sec 21555). But standard transit planning principles recognize that fewer than half of all transit trips occur during commute hours. Why not use the CEQA process to ensure quality bus service during all times of day, for all users and trip purposes, including school, shopping, medical, etc.?

At a minimum, OPR guidelines should require documentation of progress toward achieving the GHG reduction goals in Executive Orders #S-3-05 (Schwarzenegger) and #B-16-2012 (Brown). Having recently reviewed several environmental documents prepared by Caltrans, I respectfully suggest that there needs to be information for the public and decision makers that is more substantive than it is speculative.

The draft “*Evaluation*” document also asks for comments on Equity as a potential metric. I strongly support such inclusion. The notion of equitable mobility for all people is important to achieving numerous State goals, and access by all modes is important. Active transportation that does not produce GHGs should be explicitly encouraged and supported. The notion of “complete streets” not only allows for healthier and more equitable travel, it also encourages the seldom-cited value of improving access by people with disabilities to fixed-route bus and rail transit, thus reducing the enormous rate of increase in unnecessary “complementary paratransit” under the Americans with Disabilities Act (ADA). A bus ride generally costs the public subsidy less than one-tenth the cost of a paratransit ride, and is far more inclusionary and sustainable.

There is an expression that “CEQA requires a good faith effort by public agencies; it does not require perfection.” To the extent that this is legally accurate, there remains a moral and public policy obligation to ensure proper oversight for public agencies that consistently fail to exhibit good faith commitment to the public good. As a key example, the Metropolitan Transportation Commission (MTC) for the San Francisco Bay Area is currently the respondent in 4 separate lawsuits regarding their adoption of an Environmental impact Report (EIR) for their Regional Transportation Plan/Sustainable Communities Strategy entitled “Plan Bay Area,” with petitioners ranging the gamut from the Building Industry Association to the Sierra Club to entities affiliated with what is commonly called the “Tea Party.” With this range of objection, clearly something is not working properly.

Please note that I am providing these comments as an individual, although I may assist in contributing to potential comments by a statewide and national environmental organization for the next round of public input regarding this matter.

If you have any questions or desire further information, please do not hesitate to contact me at the phone number or email on this letterhead. I also look forward to receiving notice of the next opportunity to comment on this matter before July 2014.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrisha Piras". The signature is written in a cursive, flowing style.

Patrisha Piras

cc: Chair, Sierra Club California-Nevada Regional Conservation Committee (CNRCC)
Sierra Club Bay Region 3-Chapter SB 375 Working Group