

February 14, 2014

Ken Alex, Director
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95812

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. SB 743 (Steinberg) provides an historic opportunity to better align the California Environmental Quality Act (CEQA) process with the overarching goals of SB 375 and AB 32 to reduce greenhouse gas emissions and build healthy and safe communities. We appreciate the Governor's Office of Planning and Research's (OPR's) leadership and efforts to date to identify a suitable transportation impact metric to advance these goals.

We commend OPR on its open and collaborative process to develop the new metric, including the development of appropriate criteria upon which a more objective discussion can be built. To that end, we suggest the consideration of the following criteria and principles. The new metric should be:

- Transparent, objective, and defensible;
- Supportive of efficient land use patterns (somewhat, but not directly covered in the "Environmental Effect" criteria); and
- Linked to clear, meaningful, and quantifiable mitigation measures.

With regard to the alternative metric, we strongly support vehicle miles travelled (VMT) per person trip. This metric is both easily quantifiable with existing data and tools, and supportive of efficient development patterns. We are less supportive of metrics that use travel time and delay as a measure of the impact on the physical environment.

Past studies have shown that approximately half of the traffic in San Francisco's congested regional core is comprised of vehicles that did not originate from San Francisco. Therefore, we encourage OPR to consider a holistic statewide approach to implementing this policy change.

Thank you for your consideration of our input. I am happy to discuss any of these concepts further.

Sincerely,



Tilly Chang
Executive Director

cc: J. Rahaim – SF Planning



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