



SPUR

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Christopher Calfee, Senior Counsel via email to: CEQA.Guidelines@resources.ca.gov

Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Subject: Comments on OPR's Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, January 20, 2016

Dear Mr. Calfee:

Thank you for opportunity to respond to the Governor's Office of Planning and Research ("OPR") request for comment regarding the updates to the California Environmental Quality Act (CEQA) Guidelines – Revised Proposal on Updates to the CEQA Guidelines Evaluating Transportation Impacts in CEQA ("Revised Proposal") dated January 20, 2016.

SPUR is a non-profit focused on good planning and good government in the Bay Area region with offices in San Francisco, San Jose and Oakland. We have worked for decades to help cities in the Bay Area grow in a thoughtful way.

Replacing auto LOS as a measure of transportation performance is among the most effective policy changes that the State can make. We strongly support the proposed updates to CEQA guidelines and fulfillment of the requirements of SB743.

Specifically, we support the use of Vehicle Miles Traveled (VMT), rather than auto level of service, as the most useful measure of the environmental impacts from transportation associated with a project.

We need to reverse climate change, address growing public health problems, improve quality of life and sustain California's economy. To do this, we must have neighborhoods, cities and regions that function. Existing practice of prioritizing the car and failing to address performance of other types of mobility has led us, for decades, to make places that don't work.

Many of our smart policies are thwarted, and significant public and private investment is wasted with the existing CEQA review process. This is because the mitigations and alternatives that attempt to reduce automobile delay impacts often result in adverse outcomes on the environment. This is contrary to the intent of CEQA to ensure the long-term protection of the environment.

The new guidelines should be stringent enough to ensure that projects that induce new auto travel and associated safety and environmental impacts are mitigated, or that the project is altered. This year, the City and County of San Francisco adopted this CEQA policy change at a local level. We hope that you will use their expertise and partnership to help ensure that the OPR guidelines reflect the best possible thinking on how to measure VMT from a project. OPR should continue to provide strong justification when determining that particular types of projects would result in low VMT and thus would not have VMT impacts.

We appreciate the careful process and outreach that the state has undertaken to help local governments make this policy and process change. We look forward to the adoption of these new state CEQA guidelines.

Sincerely,



Ratna Amin
Transportation Policy Director

Cc:

Kevin de Leon, Senate Pro Tem

Anthony Rendon, Speaker, California State Assembly

Jim Frazier, Cahir, Assembly Transportation Committee

Brian Kelly, Secretary, California State Transportation Agency