

1 [Urging Planning Commission to Update Transportation Analyses under CEQA.]

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3 **Resolution urging the Planning Commission to set policy directing the Environmental**
4 **Review Officer to modify local environmental review criteria to assess transportation**
5 **impacts more accurately in conformance with updated analytical methods.**

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7 WHEREAS, San Francisco is a Transit First City as stated in Charter section 16.102:
8 “travel by public transit, by bicycle and on foot must be an attractive alternative to travel by
9 private automobile”; and

10 WHEREAS, San Francisco’s historic pattern of dense development and the limitations
11 of its street network mean that there will always be competition between transportation modes
12 for limited road space; and,

13 WHEREAS, The California Environmental Quality Act (CEQA) requires that potential
14 significant adverse environmental impacts be analyzed and mitigated; and,

15 WHEREAS, Section 21000 (e) of CEQA states: “Every citizen has a responsibility to
16 contribute to the preservation and enhancement of the environment.”; and,

17 WHEREAS, CEQA grants broad authority to municipalities to implement its provisions;
18 and,

19 WHEREAS, The City and County of San Francisco implements CEQA through Section
20 31 of the Administrative Code, which delegates administration of CEQA to the Planning
21 Department's Office of Environmental Review (OER) and Environmental Review Officer
22 (ERO), and vests with the Planning Commission final authority on setting guidelines and
23 policies with which the Office of Environmental Review implements CEQA locally; and,

24 WHEREAS, An Environmental Impact Report (EIR) is required when the ERO
25 determines that a project may cause significant adverse environmental impacts as defined by

1 California statute and guidelines, San Francisco's Administrative Code and local guidelines;
2 and,

3 WHEREAS, The OER has historically, through guidelines, used a metric to analyze
4 traffic impacts called the Level of Service (LOS), which runs from level 'A,' or free flow of
5 traffic, to level 'F', or total congestion, to determine whether a street project causes any
6 significant impacts, including an environmental impact of increasing air pollution due to low
7 speed auto travel and thus triggers an EIR; and,

8 WHEREAS, Current OER guidelines could require preparation of an EIR if a bicycle
9 lane or other transit project might degrade the LOS at an intersection to levels 'E' or 'F;' and,

10 WHEREAS, LOS 'E' and 'F' are designated as adverse impacts to the environment
11 because, in decades past, slow moving traffic theoretically led to 'hot spots' where pollutants
12 accrue to levels that can cause harm to the environment and people; and,

13 WHEREAS, The effects of hot spots, if any, can be evaluated and mitigated
14 independently of LOS; and,

15 WHEREAS, Automotive emission control technology has advanced over the
16 intervening decades such that slower traffic is unlikely to cause any 'hot spots,' thus obviating
17 CEQA's concern over LOS as a measure of environmental impact; and,

18 WHEREAS, The Bay Area Air Quality Management District has not registered an
19 automotive generated 'hot spot' in the 9 county Bay Area over the past decade; and,

20 WHEREAS, Invariably, mitigating LOS through increasing roadway capacity degrades
21 environmental quality by increasing vehicle trips and vehicle volume and consequently
22 increasing air pollution and greenhouse gas pollution, and increasing danger for bicyclists and
23 pedestrians; and,

24 WHEREAS, LOS measures auto delay at intersections, not mid block and ignores all
25 transit, pedestrian and bicycle delay and safety; and,

1 WHEREAS, LOS analysis does not account for modal shift, where reduced motor
2 vehicle capacity encourages auto trips to shift to other travel times, routes or travel modes;
3 and,

4 WHEREAS, LOS, as constructed, favors the incumbency of the automobile, the most
5 inefficient mode of transportation, at the expense of bicycles, pedestrians, and public transit;
6 and,

7 WHEREAS, Auto LOS as a metric does not recognize that projects such as transit
8 lanes, bicycle lanes, traffic calming, and sidewalk widening may reduce auto LOS but
9 increase capacity for non-automobile modes, which can increase the total number of persons
10 moving through a given corridor; and,

11 WHEREAS, LOS does not take into account relationships and conflicts among modes,
12 such as the interplay between higher traffic speeds, higher flows, broader roadways, lateral
13 separation and the negative, harmful consequences of those factors to pedestrian safety; and,
14 WHEREAS, LOS does not take into account the qualitative impacts on all users, including
15 safety both real and perceived as well as trip quality; now therefore, be it

16 RESOLVED, That the San Francisco Board of Supervisors finds that automobile LOS
17 analysis alone is not an appropriate metric for assessing environmental impacts and for
18 analyzing projects that may improve overall environmental quality in conformance with
19 Section 16.102 of the Charter; and, be it

20 FURTHER RESOLVED, That the San Francisco Board of Supervisors urges the
21 Planning Commission and the Office of Environmental Review to consider and implement
22 significance criteria under CEQA that will more accurately analyze and predict traffic- and
23 transportation-related environmental impacts ; and be it

24 FURTHER RESOLVED, that this Board urges the Planning Commission to consider
25 significance criteria other than the measurement of LOS, particularly where creation of, or

1 improvement to, pedestrian, bicycle and transit facilities, including all projects that create
2 dedicated right of-way or re-allot traffic signal timing to improve pedestrian, bicycle and transit
3 safety and efficiency, may improve overall transportation network and operations.

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