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

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

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

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

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

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

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

WHEREAS, An Environmental Impact Report (EIR) is required when the ERO determines that a project may cause significant adverse environmental impacts as defined by...
California statute and guidelines, San Francisco's Administrative Code and local guidelines;

and,

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

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

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

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

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

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

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

WHEREAS, LOS measures auto delay at intersections, not mid block and ignores all transit, pedestrian and bicycle delay and safety; and,
WHEREAS, LOS analysis does not account for modal shift, where reduced motor vehicle capacity encourages auto trips to shift to other travel times, routes or travel modes; and,

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

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

WHEREAS, LOS does not take into account relationships and conflicts among modes, such as the interplay between higher traffic speeds, higher flows, broader roadways, lateral separation and the negative, harmful consequences of those factors to pedestrian safety; and,

WHEREAS, LOS does not take into account the qualitative impacts on all users, including safety both real and perceived as well as trip quality; now therefore, be it

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

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

FURTHER RESOLVED, that this Board urges the Planning Commission to consider significance criteria other than the measurement of LOS, particularly where creation of, or
improvement to, pedestrian, bicycle and transit facilities, including all projects that create
dedicated right of-way or re-allot traffic signal timing to improve pedestrian, bicycle and transit
safety and efficiency, may improve overall transportation network and operations.
Resolution urging the Planning Commission to set policy directing the Environmental Review Officer to modify local environmental review criteria to assess transportation impacts more accurately in conformance with updated analytical methods.

April 18, 2006 Board of Supervisors — ADOPTED
Ayes: 9 - Ammiano, Daly, Duffy, Elsbernd, Ma, Maxwell, Mirkarimi, Peskin, Sandoval
Excused: 2 - Alioto-Pier, McGoldrick
I hereby certify that the foregoing Resolution was ADOPTED on April 18, 2006 by the Board of Supervisors of the City and County of San Francisco.

File No. 051964

Date Approved

Gloria L. Young
Clerk of the Board

Mayor Gavin Newsom