Dear Mr. Calfee:

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review and provide comments on the Final Preliminary Discussion Draft of the Updates Implementing SB 743. It is clear that the proposed updates to the CEQA guidelines will effectively eliminate level of service (LOS) as a measure of transportation impact in favor of a metric that will better reflect the impact that project related transportation has on the environment. The metric proposed by the Office of Planning and Research (OPR) to accomplish this shift in the determination of transportation impacts is vehicle miles traveled (VMT).

The successful application of VMT as a measure of transportation impact involves the determination of trip generation rates and trip lengths associated with the proposed project. This may be accomplished with a number of available modeling software. These models work well for development projects, such as residential structures or manufacturing plants, that are designed to be occupied by an expected number of residents or employees. However, the determination of VMT is not as clear for projects normally carried out by utilities like LADWP. The purpose of many projects LADWP conducts is to improve the safety and reliability of water and power delivery infrastructure. These projects normally do not have a set number of employees assigned to the project location upon its completion. Our projects usually receive regular vehicle traffic during the construction period and only limited traffic for the purpose of repairs and maintenance thereafter.

We request that OPR clarify the process by which VMT will be calculated for construction and infrastructure improvement projects. Also, please clarify how VMT will be taken into account over the life of such a project and what mitigation measures would be acceptable during construction and operation phases.

Please feel free to contact me if you have any questions.

Thank you,

Eduardo Cuevas
Environmental Planning & Assessment
Los Angeles Department of Water and Power