



# KITTELSON & ASSOCIATES, INC.

TRANSPORTATION ENGINEERING / PLANNING

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Christopher Calfee, Senior Counsel  
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1400 Tenth Street  
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**RE: SB743 Preliminary Evaluation of Alternative Methods of Transportation Analysis**

Dear Chris,

We appreciate the opportunity to provide feedback on the *Preliminary Evaluation of Alternative Methods of Transportation Analysis*. Your efforts on this to replace level of service (LOS) to a new way to measure environmental impacts related to transportation has broader implications for transportation planning that move us more in line with the state and regional policies.

## **CEQA Background**

As noted, the intent of CEQA to disclose potential effects on the environment to the public and decision makers and thus includes opportunities for public engagement and public comment throughout the CEQA review process. CEQA applies statewide and for all projects (land use and transportation). LOS has been an explicit part of CEQA since the late 1990s.

Recall that the CEQA checklist includes more than just auto LOS when evaluating the potential transportation impacts of a project. While VMT captures the regional impacts, it is still important to ensure that localized impacts are addressed (pedestrian and bicycle safety, noise and air quality) are still part of CEQA analysis.

While SB743 focuses on “level of service” under the Appendix G checklist, this update to the CEQA Guidelines could consider the overall transportation in light of our statewide policies to ensure similar outcomes – reduced emissions, multimodal systems, and mixed use neighborhoods – and broader transportation issues.

## **Goals and Objectives**

As noted in your evaluation, per SB 743, this new criteria for determining the significance of transportation impacts must promote:

- reduction of greenhouse gas emissions
- development of multimodal transportation networks

- diversity of land uses

In identifying the goals and objectives for this effort, the evaluation expands beyond the environmental review on the physical changes to the environment to include social and economic impacts that are not generally considered in CEQA.

However, ideally, the new metric would apply not only to assessing the environmental impacts to transportation of projects, but also to transportation system planning which encompasses some of the broader objectives stated, such as economy, equity, and health. This new metric can be applied to the broader transportation planning practice in California and consistency with other state policies.

To achieve the goals and objectives set forth in the document, this effort to reform transportation analysis method for CEQA would work best if implemented along with a more comprehensive Circulation Element of the General Plan that establishes the specific goals and objectives and identifies the transportation improvements necessary to achieve them while being consistent with the Land Use Element. These improvements would not be limited to roadway capacity improvements and would include bicycle and pedestrian facilities, transit, and TDM. The CEQA analysis measures the project's impacts and thus its relative responsibility to partake in the improvements. Without such comprehensive effort, the CEQA process alone cannot achieve the goals and objectives for a number of reasons:

- Some projects are too small to provide meaningful mitigation measures such as TDM programs but they can certainly contribute or partake in an areawide/citywide program.
- By the time a project gets to the environmental stage, its location is predetermined. Site selection occurs much earlier in the development time line and may be influenced by policies of the General Plan.

### **Candidate Metrics**

Given the timing of this effort, the preliminary evaluation provides a screening level review of possible alternative metrics.

- The evaluation appears to focus on impacts of land use development as the project type rather than transportation projects. This could be problematic when applying VMT as a measure for transportation projects.
- The new metric could apply statewide within transit priority areas as well as outside transit priority areas. All land use projects of all sizes statewide (within transit priority areas as well as outside transit priority areas) would be subject to the same transportation analysis measure.
  - This provides a consistent approach and measure for all projects regardless of location. (Simplicity)
  - This keeps it simple for lead agencies and project applicants to apply as well as decision-makers and public to review.

It appears that VMT is the front runner of the suggested transportation metrics. VMT reflects the lower vehicle trip generation and lower trip length of in-fill development which results in the desired outcome. VMT captures regional location, land use typology, and site design features or local context.

While there are potential issues with VMT, this metric meets the criteria established by SB743. The regional models are available to provide inputs to the analysis, with some refinement or additional analysis necessary for some non-residential developments. The measure captures effects of regional location, accounts for non-auto modes, can capture the benefits of active transportation and transit projects as either part of the project or as mitigation measures to reduce VMT.

From our experience tools and data are available and can continue to be refined and improved with additional data to validate the findings to calculate VMT.

Here are some thoughts to consider:

- The measurement of VMT should be accurate for all types of land uses. While the confidence level of available models to predict VMT for residential uses is quite high, it is not true for other key uses such as shopping center and hospital. If VMT is to be selected, regional efforts would be necessary to compile better data to validate VMT for some of these non-residential uses.
- VMT inherently favors developments in infill area where infrastructures for transit, bicycle and pedestrians are more developed. However, there would be uses that are just not appropriate to locate in a city core. If the threshold is a targeted VMT per capita, would such uses, such as lumber yards, be penalized? By the same token, would there be biased towards retail development since shopping trips tend to be shorter?
- What is the denominator?
  - Per capita, per employee
  - Per (person) trip generated
- Address the concern that some local agencies relied on LOS to capture traffic impact fees. For local agencies to undertake this new metric can be a daunting task as it changes the way they currently assess impacts and approach transportation planning. The regional agencies (MTC and CMAs) will be key partners in providing the information and resources to support local agencies in implementing this new measure.
- It would be very helpful for OPR to provide guidance how the metrics could be applied to different types of project, such as development projects and roadway improvement projects. For example, VMT per capita might not be applicable to a roadway project.
- It would be helpful for OPR to identify a process for setting significance thresholds associated with the new metric to serve as a guide for local agencies.

### **Response to Open Questions:**

1a. Are there environmental impacts related to transportation other than air quality, noise, and safety? If so, what is the best measurement of such impacts that is not tied to capacity?

With the reduction in vehicle trips and mode shift, which affects VMT, the corresponding impacts on transit service and facilities should be addressed. Transit performance is covered by other Appendix G checklist items but from our experience not many Bay Area cities have set standards for transit performance or rely on the local service provider. San Francisco and Alameda may be the exceptions.

A possible measure is to use the methods described in the Transit Capacity and Quality of Service Manual, which includes capacity, but also quality of service measures.

1c. Would consistency with roadway design guidelines normally indicate a less than significant safety impact?

Yes, from our experience, safety often gets addressed as part of the checklist item XVI.d, unless the local agency has specific policies or plans regarding the safety of bicycle or pedestrian facilities. However, the current design standards and guidelines for some local agencies would need to be revisited to consider all modes.

2. What are best available models and tools to measure transportation impacts?

From our experience, the best models and tools to use to measure VMT will vary by project in terms of size of the project, the type of project, and location. Setting specific criteria for the models could be problematic. However, defining a process would help lead agencies better understand what tools are available and what level of effort is needed to calculate the new metric. For example, with VMT, the process could involve the regional models to provide the baseline VMT and average trip length for a particular location in the region and by land use type and sketch planning tools, can capture the local context and specific project level details such as site design.

3. What role should parking play in the analysis of transportation impacts?

If we are moving away from delay, then parking should not play a role in transportation impact analysis. Lack of parking capacity should not be considered an environmental impact, but parking management is a key component of the transportation demand management (TDM) strategies that can be included as mitigation measures to support and encourage alternative modes and walkable communities and reduce VMT.

Thanks again for the opportunity to be part of this process. We appreciate OPRs efforts in preparing the preliminary evaluation in such a short timeframe with stakeholder involvement. We are eager to support OPRs efforts and will continue to engage in the stakeholder discussions.

Sincerely,  
KITTELSON & ASSOCIATES, INC.

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