
From: Andrew Tang
Sent: Thursday, January 16, 2014 2:58 PM
To: CEQA Guidelines
Subject: LOS Alternatives

Thank you for the opportunity to comment on the development of alternative measures for transportation analysis.

I am very excited about the prospect of seeing alternatives to LOS being used for environmental review and am a proponent of multimodal transportation. As your paper, "Preliminary Evaluation of Alternative Methods of Transportation Analysis" points out, while evaluating LOS is well-intended, it has several unintended consequences. In the process of developing alternative measures, I urge the Office of Planning and Research to take care to not develop measures that also have unintended consequences.

I would like to propose the use of a hypothetical test project to evaluate alternative measures. Consider a project that would prohibit all motor vehicle usage of all roadways in the San Francisco Bay Area. Such a project would make trip making for many residents impractical, with the result that trip making and economic activity would likely decrease dramatically. Clearly this is an undesirable project. However, transportation measures such as vehicle-miles or vehicle-hours of travel or automobile trips generated would be zero with this project, providing the unintended result that this project would be viewed positively.