

12 February, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95814

RE: Preliminary Evaluation of Alternative Methods of Transportation Analysis, December 30, 2013

Dear Mr Calfee:

I am a planner who has prepared CEQA documents and practiced transportation planning and air quality microscale and conformity analyses for almost 25 years, both as a consultant and as an MPO and municipal staff member. I have worked on projects in the most polluted air basins in California. Today I write on my own behalf in support of the direction the Governor's Office of Planning and Research (OPR) is taking with respect to SB 743.

Item IV, Problems with using LOS in CEQA, nicely describes most of the issues with Level-of-Service analyses. I would put a finer point on the issue outlined on page 4 regarding "last in" development.

Example: A city that has established a specific, LoS-based significance threshold may disproportionately burden a project with exactions. The potential for disproportionate exactions becomes clear when one considers that "background traffic" is considered to increase at a localized annual rate and is added to the baseline. This "background traffic" is not required to pay exactions to compensate for the additional burden placed on the transportation system. Now consider a small rezone or general plan amendment, which is subject to CEQA. Let's imagine that the Level of Service threshold has not yet been reached at several nearby intersections, but the potential development associated with the rezone or general plan amendment pushes modeled traffic just above the adopted LoS threshold. The project proponent will very likely be required to pay into roadway or intersection improvements—an additional exaction not meted out on traffic increases associated with nondiscretionary approvals.

On pages 7 and 8, OPR has noted that "(i)n growing communities, some degree of roadway congestion is inevitable [citation]; we cannot 'build our way out of congestion' by adding roadway capacity because doing so induces additional vehicle travel." This is a key point and I draw attention to it specifically because congestion has been cited by municipal traffic engineers throughout California as a key cause of the state's air quality problems, with the apparent solution a new road here, a widened road there, a dedicated right turn lane at the next intersection. Yet in the decades I have prepared air quality analyses and in the additional decades I have called California my home, air quality improvements have come not as a result of new roadways but from more efficient automobile engines and cleaner gasoline formulations. Road-widening-as-air-cleaner is a fiction that has significant financial support from the State of California and the U.S. Environmental Protection Agency. OPR and California should be very clear that road extensions and widenings are growth-inducing and have minimal, if any, demonstrable air quality benefits. The State should be certain its funding priorities do not conflict with its air quality, greenhouse gas, and public health goals.

The alternative criteria outlined in the paper are a very good start. These criteria should be applied *throughout* California, not just in transit priority areas as defined. Most California cities have very few areas, if any, that might be defined as transit priority areas and there will be pressure to find ways to avoid such a designation in many cities. However, a broad interpretation is vital to improving air quality and public health. As an example, the San Joaquin Valley is comprised primarily of very small cities and unincorporated communities. A narrow definition of transit priority areas will promote the continued propagation of road extensions and widenings, and continue contributing to one of the worst, most intractable air pollution problems in the country. The air quality problem is disproportionately large compared to the region's population and economic vitality—and the problem has been supported and encouraged with public funds and the empty promise of better air quality.



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