

From: Colby Brown
Sent: Friday, November 21, 2014 6:12 PM
To: CEQA Guidelines
Subject: RE: Comments on updates to CEQA guidelines

Thank you Chris, I'm glad to hear that it's not too late to submit something.

Here are my comments:

- Regarding Subdivision (b)(1) we encourage OPR to take a look at the research literature regarding multimodal transportation accessibility metrics, which we believe may importantly complement VMT for impact analyses in the future. When a larger number and broader diversity of land uses are accessible to residents within a reasonable travel time by non-auto modes, trip lengths themselves may become shorter, and fewer trips may occur by car, leading to reduced VMT, as well as a wide range of other benefits.
- The proposed methodology outlined in Appendix D assumes a fixed trip length distribution, borrowed from large-scale travel surveys. This approach could become problematic for a variety of reasons. To give an example, while travel time budgets remain relatively constant over time and from place to place all over the world, trip lengths vary considerably for different individuals living in different places, with different frequencies of trip-making by principal purpose, and different travel modes available.
- Appendix E correctly identifies travel forecasting models, integrated with land use models, as the proper tools for estimating induced VMT. However, Appendix F presents a very incomplete list of tools which is heavily weighted towards sketch-planning methods and does not include many land use and transportation models. It is worth noting, for example, that while not mentioned on this list, Cube is currently the adopted software platform for the California statewide passenger and freight models, and is also already used by many MPOs in the state to forecast VMT for air quality conformity and other purposes.
- Innovative commercially available data resources could also be leveraged to help local communities estimate VMT or other impacts of land use and transportation projects. For example, Citilabs has developed a data product with coverage in all the major cities of California (and nationwide) called StreetLytics, which includes traffic volume estimates on every street as well as origin-destination flows from which neighborhood-specific trip length distributions can be derived. Like many Big Data products, this offering was developed with private-sector market opportunities in mind, but could be very useful in public-sector applications related to SB 743, such as benchmarking VMT estimates for cities and counties.

I apologize for not writing these up in a formal letter but given the short time allowed to prepare something, hopefully that this simple format can suffice.

Thank you,

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