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February 13, 2014

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**Subject: Input on the Preliminary Evaluation of Alternative Methods of Transportation Analysis**

Mr. Calfee:

First, I appreciate this opportunity to provide comment on the December 30, 2013 "Preliminary Evaluation of Alternative Methods of Transportation Analysis." In general, I support the goals of Senate Bill 743. Transportation in California is changing. With an expansion in public transit, installation of more bicycle and non-motorized facilities, the rise of the "sharing" economy – car share, bike share, and ride share platforms; transportation choices for all Californians are expanding. Our cities are growing denser and more urban. As a transportation professional, I understand and support a move towards a more multi-modal California.

In response to the December 30<sup>th</sup> document, I must say that I am very concerned with the position of the Governor's Office of Planning and Research (OPR) regarding "problems with using Level of Service (LOS) in the California Environmental Quality Act (CEQA)." This statement seems to diminish the value of evaluating the operational performance of a transportation facility ("operations" in the sense of how all users move through a transportation network). This statement also only seems to apply to LOS when used to measure traffic operations at an intersection level, and does not recognize that LOS also applies to freeway ramp and mainline operations or arterial roadway operations.

When used in transportation analyses, LOS is used to define the *quality* of service, and is based on factors such as speed, travel time, density, and average delays resulting from various traffic control devices. I urge OPR to review the work of FHWA discussing various measures of effectiveness (MOEs) in the report Traffic Analysis Toolbox Volume VI: Definition, Interpretation, and Calculation of Traffic Analysis Tools Measures of Effectiveness<sup>1</sup>, which provides a thorough discussion of the various measures of effectiveness and how they apply to traffic operations.

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<sup>1</sup> Dowling, Richard. 2007. FHWA-HOP-08-054.  
<http://ops.fhwa.dot.gov/publications/fhwahop08054/fhwahop08054.pdf>

The December 30<sup>th</sup> document outlines OPR Goals and Objectives in Developing Alternative Criteria. Both the December 30<sup>th</sup> document and California's landmark CEQA legislation recognize that the analysis of environmental effect is imperative. Agencies need to be able to evaluate new projects to determine their impacts on the local environment. One primary reason is to assure that new projects provide adequate capital improvements to minimize and/or mitigate their impact on the environment. Traffic impact analyses conducted as part of the CEQA process are extremely useful tools to identify localized impacts and improvements – such as added left-turn signals, widened sidewalks, and upgraded signal detection systems. The majority of the alternative criteria discussed in the December 30<sup>th</sup> document cannot provide the required analyses to identify specific operational improvements that would be required by a new project, and would therefore inhibit Cities and agencies in their ability to require new projects to fund these types of improvements.

I support OPR's goal to "seek criteria that will lead to efficient use of limited fiscal revenues, for example by reducing long run infrastructure maintenance costs." Many infrastructure costs are currently addressed by local municipalities through the CEQA process. These include direct impacts and mitigation measures, such as new traffic signals and new signal detection systems. For example, Caltrans Traffic Operations Policy Directive 09-06<sup>2</sup> requires agencies to implement bicycle detection at traffic signals, something that could be identified as a required mitigation measure for a new project. Other localized infrastructure improvements that can be addressed through the CEQA process include traffic signal modifications, signing and marking improvements, and traffic signal synchronization/interconnection programs. All of these improvements are not auto-specific and are proven to effectively reduce emissions. Furthermore, some agencies rely on the CEQA process to identify project specific mitigations so that new projects can set aside funds to pay for future mitigation measures not yet determined.

Overall, I have a great concern with eliminating LOS criteria. Cities and agencies rely on development to fund necessary transportation system capital improvements. Without CEQA analysis, a City/agency must have other options – a strong General Plan indicating priorities for the future transportation system, an impact fee program to fund identified capital projects, and staff resources to ensure compliance by development. I'm very concerned that eliminating LOS criteria will have an adverse financial impact on cities and agencies that do not already have these other options in-place, which will result in a less-than efficient use of limited fiscal funds.

I respectfully submit the following comments in response to the preliminary evaluation of the alternative criteria:

- Vehicle Miles Traveled (VMT):
  - It is my firm belief that estimates of trip length will be inherently flawed and not accurate. For example, the City of Santa Monica has employees that commute from as close as a few blocks to as far as San Diego County and the San Joaquin valley.
  - Using VMT as an alternative metric will not account for the operational impacts of new developments, typically localized around the immediate project area. For example, a new school in an infill site has huge "peaks"

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<sup>2</sup> <http://www.dot.ca.gov/hq/traffops/signtech/signdel/policy/09-06.pdf>

of student arrivals and departures that significantly impact how the adjacent transportation facilities function. These analyses must be accounted for so that the project is appropriately designed and/or mitigated – providing wide sidewalks to accommodate many transit riders, a designated pick-up/drop-off area for vehicles arriving from outside of the district, etc.

- Automobile Trips Generated
  - Similar to VMT, this alternative metric does not account for the operational impacts of new development, typically localized around the immediate project area
- Presumption of Less Than Significant Transportation Impact Based on Location
  - In theory this is a valid premise, and data continues to support this premise when looking at transit-oriented development “done right.” Perhaps OPR’s goals could be accomplished by an analysis of the traffic impacts of what *could* be built versus what *should* be built on an infill site – this could also lead to “right-sizing” a project and identifying a mix of land use and transportation features to reduce vehicle trips and minimize traffic impacts.

Three of the six alternative criteria state that mitigations can include “building transportation demand management (TDM) features into the project.” As a City on the leading edge of TDM regulation and enforcement, I can say that in order to effectively implement, monitor, and regulate TDM programs, a significant amount of staff resources must be dedicated. Santa Monica has been regulating employer trips for more than 20 years, and currently regulates more than 700 local employers, employing more than 37,000 people. We have two full-time dedicated staff to oversee these programs, and they are overworked and falling behind. We will be adding two as-needed staff just to catch up and stay current with all monitoring and enforcement activities. Many cities do not have staff devoted to this function, and do not have the required local legislation to establish programs to specify, monitor, enforce, and regulate TDM programs.

In closing, I appreciate the opportunity to provide comments on OPR’s work. It is important that the State’s guidelines for evaluating environmental impacts adapt to the changing needs of California’s residents. I hope that OPR will review these comments and be aware of the potential unintended costly implications to the State’s cities and agencies that may result from the elimination of LOS criteria.

Respectfully,



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