



# CITY OF SANTEE

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Mr. Christopher Calfee  
Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

## Re: Comments on alternative methods of transportation analysis

Dear Mr. Calfee:

After carefully reviewing the proposed alternative methods of transportation analysis, the following are my comments for the specific sections in the proposal.

### Problems with using LOS in CEQA:

**Los is difficult and expensive to calculate:** maybe, but it is also more accurate and intuitive. Plus for a project costing easily in the tens of millions of dollars, the cost of a traffic study is negligible.

**LOS is biased against "last in" development:** same is true for the alternatives. Reducing greenhouse gas puts more burden on new development than on existing ones since there is not much to be done with existing. To be fair the criteria should be not to exceed exiting levels per capita.

**Infill projects disproportionately trigger LOS thresholds:** I'm Ok with making infill projects the exception while still using LOS for other projects

**LOS scale of analysis is too small:** not if the scope is properly determined.

**LOS mitigation is itself problematic:** "adding motor vehicle capacity may induce additional vehicle travel, which negatively impacts the environment and human life." Travel is an indispensable part of human life. There is value in reversing the trend of urban sprawl and

reduce pollution, but it will not happen overnight in a drastic fashion without severely hurting the economy and quality of life.

**LOS mischaracterizes transit, bicycle, and pedestrian improvements as detrimental to transportation:** "Since LOS measures the delay of motor vehicles, any improvements for other modes that might inconvenience motorists is characterized as an impediment to transportation." – the effect is very small if there is any.

**Use of LOS thresholds implies false precision:** not more imprecise than the alternatives. It actually is quite precise and intuitive.

**As a measurement of delay, LOS measures motorist convenience, but not a physical impact to the environment:** congestion is directly related to noise, and pollution.

### **SB 743**

**Criteria for determining the significance of transportation impacts of projects within transit priority areas:** Ok with that.

**OPR to develop such criteria outside of transit priority areas:** not a good idea

### **OPR goals and objectives in developing alternative criteria**

**Fiscal and economic effect:** the criteria should encourage development which helps the economy. However the way it is conceived will most likely hinder development therefore hurting the economy.

**Equity:** transit not necessarily reduces pollution if the ridership is not significantly higher than what it is today.

**Simplicity:** LOS is easy to understand

**Access to destinations:** better proximity of land uses can help, however it is not reasonable to expect all or most development to occur near transit priority areas. Access to destination also means to provide access for residents from all kinds of developments.

### **Preliminary evaluation of the alternative criteria**

**Vehicle miles traveled (VMT):** what is the threshold of impact? It does not account for pollution caused by congestion. It was stated that LOS is not a physical change in the environment. By the same token, VMT is not a physical change in the environment either. Could hinder even prevent development hence economic growth.

**Auto trips generated:** what is the threshold of impact? The same issues raised against using LOS are true to auto trips too

**Multi-modal LOS:** Ok

**Fuel use:** more pertinent than VMT since this considers congestion.

**Vehicle hours traveled (VHT):** how to measure?

**Conclusion:**

Congestion is a major quality of life issue. If LOS is not considered in evaluating a development, gridlock conditions are going to occur widely and at the end create more pollution. My recommendation is to limit the new criteria to projects within transit priority areas or infill projects. Any alternatives must be carefully studied before implemented. As a transportation professional I strongly recommend that the new recommendations are circulated and we are given the chance to comment before finalized.

I can be reached at 619-258-4100 ext. 189 if you have questions.

Sincerely,



Minjie Mei

Principal Traffic Engineer