
From: Gary Black

Sent: Wednesday, January 15, 2014 10:22 AM

To: CEQA Guidelines

Cc: Teri Wissler Adam; Henry Servin; Jeff Elia

Subject: LOS Alternatives

I agree with the direction OPR is heading to remove LOS (and parking) from the CEQA guidelines. I have always thought that traffic congestion is not a physical effect to the environment. I would like to see traffic analysis completed only to the extent that it allows calculation of noise and air quality impacts. Based on my understanding, VMT is a good measure for noise and air quality analyses. I don't know if the noise and air quality calculations require any other transportation data.

Regarding the calculation of VMT I agree it is easy in theory but not easy in practice. There is no standardized procedure for calculating VMT that I am aware of. Over the years, standardized procedures have been developed to calculate LOS. If you give 10 analysts an LOS problem, you probably will get the same answer from each. If you ask them to calculate VMT, you will get 10 different answers. I would like OPR to develop a standardized procedure for calculating VMT.

We typically use regional travel demand models to calculate VMT, but this is maybe not practical for small projects. We have used the MXD procedure to calculate VMT, but this requires just as many input assumptions as LOS, if not more, and many of them are just a guess. What would be helpful is if MPOs could calculate and publish typical trip lengths for different types of trips in different parts of each region, then VMT could be calculated simply by applying the appropriate trip generation rates.

Speaking of trip generation rates, I believe much more research needs to be done (or maybe the existing research just needs to be organized) about trip reductions due to various factors such as transit proximity, mixed-use districts, parking charges, TDM programs, and others. Similar to the ITE Trip Generation manual, it would be nice to have a "trip reduction manual" that standardized the applicable reductions. C/CAG in San Mateo County has gone a step in this direction, but their trip reduction manual could use some refinement.

I would not like to see parking as an impact category under CEQA.

I believe the guidelines should stick to actual physical impacts to the greatest possible extent. Individual cities and counties are still free to establish whatever local measures of transportation effectiveness they wish, outside of CEQA. This gives the local jurisdictions the maximum flexibility to establish appropriate thresholds. I think what we all want to avoid is having to do EIRs on small infill projects.

Thanks for listening,

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