
From: Shykowski, Jason
Sent: Friday, February 07, 2014 11:45 AM
To: CEQA Guidelines
Subject: LOS Alternatives

I am writing you in response to your request for comments regarding proposed guidelines for future transportation CEQA analysis in California. As a traffic engineer, I ask that the LOS metric be maintained, either as is or in combination with some other metric, in areas outside of transit priority zones.

Infill areas are often impacted by heavy traffic. Adding more development is difficult when LOS is the only metric you have of measuring the project's traffic impact. Replacing this sometimes counter-productive metric around infill projects is worth exploring.

However, while many of us agree that a more balanced use of the various transportation modes is a benefit, discarding the time tested LOS metric is not necessarily advantageous. Determining congestion is a very useful metric when comparing alternatives. Congestion affects all modes and impacts the livability of a community. Congested roadways increase emissions, cause transit delay, and can make a particular area unpleasant to bike or walk. It is an issue that directly affects the public and causes them concern. Additionally, many cities and counties have built highly successful programs around the LOS model. They have long range plans and policies based upon this measure. If change is needed to the metrics outside of the transit priority areas, a method that accounts for mode shift while continuing to report on congestion may be more appropriate. Since it is already in wide use, the traditional LOS metric might make the most sense. Perhaps a combination of automobile trips generated, as mentioned in OPR's preliminary evaluation, coupled with LOS could accomplish the desired outcome of rewarding a project that encourages non-vehicle modes of travel while still accounting for the direct roadway congestion that most concerns our constituents.

Thank you for this opportunity to comment.

Jason Shykowski



