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From: Kent Strumpell  
Sent: Friday, February 14, 2014 2:21 PM  
To: CEQA Guidelines  
Cc: Backstrom Paul  
Subject: CEQA guidelines, transportation analysis

Feb. 14, 2014

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street Sacramento, CA 95814  
emailed to: [CEQA.Guidelines@ceres.ca.gov](mailto:CEQA.Guidelines@ceres.ca.gov)

Re: Preliminary Evaluation of Alternative Methods of Transportation Analysis  
url: <http://opr.ca.gov/docs/PreliminaryEvaluationTransportationMetrics.pdf>

Dear Mr. Calfee

Below please find my comments and response to questions put forth in the document cited above. I cite the section I am commenting on prior to my responses.

IV. Problems with using LOS in CEQA

I agree with statements in this section

A local example

I can attest to the negative outcomes that LOS-driven mitigation has created in my community where a very large project\* was required to fund roadway widening. The result has been:

- the introduction of additional vehicles into the project-adjacent area where the road was widened,
- only temporary congestion relief with a return of back-ups and delays
- increased levels of roadside pollution and noise
- eliminating the ability to add bike lanes to correct a gap in the regional bikeway network (all surplus ROW width was consumed by the widening)
- reduction of sidewalk width in a commercial district dense with restaurants, conflicting with local goals to enhance the pedestrian environment that would stimulate locally-serving businesses.

\*The example cited was the widening of SR 1 / Lincoln Blvd. in conjunction with the Playa Vista project in the Westchester neighborhood of Los Angeles)

In my experience of similar projects in the LA area, increasing automobile capacity as a means to mitigate new trips and reduce delays frequently results in increased traffic volume that inevitably reaches the saturation point, introducing more cars into the subject area than before the mitigation. This LOS-driven response ultimately worsens traffic-related environmental impacts.

V. SB 743

I agree with the need for SB 743's approach for correcting problems with CEQA.

#### VI. OPR Goals and Objectives in Developing Alternative Criteria

I agree with the goals and objectives described in Section VI for developing alternative criteria.

I believe the criteria should apply broadly, not just to transit priority areas.

#### VII. Preliminary Evaluation of the Alternative Criteria

VMT sounds like the best metric to use.

#### VIII. Open questions and next steps

Question VIII 1. a. Are there environmental impacts related to transportation other than air quality (including greenhouse gas emissions), noise and safety? If so, what is the best measurement of such impacts that is not tied to capacity?

Suggestion:

Need to analyze how proposed mitigations could negatively impact the implementation and usage levels of more environmentally beneficial and sustainable alternative travel options. (see my example above how a CEQA-inspired road widening precluded an opportunity for closing a gap in the bikeway network.)

Question VIII 1. c. Would consistency with roadway design guidelines normally indicate a less than significant safety impact?

Answer:

Not necessarily. Existing roadway design guidelines may be insufficient to protect vulnerable roadway users. Better practices may be available.

Question VIII 3. SB 743 provides that parking impacts of certain types of projects in certain locations shall not be considered significant impacts on the environment. Where that limitation does not apply, what role, if any, should parking play in the analysis of transportation impacts?

Answer:

Projects should be required to make full of use parking plans and parking related TDM strategies that will minimize automobile use, including achieving 15% availability of open parking spots by optimizing parking fees (Ie, D. Shoup recommendations)

Thank you,

Kent Strumpell