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

RE: 2014 CEQA Guidelines Update including Alternative Methods of Transportation Analysis

Dear Mr. Calfee:

Thank you for the opportunity to comment on the 2014 CEQA Guidelines Update. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) considering our interest in potential updates to CEQA Guidelines that will promote improved mobility and transit-oriented development patterns. LACMTA is committed to a more multimodal and sustainable Los Angeles County, and we are supportive of efforts to reduce the cost of environmental review, incentivize transit-oriented development, and promote green transportation projects.

LACMTA fully supports the State's effort to develop an alternative to the traditional automobile Level of Service (LOS) performance metric. Our interests in the LOS alternatives relate to both the analysis of development projects and how they will influence our transportation system, as well as the development of transportation projects themselves. Given the State's goals of reducing greenhouse gas emissions and promoting more sustainable development, the State should look at alternatives to the automobile LOS which emphasize multi-modalism and infill development. Below we give an analysis of each proposed alternative measure, as they relate to both kinds of projects. We also propose an additional alternative that was not listed in the solicitation for input: Person Throughput.

Alternatives to LOS Relative to Development Projects

Vehicle Miles Traveled (VMT)

VMT is potentially a good measure for identifying development impacts with respect to motor vehicle trip generation. It encompasses not only the number of trips being generated but also length of the trip. VMT is the primary variable that Air Quality Models use for estimated potential emission impacts for various development and transportation projects. Any model used to calculate VMT should use local surveys and data as much as possible and be validated to local conditions.

Automobile Trips Generated (ATG)

Automobile Trips Generated is a respectable alternative to LOS, but it is not as robust as the VMT analysis because it does not indicate direction and duration of the trips being made.

Multi-Modal Level of Service (MMLOS)

LACMTA is supportive of the inclusive nature of MMLOS but is concerned that the data to support it is not yet entirely reliable. More should be done to quantify and understand non-motor vehicle trip generation. If MMLOS is used, LOS for each mode should be kept mode specific, not combined into a single LOS for all modes.

Fuel Use

Fuel Use is a problematic metric because fuel consumption varies so greatly between vehicles, and while electric vehicles emit less while running, their electricity may not be from a sustainable source.

Motor Vehicle Hours Traveled (VHT)

LACMTA prefers VMT to Vehicle Hours Traveled (VHT) because it is heavily dependent on knowing the travel times for each trip, which is not readily or reliably available, and VHT does not provide insights beyond VMT that are significant.

Presumption of Less Than Significant Transportation Impact Based on Location

This measure is highly subjective and may become a liability.

Alternatives to LOS as Relative to Transportation Projects

Person Throughput

LACMTA recommends that the State consider using person throughput as an alternative to the automobile LOS metric for transportation projects. The person throughput metric would better capture the ability of a variety of transportation projects to move people through a corridor or intersection. While this metric is not as well defined as some of the others proposed, it has been analyzed in Minnesota and New York. Additionally, while some of the other modes are still auto-centric, this metric takes into account the totality of the transportation network in a corridor or at an intersection. In short, this metric meets both goals of supporting sustainable transportation projects as well as infill development. This metric will provide a better view of non-automobile usage and impacts from both development and transportation projects.

VMT

Metro supports using VMT as a short-term substitute for automobile LOS. The VMT metric is easy to collect and is consistent with other state policy objectives like SB 375. However, VMT remains auto-centric and may become obsolete as vehicles transition to low- or no-carbon fuels.

ATG, Fuel Use and VHT

Metro does not support the following metrics: automobile trips generated, fuel use, and motor vehicle hours traveled. All three metrics focus too heavily on the automobile and are not the best proxy for evaluating transit or active transportation usage.

MMLOS

Metro does not support MMLOS given the lack of consensus regarding the relative weights assigned to each mode. As such, MMLOS could result in increased automobile trips which runs counter to the goals of SB 375 and other state and local objectives.

Presumption of Less Than Significant Transportation Impact Based on Location

Metro does not support the alternative Presumption of Less Than Significant Transportation Impact Based on Location. While in concept, this presumption could work, it could also entail prolonged studies and lawsuits over areas designated as having less than significant impact. This would run counter to the goals of SB 743.

Transit Priority Definition Clarification

It is also noted that State Statute currently defines a high quality transit corridor as a bus route with 15 minute frequency or better during the commute periods, which may not be the best measure of high quality transit. The frequency of the transit line can be narrowed or widened at any time, especially in the case of bus service, and frequency of transit service is largely based on demand. Furthermore, commute periods, or “peak periods” have varying definitions across the industry, and many not actually be the busiest travel periods for transit lines.

If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net.

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Sincerely,



Nick Saponara
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