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From: louis rubenstein

Sent: Friday, February 14, 2014 4:56 PM

To: CEQA Guidelines

Subject: Comments on Preliminary Evaluation of Alternative Methods of Transportation Analysis

The document almost seems to be the framework for a transportation plan to promote transit and not an evaluation method. I am in favor of transit. However, the transportation planning and environmental analysis are closely related but separate processes.

The restriction that transportation environmental impact be linked to physical impact is limiting. Currently the key link as the document notes is increasing congestion and lowering level of service leads to lower air quality . Transportation is also linked to land use density. Some highway have a high volume of trucks and buses. These vehicles perform an essential role, but seem to disturb many drivers. When they enter local streets they have a large visual impact.

Level of service is meaningful and measurable for the impact of a project in a small area. In a wider area the local project impact could be lost. VMT would be less meaningful on a local project. On a regional project VMT would have more usefulness. If all automobiles were powered by electricity derived from solar energy the link of VMT to the physical environment would be weakened.

The efficient movement of people and goods is essential to a healthy economy. People care about travel time and cost, but these are not physical impacts on the environment. They are linked to the environment by the mass of the transport vehicle and non uniform speed. Replacing travel by electronic communication, or shorter trips due to higher density would reduce environmental impact. If a project were near a transit service measures to encourage transit would be meaningful in evaluating environmental impact.

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