



METROPOLITAN
TRANSPORTATION
COMMISSION

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February 14, 2014

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

Re: LOS Alternatives

Dear Mr. Calfee,

The Metropolitan Transportation Commission (MTC), the metropolitan planning organization for the nine-county San Francisco Bay Area, and the Association of Bay Area Governments (ABAG), the region's council of governments, would like to offer the following comments on the preliminary evaluation of alternative methods of transportation analysis issued December 30, 2013 by the Governor's Office of Planning & Research. MTC and ABAG look forward to OPR guidance for SB 743 implementation and changing the analysis of transportation impacts under the California Environmental Quality Act (CEQA). We believe that it will advance implementation of Plan Bay Area, the San Francisco Bay Area's first Regional Transportation Plan/Sustainable Communities Strategy adopted July 18, 2013.

General Comments

MTC and ABAG support OPR's guidelines to be applied consistently statewide. We believe that using level of service (LOS) analysis as the metric to measure program or project-level transportation impacts under environmental review works against the development of multimodal transportation networks and the transit-oriented development that is necessary to implement Plan Bay Area to meet the region's greenhouse gas emission reductions¹. We believe that the new criteria defined in the guidelines should be applied to development located both inside and outside of transit priority areas to achieve both regional and statewide goals.

OPR Goals and Objectives in Developing Alternative Criteria

MTC and ABAG support the goals, objectives and factors OPR is considering in developing and evaluating different criteria. All of the factors listed on pages 6 and 7 of the December 30 preliminary

¹ While MTC and ABAG support the removal of LOS in CEQA analysis, we recognize that local jurisdictions may continue to utilize LOS for other local analysis or programs.

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evaluation of transportation metrics analysis are goals and objectives articulated in Plan Bay Area. One performance target included in Plan Bay Area that is not explicitly included in your list is increased safety by reducing the number of injuries and fatalities from collisions. MTC and ABAG suggest either adding safety as a stand-alone factor to consider in developing and evaluating criteria, or more explicitly describe this component of the health factor on page 7. Additionally, OPR might consider adding a factor that captures or evaluates the effects of development on existing transit service.

Preliminary Evaluation of the Alternative Criteria

MTC and ABAG favor using Vehicle Miles Traveled (VMT) as the criterion to measure transportation impacts under CEQA for its ease of use, as well as the ability to account for length of trip/regional location. Because the calculation of trip generation rates is critical to determining VMT, we suggest looking beyond the current Institute of Transportation Engineers (ITE) trip generation rate calculation to an alternative methodology that better considers and reflects the impacts of transit-oriented and infill development.

We have two comments with regard to the presumption of less than significant transportation impact based on location criterion. First, should this criterion be pursued, MTC and ABAG recommend the inclusion of the Bay Area's priority development areas (PDAs) in the "transportation-beneficial development" areas. PDAs are locally-designated areas that serve as the location for the majority of growth projected in Plan Bay Area. By definition, PDAs are transit served. Second, MTC and ABAG believe further dialogue is needed related to thresholds for project size, along with appropriately-scaled mitigations, and are happy to participate in these discussions.

Open Question and Next Steps

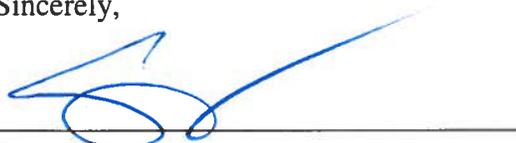
Responding to Question #2 related to modeling criteria, MTC and ABAG offer that to accurately predict the expected travel from residential and commercial development, analytical tools should have an explicit understanding of the land uses in the likely travel shed of the project. As such, regional travel models, such as those used by metropolitan planning organizations, are best suited to support SB 743 implementation. OPR should establish criteria for the models used to assess potential projects; the criteria should include: (a) a demonstrated ability to make travel-related predictions; and, (b) an explicit accounting of land uses within the likely travel shed of the project.

Finally, MTC and ABAG encourage clarity in the final guidelines so that local jurisdictions can easily follow and implement them. We suggest that OPR include examples for how to use or apply the guidelines. MTC and ABAG staff would be happy to host a workshop in the Bay Area to help disseminate information related to the final guidelines.

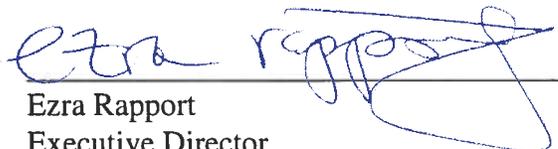
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Thank you for the opportunity to provide these comments. We are hopeful that this new way of assessing transportation impacts through CEQA will facilitate and enable development in the San Francisco Bay Area in a manner that improves the region's livability, economic vitality, and quality of life, while also meeting our greenhouse gas reduction targets.

Sincerely,



Steve Heminger
Executive Director
MTC



Ezra Rapport
Executive Director
ABAG