
From: Michelle DeRobertis
Sent: Friday, February 14, 2014 12:21 PM
To: CEQA Guidelines
Subject: LOS Alternatives

Dear Mr. Calfee:

As a registered traffic and civil engineer in California for almost 30 years, I support metrics other than LOS and my first choice is VMT. I have attached two professional papers that also address this issue. The first is a case study of how Bellingham WA changed their traffic impact study procedures to use Person-Trips Available. It was previously published by APA. The second, co-authored by myself and two colleagues, makes the case that traffic studies do not support sustainable transportation; this has been submitted for consideration to the ITE Journal.

I also offer the following comments to this discussion.

1. Your introduction should make clear that the initial study questions were always meant to be a guide, not absolute.

2. I support alternative metrics since currently, impacts to auto traffic are evaluated but impacts to pedestrians, bicyclists and transit are ignored, particularly when caused by said auto traffic. This has led to absurd conclusions such as a road diet that would convert a travel lane to bike lanes is an "adverse impact" on the environment, since delay for motorists would increase, even though bike lanes would help provide commuters with an environmentally beneficial alternative to driving.

3. I agree with the problems listed in *Section IV. Problems with using LOS in CEQA*, but not in the order listed; these are the two most important:

- LOS mischaracterizes transit, bicycle, and pedestrian improvements as detrimental to transportation; and
- As a measurement of delay, LOS measures motorist convenience, but not a physical impact to the environment.

Furthermore, the problems with LOS in CEQA are:

- considering only automobile LOS and congestion does not address the impact of automobile traffic on other modes, and how their safety and delay are impacted by automobile traffic.
- using only auto LOS implies that auto congestion can and should be mitigated by increasing auto capacity, again to the detriment of other modes AND to the environment.

4. Regardless of how auto traffic impacts are measured, (vehicle trips, VMT, intersection auto

LOS,) the logical way to mitigate auto traffic impacts is not to further damage the environment by widening roadways, which has many environmental impacts of its own (increasing impermeable surfaces, increased run off and water pollution, loss of habitat). It is to provide the community with alternatives to driving- e.g better, faster and more convenient public transit and safe and convenient bike and pedestrian facilities. The CEQA guidelines should make this explicitly clear.

5. Additional performance metrics must be included that measure a) the state of the transit, bicycle and pedestrian transportation network; and b) how auto traffic impacts these other modes.

6. To give this issue a historical perspective the OPR should provide the chronology of all the CEQA Initial Study questions since CEQA was passed in 1970. I think, but would like OPR to confirm, that intersection automobile LOS was not specifically added to the Initial Study Checklist until 1999. This begs the question: what was used in the 1970's and 1980's for CEQA? LOS was being used in traffic studies during this time but was not specifically one of the initial study questions. By revisiting what was used in previous decades, we will be better able to go forward.

My research found this for the 1986 checklist: (not perfect either by any means!)

Section 13 Transportation Checklist, 1986

Will the project result in:

- a) Generation of substantial additional vehicle movement?
- b) Effects on existing parking facilities or demand for new parking?
- c) Substantial impacts upon existing transportation systems?
- d) Alterations to waterborne, rail or air traffic?
- e) Alterations to present patterns of circulation or movement of people and/or goods?
- f) Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?

Sincerely,

Michelle DeRobertis PE